ENVIRONMENTAL STATUS REPORT

PREPARED BY:

THE RILEY GROUP, INC.
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PREPARED FOR:

MAIN STREET FLATS OWNER, LLC
C/O MR. DAVID OSTRER
10575 MAIN STREET
BELLEVUE, WASHINGTON 98004

RGI PROJECT NO. 2012-107N

ENVIRONMENTAL STATUS REPORT

MAIN STREET FLATS
10575 MAIN STREET
BELLEVUE, WASHINGTON 98004

AUGUST 26, 2022

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1 INTRODUCTION

1.1 PURPOSE

The Riley Group, Inc. (RGI) is pleased to present this Environmental Status Report (ESR) documenting the review of environmental conditions and inspection and groundwater sampling activities performed at the property located at 10575 Main Street in Bellevue, Washington (herein referred to as the Property). The general location of the Property is depicted on Figure 1.

The Property is currently owned by Main Street Flats Owner, LLC. The Property was enrolled in the Washington State Department of Ecology (Ecology) Voluntary Cleanup Program (VCP) in December of 2013 and is identified by Ecology as the Alamo Manhattan Main Street project with VCP project number NW2811.

On June 17, 2017 the property owner at the time (Alamo Manhattan Bellevue, LLC) entered into an Environmental Covenant (EC) with Ecology. Ownership of the Property was transferred to Main Street Flats Owner, LLC (also referred to as the Grantor in the EC) on July 9, 2021. The EC stipulates that the EC "shall run with the land and be binding on all current and future owners of any portion of, or interest in, the Property." The EC places several restrictions and requirements for the Property. These requirements include that annual inspections of the parking garage be performed and that groundwater sampling be completed approximately 5 years after the issuance of the EC. A copy of the EC is included in Appendix A.

The purpose of the ESR is to document the environmental work performed at the Property in accordance with the EC and to evaluate current environmental conditions at the Property to assist with Ecology's five year review of the Property. This ESR was performed in general accordance with RGI's *Groundwater Sampling & 5 Year Evaluation* proposal dated June 10, 2022. Authorization to proceed with this work was granted by Mr. David Ostrer of Main Street Flats Owner, LLC on June 21, 2022.

1.2 PROPERTY AND SITE LOCATIONS

The Property is defined as the area situated with the Property boundaries. The Site is defined as the location were soil and/or groundwater containing containing concentrations of contaminants of concern (COCs) exceeding applicable MTCA cleanup levels have come to be located, irrespective of the Property boundary. The Property and Site locations are depicted on Figure 2 and discussed below.

1.3.1 PROPERTY LOCATION

The Property is located at 10575 Main Street in Bellevue, Washington and is located on the United States Geologic Survey (USGS) Bellevue South, Washington, 7.5-Minute Topographic Map at an elevation of approximately 100 feet above mean sea level (See Figure 1).

The Property is located in the southwest quarter of Section 32 of Township 25 North, Range 5 East of the Willamette Meridian. The King County tax parcel number associated with the Property is 5223300005 and the Property occupies approximately 1.45 acres of land. Prior to the redevelopment of the Property in 2013 as the Main Street Apartments, the Property consisted of two King County tax parcels. Parcel 5223300005 (Parcel 0005) represented the eastern half of the Property and parcel 5223300015 (Parcel 0015) represented the western half of the Property.

The Property is generally flat except for a steep slope along the southern boundary of the Property. The surrounding area also slopes down to the northwest. Typical property use in the vicinity is a mixture of retail and residential properties.

1.3.2 SITE LOCATION

The Site consists of two Areas (Area 1 and Area 2), which are both situated on the southwestern portion of the Property. In Area 1, diesel-range total petroleum hydrocarbons (TPH) impacted soil is present between approximately elevations 74' to 62' (or 23' to 35' bgs). In Area 2, diesel-range TPH and PCE impacted soil is present between approximately elevations 62' and 59' (or 35' to 38'bgs). The Site is confined to within the Property boundaries.

1.3 PROPERTY HISTORY

Prior to 1946, the Property consisted of undeveloped, vegetated land. The Property history of both parcels is discussed below.

1.3.1 FORMER PARCEL 0005 (EASTERN PORTION OF PROPERTY)

Development was first observed on Parcel 0005 in 1946 when a building was constructed for use as an automobile repair garage, gas station, and a sales facility. Historical records indicated that this building was originally heated by an oil burner, but no indications as to how the fuel was stored was encountered.

Historical tax assessor records and previous reports indicated that three 1,000-gallon tanks and dispenser pumps were present. Historical records also indicated that underground hydraulic hoists were also present at one time. Historical city directories indicated this building was previously occupied by a gas station, auto repair facilities, car dealerships and other general retail businesses. The building on the eastern portion of the Property was demolished in 2013 prior to the redevelopment of the Property as the current Main Street Flats apartment building.

1.3.2 FORMER PARCEL 0015 (WESTERN PORTION OF PROPERTY)

Development was first observed on Parcel 0015 in 1953 when a building was constructed and primarily used for retail stores. Historical records indicated that this building was originally heated by an oil burner, but no indications as to how the fuel was stored were encountered during previous investigations.

Historical records and previous reports indicated that a 2,000-gallon UST and dispenser pump were present. Previous uses considered environmentally significant included use as a dry cleaning facility, machine shop, Puget Power, McCall Oil Fuel, RP Automotive, Bellevue Camera Shop, Overlake Photo Company photo developing, and B&B Auto Parts. The building was demolished in 2013 prior to the redevelopment of the Property as the current Main Street Flats apartment building.

1.4 PREVIOUS INVESTIGATIONS

Prior to the issuance of the EC in 2017, numerous environmental investigations have been completed for the Property and are documented in the following documents:

- *Phase I Environmental Site Assessment Report* (Phase I ESA)*; Aaron Bothers Retail Property* dated March 21, 2012 by RGI.
- *Phase II Subsurface Investigation Report* (Phase II)*; Proposed Main Street Development* dated July 24, 2012 by RGI.

- *Additional Groundwater Monitoring Well Installation and Sampling Report* (Well and Sampling Report) *Proposed Main Street Development* dated June 19, 2013 by RGI.
- *Phase I Environmental Site Assessment Update Report* (Phase I ESA Update) *Main Street Development* dated June 26, 2013 by RGI.
- *Excavation Work Plan, Main Street Development* (RA Work Plan) dated July 17, 2013 by RGI.
- *Remedial Action Report* (RA Report) dated June 13, 2014 by RGI.
- *Groundwater Characterization Work Plan* (GC Work Plan) dated October 30, 2014 by RGI.
- *Groundwater Characterization Report* (GC Report) dated July 21, 2015 by RGI.
- *Further Action at the following Site: Alamo Manhattan Main Street* (2016 Opinion Letter) dated June 6, 2016 by Ecology.
- *Method B Groundwater Evaluation Technical Memorandum* (GE Memorandum) dated July 21, 2016 by RGI.
- *Supplemental Remedial Investigation Work Plan* (2016 Work Plan) dated August 11, 2016 by RGI.
- *Response to Ecology June 6, 2016 Opinion Letter Technical Memorandum* (2016 Response Memorandum) dated August 11, 2016.
- *Focused Feasibility and Disproportionate Cost Analysis* dated January 18, 2017 by RGI.
- *Supplemental Remedial Investigation* Report dated January 18, 2017 by RGI.
- *Groundwater Evaluation Technical Memorandum* dated May 12, 2017.

All environmental investigation work conducted prior to the issuance of the EC in 2017 is documented in the aforementioned documents. In addition, the 2013 RA Report and 2017 SRI Report provide a comprehensive summary environmental work conducted at the Property. Therefore, the reader is directed to refer to these reports for details pertaining to previous investigations.

Environmental work conducted on the Property since the issuance of the EC is summarized below.

1.4.1 ANNUAL INSPECTIONS (2018-2021)

Exhibit E of the EC describes the requirement for annual inspections of the garage floor slab and existing groundwater monitoring wells on the Property (RW1, RW2, and MW6). RGI completed annual inspections of the garage floor slab in the two areas where soil contamination was left in place in 2018, 2019, 2020, and 2021. Annual inpsections were documented in the following memorandums, which were all submitted to Ecology:

- *2018 Annual Inspection Summary Memorandum* dated July 3, 2018 by RGI.
- *2019 Annual Inspection Summary Memorandum* dated June 27, 2019 by RGI.
- *2020 Annual Inspection Summary Memorandum* dated August 11, 2020 by RGI.
- *2021 Annual Inspection Summary Memorandum* dated August 10, 2021 by RGI.

During all four of these inspections, no significant defects to the garage floor slab were encountered that would have impacted the integrity of the concrete slab and caused a risk of

exposure to soil contamination. In addition, wells RW1, RW2, and MW6 were observed to be in good condition during all four inspections.

1.4.2 PARTNERS GROUNDWATER MONITORING (2021)

In June of 2022, RGI was provided the *Monitoring Well Sampling Report* (MWS Report) dated July 8, 2021 by Partners. RGI reviewed this report, which documents groundwater sampling activities conducted by Partners in June of 2021. This report also summarizes a Phase I Environmental Site Assessment Report (Phase I ESA) completed by Partners in July of 2021 prior to the purchase of the Property by Main Street Flats Owner, LLC. Based on the summary provided in the MWS Report, the Phase I ESA did not identify significant environmental conditions for the Property that were not previously documented in RGI's previous reports. Partners concluded that the known environmental issues at the Property constituted a controlled recognized environmental condition (CREC).

On June 22, 2021, Partners subcontracted with Blain Tech to collect groundwater samples from wells RW1 and RW2. Water levels were obtained from wells RW1, RW2, and MW6 and depth to groundwater ranged from 31.78' to 34.08' feet below the top of well casing at the time.

Groundwater samples were obtained from RW1 and RW2 using standard low flow sampling techniques utilizing a bladder pump and groundwater samples were submitted to Pace Analytical laboratory for analysis of gasoline- and diesel-range petroleum hydrocarbons using methods NWTPH-Gx and NWTPH-Dx, respectively.

Diesel- and oil-range TPH were detected at very low concentrations ranging between 110 micrograms/liter (μg/L) and 181 μg/L. All reported concentrations were qualified by the laboratory with a j flag indicating that these concentrations were above the reported detection limit (RDL), but below the method detection limit (MDL). All of these concentrations were well below the MTCA Method A groundwater cleanup level for diesel- and oil-range TPH of 500 μg/L.

Gasoline-range TPH was not detected at a concentration above the laboratory detection limit in wells RW1 and RW2.

A copy of the *Monitoring Well Sampling Report* prepared by Partners is included in Appendix B. Analytical results are summarized in Table 1 and displayed graphically on Figure 4.

2 SCOPE OF WORK

The scope of work for the ESR consisted of the following tasks:

- Reviewed documents provided to RGI by the Client and other historical documentation pertinent to the evaluation;
- Completed the 2022 inspection of the garage floor and wells RW1, RW2, and MW6 in accordance with Exhibit E of the EC;
- Collected groundwater samples from wells RW1 and RW2 and analyzed groundwater samples for COCs in accordance with Section 2b and Exibit F of the EC;
- Obtained groundwater elevation data from wells RW1, RW2, and MW6 and utilized this data to determine groundwater flow direction across the Property;
- Compared groundwater analytical results to groundwater cleanup levels that comply with MTCA regulations;

- Coordinated disposal of Investigation Derived Waste (IDW) generated during well sampling;
- Retained the services of Pyron Environmental, Inc. (Pyron) to validate analytical data obtained for the project.
- Entered all required data obtained during the project into Ecology's Electronic Information Management (EIM) database.
- Prepared this ESR presenting our findings and conclusions.

3 REGULATORY ANALYSIS OF PROPERTY CONDITIONS UNDER MTCA

3.1 MTCA CLEANUP REGULATION

In Washington State, the Model Toxics Control Act (MTCA, RCW 70.105D), mandates that site cleanups protect human health and the environment. The MTCA Cleanup Regulation (173-340 WAC) defines the approach for establishing cleanup requirements for individual sites, including the establishment of cleanup standards and selection of cleanup actions.

The MTCA regulation provides three options for establishing generic and site-specific cleanup levels for soil and groundwater. Method A cleanup levels have been adopted for specific purposes and are intended to provide conservative cleanup levels for sites undergoing routine site characterization or cleanup actions or those sites with relatively few hazardous substances. Method B and C cleanup levels are set using a site risk assessment, which focuses on the use of "reasonable maximum exposure" assumptions based on site-specific characteristics and toxicity of contaminants of concern (COCs).

3.2 SOIL CLEANUP LEVELS

Soil assessment was not included in the ESR due to the fact that soil on the Property has been remediated to the fullest extent possible. Soil cleanup levels compliant with MTCA regulations were previously used to demonstrate that soil was remediated on the Property to the fullest extent practicable.

The soil cleanup was documented in RGI's 2013 RA Report, which was reviewed by Ecology.

3.3 GROUNDWATER CLEANUP LEVELS

Groundwater samples obtained during previous investigations were previously analyzed for a suite of COPCs including gasoline-, diesel-, and oil-range TPH, extractable petroleum hydrocarbons (EPH), volatile petroleum hydrocarbons (VPH), volatile organic compounds (VOCs), carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and naphthalenes.

Prior to June of 2016, the MTCA Method A groundwater cleanup levels were selected for evaluating groundwater quality on the Property. However beginning in June of 2016, the MTCA Method B groundwater cleanup levels were selected for determining if groundwater concentrations of COCs were in compliance with MTCA regulations. Ecology agreed that MTCA Method B cleanup levels were appropriate for evaluating groundwater on the Property at the time.

Section 2b and Exhibit F of the EC state that COCs in groundwater be evaluated using Method B groundwater cleanup levels. This approach takes into account the additive effects of the petroleum fractions and VOCs present in the mixture and utilizes the Ecology *Worksheet for*

Calculating Potable Groundwater Cleanup Levels to calculate a Method B groundwater cleanup level based on the concentration of the individual petroleum fractions.

As discussed in Section 5.5, no petroleum fractions were encountered in RW1 at concentrations above compound-specific laboratory detection limits and only the C16-C21 petroleum fraction was detected in RW2 at a concentration of 58.5 μg/L. Therefore, RGI considered it approprate to evaluate groundwater concentrations of COCs using MTCA Method A groundwater cleanup levels. This change in approach was discussed with Ecology and Ecology concurred with the decision.

Under MTCA regulations, groundwater cleanup levels must be set at concentrations at least as stringent as applicable state and federal laws (Applicable or Relevant and Appropriate Requirements [ARARs], WAC 173-340-700[5][a]). Therefore, when no Method A groundwater cleanup level was available for a given compound, the ARAR was referenced. When no Method A or ARAR was available, MTCA Method B groundwater cleanup levels were referenced.

MTCA Method A groundwater cleanup levels, ARARs, and MTCA Method B groundwater cleanup levels were referenced historically during this project and are summarized in Table 1. Groundwater cleanup levels were obtained from the Ecology Cleanup Levels and Risk Calculation (CLARC) database in August of 2022.

4 2022 ANNUAL INSPECTION

An EC was recorded for the Property by King County on June 27, 2017 and Ecology subsequently issued a NFA letter dated July 25, 2017. The EC restricted certain uses of the Property and required that contaminated soil left in place in Areas 1 and 2 be contained by the concrete garage floor. The EC states that inspections of the garage floor and groundwater monitoring wells be conducted annually. The Ecology approved procedure for performing annual inspections is described in Exhibit E of the EC (Operation, Maintenance, Inspection, and Contingency Plan).

The locations of Area 1 and 2 along with groundwater monitoring wells are displayed on Figures 2 through 4. The purpose of the annual inspection was to determine if the parking garage floor was altered or damaged in any way that would impact the ability of the concrete floor to contain contaminated soil in Area 1 and Area 2. The EC also required that groundwater monitoring wells RW1, RW2, and MW6 be inspected annually to determine if any damage has occurred to these wells.

On July 8, 2022, Ms. Sierra Kindley of RGI inspected the concrete floor in the lower level of the Main Street Flats parking garage in the locations of Area 1 and 2. RGI additionally inspected groundwater monitoring wells RW1, RW2, and MW6. The layout of the parking garage with the locations of Area 1 and 2 and groundwater monitoring wells are presented on Figure 3. Photographs pertaining to the inspection areas are presented in Appendix C.

The portions of the concrete garage floor slab situated above Areas 1 and 2 were in good condition and no damage to the concrete slab was observed (see Photos 1 through 4). Groundwater monitoring wells RW1, RW2, and MW6 were also observed to be in good condition with no damage observed (see Photos 5 through 10).

5 2022-Q2 GROUNDWATER MONITORING

Groundwater sampling activities were performed on June 28, 2022, and included sampling wells RW1 and RW2 situated in the parking garage of the Property. These activities were completed in accordance with Exhibit F and Section 2b of the EC and are discussed in this section.

5.1 GROUNDWATER SAMPLING

Prior to groundwater sampling, the depth to groundwater was measured at RW1, RW2, and MW6 from the northernmost point of the top of each well casing using an electronic water level meter.

After collection of groundwater level data, wells RW1 and RW2 were purged using a submersible pump and dedicated tubing. Measurements of water quality parameters (temperature, pH, and conductivity) were recorded using a HANNA multi-variable water quality meter. Both wells purged dry during purging and were given adequate time for groundwater to recharge prior to sampling.

During sample collection, the flow rate of the pump was reduced to less than 100 milliliters per minute (mL/min) in accordance with standard low flow sampling techniques. Groundwater was pumped directly through dedicated tubing into laboratory-supplied containers appropriate for the intended analyses. A total of two groundwater samples were submitted for analyses of COCs.

Depth to groundwater measurements for wells located in the underground parking garage ranged from 30.22' to 31.89' feet below the top of casing (TOC) of each well. Corresponding groundwater elevations ranged from elevations 48.56' to 47.57'. The groundwater flow direction was to the east-southeast. Groundwater elevation contours generated from data obtained during this sampling event are presented on Figure 3.

It should be noted that groundwater flow direction across the Property varies and is influenced by geometry of the surface of the silt layer that underlies the Property. For addition information regarding hydrogeological conditions at the Property see Section 6.1 of RGI's 2017 SRI Report.

All groundwater samples obtained during this project were collected in accordance with RGI's standard operating and decontamination procedures. Samples were placed in preconditioned, sterilized containers provided by an Ecology accredited analytical laboratory. All reusable equipment was decontaminated between sample locations.

All samples were appropriately labeled and stored in an iced cooler and transported to the analytical laboratory using standard chain-of-custody protocols.

5.2 INVESTIGATION DERIVED WASTE

Investigation Derived Waste (IDW) consisted of purge water generated during groundwater sampling. IDW was stored in 20-gallon Department of Transportation (DOT) approved drum, which was appropriately labeled and temporarily stored in the southwest corner of parking garage until analytical data was obtained and reviewed by RGI.

On August 11, 2022, the drum of purge water was removed from the Property by Marine Vacuum Services, Inc. (Marvac) and transported off-Property. All IDW was removed from the Property and disposed of in accordance with applicable regulations. Documentation pertaining to IDW disposal is included in Appendix D.

5.3 ANALYTICAL LABORATORY ANALYSES

A total of two groundwater samples were collected during this project and submitted to Friedman & Bruya, Inc. (FBI) in Seattle, Washington, for one or more of the following analyses:

- Diesel- and oil-range Total Petroleum Hydrocarbons (TPH) using Method NWTPH-Dx;
- Extractable petroleum hydrocarbons (EPH) using Method NWEPH, and
- Volatile petroleum hydrocarbons (VPH) using Method NWVPH.

Groundwater analytical data is summarized in Table 1 and post-2013 Remedial Action groundwater analytical results are displayed graphically on Figure 4. A copy of final analytical laboratory report for samples analyzed duirng this project are included in Appendix E.

5.4 DATA VALIDATION

Analytical data obtained during this project was submitted to Pyron Environmental, Inc. (Pyron) for data validation services in accordance with Exhibit F of the EC.

Pyron conducted a Stage 2A data review using the procedures specified in the United States Environmental Protection Agency (USEPA) Contract Laboratory Program (CLP) Functional Guidelines (NFG) for review of analytical data.

Pyron evaluated hold times, method blank, surrogate spikes, matrix spike/matrix duplicate, and laboratory control sample for all analyses performed during this project, which consisted of diesel- and oil-range TPH, EPH, and VPH.

Pyron determined that all analytical data were at known quality at the level of quality evaluation (EPA Stage 2A) and acceptable for use. A copy of the *Data Validation Report* dated August 23, 2022 by Pyron is included in Appendix F.

5.5 GROUNDWATER ANALYTICAL RESULTS

A total of 2 groundwater samples obtained from wells RW1 and RW2 were analyzed for diesel- and oil-range TPH using method NWTPH-Dx and EPH/VPH using methods NWEPH and NWVPH, respectively. Post 2013 Remedial Action groundwater analytical data is summarized in Table 1 and displayed graphically on Figure 4.

RGI originally planned to evaluate groundwater using Method B as indicated in Section 2b and Exhibit F of the EC. However, there was only one petroleum fraction range detected in RW2 where a concentration of 58.5 µg/L was detected in the EPH petroleum fraction range C16-C21. Since the objective of the Method B evaluation is to determine the toxicity of the petroleum mixture based on detected concentrations the individual petroleum fractions, using primarily compound-specific laboratory detection limits to complete the evaluation greatly diminishes the usefulness of the evaluation. Therefore, RGI considered it appropriate to evaluate groundwater concentrations of COCs using MTCA Method A groundwater cleanup levels and the NWTPH-Dx groundwater data. This change in approach was discussed with Ecology and Ecology concurred with the decision.

Diesel-range TPH was detected in wells RW1 and RW2 at a concentrations of 170 µg/L and 220 µg/L, which were both below MTCA Method A groundwater cleanup level for diesel-range TPH of 500 µg/L. Both of these concentrations were flagged by the analytical chemist with a qualifier indicating that the sample chromatographic pattern did not resemble the fuel standard used for quantification. This flag may be indicative of the possible presence of organics in groundwater. Since both of the detected concentrations were well below the MTCA Method A groundwater cleanup level for diesel-range TPH and groundwater at the Property has been in compliance with MTCA regulations since 2016, no further evaluation of this flagged data was warranted.

Oil-range TPH and VPH petroleum fractions were not detected in groundwater at concentrations above the compound-specific laboratory detection limits in RW1 or RW2.

5.6 ELECTRONIC INFORMATION MANAGEMENT

All of the required data associated with the laboratory analyses performed during this project were entered into Ecology's Electronic Information Management (EIM) database in accordance with Exhibit F of the EC.

As of Augusts 26, 2022 RGI has not received the official acknowledgment from Ecology that this data was accepted into the EIM database. However, RGI anticipates this confirmation from Ecology will be received within the next couple of weeks.

6 DISCUSSION

Groundwater analytical results obtained during this project and also data obtained by others in 2021 demonstrate that groundwater concentrations of COCs on the Property have attenuated significantly via natural attenuation since the completion of the 2013 Remedial Action. Current concentrations of COCs in groundwater are in compliance with MTCA Method A groundwater cleanup levels. The recently observed low concentrations of diesel-range TPH that were flagged by the laboratory may also be indicative of the possible presence of organics in groundwater. Since the Property is currently in compliance with MTCA regulations, no further evaluation of the flagged data was warranted.

Section 2(b)(ii) of the EC states the following regarding the groundwater sampling event to be performed 5 years after issuance of the EC:

- "If Method B TPH concentrations in both samples are in compliance with Method B cleanup levels (both calculated from the Ecology Method B worksheet), Grantor may request that Ecology remove the groundwater monitoring requirement from this Covenant."

As discussed in Section 5.5, Method B was not used to evaluate groundwater concentrations of COCs due to the fact there was only one detection in the EPH/VPH analysis, which yielded a concentration of 58.5 µg/L in the EPH C16 to C21 petroleum fraction range in RW2. No petroleum fractions were detected at concentrations above compound-specific laboratory detection limits in RW1. Based on this data, it is apparent that groundwater concentrations of contaminants are in compliance with MTCA regulations regardless of whether Method A or Method B was used to evaluate the data. In addition, groundwater concentrations of COCs have attenuated significantly since the completion of the 2013 Remedial Action and have been in compliance with applicable MTCA groundwater cleanup levels since June of 2016. Therefore, we request that Ecology remove the groundwater monitoring requirement from the EC and grant us permission to decommission groundwater monitoring wells associated with the Property.

Five inspections of the garage floor have been conducted since the issuance of the EC in 2017 and no significant wear or damage has been observed to the parking garage floor and groundwater monitoring wells have also remained in good condition. Since the soil contamination in Area 1 and Area 2 are covered by a slab that is situated indoors and not subject to extreme weather conditions or damage from heavy equipment, the integrity of the concrete slab is anticipated to remain intact for a long period of time. Therefore, we request that Ecology reduce the annual inspection requirement to a biennial basis.

7 CONCLUSIONS

Based on the data obtained during the ESR and the evaluation of relevant data pertaining to the Property, RGI draws the following conclusions:

- Groundwater sampling was completed in June of 2022 in accordance with Section 2b and Exhibit F of the Environmental Covenant (EC). Groundwater analytical data obtained from wells RW1 and RW2 indicates that concentrations of contaminants of concern (COCs) are in compliance with MTCA regulations. The observed groundwater flow direction based on groundwater elevation data obtained from wells RW1, RW2, and MW6 was to the east south-east.

- The annual inspection of the Property was completed in July of 2022 in accordance with Exhibit E of the EC. The garage floor slab in the locations of Area 1 and Area 2 was observed to be in good condition. In addition, no significant wear or damage has been observed to the garage floor since annual inspections commenced in 2018. Groundwater monitoring wells RW1, RW2 and MW6 were also observed to be in good condition.

- Groundwater concentrations of COCs have attenuated significantly since completion of the 2013 Remedial Action and have been compliance with MTCA regulations since 2016. Therefore, no further groundwater monitoring is warranted. We respectfully request that Ecology remove the groundwater monitoring requirement from the EC as permitted in Section 2(b)(ii) in the EC. In addition, we request that Ecology grant us permission to decommission all groundwater monitoring wells associated with the Property.

- Soil contamination in Area 1 and Area 2 remains capped by the parking garage floor of the Main Street Flats apartment building, which prevents any risk of exposure to this soil contamination. Therefore, these soil impacts do not represent a threat to human health or the environment. Five inspections of the garage floor slab have been conducted since the issuance of the EC in 2017 and no significant wear or damage has been observed to the parking garage floor and groundwater monitoring wells have remained in good condition. The garage floor in the location of Area 1 and Area 2 is not subject to extreme weather conditions or damage from heavy equipment. Therefore, the integrity of the slab is anticipated to remain intact for a long period of time. Based on this, we request that Ecology reduce the annual inspection requirement to a biennial basis.

If you have any questions, or need additional information pertaining to this SRI report, please contact us at (425) 415-0551.

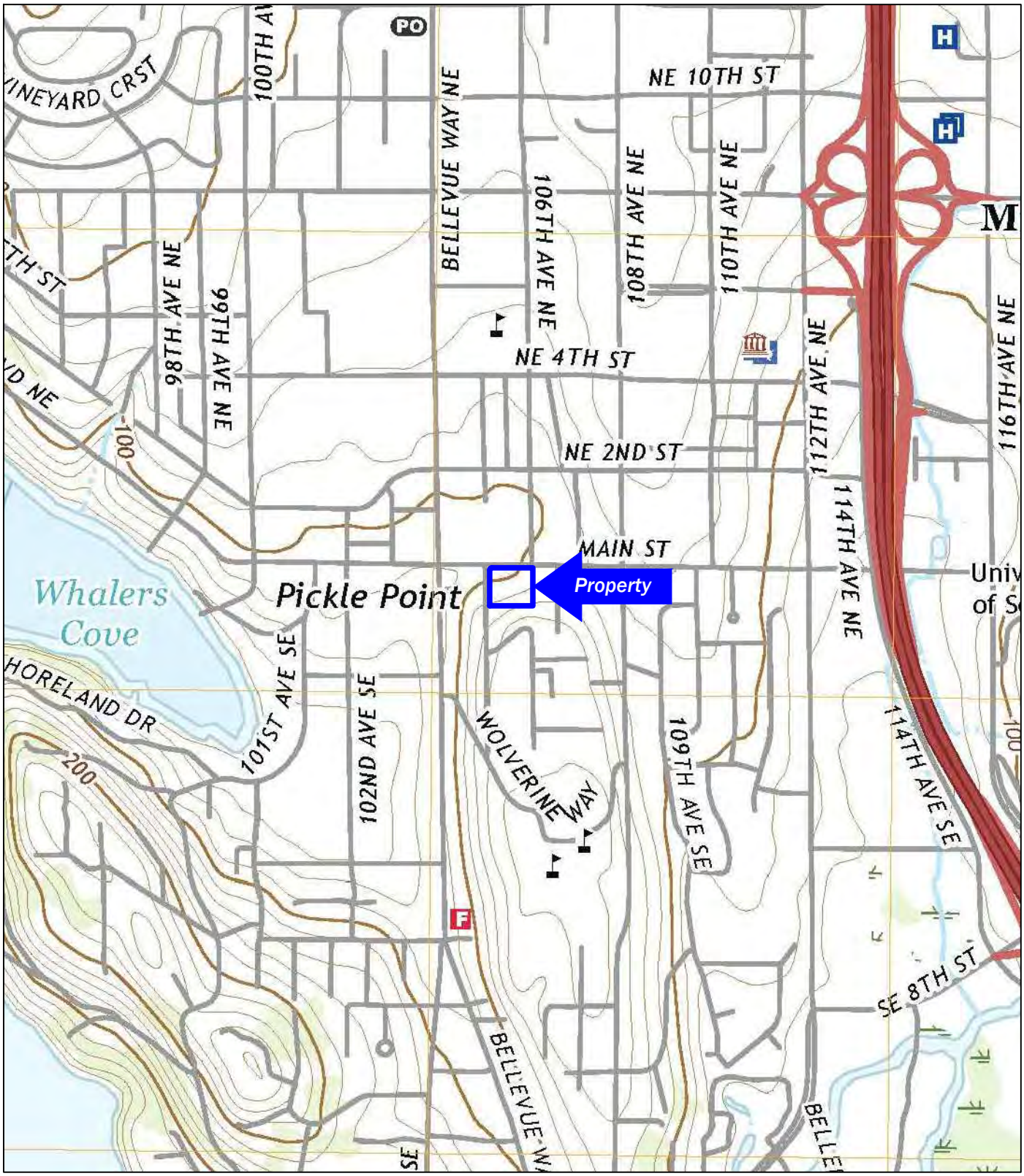
Sincerely,

THE RILEY GROUP, INC.

Jerry Sawetz
Senior Environmental Scientist

Paul D. Riley, LG, LHG
Principal

Report Distribution *Mr. David Ostrer, Main Street Owner, LLC, (1 PDF copy)*
Ms. Tamara Welty, Ecology (1 PDF copy)



USGS, 2020, Mercer Island, Washington
7.5-Minute Quadrangle

Approximate Scale: 1"=1000'

0 500 1000 2000

N

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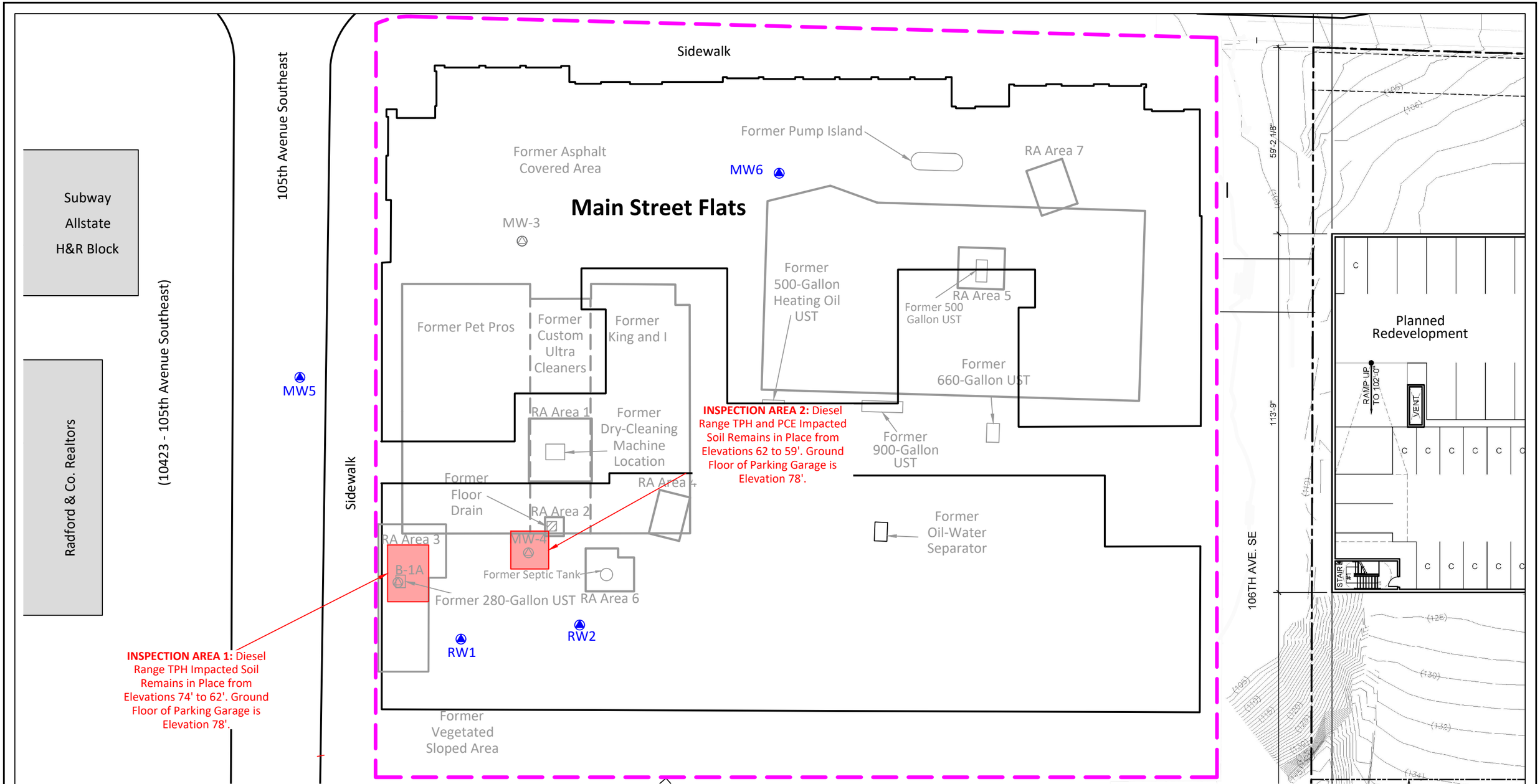
Main Street Bellevue		Figure 1
RGI Project Number 2012-107N	Property Vicinity Map	Date Drawn: 08/2022
Address: 10575 Main Street, Bellevue, Washington 98004		



= Area where soil was remediated during RA in 2013
= Existing groundwater monitoring well location
= Former groundwater monitoring well location
= (in pink) Property boundary

Approximate Scale: 1"=30'
0 15 30 60
N

Drawn from Bush, Roed & Hitchings, Inc., ALTA/ACSM Land Title Survey, dated 03/2012 and HLR Architects, Overall Building Plan 'A' A2.1, 08/04/15.

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Main Street Bellevue		Figure 2
RGI Project Number 2012-107N	Property Representation with Historical Investigation Locations	Date Drawn: 08/2022
Address: 10575 Main Street, Bellevue, Washington 98004		

Main Street

105th Avenue Southeast

Sidewalk

13'-14.5' Overhead Clearance

B-1 (Dry)

ONE WAY

ONE WAY

ONE WAY

MW6 (48.12')

MW-3

Former MW-4

Former B-1A

17' Overhead Clearance

Ground Floor of Parking Garage

T.O.SLAB=79'-1"

T.O.SLAB=79'-1"

MW5 (Not Measured)

Inspection Area 2: Diesel Range TPH and PCE Impacted Soil Remains in Place Between Approximate Elevations 62' to 59'

Inspection Area 1: Diesel Range TPH Impacted Soil Remains in Place Between Approximate Elevations 74' to 62'

STAIR #1

VENT

RW1 (48.56')

RW2 (47.57')

UP TO 88'-2"

48.14
48.05
48.23
47.96
48.32
47.87
48.05
47.78
48.41
48.23
47.96
47.69

48.31 = Groundwater contours generated using Surfer Software (based on Triangulation method).
Contours based on June 28, 2022 water level measurements.
Dashed where inferred, queried where uncertain.

(48.56') = Groundwater elevation (in feet)

= Groundwater flow direction based on groundwater elevations recorded on June 28, 2022

= Existing groundwater monitoring well location

= Former groundwater monitoring well location

= (in pink) Property boundary

Drawn from Bush, Roed & Hitchings, Inc., ALTA/ACSM Land Title Survey, dated 03/2012.

Approximate Scale: 1"=20'

0 10 20 40

N

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Main Street Bellevue		Figure 3
RGI Project Number 2012-107N	June 2022 Groundwater Elevation Contours with 2022 Inspection Areas	Date Drawn: 08/2022
Address: 10575 Main Street, Bellevue, Washington 98004		

Subway
Allstate
H&R Block

Radford & Co. Realtors

105th Avenue Southeast

(10423 - 105th Avenue Southeast)

Sidewalk

Sidewalk

MW6 (TPH Evaluated Using MTCA Method B)

Date	TPH	BTEX	HVOCs
01/04/17	ND	ND	ND
10/28/16	ND	ND	ND
08/29/16	ND	ND	ND

MW6 (TPH Evaluated Using MTCA Method A)

Date	Gas	BTEX	DSL w/out silica	Oil w/out silica
01/04/17	ND	ND	ND	ND
10/28/16	ND	ND	ND	ND
08/29/16	ND	ND	ND	ND

MW5 (TPH Evaluated Using MTCA Method B)

Date	TPH	BTEX	HVOCs
08/29/16	ND	ND	ND

MW5 (TPH Evaluated Using MTCA Method A)

Date	Gas	BTEX	DSL w/out silica	Oil w/out silica	DSL w/silica	Oil w/silica	PCE	1,1,1-TCA	Other HVOCs
05/07/15	ND	ND	----	----	ND	ND	ND	**1.4**	ND
01/29/15	ND	ND	ND	ND	ND	ND	----	**1.6**	----
12/12/14	ND	ND	**230 x**	ND	**67**	ND	ND	**1.4**	ND

MW5

MW6
(48.12')

MW-3

MW-4

B-1A

RW1
(48.56')

RW2
(47.57')

Former Pump Island

Former Asphalt Covered Area

Former Custom Ultra Cleaners

Former King and I

Former Dry-Cleaning Machine Location

Former Floor Drain

Former Septic Tank

Former 280-Gallon UST

Former Vegetated Sloped Area

RA Area 1

RA Area 2

RA Area 3

RA Area 4

RA Area 5

RA Area 6

RA Area 7

Former 500-Gallon Heating Oil UST

Former 500 Gallon UST

Former 660-Gallon UST

Former 900-Gallon UST

Former Oil-Water Separator

Main Street Flats

INSPECTION AREA 1: Diesel Range TPH Impacted Soil Remains in Place from Elevations 74' to 62'. Ground Floor of Parking Garage is Elevation 78'.

INSPECTION AREA 2: Diesel Range TPH and PCE Impacted Soil Remains in Place from Elevations 62 to 59'. Ground Floor of Parking Garage is Elevation 78'.

RW-2 (TPH Evaluated Using MTCA Method B)

Date	TPH	BTEX	HVOCs
01/04/17	ND	ND	ND
10/28/16	ND	ND	ND
08/30/16	ND	ND	ND
06/24/16	ND	ND	----

RW-2 (TPH Evaluated Using MTCA Method A)

Date	Gas	B	DSL w/out silica	Oil w/out silica	DSL w/silica	Oil w/silica	PCE
06/28/22	----	ND	**220 x**	ND	----	----	----
06/22/21*	----	ND	**118 J**	**133 J**	----	----	----
05/07/15	ND	ND	----	---	ND	ND	ND
01/29/15	ND	ND	**2,000 x**	**360 x**	ND	ND	ND
12/12/14	ND	**0.82**	**1,400 x**	ND	ND	ND	ND
11/13/13	ND	ND	**180 x**	ND	----	----	ND

RW-1 (TPH Evaluated Using MTCA Method B)

Date	TPH	BTEX	HVOCs
01/04/17	**614**	ND	ND
10/28/16	ND	ND	ND
08/30/16	ND	ND	ND
06/24/16	**675**	ND	----

RW-1 (TPH Evaluated Using MTCA Method A)

Date	Gas	B	DSL w/out silica	Oil w/out silica	DSL w/silica	Oil w/silica	PCE
06/28/22	----	ND	**170 x**	ND	----	----	----
06/22/21*	----	ND	**110 J**	**181 J**	----	----	----
05/07/15	ND	ND	----	----	**440**	----	ND
01/29/15	ND	**B = 0.39**	**2,800 x**	**540 x**	**240**	----	**ND**
12/12/14	ND	ND	**4,400 x**	**840 x**	**1,200**	----	**1.5**
11/13/13	ND	----	**190 x**	ND	----	----	ND

Planned Redevelopment

RAMP UP TO 102'-0"

VENT

STAIR #1

106TH AVE

59'-2 1/8"

113'-9"

= Groundwater analytical results in micrograms/liter

Gas/DSL/Oil= Gasoline-range/diesel-range/oil-range total petroleum hydrocarbons

BTEX = Benzene, toluene, ethylbenzene, and xylenes

PCE = Tetrachloroethylene, 1,1,1-TCA = 1,1,1-Trichloroethane

HVOCs = Halogenated volatile organic compounds

Silica = Silica gel cleanup

J = detection is less than the laboratory RDL, but more than the MDL

ND = Not detected above laboratory detection limits.

* = Groundwater data obtained from the Monitoring Well Sampling Report dated July 8, 2021 by Partners.

Bold and yellow highlighted results exceeded MTCA Method A groundwater cleanup levels.

From 6/24/16 through 1/4/17, MTCA Method B was used to determine if groundwater concentrations of COCs were in comlpliance with the MTCA regulation.

Note: Flagged samples were not highlighted due to the fact that the laboratory report indicated that the chromatogram pattern did not resemble diesel-range TPH.

(48.56') = Groundwater elevations observed by RGI on June 28, 2022

= Area where soil was remediated during RA in 2013

= Existing groundwater monitoring well location

= Former groundwater monitoring well location

= (in pink) Property boundary

Approximate Scale: 1"=30'

0 15 30 60

N

Drawn from Bush, Roed & Hitchings, Inc., ALTA/ACSM Land Title Survey, dated 03/2012 and HLR Architects, Overall Building Plan 'A' A2.1, 08/04/15.

RILEYGROUP
Corporate Office
17522 Bothell Way Northeast
Bothell, Washington 98011
Phone: 425.415.0551
Fax: 425.415.0311

Main Street Bellevue | Figure 4

RGI Project Number 2012-107N | Property Representation with Post 2013 Remedial Action Groundwater Analytical Data | Date Drawn: 08/2022

Address: 10575 Main Street, Bellevue, Washington 98004

Table 1, Page 1 of 3. Summary of Groundwater Analytical Data
Main Street Flats
10575 Main Street, Bellevue, Washington 98004
The Riley Group, Inc. Project No. 2012-107N

Sample Number	Sample Date	TOC Elevation (feet)	Depth to Water (feet)	Groundwater Elevation (feet)	Gas TPH	BTEX				Diesel TPH w/out silica gel	Oil TPH w/out silica gel	Diesel TPH with silica gel	Oil TPH with silica gel	Total Naphthalenes[2]	PCE	1,1,1-TCA	MTCA Method B for TPH[3]	Other VOCs
						B	T	E	X									
Current Groundwater Monitoring Well Data																		
RW1, Screened from approximate elevation of 58.3' to 43.3', Total well length 35.5'																		
RW-1	06/28/22	78.78	30.22	48.56	----	ND<1	ND<1	ND<1	ND<2	**170 x**	ND<250	----	----	----	----	----	----	----
RW-1**	06/22/21	78.78	31.78	47	ND<100	----	----	----	----	**110 J**	**181 J**	----	----	----	----	----	----	----
RW-1	01/04/17	78.78	28.71	50.07	ND<50	ND<2.0	ND<2.0	ND<2.0	ND<6.0	**1,200 h**	**280**	----	----	----	ND<2.0	----	**614**	ND
RW-1	10/28/16	78.78	28.37	50.41	ND<50	ND<2.0	ND<2.0	ND<2.0	ND<6.0	**470 h**	ND<250	----	----	----	ND<2.0	----	ND	ND
RW-1	09/21/16	78.78	28.33	50.45	----	----	----	----	----	----	----	----	----	----	----	----	----	----
RW-1	08/30/16	78.78	27.67	51.11	ND<50	ND<2	ND<2	ND<2	ND<6	**700**	ND<250	----	----	----	ND<2	----	ND	ND
RW-1	06/24/16	78.78	27.17	51.61	----	ND<2	ND<2	ND<2	ND<4	----	----	----	----	ND<0.02	----	----	**675**	----
RW1	05/07/15	78.78	26.49	52.29	ND<100	ND<0.35	ND<1	ND<1	ND<2	----	----	**440**	ND<250	ND<1	ND<1	ND<1	----	ND
RW1	01/29/15	78.78	27.08	51.7	ND<100	**0.39**	ND<1	ND<1	ND<2	**2,800x**	**540x**	**240**	ND<250	ND<1	ND<1	ND<1	----	ND
RW1	12/12/14	78.78	27.45	51.33	ND<100	ND<0.35	ND<1	ND<1	ND<2	**4,400x**	**840x**	**1,200**	ND<250	ND<1	**1.5**	ND<1	----	ND
RW1	11/13/13	78.78	27.57*	51.21	ND<100	ND<0.35	**14**	ND<1	ND<2	**190 x**	ND<250	----	----	ND<1	ND<1	ND<1	----	**Acetone = 770** **Chloroform = 13[9]** **2-Butanone = 1,100**
RW2, Screened from approximate elevation of 57.2' to 42.2', Total well length 37.3'																		
RW-2	06/28/22	79.46	31.89	47.57	----	ND<1	ND<1	ND<1	ND<2	**220 x**	ND<250	----	----	----	----	----	----	----
RW2**	06/22/21	79.46	33.44	46.02	ND<100	----	----	----	----	**118 J**	**133 J**	----	----	----	----	----	----	----
RW-2	01/04/17	79.46	31.39	48.07	ND<50	ND<2.0	ND<2.0	ND<2.0	ND<6.0	**330 h**	ND<250	----	----	----	ND<2.0	----	ND	ND
RW-2	10/28/16	79.46	31.23	48.23	ND<50	ND<2.0	ND<2.0	ND<2.0	ND<6.0	**400 h**	ND<250	----	----	----	ND<2.0	----	ND	ND
RW-2	09/21/16	79.46	30.96	48.5	----	----	----	----	----	----	----	----	----	----	----	----	----	----
RW-2	08/30/16	79.46	30.85	48.61	ND<50	ND<2	ND<2	ND<2	ND<6	**500**	ND<250	----	----	----	ND<2	----	ND	ND
RW-2	06/24/16	79.46	30.56	48.90	----	ND<2	ND<2	ND<2	ND<4	----	----	----	----	ND<0.060	----	----	ND	----
RW2	05/07/15	79.46	29.68	49.78	ND<100	ND<0.35	ND<1	ND<1	ND<2	----	----	ND<50	ND<250	ND<1	ND<1	ND<1	----	ND
RW2	01/29/15	79.46	29.87	49.59	ND<100	ND<0.35	ND<1	ND<1	ND<2	**2,000x**	**360x**	ND<50	ND<250	ND<1	ND<1	ND<1	----	ND
RW2	12/12/14	79.46	29.99	49.47	ND<100	**0.82**	**3.1**	**1.8**	**9.7**	**1,400x**	ND<250	ND<50	ND<250	**2.2**	ND<1	ND<1	----	**1,3,5-TMB = 1.3** **1,2,4-TMB = 4.0**
RW2	11/13/13	79.46	30.68*	48.78	ND<100	ND<0.35	**3.7**	ND<1	ND<2	**180 x**	ND<250	----	----	ND<1	ND<1	ND<1	----	**Acetone = 110** **BDM = 1.2** **Chloroform = 26[5/9]** **2-Butanone = 170**
MW5, Screened from approximate elevation of 51.4' to 36.4', Total well length 65'																		
MW-5	08/29/16	101.44	51.90	49.54	ND<50	ND<2	ND<2	ND<2	ND<6	ND<130	ND<250	----	----	----	ND<2	----	ND	ND
MW5	05/07/15	101.44	50.91	50.53	ND<100	ND<0.35	ND<1	ND<1	ND<2	----	----	ND<50	ND<250	ND<1	ND<1	**1.4**	----	ND
MW5	01/29/15	101.44	51.31	50.13	ND<100	ND<0.35	ND<1	ND<1	ND<2	ND<50	ND<250	ND<50	ND<250	ND<1	ND<1	**1.6**	----	ND
MW5	12/12/14	101.44	51.59	49.85	<100	ND<0.35	ND<1	ND<1	ND<2	**230x**	ND<250	**67**	ND<250	ND<1	ND<1	**1.4**	----	ND
Groundwater Screening Levels	**MTCA Method A Cleanup Levels for Ground Water**				**800/1,000[1]**	**5**	**1,000**	**700**	**1,000**	**500**	**500**	**500**	**500**	**160**	**5**	**200**	**Not Applicable**	**Analyte Specific**
	ARAR State and Federal Primary Maximum Contaminant Level (MCL)				**----**	**5**	**1,000**	**700**	**10,000**	**----**	**----**	**----**	**----**	**----**	**5**	**200**	**Not Applicable**	**Analyte Specific**
	MTCA Method B Cleanup Levels for Ground Water				**5**	**5[6]**	**----**	**----**	**----**	**----**	**----**	**----**	**----**	**160**	**20.8**	**16,000[4]**	**795[7](6/24/16)** **684[7] (1/04/17)**	**1,3,5-TMB = 80** **1,2,4-TMB = NVE**
	Ecology Groundwater Screening Level Protective of Indoor Air (micrograms/liter)[11]				**----**	**2.4**	**15600[4]**	**2780[4]**	**310[4]**	**----**	**----**	**----**	**----**	**8.93**	**22.9**	**5,240[4]**	**----**	**1,3,5-TMB = 1,70 [4]** **1,2,4-TMB = 240 [4]** **2- Butanone = 1,700,000[4]** **Acetone = NVE** **BDM = 1.4** **Chloroform = 1.2**

Table 1, Page 2 of 3. Summary of Groundwater Analytical Data
Main Street Flats
10575 Main Street, Bellevue, Washington 98004
The Riley Group, Inc. Project No. 2012-107N

Sample Number	Sample Date	TOC Elevation (feet)	Depth to Water (feet)	Groundwater Elevation (feet)	Gas TPH	BTEX				Diesel TPH w/out silica gel	Oil TPH w/out silica gel	Diesel TPH with silica gel	Oil TPH with silica gel	Total Naphthalenes[2]	PCE	1,1,1-TCA	MTCA Method B for TPH[3]	Other VOCs
						B	T	E	X									
MW6, Screened from approximate elevation of 73' to 58', Total well length 40'																		
MW-6	06/28/22	78.7	30.58	48.12	----	----	----	----	----	----	----	----	----	----	----	----	----	----
MW-6**	06/22/21	78.7	34.08	44.62	----	----	----	----	----	----	----	----	----	----	----	----	----	----
MW-6	01/04/17	78.7	29.32	49.38	ND<50	ND<2.0	ND<2.0	ND<2.0	ND<6.0	ND<130	ND<250	----	----	----	ND<2.0	----	ND	ND
MW-6	10/28/16	78.7	29.27	49.43	ND<50	ND<2.0	ND<2.0	ND<2.0	ND<6.0	ND<130	ND<250	----	----	----	ND<2.0	----	ND	ND
MW-6	09/21/16	78.7	28.96	49.74	----	----	----	----	----	----	----	----	----	----	----	----	----	----
MW-6	08/29/16	78.7	28.75	49.95	ND<50	ND<2	ND<2	ND<2	ND<6	ND<130	ND<250	----	----	----	ND<2	----	ND	ND
Historical Groundwater Monitoring Well Data																		
B1A (Decommissioned) Screened from approximate elevation of 57' to 47', Total well length 50'																		
UST1-B1A-W	09/03/13	~97	43.5	~53.5	**360**	**6.9**	**28**	**6.1**	**44**	**5,200 x**	**1,000 x**	**420**	ND<300	**2.3**	ND<1	ND<1	----	ND
MW3 (Decommissioned), Screened from approximate elevation of 52.41' to 37.41', Total well length 60'																		
MW-3	06/11/13	97.41	43.44	53.97	ND<100	ND<1	ND<1	ND<1	ND<3	----	----	ND<50	ND<250	----	----	----	----	----
MW-3	05/22/13	97.41	43.1	54.31	----	----	----	----	----	----	----	----	----	----	----	----	----	----
MW-3	05/14/12	97.41	50.51	46.90	----	----	----	----	----	----	----	----	----	----	ND<0.20	**0.40**	----	**Chloroform = 0.24**
MW4 (Decommissioned), Screened from approximate elevation of 55.29' to 45.29', Total well length 53'																		
MW4	06/11/13	98.29	42.06	56.23	**800**	**17**	**62**	**15**	**90**	----	----	**220 x**	ND<250	----	----	----	----	----
MW4	05/22/13	98.29	43.51	54.78	**340**	**6**	**25**	**5.7**	**39**	**7,900 x**	**1,300 x**	**190**	ND<250	----	ND<1	ND<1	----	ND
Groundwater Screening Levels	**MTCA Method A Cleanup Levels for Ground Water**				**800/1,000[1]**	**5**	**1,000**	**700**	**1,000**	**500**	**500**	**500**	**500**	**160**	**5**	**200**	**Not Applicable**	**Analyte Specific**
	ARAR State and Federal Primary Maximum Contaminant Level (MCL)				**----**	**5**	**1,000**	**700**	**10,000**	**----**	**----**	**----**	**----**	**----**	**5**	**200**	**Not Applicable**	**Analyte Specific**
	MTCA Method B Cleanup Levels for Ground Water				**5**	**5[6]**	**----**	**----**	**----**	**----**	**----**	**----**	**----**	**160**	**20.8**	**16,000[4]**	**795[7](6/24/16) 684[7] (1/04/17)**	**1,3,5-TMB = 80 1,2,4-TMB = NVE**
	Ecology Groundwater Screening Level Protective of Indoor Air (micrograms/liter)[8]				**----**	**2.4**	**15,000[4]**	**2800[4]**	**320[4]**	**----**	**----**	**----**	**----**	**8.9**	**25**	**5,400[4]**	**----**	**1,3,5-TMB = 1,70 [4] 1,2,4-TMB = 240 [4] 2- Butanone = 1,700,000[4] Acetone = NVE BDM = 1.4 Chloroform = 1.2**

Notes:
Samples collected by RGI field staff using a submersible pump under low flow conditions unless otherwise notice.
** = Groundwater data obtained from the *Monitoring Well Sampling Report* dated July 8, 2021 by Partners.
Unless otherwise noted, all analytical results are given in micrograms per liter (ug/L), equivalent to parts per billion (ppb).
Gasoline-range TPH (total petroleum hydrocarbons) determined used Northwest Test Method NWTPH-Gx.
BTEX (benzene, toluene, ethylbenzene and xylenes) determined using EPA Test Method 8021B or 8260C.
Diesel and Oil-Range TPH determined used Northwest Test Method NWTPH-Dx with and without silica gel cleanup.
Silica gel = Sample extract is passed through a silica gel column prior to analysis. The silica gel column removes natural occurring biogenic material that can interfere with the TPH result when present.
PCE (tetrachloroethene), 1,1,1-TCA (1,1,1-trichloroethane), 2-butanone, acetone, BMD (Bromodichloromethane), chloroform, TMB (Trimethylbenzene), and other VOCs (volatile organic compounds) determined using EPA Test Method 8260C.
ND = Not detected above noted analytical detection limit.
NVE = No value established.
TOC = Top of casing. Depth to water measurements were obtained from TOC (in feet).
---- = Not analyzed or not applicable.
x = According to the analytical chemist, the sample chromatographic pattern does not resemble the fuel standard used for quantification.
h = Chromatogram indicates that it is likely that sample contains a diesel range product that is likely biased high due to biogenic interference.
J = Dectection is less than the laboratory RDL, but more than the MDL
* Depth to water measurements obtained on December 23, 2013.
[1] The higher cleanup level is allowed if no benzene is detected in the sample and the total of toluene, ethylbenzene and xylenes is less than 1% of the gasoline mixture.
[2] Analyzed using EPA Test Method 8260C.

Table 1, Page 3 of 3. Summary of Groundwater Analytical Data
Main Street Flats
10575 Main Street, Bellevue, Washington 98004
The Riley Group, Inc. Project No. 2012-107N

Notes Continued:

* Depth to water measurements obtained on December 23, 2013.

[1] The higher cleanup level is allowed if no benzene is detected in the sample and the total of toluene, ethylbenzene and xylenes is less than 1% of the gasoline mixture.

[2] Analyzed using EPA Test Method 8260C.

[3] Measured TPH groundwater concentration used for Method B evaluation (as approved in advance by Ecology). As discussed with Ecology and stated in the Ecology approved SRI Work Plan, MTCA Method B was used to evaluate total petroleum hydrocarbons (TPH) concentrations in groundwater from 2016-2017.

[4] The non-carcinogenic MTCA Method B value was referenced due to the fact that a carcinogenic Method B value does not exist.

[5] No carcinogenic Method B was available in the searchable CLARC database at the time the Remedial Action report was prepared. Therefore, this concentration was compared to the Method B non-carcinogenic level of 80 micrograms/liter at that time.

[6] RGI evaluated the cancer risk for the ARAR which was determined to be greater than 10^{-5}. Therefore, the ARAR is adjusted down to a cancer risk of 10^{-5}.

[7] Method B groundwater cleanup level calculated using the Ecology *Worksheet for Calculating Potable Groundwater Cleanup Levels* . See Section 3.3 of the 2017 SRI Report and Appendix B of report for details and extractable petroleum hydrocarbon (EPH) and volatile organic hydrocarbon

[8] Washington State Department of Ecology (Ecology) Model Toxics Control Act (MTCA) Method B groundwater screening level considered protective of indoor air. Obtained from Ecology's Cleanup Level and Risk Calculation (CLARC) database in August of 2022.

[9] Groundwater concentration exceeded Ecology's Groundwater Screening Level considered protective of indoor air.

Ecology Model Toxics Control Act Method A or B Cleanup Levels for Ground Water and groundwater ARARs obtained from WAC 173-340-900, Table 720-1 and the Ecology CLARC database.

ARAR = Applicable or Relevant and Appropriate Requirement. ARARs for the Property are the Federal and State Primary Maximum Contaminant Levels (MCLs) as established under the Environmental Protection Agency (EPA) National Primary Drinking Water Regulations. ARARs are referenced in Ecology's CLARC database.

Bold results indicated concentrations above laboratory detection limits.

Bold and yellow highlighted results indicate concentrations (if any) that were not in compliance with the MTCA groundwater cleanup level being utilized at the time.

After Recording Return
Original Signed Covenant to:
Mr. Michael Warfel
Toxics Cleanup Program
Department of Ecology
Northwest Region
3190 160th Ave SE
Bellevue, Washington 98008

Environmental Covenant

Grantor: Alamo Manhattan Bellevue, LLC
Grantee: State of Washington, Department of Ecology (hereafter "Ecology")
Brief Legal Description: Parcel A, City of Bellevue Boundary Line Adjustment No. 13-109430 LW
Tax Parcel No.: King County Tax Parcel 5223300005
Cross Reference: No Further Action Opinion, VCP Project No. NW2811, Alamo Manhattan Main Street, 10505 Main Street, Bellevue WA 98004

RECITALS

a. This document is an environmental (restrictive) covenant (hereafter "Covenant") executed pursuant to the Model Toxics Control Act ("MTCA"), chapter 70.105D RCW, and Uniform Environmental Covenants Act ("UECA"), chapter 64.70 RCW.

b. The property that is the subject of this Covenant is part or all of a MTCA site (hereafter "Site") known as the Alamo Manhattan Main Street property located at 10505 Main Street, Bellevue, Washington, Facility No. 5245 (hereafter "Property"). The Property is legally described in Exhibit A, and illustrated in Exhibit B, both of which are attached. If there are differences between these two Exhibits, the legal description in Exhibit A shall prevail.

c. The Property has been the subject of remedial action conducted under MTCA, including the excavation and removal of 1,434 tons of contaminated soil during redevelopment. This Covenant is required because residual soil contamination remains on the Property after completion of remedial action. Specifically, the following principal contaminants remain on the Property:

Medium	Principal Contaminants Present
Soil	Diesel-range total petroleum hydrocarbons (TPH) Tetrachloroethylene (PCE)
Groundwater	Not applicable
Surface Water/Sediment	Not applicable

Remaining institutional controls for the Property due to the residual soil contamination include: (i) containment of residual contaminated soils beneath a cap consisting of the garage floor slab; and (ii) groundwater monitoring to occur at the time of the 5-year periodic review of the Covenant (anticipated in June 2022).

d. It is the purpose of this Covenant to restrict certain activities and uses of the Property to protect human health and the environment and the integrity of remedial action conducted at the Site. Records describing the extent of residual contamination and remedial action conducted are available through Ecology. This includes the following documents:

- *Remedial Action Report*, dated June 13, 2014 by The Riley Group, Inc. (RGI).
- *Supplemental Remedial Investigation Work Plan* dated August 22, 2016 by RGI.
- *Supplemental Remedial Investigation Report* dated January 18, 2017 by RGI.
- *Focused Feasibility Study and Disproportionate Cost Analysis* dated January 18, 2017 by RGI.
- *Technical Memorandum, Results of May 4, 2017 Groundwater Monitoring Event* dated May 12, 2017 by RGI.

e. This Covenant grants Ecology certain rights under UECA and as specified in this Covenant. As a Holder of this Covenant under UECA, Ecology has an interest in real property, however, this is not an ownership interest which equates to liability under MTCA or the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601 *et seq.* The rights of Ecology as an "agency" under UECA, other than its' right as a holder, are not an interest in real property.

COVENANT

Alamo Manhattan Bellevue, LLC, as Grantor and owner of the Property, hereby grants to the Washington State Department of Ecology, and its successors and assignees, the following covenants. Furthermore, it is the intent of the Grantor that such covenants shall supersede any prior interests the Grantor has in the Property, and shall run with the land and be binding on all current and future owners of any portion of, or interest in, the Property.

Section 1. General Restrictions and Requirements.

The following general restrictions and requirements shall apply to the Property:

a. Interference with Remedial Action. The Grantor shall not engage in any activity on the Property that may impact or interfere with the remedial action and any operation, maintenance, inspection or monitoring of remedial action without prior written approval from Ecology.

b. **Protection of Human Health and the Environment.** The Grantor shall not engage in any activity on the Property that may threaten continued protection of human health or the environment without prior written approval from Ecology. This prohibition includes, but is not limited to, any activity that results in the release of residual contamination that was contained as a part of the remedial action or that exacerbates or creates a new exposure to residual contamination remaining on the Property.

c. **Continued Compliance Required.** Grantor shall not convey any interest in any portion of the Property without providing for the continued adequate and complete operation, maintenance and monitoring of the remedial action and continued compliance with this Covenant.

d. **Leases.** Grantor shall restrict any lease for any portion of the Property to uses and activities consistent with this Covenant, and shall notify all lessees of the restrictions on the use of the Property.

e. **Preservation of Reference Monuments.** Grantor shall make a good faith effort to preserve any reference monuments and boundary markers used to define the areal extent of coverage of this Covenant. Should a monument or marker be damaged or destroyed, Grantor shall have it replaced by a licensed professional surveyor within 30 days of discovery of the damage or destruction.

Section 2. Specific Prohibitions and Requirements.

In addition to the general restrictions in Section 1 of this Covenant, the following additional specific restrictions and requirements shall apply to the Property.

a. **Containment of Soil.** The remedial action for the Property is based on containing contaminated soil under an existing cap consisting of a concrete garage floor slab situated at the ground level of the underground parking garage associated with the Main Street Apartments building located on the Property. The floor slab is situated at approximately elevation 78 feet above mean sea level (AMSL). Contaminated soil locations are situated only on the southwestern portion of the Property and these locations are illustrated in Exhibit C as Area 1 and Area 2. Area 1 consists of diesel-range total petroleum hydrocarbon (TPH) impacted soil extending from approximately elevation 74 feet AMSL to 62 feet AMSL. Area 2 consists of diesel-range TPH and PCE contaminated soil extending from approximately elevation 62 feet AMSL to 59 feet AMSL. The floor slab minimizes the potential for contact with contaminated soil. As such, the following restrictions apply within the areas illustrated on Exhibit C.

The Grantor shall not alter or remove the existing structures on the Property in any manner that would expose contaminated soil, result in a release of contaminants to the environment, or create a new exposure pathway, unless Ecology gives the Grantor prior written approval. Should the Grantor propose to remove all or a portion of the existing structures overlying the areas displayed in Exhibit C so that access to the contaminated soil is feasible, Ecology may require treatment or removal of the contaminated soil.

The Grantor covenants and agrees that it shall annually inspect the floor slab in the building parking garage (which caps the two areas of contaminated soil) and report to Ecology within thirty (30) days of the inspection. At any time, including observations or reports made outside of the annual inspection, if Grantor discovers any damage to the floor slab in areas above the two areas of contaminated soil that would indicate that the integrity or performance of the floor slab has been

compromised, then Grantor shall provide a report to Ecology within three (3) business days of the discovery of the damage.

Three groundwater monitoring wells (RW1, RW2, and MW6) are located in the bottom level of the building parking garage on the Property to monitor the performance of the remedial action. The Grantor shall inspect the monitoring wells annually, and shall maintain clear access to these monitoring wells and protect them from damage. At any time, including observations or reports made outside of the annual inspection, if Grantor discovers any damage to a monitoring well that would indicate that the integrity or performance of the monitoring well has been compromised, then Grantor shall provide a report to Ecology within three (3) business days of the discovery of the damage.

Unless Ecology approves of an alternative plan in writing, the Grantor shall promptly repair any damage to the floor slab or to a monitoring well, and shall submit a report documenting this work to Ecology within thirty (30) days of completing the repairs.

An Operation, Maintenance, Inspection, and Contingency Plan is attached as Exhibit E to this Environmental Covenant.

b. **Monitoring.** The Grantor agrees to conduct the following groundwater monitoring activities in order to demonstrate protectiveness of the remedial action:

i. One groundwater monitoring event at the time of the 5-year Periodic Review of the Covenant (anticipated in June 2022). Groundwater shall be evaluated for compliance with Method B cleanup levels for TPH, to include:

   a. Measurement of groundwater levels at RW1, RW2, and MW6.
   b. Collection of groundwater samples from RW1 and RW2.
   c. Analysis of groundwater samples for TPH-Dx (no silica gel), EPH, and VPH.
   d. Evaluation of Method B compliance using the Ecology Method B worksheet.
   e. Reporting of results to Ecology.

ii. If Method B TPH concentrations in both samples are in compliance with Method B cleanup levels (both calculated from the Ecology Method B worksheet), Grantor may request that Ecology remove the groundwater monitoring requirement from this Covenant.

iii. If either sample contains Method B TPH concentrations that are not in compliance with Method B cleanup levels, Grantor shall work with Ecology to determine appropriate next steps for the Site.

A Groundwater Monitoring Plan is included as Exhibit F to this Environmental Covenant.

Section 3. Access.

a. The Grantor shall maintain clear access to all remedial action components necessary to construct, operate, inspect, monitor and maintain the remedial action.

b. The Grantor freely and voluntarily grants Ecology and its authorized representatives, upon reasonable prior notice, the right to enter the Property at reasonable times to evaluate the effectiveness of this Covenant and the remedial action, and enforce compliance with this Covenant and those actions, including the right to take samples, inspect any remedial action conducted on the Property, and to inspect related records. Prior notice is not required in the event of an emergency or suspected threat to human health or the environment.

c. No right of access or use by a third party to any portion of the Property is conveyed by this instrument.

Section 4. Notice Requirements.

a. **Conveyance of Any Interest.** The Grantor, when conveying any interest within the area of the Property described and illustrated in Exhibit C, including but not limited to title, easement, leases, and security or other interests must:

i. Provide written notice to Ecology of the intended conveyance of title or ownership of the Property at least thirty (30) days in advance of the conveyance.

ii. Include in a conveying document or lease document a notice in substantially the following form, as well as a complete copy of this Covenant:

NOTICE: THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL COVENANT GRANTED TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY ON [_____] AND RECORDED WITH THE KING COUNTY AUDITOR UNDER RECORDING NUMBER [_____]. USES AND ACTIVITIES ON THIS PROPERTY MUST COMPLY WITH THAT COVENANT, A COMPLETE COPY OF WHICH IS ATTACHED TO THIS DOCUMENT.

iii. Unless otherwise agreed to in writing by Ecology, provide Ecology with a complete copy of the executed document conveying title or ownership of the Property within thirty (30) days of the date of execution.

b. **Reporting Violations.** Should the Grantor become aware of any violation of this Covenant, Grantor shall promptly report such violation in writing to Ecology.

c. **Emergencies.** For any emergency or significant change in Site conditions due to Acts of Nature (for example, flood or fire) resulting in a violation of this Covenant, the Grantor is authorized to respond to such an event in accordance with state and federal law. The Grantor must notify Ecology in writing of the event and response actions planned or taken as soon as practical but no later than within three (3) business days of the discovery of the event.

d. **Notification procedure.** Any required written notice, approval, reporting or other communication shall be delivered: (a) personally, (b) by United States registered or certified mail, postage prepaid, (c) by Federal Express or other reputable courier service regularly providing evidence of delivery (with charges paid by the party sending the notice), (d) by same day messenger service, or (e) by electronic mail, provided that such electronic mail shall be followed

within one (1) business day by separate delivery of such notice pursuant to clause (a), (b), (c) or (d) above. Any such notice to a party shall be addressed to the address(es) set forth below (subject to the right of a party to designate a different address for itself by notice similarly given):

Alamo Manhattan Bellevue, LLC Mr. Matt Segrest 3012 Fairmount Street, Suite 100 Dallas, Texas 75201 (469) 941-4510 Matt.segrest@alamomanhattan.com and AIG Global Real Estate Investment Corp. Attention: Tim Barry 171 17th Street, Suite 1650 Atlanta, Georgia 30363 (404) 965-5961 tim.barry@aig.com and AIG Global Real Estate Investment Corp. Attention: President and General Counsel 80 Pine Street, 4th Floor New York, New York 10005 (646) 857-2300 john.mallinson@aig.com	Environmental Covenants Coordinator Washington State Department of Ecology Toxics Cleanup Program P.O. Box 47600 Olympia, WA 98504 7600 (360) 407-6000 ToxicsCleanupProgramHQ@ecy.wa.gov

Section 5. Modification or Termination.

a. Grantor must provide written notice and obtain approval from Ecology at least sixty (60) days in advance of any proposed activity or use of the Property that is inconsistent with this Covenant. For any proposal that is inconsistent with this Covenant and permanently modifies an activity or use restriction at the Property:

i. Ecology must issue a public notice and provide an opportunity for the public to comment on the proposal; and

ii. If Ecology approves of the proposal, the Covenant must be amended to reflect the change before the activity or use can proceed.

b. If the conditions at the Site requiring a Covenant have changed or no longer exist, then the Grantor may submit a request to Ecology that this Covenant be amended or terminated. Any amendment or termination of this Covenant must follow the procedures in MTCA and UECA and any rules promulgated under these chapters.

c. By signing this agreement, per RCW 64.70.100, the original signatories to this agreement, other than Ecology, in the event the Grantor no longer has a property interest in the Property, agrees to waive all rights to sign amendments and termination of this Covenant.

Section 6. Enforcement and Construction.

a. This Covenant is being freely and voluntarily granted by the Grantor.

b. Within ten (10) days of execution of this Covenant, Grantor shall provide Ecology with an original signed Covenant and proof of recording and a copy of the Covenant and proof of recording to others required by RCW 64.70.070.

c. Ecology shall be entitled to enforce the terms of this Covenant by resort to specific performance or legal process. All remedies available in this Covenant shall be in addition to any and all remedies at law or in equity, including MTCA and UECA. Enforcement of the terms of this Covenant shall be at the discretion of Ecology, and any forbearance, delay or omission to exercise its rights under this Covenant in the event of a breach of any term of this Covenant is not a waiver by Ecology of that term or of any subsequent breach of that term, or any other term in this Covenant, or of any rights of Ecology under this Covenant.

d. The Grantor shall be responsible for all costs associated with implementation of this Covenant. Furthermore, the Grantor, upon request by Ecology, shall be obligated to pay for Ecology's costs to process a request for any modification or termination of this Covenant and any approval required by this Covenant.

e. This Covenant shall be liberally construed to meet the intent of MTCA and UECA.

f. The provisions of this Covenant shall be severable. If any provision in this Covenant or its application to any person or circumstance is held invalid, the remainder of this Covenant or its application to any person or circumstance is not affected and shall continue in full force and effect as though such void provision had not been contained herein. As used in this Covenant, a "business day" means a day (excluding Saturday, Sunday and federal and state holidays) on which banks in Washington State are open for business.

g. A heading used at the beginning of any section or paragraph or exhibit of this Covenant may be used to aid in the interpretation of that section or paragraph or exhibit but does not override the specific requirements in that section or paragraph.

The undersigned Grantor warrants he/she holds the title to the Property and has authority to execute this Covenant.

Exhibit D

SUBORDINATION AGREEMENT

KNOW ALL PERSONS, That J.P. Morgan Chase Bank, N.A. ("Lender"), the beneficiary and holder of that certain Construction Loan and Security Agreement dated the 1st day of July, 2013 ("Instrument"), executed by Brian Fox, Vice-President-Underwriting Manager, and recorded in the office of the County Auditor of King County, State of Washington, on July 1, 2013, under Auditor's File Number 20130701001425, does hereby agree that said Instrument shall be subordinate to the interest of the State of Washington, Department of Ecology, under the environmental (restrictive) covenant dated June 27, 2017 (the "Covenant"), as demonstrated by the execution and recording of this Subordination Agreement the office of the County Auditor of King County, State of Washington. For the avoidance of doubt, this Subordination Agreement is not intended to and does not limit the Lender's rights to foreclose or avail itself of any other remedy under the Instrument; however, the requirements and rights of this Covenant shall survive any such foreclosure of exercise of Lender's rights and remedies.

By: Brian Fox

Title: Authorized officer

Dated: 6/21/17

CORPORATE ACKNOWLEDGMENT

STATE OF Texas

COUNTY OF Dallas

On this 21 day of June, 2017, I certify that Brian Fox personally appeared before me, acknowledged that **he/she** is the Authorized Officer of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that **he/she** was authorized to execute said instrument for said corporation.

JENNIFER CUADRA
Notary Public, State of Texas
Comm. Expires 08-12-2018
Notary ID 125661149

Jennifer Cuadra
Notary Public in and for the State of Texas
Residing at 2200 Ross Ave, Dallas, TX 75201
My appointment expires 08/12/18

EXECUTED this 21st day of June, 2017.

(signature)

By: Matt Segrest (printed)

Title: Manager

CORPORATE ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF DALLAS

On this 21st day of JUNE, 2017, I certify that MATT SEGREST personally appeared before me, acknowledged that he/she is the MANAGER of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he/she was authorized to execute said instrument for said corporation.

JESSICA HARVEY
NOTARY PUBLIC
STATE OF TEXAS
MY COMM. EXP. 09/25/2019

Notary Public in and for the State of Texas
Residing at 3012 FAIRMOUNT ST #100 DALLAS, TX 75201
My appointment expires 09/25/2019

The Department of Ecology, hereby accepts the status as GRANTEE and HOLDER of the above Environmental Covenant pertaining to the Alamo Manhattan Main Street property, 10505 Main Street, Bellevue, Washington. Facility No. 5245.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

_____ (signature)

By: ROBERT W WARREN (printed)

Title: SECTION MANAGER

Dated: 6-23-17

Exhibit A

LEGAL DESCRIPTION

Parcel A, City of Bellevue Boundary Line Adjustments No. 13-109430 LW, recorded under recording no. 20130607900002, in King County, Washington;

Except that portion thereof conveyed to the City of Bellevue by deed of dedication recorded under recording no. 20131004001718.

Exhibit B

Property Maps

GIS, 2016, Bellevue, Washington

Approximate Scale: 1"=300'

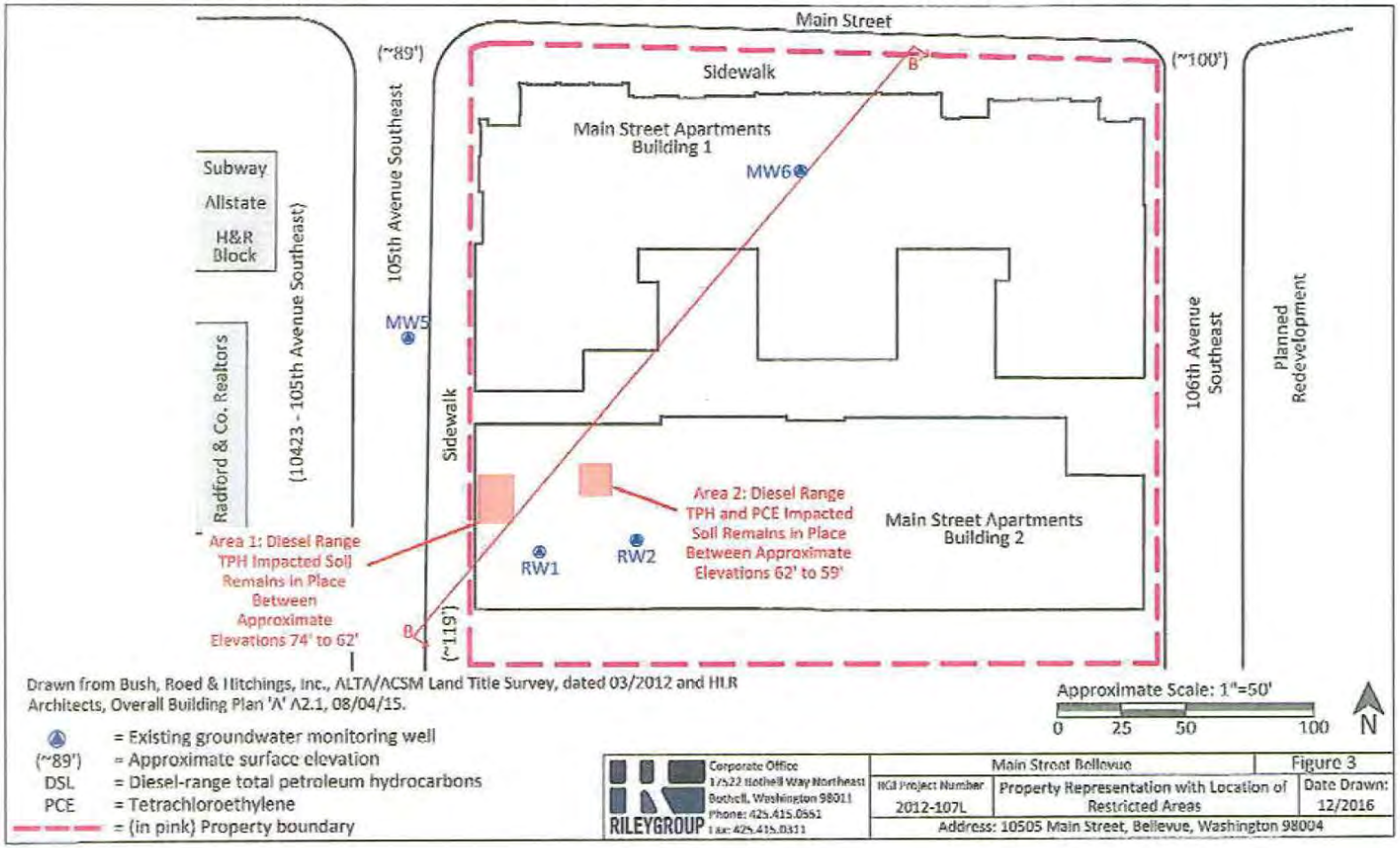
0 150 300 600

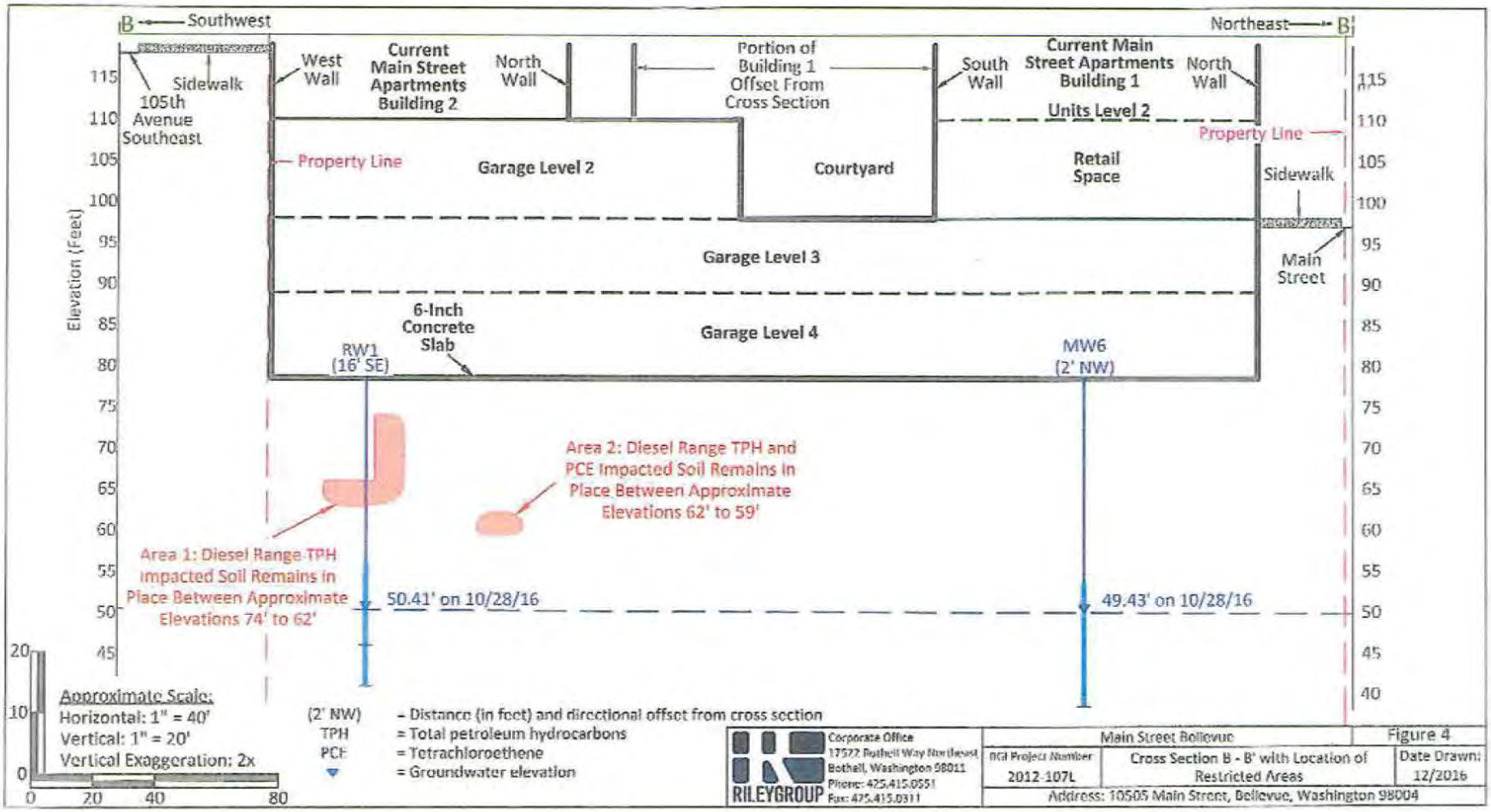
N

Corporate Office 17522 Bothell Way Northeast Bothell, Washington 98011 Phone: 425.415.0551 Fax: 425.415.0311	Main Street Bellevue	Figure 1
RILEYGROUP	RGI Project Number 2012-107L Property Vicinity Map	Date Drawn: 12/2016
	Address: 10505 Main Street, Bellevue, Washington 98004	

Exhibit C

Maps Illustrating Location of Restrictions




B
Southwest
Northeast
B'
West Wall
Current Main Street Apartments Building 2
North Wall
Portion of Building 1 Offset From Cross Section
South Wall
Current Main Street Apartments Building 1
North Wall
Sidewalk
105th Avenue Southeast
Units Level 2
Property Line
Property Line
Garage Level 2
Courtyard
Retail Space
Sidewalk
Garage Level 3
Main Street
6-Inch Concrete Slab
Garage Level 4
RW1 (16' SE)
MW6 (2' NW)
Elevation (Feet)
115
110
105
100
95
90
85
80
75
70
65
60
55
50
45
40
Area 2: Diesel Range TPH and PCE Impacted Soil Remains in Place Between Approximate Elevations 62' to 59'
Area 1: Diesel Range TPH Impacted Soil Remains in Place Between Approximate Elevations 74' to 62'
50.41' on 10/28/16
49.43' on 10/28/16
Approximate Scale:
Horizontal: 1" = 40'
Vertical: 1" = 20'
Vertical Exaggeration: 2x
20
10
0
0
20
40
80
(2' NW) - Distance (in feet) and directional offset from cross section
TPH = Total petroleum hydrocarbons
PCE = Tetrachloroethene
▼ = Groundwater elevation
RILEYGROUP
Corporate Office
17522 Bothell Way Northeast
Bothell, Washington 98011
Phone: 425.415.0551
Fax: 425.415.0311
Main Street Bellevue
Figure 4
RGI Project Number
2012-107L
Cross Section B - B' with Location of Restricted Areas
Date Drawn:
12/2016
Address: 10505 Main Street, Bellevue, Washington 98004

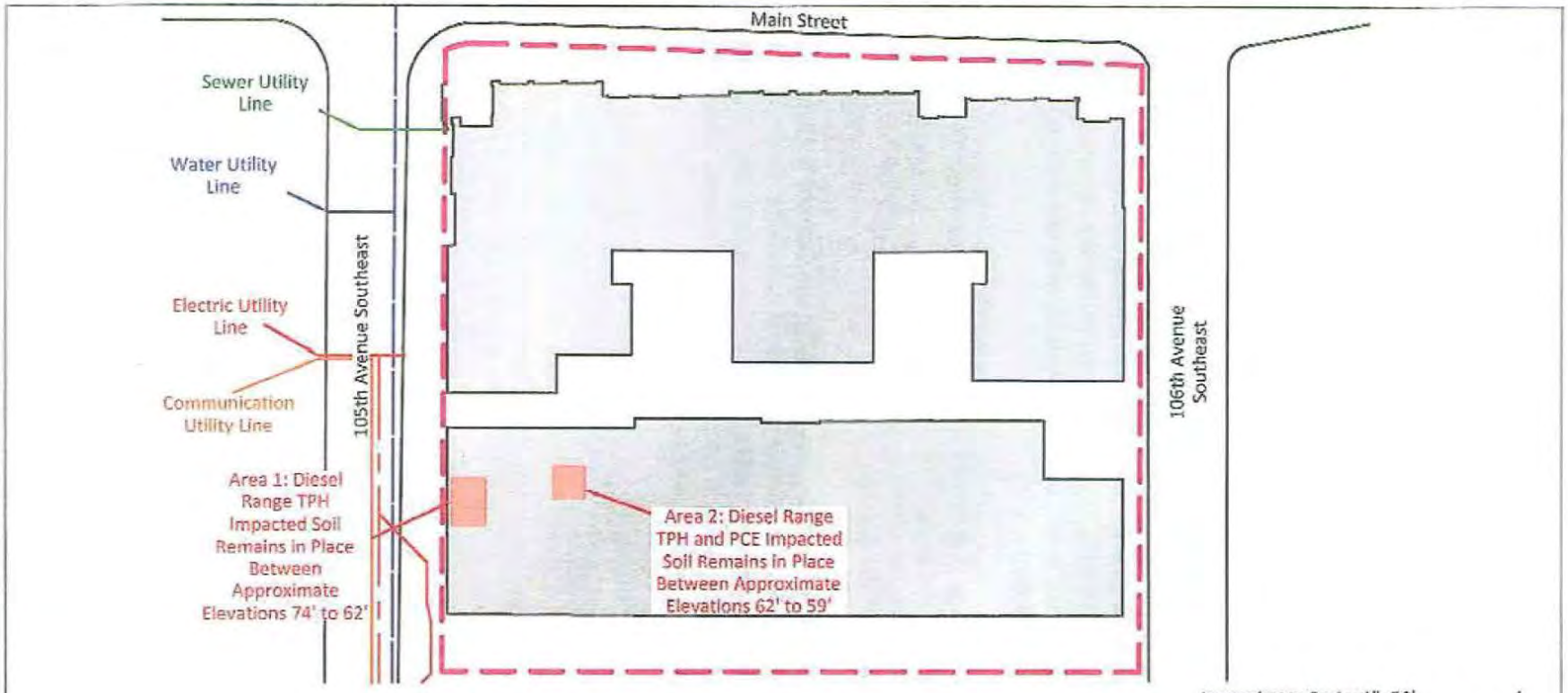

Main Street
Sewer Utility Line
Water Utility Line
Electric Utility Line
Communication Utility Line
105th Avenue Southeast
106th Avenue Southeast
Area 1: Diesel Range TPH Impacted Soil Remains in Place Between Approximate Elevations 74' to 62'
Area 2: Diesel Range TPH and PCE Impacted Soil Remains in Place Between Approximate Elevations 62' to 59'
Approximate Scale: 1"=50'
0 25 50 100
N
Drawn from Bush, Roed & Hitchings, Inc., Combined Utility Plan, Main Street, dated 10/29/2013
= Location of contaminated soil
= (in pink) Property boundary
Corporate Office
1/522 Bothell Way Northeast
Bothell, Washington 98011
Phone: 425.415.0551
Fax: 425.415.0311
RILEYGROUP
Main Street Bellevue
Figure 2
RGI Project Number
2012-107L
Property Representation Map with Utility Locations
Date Drawn:
12/2016
Address: 10505 Main Street, Bellevue, Washington 98004

Exhibit E

Operation, Maintenance, Inspection, and Contingency Plan

The garage floor slab and three groundwater monitoring wells are situated at the lower level of the parking garage (RW1, RW2, and MW6) at the Main Street Apartments Building located on the Property. The garage floor slab and the monitoring wells shall be inspected on an annual basis in order to determine if any damage has occurred that could jeopardize the integrity or performance of the floor slab and/or the monitoring wells.

The annual inspection shall consist of qualified personnel walking through the garage and closely inspecting the monitoring wells and the areas of the floor slab situated above the two areas of residual contaminated soils. The results of the inspection will be documented in a field report, and photographs of the monitoring wells and floor slab shall be obtained during each inspection and will be maintained in the project file.

If Grantor discovers any damage that would indicate that the integrity or performance of the monitoring wells or the areas of the garage floor slab above the two areas of residual contaminated soils have been jeopardized, then the Grantor shall report these findings to Ecology within three (3) business days of discovery of the damage.

Unless Ecology approves of an alternative plan in writing, the Grantor shall promptly repair any damage by retaining the appropriate contractor (i.e., general contractor, driller, etc.) to perform the work required to restore the integrity and performance of the concrete slab and/or the monitoring wells. The Grantor will also prepare a report documenting any such work, which will be submitted to Ecology within thirty (30) days of completing the repairs.

Exhibit F

GROUNDWATER MONITORING PLAN

The Groundwater Monitoring Plan includes the following elements:

- Monitoring Locations: RW1, RW2, and MW6.
- Monitoring Parameters: Water levels for all wells; sampling for TPH-Dx, VPH, EPH, in wells RW1 and RW2.
- Monitoring Frequency: Refer to Section 2(b) of the Environmental Covenant.
- Sampling Procedures.
- Analytical Laboratory Methods.
- Management and Proper Disposal of Purge Water.
- Data Validation.
- Method B Calculations.
- Data Reporting.
- Data Upload to EIM.
- Contingency Plan.

The methodology to be used to perform all of the aforementioned tasks (with the exception of Data Upload to EIM, Data Validation, and Contingency Plan) are described in detail in Section 2(b) of the Environmental Covenant and the Supplemental Remedial Investigation Work Plan (SRI Work Plan) dated August 22, 2016 by The Riley Group, Inc. Well logs describing well construction details for wells RW1, RW2 and MW6 are also included in the SRI Work Plan. Tasks not included in Section 2(b) of the Environmental Covenant and the SRI Work Plan are discussed below.

- Data Upload to EIM - At the completion of all groundwater monitoring activities, groundwater analytical data obtained from the laboratory will be uploaded into Ecology's Electronic Information Management (EIM) database. EIM data submittal will be considered complete after the Ecology EIM Coordinator indicates that the data has been successfully uploaded into the EIM database and reviewed by the Ecology Site Manager.

- Data Validation – The quality control data from the laboratory will be evaluated to determine if any of the sample results require qualification.

- Contingency Plan - If either sample from RW1 or RW2 contains Method B concentrations that are not in compliance with Method B cleanup levels (both calculated from the Ecology Method B worksheet), Grantor shall notify Ecology and work with Ecology to determine appropriate next steps for the Site.

Enclosure C

Operation and Maintenance Plan for Engineered Controls

Exhibit E

OPERATION, MAINTENANCE, INSPECTION, AND CONTINGENCY PLAN

The garage floor slab and three groundwater monitoring wells are situated at the lower level of the parking garage (RW1, RW2, and MW6) at the Main Street Apartments Building located on the Property. The garage floor slab and the monitoring wells shall be inspected on an annual basis in order to determine if any damage has occurred that could jeopardize the integrity or performance of the floor slab and/or the monitoring wells.

The annual inspection shall consist of qualified personnel walking through the garage and closely inspecting the monitoring wells and the areas of the floor slab situated above the two areas of residual contaminated soils. The results of the inspection will be documented in a field report, and photographs of the monitoring wells and floor slab shall be obtained during each inspection and will be maintained in the project file.

If Grantor discovers any damage that would indicate that the integrity or performance of the monitoring wells or the areas of the garage floor slab above the two areas of residual contaminated soils have been jeopardized, then the Grantor shall report these findings to Ecology within three (3) business days of discovery of the damage.

Unless Ecology approves of an alternative plan in writing, the Grantor shall promptly repair any damage by retaining the appropriate contractor (i.e., general contractor, driller, etc.) to perform the work required to restore the integrity and performance of the concrete slab and/or the monitoring wells. The Grantor will also prepare a report documenting any such work, which will be submitted to Ecology within thirty (30) days of completing the repairs.

Enclosure D

Confirmational Monitoring Plan

Exhibit F

GROUNDWATER MONITORING PLAN

The Groundwater Monitoring Plan includes the following elements:

- Monitoring Locations: RW1, RW2, and MW6.
- Monitoring Parameters: Water levels for all wells; sampling for TPH-Dx, VPH, EPH, in wells RW1 and RW2.
- Monitoring Frequency: Refer to Section 2(b) of the Environmental Covenant.
- Sampling Procedures.
- Analytical Laboratory Methods.
- Management and Proper Disposal of Purge Water.
- Data Validation.
- Method B Calculations.
- Data Reporting.
- Data Upload to EIM.
- Contingency Plan.

The methodology to be used to perform all of the aforementioned tasks (with the exception of Data Upload to EIM, Data Validation, and Contingency Plan) are described in detail in Section 2(b) of the Environmental Covenant and the Supplemental Remedial Investigation Work Plan (SRI Work Plan) dated August 22, 2016 by The Riley Group, Inc. Well logs describing well construction details for wells RW1, RW2 and MW6 are also included in the SRI Work Plan. Tasks not included in Section 2(b) of the Environmental Covenant and the SRI Work Plan are discussed below.

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- Data Validation – The quality control data from the laboratory will be evaluated to determine if any of the sample results require qualification.

- Contingency Plan - If either sample from RW1 or RW2 contains Method B concentrations that are not in compliance with Method B cleanup levels (both calculated from the Ecology Method B worksheet), Grantor shall notify Ecology and work with Ecology to determine appropriate next steps for the Site.

PARTNER

MONITORING WELL SAMPLING REPORT

Main Street Flats
10505 and 10625 Main Street
Bellevue, Washington 98004

July 8, 2021
Partner Project Number: 21-316573.5

Prepared for:

Hines
10885 Northeast 4th Street
Bellevue, Washington 98004

Engineers who understand your business

PARTNER

July 8, 2021

John Coombs
Hines
10885 Northeast 4th Street
Bellevue, Washington 98004

Subject: Monitoring Well Sampling Report
Main Street Flats
10505 and 10625 Main Street
Bellevue, Washington 98004
Partner Project Number: 21-316573.5

Dear Mr. Coombs:

Partner Engineering and Science, Inc. (Partner) is pleased to provide the results of the assessment performed at the above-referenced property. The following report describes the field activities, methods, and findings of the Monitoring Well Sampling conducted at the above-referenced property.

This assessment was performed consistent with acceptable industry standards. The independent conclusions represent Partner's best professional judgment based upon existing conditions and the information and data available to us during the course of this assignment.

We appreciate the opportunity to provide these services. If you have any questions concerning this report, or if we can assist you in any other matter, please contact Megan Nielsen at 909-224-8542.

Sincerely,

Partner Engineering and Science, Inc.

Hunter White
Project Manager

Samantha J. Fujita, LG
Regional Manager – Subsurface Investigation

Megan Nielsen
National Client Manager

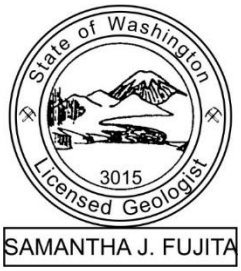


TABLE OF CONTENTS

ATTACHMENTS

1.0 INTRODUCTION

1.1 Purpose

The purpose of the investigation was to gauge and/or sample the on-site monitoring wells to evaluate the potential impact of petroleum hydrocarbons to groundwater as a consequence of the known historical impacts to groundwater. Hines provided project authorization of Partner Proposal Number P21-316573.5.

1.2 Limitations

This report presents a summary of work conducted by Partner. The work includes observations of site conditions encountered and the analytical results provided by an independent third-party laboratory of samples collected during the course of the project. The number and location of samples were selected to provide the required information. It cannot be assumed that the limited available data are representative of subsurface conditions in areas not sampled.

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.

1.3 User Reliance

Partner was engaged by Hines (the Addressee), or their authorized representative, to perform this investigation. 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 two parcels of land comprising 2.6 acres located on the south side of Main Street within a mixed residential and commercial area of Bellevue, King County, Washington. The subject property is currently developed with two inter-connected buildings and three interconnected buildings, which were constructed in 2014 and 2018, and are occupied by Main Street Flats for residential use. In addition to the structures, the subject property is improved with a three-level below building parking garage, a second four-level below building garage rooftop terrace, fitness center, courtyards, barbeque area with grills, and associated landscaping.

The subject property is bound by Main Street followed by commercial buildings to the north, 107th Avenue Southeast followed by residential buildings to the east, residential buildings to the south, and 105th Avenue Southeast followed by commercial buildings 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 June 11, 2021, on behalf of Hines. According to the reviewed historical sources, the subject property was previously undeveloped land with limited residential use from as early as 1943 to *circa* 1950; developed with two commercial structures by 1955 until *circa* 2013. During that time, the subject property was occupied by a variety of different commercial businesses, including an automotive repair shop/gasoline station and a dry-cleaner. The subject property was then redeveloped with the current improvements in 2014 and 2018. During that time, the subject property was occupied by a variety of different commercial businesses, including an automotive repair shop/gasoline station and a dry-cleaner.

The following controlled recognized environmental condition (CREC) was identified in the Phase I:

- According to documents obtained from the State of Washington Department of Ecology (Ecology), the subject property was formerly occupied by various commercial businesses since the mid-1940s including an automotive sales and repair facility, a gasoline station, and a residential dry-cleaning facility. According to historical documents, a total of eight underground storage tanks (USTs) were located on the subject property. The tanks consisted of a 500-gallon (contents unknown) tank, a 500-gallon heating oil tank, a 660-gallon fuel tank, a 900-gallon fuel tank, three 1,000-gallon fuel tanks, and a 2,000-gallon gasoline tank. In addition, a septic tank which was reportedly connected to the tenant space occupied by the dry-cleaning facility, was also located on the subject property. During redevelopment activities in 2013, a total of five USTs and the septic tank were encountered and decommissioned as part of the building foundation and remedial action work during August through October 2013. According to soil samples collected during removal activities, soil on-site contained elevated concentrations of benzene, ethylbenzene, xylenes, gasoline-range organics (GRO), diesel-range organics (DRO), residual-range organics, tetrachloroethene (PCE), and naphthalene. A total of 1,434 tons of impacted soil was removed from the subject property and transported to a licensed off-site disposal facility. Confirmation soil samples were than collected and analyzed. According to the analytical results, soil containing concentrations of DRO above the Ecology Model Toxics Control Act

(MTCA) Method A cleanup levels was encountered between 42 and 50 feet below ground surface in a small area near the southwest corner of the property. In addition, soil containing concentrations of DRO and PCE above the Ecology MTCA Method A cleanup levels, was encountered at a depth of approximately 36 feet below ground surface (bgs) in the vicinity of the former dry-cleaning tenant space on the southwest portion of the property.

During the environmental investigations, several groundwater monitoring wells were also installed to characterize the groundwater impacts beginning in 2014. The initial groundwater results found the following contaminants of concern (COCs): GRO, DRO, RRO, and PCE. The two monitoring wells affected by the site impacts (RW1 and RW2) showed sampling results for the COCs below clean up levels for four consecutive quarterly monitoring events conducted between June 2016 and January 2017. An additional groundwater monitoring event for these wells was also conducted in May 2017, which also showed results below cleanup levels.

Based on the remedial actions taken and analytical results, Ecology issued a No Further Action (NFA) letter to Alamo Manhattan Bellevue LLC on July 25, 2017. However, due to the residual soil impacts located on the southwest portion of the subject property, institutional controls were required to be implemented. According to an Environmental Covenant between Alamo Manhattan Bellevue, LLC and Ecology the institutional controls include the containment of residual impacted soils beneath a cap consisting of the garage floor slab, and groundwater monitoring to occur at the time of the 5-year periodic review of the Covenant (anticipated in June 2022). As part of the agreement, the floor slab in the building parking garage (which caps the two areas of impacted soil) must be inspected annually and a report must be submitted to Ecology within 30 days of inspection. In addition, the three groundwater monitoring wells (RW1, RW2, and MW6) that are located in the bottom level of the building parking garage must be inspected annually. If any damage to the floor slab and/or monitoring wells are observed, the subject property owner must promptly repair the damage and provide a report to Ecology. Partner was provided with a copy of the Proposal for Services prepared by The Riley Group, Inc. (RGI) dated August 25, 2017. According to the document, RGI has been contracted to complete the annual inspections required by Ecology, with the first annual inspection scheduled to occur in June 2018. Based on the institutional controls currently in place, the historical use of the subject property and associated impacts are considered to represent a CREC.

2.3 Geology and Hydrogeology

Review of the United States Geological Survey (USGS) *Mercer Island, Wasington* Quadrangle topographic map, indicates the subject property is situated approximately 115 feet above mean sea level, and the local topography is sloping moderately to the northwest. Refer to Figure 2 for a topographic map of the site vicinity.

The subject property lies in the Puget Sound Lowland, a series of north to south trending valleys ranging from British Columbia to Eugene, Oregon and bordered by the Cascade Range and Olympic Mountains. Surfical soils in the Puget Sound Lowland are mainly formed in glacial drift deposits from the last period of glaciation, about 10-14,000 years ago. Underlying the young glacial deposits is sediment deposited during previous or interglacial periods.

Based on well logs for the on-site monitoring wells, the underlying subsurface consists predominantly of fill from the ground surface to approximately 5 feet below ground surface (bgs). From 5 to 40 feet bgs, the subsurface consists predominantly of brown silty sand (SM). Groundwater was measured prior to purging and sampling the wells at depths of 31.78 (RW1), 33.44 (RW2), and 34.08 feet bgs (MW6).

3.0 FIELD ACTIVITIES

The Monitoring Well Sampling scope included gauging the water level of the three on-site wells (RW1, RW2, and MW6) and purging and sampling two of the on-site monitoring wells (RW1 and RW2) to collect representative groundwater samples. Refer to Table 1 for a summary of the borings, sampling schedule, and laboratory analyses for this investigation.

3.1 Preparatory Activities

Prior to the initiation of fieldwork, Partner completed the following activities.

3.1.1 Health and Safety Plan

Partner prepared a site-specific Health and Safety Plan, which was reviewed with on-site personnel involved in the project prior to the commencement of drilling activities.

3.2 Sampling Equipment

On June 22, 2021, Partner subcontracted with Blaine Tech Services, Inc. (Blaine Tech) to provide and operate groundwater sampling equipment. Groundwater sampling was conducted using a Sample Pro bladder pump with a MP50 controller, YSI 556 flow cell, HACH 2100Q turbidity meter, and a Solinst interface probe Sampling equipment was decontaminated between wells to prevent cross-contamination.

3.3 Groundwater Sampling

On June 22, 2021, Partner subcontracted with Blaine Tech to sample the monitoring wells. Each of the three wells was gauged utilizing a water level meter. Additionally, the depth of each well was measured. Groundwater from wells RW1 and RW2 was sampled using the low-flow purge method using a bladder pump. Turbidity, pH, conductivity, dissolved oxygen, temperature, and salinity were measured at three-minute intervals during purging using a Horiba U-50 meter. Samples were collected using a new section of 3/8-inch diameter polyethylene tubing fed through a bladder pump and retained in either eight hydrochloric acid-preserved VOA vials. The VOA vials were labeled for identification and stored in an iced cooler.

Refer to Appendix A for the groundwater sampling field sheets. Refer to Figure 3 for a map indicating well locations.

3.4 Post-Sampling Activities

Following the gauging and/or sampling of the wells, the well caps were secured onto the top of the well casing and the manhole covers for the wells were secured with 9/16th-inch bolts.

Generated purge water was containerized in a properly labeled and sealed 55-gallon drum and stored on site. The derived waste will be profiled and transported under proper waste manifest to an appropriate licensed off-site facility for recycling and/or disposal pending the necessary laboratory analysis results for waste profiling.

4.0 DATA ANALYSIS

4.1 Laboratory Analysis

Partner collected two groundwater samples on June 22, 2021, which were transported in an iced cooler under chain-of-custody protocol to Pace Analytical (Pace) a state-certified laboratory [Environmental Laboratory Accreditation Program (ELAP) certificate number C1915] in Mount Juliet, Tennessee, for analysis. Each groundwater sample (two groundwater samples total) was analyzed for GRO via Method NWTPH-Gx, and DRO and RRO via Method NWTPH-Dx/DxExtended.

Laboratory analytical results are included in Appendix B and discussed below.

4.2 Regulatory Agency Comparison Criteria

Washington Department of Ecology Models Toxic Control Act

Ecology promulgated the Models Toxic Control Act (MTCA) Cleanup Regulation (Chapter 173-340 of the Washington Administrative Code [WAC]) to establish administrative processes and standards for identifying, investigating, and cleaning up facilities where there has been a release or threatened release of a hazardous substance or substances that may pose a threat to human health and/or the environment. The MTCA Cleanup Regulation provides Method A for establishing cleanup levels for petroleum hydrocarbons in groundwater for unrestricted land use.

4.3 Groundwater Sample Data Analysis

DRO and RRO were detected in each analyzed groundwater sample at trace concentrations below the laboratory Reporting Detection Limit (RDL), but above the laboratory Method Detection Limit (MDL). GRO was not detected above laboratory RDLs or MDLs in the analyzed groundwater samples, and the RDLs and MDLs were below applicable cleanup levels.

None of the detected concentrations of DRO or RRO in the analyzed groundwater samples exceeded MTCA Method A cleanup levels.

Refer to Table 2 for a summary of the groundwater sample GRO/DRO/RRO laboratory analysis results.

5.0 SUMMARY AND CONCLUSIONS

Partner conducted Monitoring Well Sampling at the subject property to gauge and/or sample the on-site monitoring wells to evaluate the potential impact of petroleum hydrocarbons to groundwater as a consequence of the known historical impacts to groundwater. The scope of the Monitoring Well Sampling included gauging the water level of the three on-site wells and purging and sampling on-site monitoring wells RW1 and RW2 to collect representative groundwater samples. Two groundwater samples were analyzed for GRO, DRO, and RRO.

Groundwater was measured prior to purging and sampling the wells at depths of 31.78 (RW1), 33.44 (RW2), and 34.08 feet bgs (MW6).

None of the detected concentrations of DRO or RRO in the analyzed groundwater samples exceeded MTCA Method A cleanup levels.

TABLES

PARTNER

Table 1: Summary of Investigation Scope
10505 and 10625 Main Street
Bellevue, Washington 98004
Partner Project Number 21-316573.5
June 22, 2021

Well Identification	Location	Depth to Groundwater from TOC (feet bgs)	Terminal Depth of Well from TOC (feet bgs)	Matrix Sampled	Target Analytes
RW1	Southwest portion of parking garage	31.78	36.61	Groundwater	GRO/DRO/RRO
RW2	Southwest portion of parking garage	33.44	36.08	Groundwater	GRO/DRO/RRO
MW6	North-central portion of parking garage	34.08	38.67	NA	NA

Notes:

*Each groundwater sample analyzed for gasoline range organics (GRO) via Method NWTPH-Gx and for diesel-range organics (DRO) and residual range oragnics (RRO) via Method NWTPH-Dx/DxExtended.

**Refusal encountered at the terminal depth

TOC = top of casing

bgs = below ground surface

NA = not applicable

PARTNER

Table 2: Groundwater Sample GRO/DRO/RRO Laboratory Results
10505 and 10625 Main Street
Bellevue, Washington 98004
Partner Project Number 21-316573.5
June 22, 2021

Method	GRO/DRO/RRO via NWTPH-Gx and NWTPH-Dx/DxExtended		
Units	(µg/L)		
Analyte	MTCA Method A ULU	RW1	RW2
GRO	**1,000**	<100	<100
DRO	**500**	110 J	118 J
RRO	**500**	181 J	133 J

Notes:

GRO = gasoline-range organics (Gx)

DRO = diesel-range organics (Dx)

RRO = residual-range organics (Extended)

NWTPH = Northwest Total Petroleum Hydrocarbons

µg/L = micrograms per liter

MTCA Method A = groundwater cleanup levels for unrestricted land use (ULU) (Washington State Department of Ecology [Ecology], Model Toxics Control Act [MTCA], February 2021)

< = not detected above indicated laboratory Reporting Detection Limit (RDL) or Method Detection Limit (MDL)
J = detection is less than the laboratory RDL, but more than the MDL

PARTNER

FIGURES

PARTNER

PARTNER
3607 1st Avenue Northwest
Seattle, Washington 98107

Project Number: 21-316573.5

N

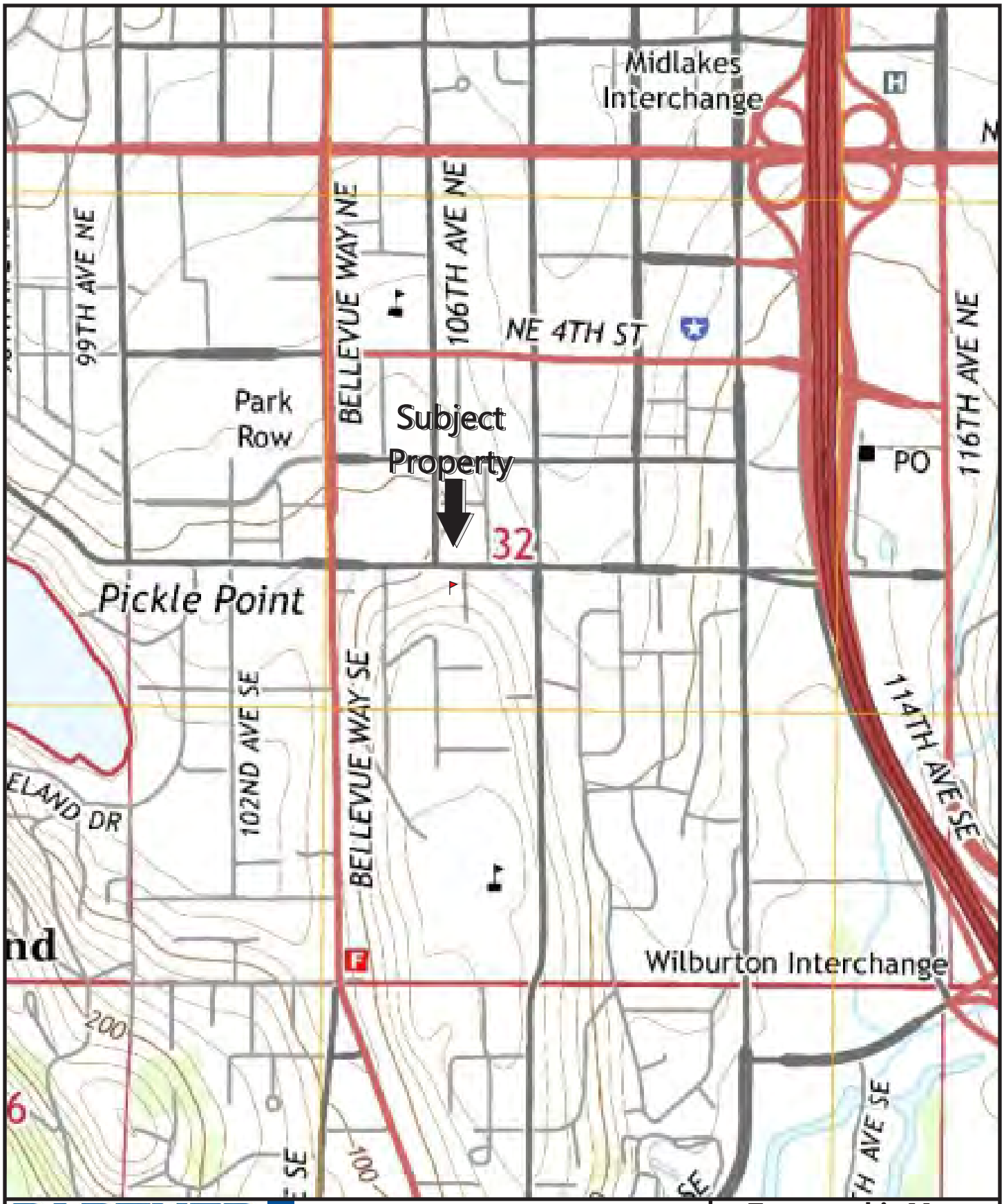
Legend

Subject Property

Site Vicinity Map

Figure	Prepared By	Date
1	H. White	July 2021

10505 and 10625 Main Street
Bellevue, Washington 98004



PARTNER

3607 1st Avenue Northwest
Seattle, Washington 98107
Project Number: 21-316573.5

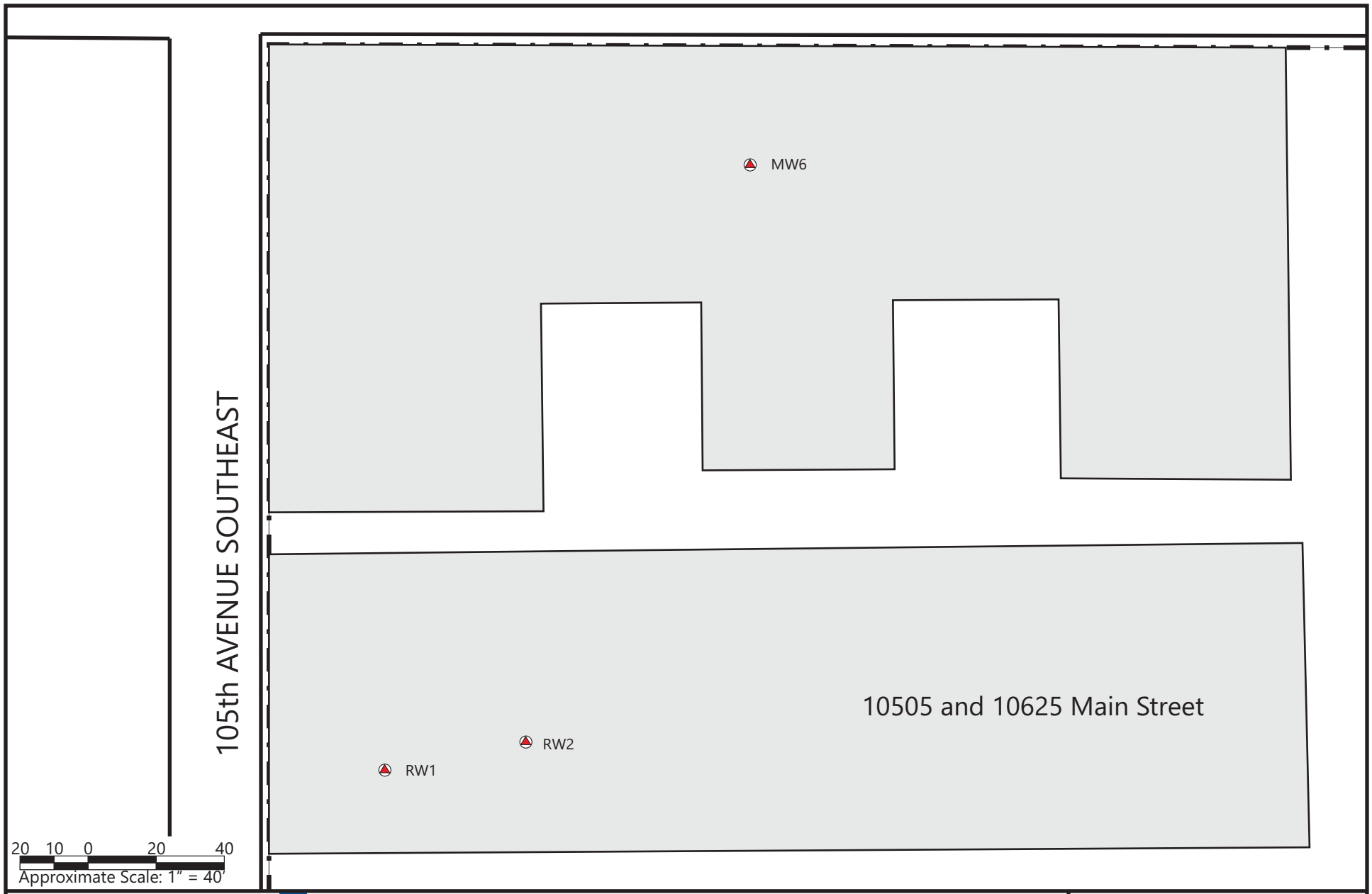
N

USGS *Mercer Island, Washington*
Quadrangle
Version: 2014

Topographic Map

Figure	Prepared By	Date
2	H. White	July 2021

10505 and 10625 Main Street
Bellevue, Washington 98004



PARTNER

3607 1st Avenue Northwest
Seattle, Washington 98107

Project Number: 21-316573.5

N

Legend

Subject Property

Monitoring Well

Well Location Map

Figure	Prepared By	Date
3	H. White	July 2021

10505 and 10625 Main Street
Bellevue, Washington 98004

APPENDIX A: GROUNDWATER SAMPLING FIELD SHEETS

PARTNER

WELL GAUGING DATA

Project # 210622-LBI Date 6/22/21 Client PARTNERS ENG

Site BELLEVUE - 10505 MAIN ST

Well ID	Time	Well Size (in.)	Sheen / Odor	Depth to Immiscible Liquid (ft.)	Thickness of Immiscible Liquid (ft.)	Volume of Immiscibles Removed (ml)	Depth to water (ft.)	Depth to well bottom (ft.)	Survey Point: TOB or TOC	Notes
RW1	1025	4					31.78	36.61		
RW2	1031	4					33.44	36.08		
MW6	1019	2					34.08	38.67		

LOW FLOW WELL MONITORING DATA SHEET

Project #: 210622-LB1	Client: PARTNER ENG
Sampler: LB	Gauging Date: 6/22/21
Well I.D.: RW1	Well Diameter (in.): 2 3 (4) 6 8 ____
Total Well Depth (ft.): 36.61	Depth to Water (ft.): 31.78
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: (PVC) Grade	Flow Cell Type: YSI 556

Purge Method: 2" Grundfos Pump | Peristaltic Pump | (Bladder Pump)
Sampling Method: Dedicated Tubing | New Tubing | Other ____

Start Purge Time: 1127 Flow Rate: 200 mL/MIN Pump Depth: 36'

Time	Temp. (°C or °F)	pH	Cond. (mS/cm or µS/cm)	Turbidity (NTUs)	D.O. (mg/L)	ORP (mV)	Water Removed (gals. or mL)	Depth to Water (ft.)
1130	15.63	7.00	453	23	2.03	167.3	600	32.13
1133	15.43	6.96	450	17	1.89	155.3	1200	32.13
1136	15.28	6.93	449	14	1.83	151.8	1800	32.13
1139	15.22	6.91	449	13	1.81	150.3	2400	32.13
1142	15.19	6.90	448	12	1.80	149.7	3000	32.13
1145	15.13	6.89	448	12	1.79	148.3	3600	32.13

Did well dewater? Yes (No)	Amount actually evacuated: 3.6L
Sampling Time: 1146	Sampling Date: 6/22/21
Sample I.D.: RW1	Laboratory: PACE
Analyzed for: TPH-G BTEX MTBE TPH-D	Other: SEE COC
Equipment Blank I.D.: @ Time	Duplicate I.D.:

LOW FLOW WELL MONITORING DATA SHEET

Project #: 210622-LB1	Client: PARTNER ENG
Sampler: LB	Gauging Date: 6/22/21
Well I.D.: RW2	Well Diameter (in.): 2 3 (4) 6 8 ____
Total Well Depth (ft.): 36.08	Depth to Water (ft.): 33.44
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: (PVC) Grade	Flow Cell Type: YSI 556

Purge Method: 2" Grundfos Pump | Peristaltic Pump | (Bladder Pump)
Sampling Method: Dedicated Tubing | New Tubing | Other ____

Start Purge Time: 1046 Flow Rate: 400 mL/MIN Pump Depth: 35.5'

Time	Temp. (°C or °F)	pH	Cond. (mS/cm or µS/cm)	Turbidity (NTUs)	D.O. (mg/L)	ORP (mV)	Water Removed (gals. or mL)	Depth to Water (ft.)
1049	16.77	7.16	593	31	1.36	~~50.6~~ 50.6	600	33.69
1052	16.26	7.14	583	18	1.16	78.6	1200	33.69
1055	16.15	7.08	581	15	1.17	75.3	1800	33.69
1058	16.08	7.04	580	14	1.16	74.3	2400	33.69
1101	16.05	7.03	580	13	1.15	73.9	3000	33.69
1104	16.02	7.01	579	13	1.14	72.6	3600	33.69

Did well dewater? Yes (No) Amount actually evacuated: 3.6 L

Sampling Time: 1105 Sampling Date: 6/22/21

Sample I.D.: RW2 Laboratory: PACE

Analyzed for: TPH-G BTEX MTBE TPH-D Other: SEE COC

Equipment Blank I.D.: @ Time Duplicate I.D.:

WELLHEAD INSPECTION FORM

Client: PARTNER ENG Site: BELLEVUE - 10505 MAIN ST Date: 6/22/21

Job #: 210622-LB1 Technician: L. BURES Page 1 of 1

Well ID	Well Inspected - No Corrective Action Required	Check indicates deficiency: Cap non-functional	Lock non-functional	Lock missing	Bolts missing (list qty)	Tabs stripped (list qty)	Tabs broken (list qty)	Annular seal incomplete	Apron damaged	Rim / Lid broken	Trip Hazard	Below Grade	Other (explain in notes)	Well Not Inspected (explain in notes)	Notes (list if cap or lick replaced, if there are access issues associated with repairs, if traffic control is required, if stand pipe damaged, or any specific details not covered by checklist)
RW1	X			X											
RW2	X			X											
MW6	X			X											

NOTES:

TEST EQUIPMENT CALIBRATION LOG

PROJECT NAME	Partners @ Bellevue			PROJECT NUMBER	210622-LBJ		
EQUIPMENT NAME	EQUIPMENT NUMBER	DATE/TIME OF TEST	STANDARDS USED	EQUIPMENT READING	CALIBRATED TO: OR WITHIN 10%:	TEMP.	INITIALS
YSI 556	02G0203AB	6/22/21 0730	PH 4.0 7.0 10.0	3.98 ✓ 7.04 ✓ 10.06 ✓	—	20.1	LB
			COND 3900	3925 ✓	—	19.8	LB
			ORP 237	239.0 ✓	—	20.0	LB
			DO 100%	98.6% ✓	—	—	LB

SPH or Purge Water Drum Log

Client: PARTNER ENGINEERING

Site Address: BELLEVUE - 10505 MAIN ST

STATUS OF DRUM(S) UPON ARRIVAL						
Date	6/22/21					
Number of drum(s) empty:	0					
Number of drum(s) 1/4 full:	0					
Number of drum(s) 1/2 full:	0					
Number of drum(s) 3/4 full:	0					
Number of drum(s) full:	0					
Total drum(s) on site:	0					
Are the drum(s) properly labeled?	NA					
Drum ID & Contents:	NA					
If any drum(s) are partially or totally filled, what is the first use date:	NA					

- If you add any SPH to an empty or partially filled drum, drum must have at least 20 gals. of Purgewater or DI Water.

-If drum contains SPH, the drum MUST be steel AND labeled with the appropriate label.

-All BTS drums MUST be labeled appropriately.

STATUS OF DRUM(S) UPON DEPARTURE						
Date	6/22/21					
Number of drums empty:	0					
Number of drum(s) 1/4 full:	1					
Number of drum(s) 1/2 full:	0					
Number of drum(s) 3/4 full:	0					
Number of drum(s) full:	0					
Total drum(s) on site:	1					
Are the drum(s) properly labeled?	YES					
Drum ID & Contents:	PURGE H2O					

LOCATION OF DRUM(S)
Describe location of drum(s): CORNER OF GARAGE BY WELL RW1

FINAL STATUS						
Number of new drum(s) left on site this event	1					
Date of inspection:	6/22/21					
Drum(s) labelled properly:	YES					
Logged by BTS Field Tech:	LB					
Office reviewed by:						

APPENDIX B: LABORATORY ANALYTICAL REPORT

PARTNER

ANALYTICAL REPORT

July 08, 2021

Revised Report

Partner Engineering & Science - WA

Sample Delivery Group:	L1370204
Samples Received:	06/23/2021
Project Number:	17-204849.2
Description:	Bellevue Eastgate
Site:	BELLEVUE, WA
Report To:	Hunter White 3607 1st Avenue NW Seattle, WA 98107

Entire Report Reviewed By:

Brian Ford
Project Manager

Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by Pace Analytical National is performed per guidance provided in laboratory standard operating procedures ENV-SOP-MTJL-0067 and ENV-SOP-MTJL-0068. Where sampling conducted by the customer, results relate to the accuracy of the information provided, and as the samples are received.

Pace Analytical National
12065 Lebanon Rd Mount Juliet, TN 37122 615-758-5858 800-767-5859 www.pacenational.com

TABLE OF CONTENTS

SAMPLE SUMMARY

RW1 L1370204-01 GW

Collected by	Collected date/time	Received date/time
	06/22/21 11:46	06/23/21 09:00

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (GC) by Method NWTPHGX	WG1697534	1	06/30/21 17:56	06/30/21 17:56	ACG	Mt. Juliet, TN
Semi-Volatile Organic Compounds (GC) by Method NWTPHDX-NO SGT	WG1697206	1	06/30/21 07:22	06/30/21 16:00	WCR	Mt. Juliet, TN

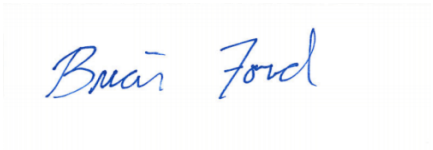
RW2 L1370204-02 GW

Collected by	Collected date/time	Received date/time
	06/22/21 11:05	06/23/21 09:00

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (GC) by Method NWTPHGX	WG1697534	1	06/30/21 18:18	06/30/21 18:18	ACG	Mt. Juliet, TN
Semi-Volatile Organic Compounds (GC) by Method NWTPHDX-NO SGT	WG1697206	1	06/30/21 07:22	06/30/21 16:25	WCR	Mt. Juliet, TN

CASE NARRATIVE

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.



Brian Ford
Project Manager

Report Revision History

Level II Report - Version 1: 07/02/21 17:37

Volatile Organic Compounds (GC) by Method NWTPHGX

Analyte	Result ug/l	Qualifier	MDL ug/l	RDL ug/l	Dilution	Analysis date / time	Batch
Gasoline Range Organics-NWTPH	U		31.6	100	1	06/30/2021 17:56	WG1697534
(S) a,a,a-Trifluorotoluene(FID)	*98.9*			*78.0-120*		*06/30/2021 17:56*	WG1697534

Semi-Volatile Organic Compounds (GC) by Method NWTPHDX-NO SGT

Analyte	Result ug/l	Qualifier	MDL ug/l	RDL ug/l	Dilution	Analysis date / time	Batch
Diesel Range Organics (DRO)	110	J	66.7	200	1	06/30/2021 16:00	WG1697206
Residual Range Organics (RRO)	181	J	83.3	250	1	06/30/2021 16:00	WG1697206
(S) o-Terphenyl	*86.3*			*52.0-156*		*06/30/2021 16:00*	WG1697206

Volatile Organic Compounds (GC) by Method NWTPHGX

Analyte	Result ug/l	Qualifier	MDL ug/l	RDL ug/l	Dilution	Analysis date / time	Batch
Gasoline Range Organics-NWTPH	U		31.6	100	1	06/30/2021 18:18	WG1697534
(S) a,a,a-Trifluorotoluene(FID)	*98.8*			*78.0-120*		*06/30/2021 18:18*	WG1697534

Semi-Volatile Organic Compounds (GC) by Method NWTPHDX-NO SGT

Analyte	Result ug/l	Qualifier	MDL ug/l	RDL ug/l	Dilution	Analysis date / time	Batch
Diesel Range Organics (DRO)	118	J	66.7	200	1	06/30/2021 16:25	WG1697206
Residual Range Organics (RRO)	133	J	83.3	250	1	06/30/2021 16:25	WG1697206
(S) o-Terphenyl	*94.2*			*52.0-156*		*06/30/2021 16:25*	WG1697206

Method Blank (MB)

(MB) R3674638-2 06/30/21 14:24

Analyte	MB Result ug/l	MB Qualifier	MB MDL ug/l	MB RDL ug/l
Gasoline Range Organics-NWTPH	33.6	J	31.6	100
(S) a,a,a-Trifluorotoluene(FID)	*98.4*			*78.0-120*

Laboratory Control Sample (LCS)

(LCS) R3674638-1 06/30/21 13:40

Analyte	Spike Amount ug/l	LCS Result ug/l	LCS Rec. %	Rec. Limits %	LCS Qualifier
Gasoline Range Organics-NWTPH	5500	5660	103	70.0-124	
(S) a,a,a-Trifluorotoluene(FID)			*105*	*78.0-120*	

L1369283-11 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1369283-11 07/01/21 00:08 • (MS) R3674638-3 07/01/21 00:51 • (MSD) R3674638-4 07/01/21 01:12

Analyte	Spike Amount ug/l	Original Result ug/l	MS Result ug/l	MSD Result ug/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Gasoline Range Organics-NWTPH	5500	207	2590	2540	43.3	42.4	1	10.0-155			1.95	21
(S) a,a,a-Trifluorotoluene(FID)					*103*	*103*		*78.0-120*				

Method Blank (MB)

(MB) R3674220-1 06/30/21 12:07

Analyte	MB Result ug/l	MB Qualifier	MB MDL ug/l	MB RDL ug/l
Diesel Range Organics (DRO)	U		66.7	200
Residual Range Organics (RRO)	U		83.3	250
(S) o-Terphenyl	*97.5*			*52.0-156*

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3674220-2 06/30/21 12:33 • (LCSD) R3674220-3 06/30/21 12:59

Analyte	Spike Amount ug/l	LCS Result ug/l	LCSD Result ug/l	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Diesel Range Organics (DRO)	1500	1480	1480	98.7	98.7	50.0-150			0.000	20
(S) o-Terphenyl				*123*	*124*	*52.0-156*				

GLOSSARY OF TERMS

Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

Abbreviations and Definitions

MDL	Method Detection Limit.
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state “ND” (Not Detected) or “BDL” (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier	Description
J	The identification of the analyte is acceptable; the reported value is an estimate.

ACCREDITATIONS & LOCATIONS

Pace Analytical National 12065 Lebanon Rd Mount Juliet, TN 37122

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN000032021-1
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey–NELAP	TN002
California	2932	New Mexico [1]	TN00003
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina [1]	DW21704
Georgia	NELAP	North Carolina [3]	41
Georgia [1]	923	North Dakota	R-140
Idaho	TN00003	Ohio–VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LAO000356
Kentucky [1 6]	KY90010	South Carolina	84004002
Kentucky [2]	16	South Dakota	n/a
Louisiana	AI30792	Tennessee [1 4]	2006
Louisiana	LA018	Texas	T104704245-20-18
Maine	TN00003	Texas [5]	LAB0152
Maryland	324	Utah	TN000032021-11
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	110033
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	998093910
Montana	CERT0086	Wyoming	A2LA
A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 [5]	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA–Crypto	TN00003		

[1] Drinking Water [2] Underground Storage Tanks [3] Aquatic Toxicity [4] Chemical/Microbiological [5] Mold [6] Wastewater n/a Accreditation not applicable

* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace Analytical.

cc: Brian Ford

J033

Partner Engineering & Science
Project: Bellevue
PM: Hunter White / Hwhite@partnerseng.com
Fastest TAT possible

GW	Sample	time	Date	Analysis
	RW1	1146	6-22-21	-01
	RW2	1105	6-22-21	-02

Analyze both groundwater samples for:
VOCs (8260), GRO (NWTPH-Gx),
DRO/RRO (NWTPH-Dx/DxExt)

Sample Receipt Checklist

COC Seal Present/Intact:	__Y__N	If Applicable	
COC Signed/Accurate:	✓Y__N	VOA Zero Headspace:	✓Y__N
Bottles arrive intact:	✓Y__N	Pres.Correct/Check:	__Y__N
Correct bottles used:	✓Y__N	6/24	
Sufficient volume sent:	✓Y__N		
RAD Screen <0.5 mR/hr:	✓Y__N		

Xfer VO

5.4, 1=5.2
460T

T. Roberts 6/23/21 900 9362
9362 4952 3176

L1370204 PARENGSWA NCF PM

R5

Time estimate: oh **Time spent:** oh **Grouping date:** 24 June 2021

Members

Paul Minnich (responsible)

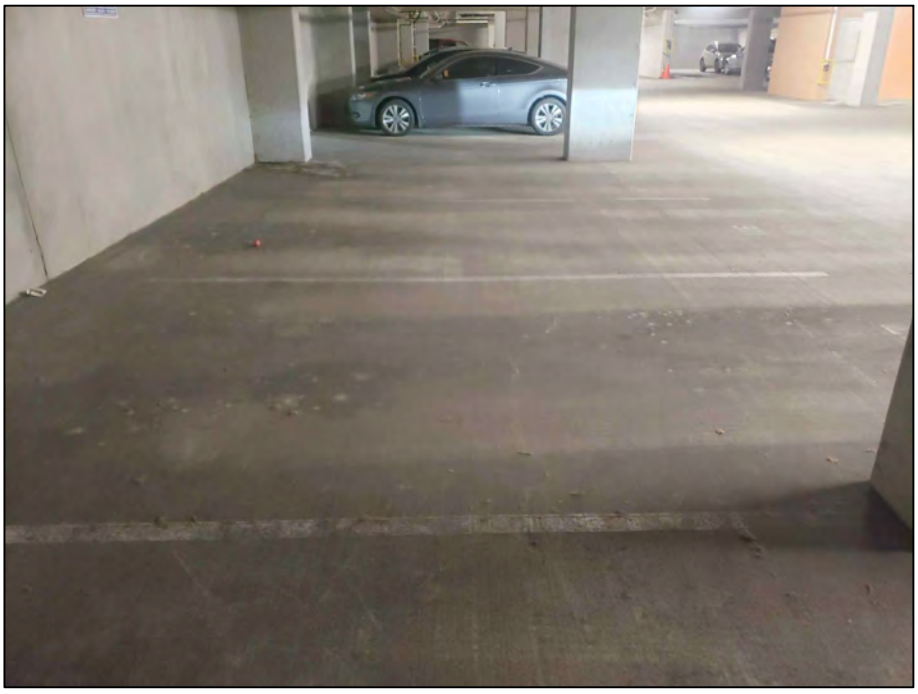
- [ ] Parameter(s) past holding time
- [ ] Temperature not in range
- [ ] Improper container type
- [ ] pH not in range
- [ ] Insufficient sample volume
- [ ] Sample is biphasic
- [ ] Vials received with headspace
- [x] Broken container
- [x] Sufficient sample remains
- [ ] If broken container: Insufficient packing material around container
- [ ] If broken container: Insufficient packing material inside cooler
- [ ] If broken container: Improper handling by carrier:_____
- [ ] If broken container: Sample was frozen
- [ ] If broken container: Container lid not intact
- [ ] Client informed by Call
- [ ] Client informed by Email
- [ ] Client informed by Voicemail
- [ ] Date/Time:_____
- [ ] PM initials:_____
- [ ] Client Contact:_____

Comments

Paul Minnich *24 June 2021 8:56 AM*

One vial for NWTPHDX for sample RW2 received broken.

Photograph 1: View looking northwest at the garage floor slab overlying Area 1.



Photograph 2: View looking north at the garage floor slab overlying Area 1.

RILEYGROUP
Corporate Office
17522 Bothell Way Northeast
Bothell, Washington 98011
Phone: 425.415.0551
Fax: 425.415.0311

Main Street Bellevue		Figure C-1
RGI Project Number 2012-107N	July 2022 Inspection Photographs	Date Drawn: 08/2022
Address: 10575 Main Street, Bellevue, Washington 98004		

Photograph 3: View looking east at the garage floor slab overlying Area 2.

Photograph 4: View looking south at the garage floor slab overlying Area 2.

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Bothell, Washington 98011
Phone: 425.415.0551
Fax: 425.415.0311

Main Street Bellevue		Figure C-2
RGI Project Number 2012-107N	July 2022 Inspection Photographs	Date Drawn: 08/2022
Address: 10575 Main Street, Bellevue, Washington 98004		

Photograph 5: View looking southwest at well RW1.

Photograph 6: View of RW1 well casing.

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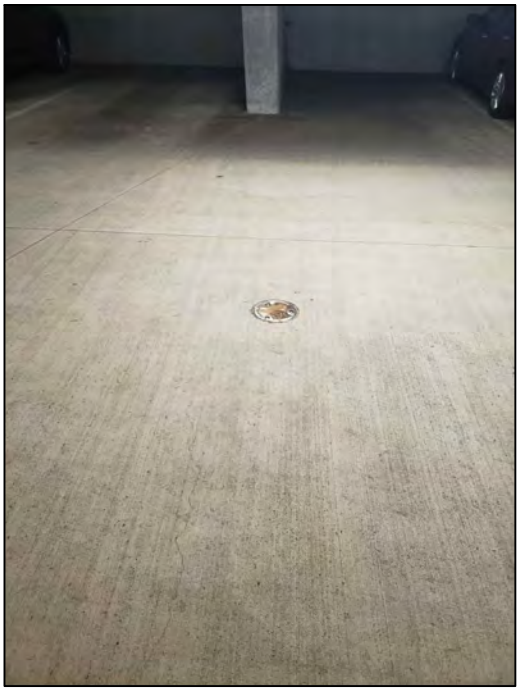
Bothell, Washington 98011
Phone: 425.415.0551
Fax: 425.415.0311

Main Street Bellevue		Figure C-3
RGI Project Number 2012-107N	July 2022 Inspection Photographs	Date Drawn: 08/2022
Address: 10575 Main Street, Bellevue, Washington 98004		



Photograph 7: View looking south at well RW2.

Photograph 8: View of RW2 well casing.

RILEYGROUP
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17522 Bothell Way Northeast
Bothell, Washington 98011
Phone: 425.415.0551
Fax: 425.415.0311

Main Street Bellevue		Figure C-4
RGI Project Number 2012-107N	July 2022 Inspection Photographs	Date Drawn: 08/2022
Address: 10575 Main Street, Bellevue, Washington 98004		

Photograph 9: View looking south-southeast at well MW6.

Photograph 10: View of MW6 well casing.

RILEYGROUP
Corporate Office
17522 Bothell Way Northeast
Bothell, Washington 98011
Phone: 425.415.0551
Fax: 425.415.0311

Main Street Bellevue		Figure C-5
RGI Project Number 2012-107N	July 2022 Inspection Photographs	Date Drawn: 08/2022
Address: 10575 Main Street, Bellevue, Washington 98004		

BILL OF LADING

N° **00127**

PRODUCT TRANSPORT MANIFEST

MARINE VACUUM SERVICE, INC.

24 HOUR EMERGENCY PHONE NUMBER (206) 762-0240

FAX NUMBER 206-763-8084

TRUCK NUMBER 325 DATE 04/11/22

TO
DESTINATION
NAME MAR-VAC
STREET 1516 Cornham St
CITY/STATE Seattle, WA

FROM
SHIPPER
NAME Riley Group
STREET 15057 NE 95th St
CITY/STATE Redmond, WA

QUANTITY	PROPER SHIPPING NAME	UN (PLACARD) NUMBER
1	20 gal Drum For disposal	
	None Reg by DOT	
	SLUDGE	

RECEIVER [signature] DATE 04/11/22

SHIPPER [signature] DATE 04/11/2022

NOTE:

Customer warrants that the waste petroleum products being transferred by the above collector do not contain any contaminates including without limitations, pesticides, chlorinated solvents at concentrations greater than 1000 PPM, any detectable levels of PCBs, or any other material classified as dangerous or hazardous waste by 40 CFR Part 261, Subpart C and D (implementing the Federal Resource Conservation and Recover Act), or by any equivalent state dangerous or hazardous substance classification programs. Should laboratory tests find this waste not in compliance with 40 CFR Part 261, customer (generator) agrees to pay for all disposal costs incurred.

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.
Yelena Aravkina, M.S.
Michael Erdahl, B.S.
Vineta Mills, M.S.
Eric Young, B.S.

3012 16th Avenue West
Seattle, WA 98119-2029
(206) 285-8282
fbi@isomedia.com
www.friedmanandbruya.com

July 19, 2022

Jerry Sawetz, Project Manager
The Riley Group, Inc.
17522 Bothell Way NE
Bothell, WA 98011

Dear Mr Sawetz:

Included are the results from the testing of material submitted on June 29, 2022 from the 2012-107N, F&BI 206517 project. There are 4 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days, or as directed by the Chain of Custody document. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl
Project Manager

Enclosures
TRG0719R.DOC

CASE NARRATIVE

This case narrative encompasses samples received on June 29, 2022 by Friedman & Bruya, Inc. from the The Riley Group 2012-107N, F&BI 206517 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	The Riley Group
206517 -01	RW1-W
206517 -02	RW2-W

The samples were sent to Fremont Analytical for EPH analysis and to Onsite Environmental for VPH analysis. The reports are enclosed.

All quality control requirements were acceptable.

Date of Report: 07/19/22
Date Received: 06/29/22
Project: 2012-107N, F&BI 206517
Date Extracted: 06/30/22
Date Analyzed: 06/30/22

RESULTS FROM THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx

Results Reported as ug/L (ppb)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 41-152)
RW1-W 206517-01	170 x	<250	89
RW2-W 206517-02	220 x	<250	114
Method Blank 02-1535 MB	<50	<250	112

Date of Report: 07/19/22
Date Received: 06/29/22
Project: 2012-107N, F&BI 206517

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL EXTENDED USING METHOD NWTPH-Dx

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	ug/L (ppb)	2,500	96	112	63-142	15

Data Qualifiers & Definitions

a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.

b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.

ca - The calibration results for the analyte were outside of acceptance criteria. The value reported is an estimate.

c - The presence of the analyte may be due to carryover from previous sample injections.

cf - The sample was centrifuged prior to analysis.

d - The sample was diluted. Detection limits were raised and surrogate recoveries may not be meaningful.

dv - Insufficient sample volume was available to achieve normal reporting limits.

f - The sample was laboratory filtered prior to analysis.

fb - The analyte was detected in the method blank.

fc - The analyte is a common laboratory and field contaminant.

hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. Variability is attributed to sample inhomogeneity.

hs - Headspace was present in the container used for analysis.

ht – The analysis was performed outside the method or client-specified holding time requirement.

ip - Recovery fell outside of control limits due to sample matrix effects.

j - The analyte concentration is reported below the lowest calibration standard. The value reported is an estimate.

J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

jl - The laboratory control sample(s) percent recovery and/or RPD were out of control limits. The reported concentration should be considered an estimate.

js - The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

lc - The presence of the analyte is likely due to laboratory contamination.

L - The reported concentration was generated from a library search.

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

pc - The sample was received with incorrect preservation or in a container not approved by the method. The value reported should be considered an estimate.

ve - The analyte response exceeded the valid instrument calibration range. The value reported is an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

SAMPLE CHAIN OF CUSTODY

206517

6/29/22

VW2/E02

Page # 1 of 1

Report To Jerry Sawetz
Company The Riley Group
Address 17522 Bothell Way NE
City, State, ZIP Bothell, WA 98011
Phone 425-415-0551 Email jsawetz@riley-group.com

SAMPLERS (*signature*) Sierra Kindley

PROJECT NAME: 2012-107N

PO #:

REMARKS: Project specific RLs? - Yes / No

INVOICE TO:

TURNAROUND TIME
- [X] Standard turnaround
- [ ] RUSH
- Rush charges authorized by:

SAMPLE DISPOSAL
- [ ] Archive samples
- [ ] Other
- Default: Dispose after 30 days

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of Jars	NWTPH-Dx	NWTPH-Gx	BTEX EPA 8021	NWTPH-HCID	VOCs EPA 8260	PAHs EPA 8270	PCBs EPA 8082	NWEPH	NWVPH			Notes
RW1-W	01A-H	6/28/22	15:00	water	8	X							X	X			
RW2-W	02	6/28/22	15:55	water	8	X							X	X			
																	Samples received at 12°C

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by: Sierra Kindley	Sierra Kindley	RGI	6/29/22	9:20
Received by:	Hope Davis	Fedex	6/29/22	11:09
Relinquished by:				
Received by: W. Madden	Windy Madden	F+BI	6/29/22	1208

Friedman & Bruya, Inc.
Ph. (206) 285-8282

OnSite Environmental Inc.
14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

July 11, 2022

Michael Erdahl
Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029

Re: Analytical Data for Project 206517
Laboratory Reference No. 2206-346

Dear Michael:

Enclosed are the analytical results and associated quality control data for samples submitted on June 30, 2022.

The standard policy of OnSite Environmental, Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

David Baumeister
Project Manager

Enclosures

Date of Report: July 11, 2022
Samples Submitted: June 30, 2022
Laboratory Reference: 2206-346
Project: 206517

Case Narrative

Samples were collected on June 28, 2022 and received by the laboratory on June 30, 2022. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Date of Report: July 11, 2022
Samples Submitted: June 30, 2022
Laboratory Reference: 2206-346
Project: 206517

VOLATILE PETROLEUM HYDROCARBONS/BTEX
NWTPH-VPH/EPA 8021B

Matrix: Water
Units: ug/L (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**RW1-W**					
Laboratory ID:	06-346-01					
Aliphatic C5-C6	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aliphatic C6-C8	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aliphatic C8-C10	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aliphatic C10-C12	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Total Aliphatic:	**NA**		NWTPH-VPH	7-11-22	7-11-22	
Aromatic C8-C10	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aromatic C10-C12	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aromatic C12-C13	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Total Aromatic:	**NA**		NWTPH-VPH	7-11-22	7-11-22	
Methyl t-butyl ether	**ND**	10	EPA 8021B	7-11-22	7-11-22	
Benzene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
Toluene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
Ethylbenzene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
m,p-Xylene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
o-Xylene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*93*	*65-122*				

Date of Report: July 11, 2022
Samples Submitted: June 30, 2022
Laboratory Reference: 2206-346
Project: 206517

VOLATILE PETROLEUM HYDROCARBONS/BTEX
NWTPH-VPH/EPA 8021B

Matrix: Water
Units: ug/L (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**RW2-W**					
Laboratory ID:	06-346-02					
Aliphatic C5-C6	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aliphatic C6-C8	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aliphatic C8-C10	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aliphatic C10-C12	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Total Aliphatic:	**NA**		NWTPH-VPH	7-6-22	7-6-22	
Aromatic C8-C10	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aromatic C10-C12	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aromatic C12-C13	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Total Aromatic:	**NA**		NWTPH-VPH	7-6-22	7-6-22	
Methyl t-butyl ether	**ND**	10	EPA 8021B	7-6-22	7-6-22	
Benzene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
Toluene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
Ethylbenzene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
m,p-Xylene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
o-Xylene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*82*	*65-122*				

Date of Report: July 11, 2022
Samples Submitted: June 30, 2022
Laboratory Reference: 2206-346
Project: 206517

VOLATILE PETROLEUM HYDROCARBONS/BTEX
NWTPH-VPH/EPA 8021B
QUALITY CONTROL

Matrix: Water
Units: ug/L (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB0706W3					
Aliphatic C5-C6	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aliphatic C6-C8	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aliphatic C8-C10	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aliphatic C10-C12	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Total Aliphatic:	**NA**		NWTPH-VPH	7-6-22	7-6-22	
Aromatic C8-C10	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aromatic C10-C12	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Aromatic C12-C13	**ND**	50	NWTPH-VPH	7-6-22	7-6-22	
Total Aromatic:	**NA**		NWTPH-VPH	7-6-22	7-6-22	
Methyl t-butyl ether	**ND**	10	EPA 8021B	7-6-22	7-6-22	
Benzene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
Toluene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
Ethylbenzene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
m,p-Xylene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
o-Xylene	**ND**	1.0	EPA 8021B	7-6-22	7-6-22	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*82*	*65-122*				
Laboratory ID:	MB0711W3					
Aliphatic C5-C6	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aliphatic C6-C8	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aliphatic C8-C10	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aliphatic C10-C12	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Total Aliphatic:	**NA**		NWTPH-VPH	7-11-22	7-11-22	
Aromatic C8-C10	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aromatic C10-C12	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Aromatic C12-C13	**ND**	50	NWTPH-VPH	7-11-22	7-11-22	
Total Aromatic:	**NA**		NWTPH-VPH	7-11-22	7-11-22	
Methyl t-butyl ether	**ND**	10	EPA 8021B	7-11-22	7-11-22	
Benzene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
Toluene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
Ethylbenzene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
m,p-Xylene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
o-Xylene	**ND**	1.0	EPA 8021B	7-11-22	7-11-22	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*90*	*65-122*				

Date of Report: July 11, 2022
Samples Submitted: June 30, 2022
Laboratory Reference: 2206-346
Project: 206517

VOLATILE PETROLEUM HYDROCARBONS/BTEX
NWTPH-VPH/EPA 8021B
QUALITY CONTROL

Matrix: Water
Units: ug/L (ppb)

Analyte	Result		Spike Level		Source Result	Percent Recovery		Recovery Limits	RPD	RPD Limit	Flags
MATRIX SPIKES											
Laboratory ID:	06-347-03										
	MS	MSD	MS	MSD		MS	MSD				
Benzene	43.8	41.3	50.0	50.0	ND	88	83	77-120	6	14	
Toluene	48.1	46.5	50.0	50.0	ND	96	93	79-120	3	14	
Ethylbenzene	52.5	51.5	50.0	50.0	ND	105	103	78-120	2	13	
m,p-Xylene	50.4	50.0	50.0	50.0	ND	101	100	77-120	1	13	
o-Xylene	51.7	51.4	50.0	50.0	ND	103	103	79-120	1	13	
Surrogate:											
Fluorobenzene						*95*	*88*	*65-122*			
SPIKE BLANK											
Laboratory ID:	SB0706W1										
	SB		SB			SB					
Benzene	54.6		50.0			109		81-116			
Toluene	55.7		50.0			111		82-118			
Ethylbenzene	57.1		50.0			114		82-118			
m,p-Xylene	56.8		50.0			114		81-118			
o-Xylene	55.6		50.0			111		81-116			
Surrogate:											
Fluorobenzene						*89*		*65-122*			

OnSite Environmental Inc.

Data Qualifiers and Abbreviations

A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.

B - The analyte indicated was also found in the blank sample.

C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.

E - The value reported exceeds the quantitation range and is an estimate.

F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.

H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.

I - Compound recovery is outside of the control limits.

J - The value reported was below the practical quantitation limit. The value is an estimate.

K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.

L - The RPD is outside of the control limits.

M - Hydrocarbons in the gasoline range are impacting the diesel range result.

M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

N1 - Hydrocarbons in diesel range are impacting lube oil range results.

O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.

P - The RPD of the detected concentrations between the two columns is greater than 40.

Q - Surrogate recovery is outside of the control limits.

S - Surrogate recovery data is not available due to the necessary dilution of the sample.

T - The sample chromatogram is not similar to a typical _____.

U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

U1 - The practical quantitation limit is elevated due to interferences present in the sample.

V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.

W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.

X - Sample extract treated with a mercury cleanup procedure.

X1 - Sample extract treated with a sulfuric acid/silica gel cleanup procedure.

X2 - Sample extract treated with a silica gel cleanup procedure.

Y - The calibration verification for this analyte exceeded the 20% drift specified in methods 8260 & 8270, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.

Y1 - Negative effects of the matrix from this sample on the instrument caused values for this analyte in the bracketing continuing calibration verification standard (CCVs) to be outside of 20% acceptance criteria. Because of this, quantitation limits and sample concentrations should be considered estimates.

Z -

ND - Not Detected at PQL
PQL - Practical Quantitation Limit
RPD - Relative Percent Difference

SUBCONTRACT SAMPLE CHAIN OF CUSTODY

Send Report To Michael Erdahl

Company Friedman and Bruya, Inc.

Address 3012 16th Ave W

City, State, ZIP Seattle, WA 98119

Phone # (206) 285-8282 Fax # (206) 283-5044

SUBCONTRACTOR Onsite 06-346

PROJECT NAME/NO. 206517

PO # C-242

REMARKS

TURNAROUND TIME

☒ Standard (1 Week)

☐ RUSH

Rush charges authorized by:

SAMPLE DISPOSAL

☐ Dispose after 30 days

☐ Return samples

☐ Will call with instructions

						ANALYSES REQUESTED										
Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of Containers	TOC	Nitrate	Nitrite	Sulfate	Sulfide	Alkalinity	Ferrous Iron	VPH			
RW1-W	01 A-D	6/28/22	1500	W	3								X			
RW2-W	02	↓	1555	↓	3								X			

Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029
Ph. (206) 285-8282
Fax (206) 283-5044

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by:	Ann Webber-Bruya	Friedman & Bruya	6/29/22	1330
Received by:	M. Voon	OSE	6/30/22	1230
Relinquished by:				
Received by:				

FORMS\COC\Subcontract.DOC

3600 Fremont Ave. N.
Seattle, WA 98103
T: (206) 352-3790
F: (206) 352-7178
info@fremontanalytical.com

Friedman & Bruya
Michael Erdahl
3012 16th Ave. W.
Seattle, WA 98119

RE: 206517
Work Order Number: 2206522

July 15, 2022

Attention Michael Erdahl:

Fremont Analytical, Inc. received 2 sample(s) on 6/30/2022 for the analyses presented in the following report.

Extractable Petroleum Hydrocarbons by NWEPH

This report consists of the following:

- Case Narrative
- Analytical Results
- Applicable Quality Control Summary Reports
- Chain of Custody

All analyses were performed consistent with the Quality Assurance program of Fremont Analytical, Inc. Please contact the laboratory if you should have any questions about the results.

Thank you for using Fremont Analytical.

Sincerely,

Brianna Barnes
Project Manager

Date: *07/15/2022*

CLIENT: Friedman & Bruya
Project: 206517
Work Order: 2206522

Work Order Sample Summary

Lab Sample ID	Client Sample ID	Date/Time Collected	Date/Time Received
2206522-001	RW1-W	06/28/2022 3:00 PM	06/30/2022 8:14 AM
2206522-002	RW2-W	06/28/2022 3:55 PM	06/30/2022 8:14 AM

Note: If no "Time Collected" is supplied, a default of 12:00AM is assigned

Original

Case Narrative

WO#: **2206522**
Date: **7/15/2022**

CLIENT: Friedman & Bruya
Project: 206517

I. SAMPLE RECEIPT:
Samples receipt information is recorded on the attached Sample Receipt Checklist.

II. GENERAL REPORTING COMMENTS:
Results are reported on a wet weight basis unless dry-weight correction is denoted in the units field on the analytical report ("mg/kg-dry" or "ug/kg-dry").

Matrix Spike (MS) and MS Duplicate (MSD) samples are tested from an analytical batch of "like" matrix to check for possible matrix effect. The MS and MSD will provide site specific matrix data only for those samples which are spiked by the laboratory. The sample chosen for spike purposes may or may not have been a sample submitted in this sample delivery group. The validity of the analytical procedures for which data is reported in this analytical report is determined by the Laboratory Control Sample (LCS) and the Method Blank (MB). The LCS and the MB are processed with the samples and the MS/MSD to ensure method criteria are achieved throughout the entire analytical process.

III. ANALYSES AND EXCEPTIONS:
Exceptions associated with this report will be footnoted in the analytical results page(s) or the quality control summary page(s) and/or noted below.

Qualifiers:

* - Flagged value is not within established control limits
B - Analyte detected in the associated Method Blank
D - Dilution was required
E - Value above quantitation range
H - Holding times for preparation or analysis exceeded
I - Analyte with an internal standard that does not meet established acceptance criteria
J - Analyte detected below Reporting Limit
N - Tentatively Identified Compound (TIC)
Q - Analyte with an initial or continuing calibration that does not meet established acceptance criteria
S - Spike recovery outside accepted recovery limits
ND - Not detected at the Reporting Limit
R - High relative percent difference observed

Acronyms:

%Rec - Percent Recovery
CCB - Continued Calibration Blank
CCV - Continued Calibration Verification
DF - Dilution Factor
DUP - Sample Duplicate
HEM - Hexane Extractable Material
ICV - Initial Calibration Verification
LCS/LCSD - Laboratory Control Sample / Laboratory Control Sample Duplicate
MCL - Maximum Contaminant Level
MB or MBLANK - Method Blank
MDL - Method Detection Limit
MS/MSD - Matrix Spike / Matrix Spike Duplicate
PDS - Post Digestion Spike
Ref Val - Reference Value
REP - Sample Replicate
RL - Reporting Limit
RPD - Relative Percent Difference
SD - Serial Dilution
SGT - Silica Gel Treatment
SPK - Spike
Surr - Surrogate

Analytical Report

Work Order: **2206522**
Date Reported: **7/15/2022**

Client: Friedman & Bruya
Collection Date: 6/28/2022 3:00:00 PM
Project: 206517
Lab ID: 2206522-001
Matrix: Water
Client Sample ID: **RW1-W**

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
Extractable Petroleum Hydrocarbons by NWEPH				Batch ID: 37022		Analyst: SB
Aliphatic Hydrocarbon (C8-C10)	ND	79.9		µg/L	1	7/15/2022 12:37:05 PM
Aliphatic Hydrocarbon (C10-C12)	ND	39.9	*	µg/L	1	7/15/2022 12:37:05 PM
Aliphatic Hydrocarbon (C12-C16)	ND	39.9		µg/L	1	7/15/2022 12:37:05 PM
Aliphatic Hydrocarbon (C16-C21)	ND	39.9		µg/L	1	7/15/2022 12:37:05 PM
Aliphatic Hydrocarbon (C21-C34)	ND	39.9		µg/L	1	7/15/2022 12:37:05 PM
Aromatic Hydrocarbon (C8-C10)	ND	79.9		µg/L	1	7/12/2022 11:11:13 PM
Aromatic Hydrocarbon (C10-C12)	ND	39.9	*	µg/L	1	7/12/2022 11:11:13 PM
Aromatic Hydrocarbon (C12-C16)	ND	39.9		µg/L	1	7/12/2022 11:11:13 PM
Aromatic Hydrocarbon (C16-C21)	ND	39.9		µg/L	1	7/12/2022 11:11:13 PM
Aromatic Hydrocarbon (C21-C34)	ND	39.9		µg/L	1	7/12/2022 11:11:13 PM
Surr: 1-Chlorooctadecane	44.2	50 - 150	S	%Rec	1	7/15/2022 12:37:05 PM
Surr: o-Terphenyl	57.8	50 - 150		%Rec	1	7/12/2022 11:11:13 PM

NOTES:
* - Associated LCS does not meet acceptance criteria; refer to QC summary.
S - Outlying surrogate recovery(ies) observed.

Analytical Report

Work Order: **2206522**
Date Reported: **7/15/2022**

Client: Friedman & Bruya
Collection Date: 6/28/2022 3:55:00 PM
Project: 206517
Lab ID: 2206522-002
Matrix: Water
Client Sample ID: **RW2-W**

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
Extractable Petroleum Hydrocarbons by NWEPH				Batch ID: 37022		Analyst: SB
Aliphatic Hydrocarbon (C8-C10)	ND	79.9		µg/L	1	7/12/2022 5:34:54 PM
Aliphatic Hydrocarbon (C10-C12)	ND	40.0	*	µg/L	1	7/12/2022 5:34:54 PM
Aliphatic Hydrocarbon (C12-C16)	ND	40.0		µg/L	1	7/12/2022 5:34:54 PM
Aliphatic Hydrocarbon (C16-C21)	ND	40.0		µg/L	1	7/12/2022 5:34:54 PM
Aliphatic Hydrocarbon (C21-C34)	ND	40.0		µg/L	1	7/12/2022 5:34:54 PM
Aromatic Hydrocarbon (C8-C10)	ND	79.9		µg/L	1	7/12/2022 11:34:57 PM
Aromatic Hydrocarbon (C10-C12)	ND	40.0	*	µg/L	1	7/12/2022 11:34:57 PM
Aromatic Hydrocarbon (C12-C16)	ND	40.0		µg/L	1	7/12/2022 11:34:57 PM
Aromatic Hydrocarbon (C16-C21)	58.5	40.0		µg/L	1	7/12/2022 11:34:57 PM
Aromatic Hydrocarbon (C21-C34)	ND	40.0		µg/L	1	7/12/2022 11:34:57 PM
Surr: 1-Chlorooctadecane	60.2	50 - 150		%Rec	1	7/12/2022 5:34:54 PM
Surr: o-Terphenyl	106	50 - 150		%Rec	1	7/12/2022 11:34:57 PM

NOTES:
* - Associated LCS does not meet acceptance criteria; refer to QC summary.

Work Order: 2206522
CLIENT: Friedman & Bruya
Project: 206517

QC SUMMARY REPORT

Extractable Petroleum Hydrocarbons by NWEPH

Sample ID: **MB-37022** SampType: **MBLK** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **MBLKW** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578014**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aliphatic Hydrocarbon (C8-C10)	ND	80.0		0	0						
Aliphatic Hydrocarbon (C10-C12)	ND	40.0		0	0						*
Aliphatic Hydrocarbon (C12-C16)	ND	40.0		0	0						
Aliphatic Hydrocarbon (C16-C21)	ND	40.0		0	0						
Aliphatic Hydrocarbon (C21-C34)	ND	40.0		0	0						
Surr: 1-Chlorooctadecane	364		400.0		90.9	50	150				

NOTES:
* - Associated LCS does not meet acceptance criteria; refer to QC summary.

Sample ID: **LCS-37022** SampType: **LCS** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **LCSW** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578015**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aliphatic Hydrocarbon (C8-C10)	258	80.0	1,000	0	25.8	23	130				
Aliphatic Hydrocarbon (C10-C12)	329	40.0	500.0	0	65.8	70	130				S
Aliphatic Hydrocarbon (C12-C16)	403	40.0	500.0	0	80.5	70	130				
Aliphatic Hydrocarbon (C16-C21)	408	40.0	500.0	0	81.6	70	130				
Aliphatic Hydrocarbon (C21-C34)	424	40.0	500.0	0	84.7	70	130				
Surr: 1-Chlorooctadecane	350		400.0		87.5	50	150				

NOTES:
S - Outlying spike recovery observed (low bias). Samples will be qualified with a *.

Sample ID: **LCSD-37022** SampType: **LCSD** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **LCSW02** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578016**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aliphatic Hydrocarbon (C8-C10)	259	80.0	1,000	0	25.9	23	130	258.0	0.248	20	
Aliphatic Hydrocarbon (C10-C12)	289	40.0	500.0	0	57.9	70	130	328.9	12.8	20	S
Aliphatic Hydrocarbon (C12-C16)	431	40.0	500.0	0	86.1	70	130	402.6	6.72	20	
Aliphatic Hydrocarbon (C16-C21)	415	40.0	500.0	0	83.1	70	130	407.8	1.84	20	
Aliphatic Hydrocarbon (C21-C34)	441	40.0	500.0	0	88.2	70	130	423.6	4.05	20	
Surr: 1-Chlorooctadecane	378		400.0		94.5	50	150		0		

Work Order: 2206522
CLIENT: Friedman & Bruya
Project: 206517

QC SUMMARY REPORT

Extractable Petroleum Hydrocarbons by NWEPH

Sample ID: **LCSD-37022** SampType: **LCSD** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **LCSW02** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578016**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

NOTES:
S - Outlying spike recovery observed (low bias). Samples will be qualified with a *.

Sample ID: **2206522-002AMS** SampType: **MS** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **RW2-W** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578024**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aliphatic Hydrocarbon (C8-C10)	370	85.7	1,071	0	34.6	8.66	130				
Aliphatic Hydrocarbon (C10-C12)	378	42.9	535.7	0	70.5	70	130				
Aliphatic Hydrocarbon (C12-C16)	473	42.9	535.7	0	88.4	70	130				
Aliphatic Hydrocarbon (C16-C21)	470	42.9	535.7	0	87.7	70	130				
Aliphatic Hydrocarbon (C21-C34)	477	42.9	535.7	0	89.0	70	130				
Surr: 1-Chlorooctadecane	422		428.5		98.4	50	150				

Sample ID: **MB-37022** SampType: **MBLK** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **MBLKW** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578029**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aromatic Hydrocarbon (C8-C10)	ND	80.0		0	0						
Aromatic Hydrocarbon (C10-C12)	ND	40.0		0	0						*
Aromatic Hydrocarbon (C12-C16)	ND	40.0		0	0						
Aromatic Hydrocarbon (C16-C21)	ND	40.0		0	0						
Aromatic Hydrocarbon (C21-C34)	ND	40.0		0	0						
Surr: o-Terphenyl	481		400.0		120	50	150				

NOTES:
* - Associated LCS does not meet acceptance criteria; refer to QC summary.

Sample ID: **LCS-37022** SampType: **LCS** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **LCSW** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578030**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aromatic Hydrocarbon (C8-C10)	349	80.0	1,000	0	34.9	28.4	130				

Work Order: 2206522
CLIENT: Friedman & Bruya
Project: 206517

QC SUMMARY REPORT

Extractable Petroleum Hydrocarbons by NWEPH

Sample ID: **LCS-37022** SampType: **LCS** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **LCSW** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578030**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aromatic Hydrocarbon (C10-C12)	338	40.0	500.0	0	67.6	70	130				S
Aromatic Hydrocarbon (C12-C16)	402	40.0	500.0	0	80.3	70	130				
Aromatic Hydrocarbon (C16-C21)	496	40.0	500.0	0	99.2	70	130				
Aromatic Hydrocarbon (C21-C34)	465	40.0	500.0	0	93.1	70	130				
Surr: o-Terphenyl	452		400.0		113	50	150				

NOTES:
S - Outlying spike recovery observed (low bias). Samples will be qualified with a *.

Sample ID: **LCSD-37022** SampType: **LCSD** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **LCSW02** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578031**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aromatic Hydrocarbon (C8-C10)	400	80.0	1,000	0	40.0	28.4	130	348.6	13.7	20	
Aromatic Hydrocarbon (C10-C12)	380	40.0	500.0	0	76.0	70	130	338.1	11.7	20	
Aromatic Hydrocarbon (C12-C16)	467	40.0	500.0	0	93.4	70	130	401.6	15.1	20	
Aromatic Hydrocarbon (C16-C21)	496	40.0	500.0	0	99.3	70	130	495.9	0.0806	20	
Aromatic Hydrocarbon (C21-C34)	487	40.0	500.0	0	97.4	70	130	465.4	4.49	20	
Surr: o-Terphenyl	477		400.0		119	50	150		0		

Sample ID: **2206522-002AMS** SampType: **MS** Units: **µg/L** Prep Date: **7/5/2022** RunNo: **76867**
Client ID: **RW2-W** Batch ID: **37022** Analysis Date: **7/12/2022** SeqNo: **1578039**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aromatic Hydrocarbon (C8-C10)	493	85.7	1,071	0	46.0	5	130				
Aromatic Hydrocarbon (C10-C12)	455	42.9	535.7	0	85.0	70	130				
Aromatic Hydrocarbon (C12-C16)	527	42.9	535.7	24.46	93.9	70	130				
Aromatic Hydrocarbon (C16-C21)	533	42.9	535.7	58.47	88.5	70	130				
Aromatic Hydrocarbon (C21-C34)	551	42.9	535.7	0	103	70	130				
Surr: o-Terphenyl	492		428.5		115	50	150				

Sample Log-In Check List

Client Name:	FB	Work Order Number:	2206522
Logged by:	Elisabeth Samoray	Date Received:	6/30/2022 8:14:00 AM

Chain of Custody

1.	Is Chain of Custody complete?	Yes	☑	No	☐	Not Present ☐
2.	How was the sample delivered?	Client				

Log In

3.	Coolers are present?	Yes	☑	No	☐	NA ☐
4.	Shipping container/cooler in good condition?	Yes	☑	No	☐	
5.	Custody Seals present on shipping container/cooler? (Refer to comments for Custody Seals not intact)	Yes	☐	No	☐	Not Present ☑
6.	Was an attempt made to cool the samples?	Yes	☑	No	☐	NA ☐
7.	Were all items received at a temperature of >2°C to 6°C *	Yes	☑	No	☐	NA ☐
8.	Sample(s) in proper container(s)?	Yes	☑	No	☐	
9.	Sufficient sample volume for indicated test(s)?	Yes	☑	No	☐	
10.	Are samples properly preserved?	Yes	☑	No	☐	
11.	Was preservative added to bottles?	Yes	☐	No	☑	NA ☐
12.	Is there headspace in the VOA vials?	Yes	☐	No	☐	NA ☑
13.	Did all samples containers arrive in good condition(unbroken)?	Yes	☑	No	☐	
14.	Does paperwork match bottle labels?	Yes	☑	No	☐	
15.	Are matrices correctly identified on Chain of Custody?	Yes	☑	No	☐	
16.	Is it clear what analyses were requested?	Yes	☑	No	☐	
17.	Were all holding times able to be met?	Yes	☑	No	☐	

Special Handling (if applicable)

18.	Was client notified of all discrepancies with this order?	Yes	☐	No	☐	NA ☑

Person Notified: _____ Date: _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

19. Additional remarks:

Item Information

Item #	Temp ºC
Sample 1	5.9

* Note: DoD/ELAP and TNI require items to be received at 4°C +/- 2°C

SUBCONTRACT SAMPLE CHAIN OF CUSTODY 2206522

Send Report To Michael Erdahl
Company Friedman and Bruya, Inc.
Address 3012 16th Ave W
City, State, ZIP Seattle, WA 98119
Phone # (206) 285-8282 Fax # (206) 283-5044

SUBCONTRACTOR Fremont

PROJECT NAME/NO. 206517

PO # C-247

REMARKS

TURNAROUND TIME
☒ Standard (1 Week)
☐ RUSH
Rush charges authorized by:

SAMPLE DISPOSAL
☐ Dispose after 30 days
☐ Return samples
☐ Will call with instructions

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of Containers	ANALYSES REQUESTED: TOC	Nitrate	Nitrite	Sulfate	Sulfide	Alkalinity	Ferrous Iron	EPH			
RW1-W		6/28/22	1500	W	1								X			
RW2-W		↓	1555	↓	1								X			

Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029
Ph. (206) 285-8282
Fax (206) 283-5044

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by:	Ann Webber-Bruya	Friedman & Bruya	6/29/22	1330
Received by: Justine Pogue	Justine Pogue	FAI	6/30/22	8:14
Relinquished by:				
Received by:				

FORMS\COC\Subcontract.DOC

Data Validation Report

Main Street Flats, Bellevue, Washington
June 2022 Groundwater Sampling

Prepared for:

The Riley Group, Inc.
17522 Bothell Way Northeast
Bothell, Washington 98011

Prepared by:

Pyron Environmental, Inc.
3530 32nd Way, NW
Olympia, WA 98502

Approved By: _____ Date: ***August/23/2022***
Mingta Lin

ACRONYMS

%R	percent recovery
BTEX	benzene, toluene, ethylbenzene, *o*- & *p*-xylene, and *m*-xylene
CLP	U.S. EPA Contract Laboratory Program
COC	chain-of-custody
EPA	U.S. Environmental Protection Agency
EPH	extractable petroleum hydrocarbon
GC/FID	gas chromatograph/flame ionization detector
GC/PID	gas chromatograph/photo ionization detector
LCS	laboratory control sample
LCSD	laboratory control sample duplicate
MRL	method reporting limit
NFGs	CLP National Functional Guidelines for Organic Data Review (EPA 2020)
QA/QC	quality assurance/quality control
RL	reporting limit
RPD	relative percent difference
SDG	sample delivery group
TPH	total petroleum hydrocarbon
VPH	volatile petroleum hydrocarbon

INTRODUCTION

This report presents and discusses findings of the data validation performed on analytical data for groundwater samples collected on June 28, 2022, for the referenced project. The laboratory report validated herein was submitted by Friedman & Bruya, Inc. (F&BI) in Seattle, Washington. The report was assigned FB&I project number 206517.

A Stage 2A data review (as defined in EPA 2009) was performed on this laboratory report. The review followed the procedures specified in USEPA CLP Functional Guidelines ([NFGs], EPA 2020), with modifications to accommodate project and analytical method requirements. The numerical quality assurance/quality control (QA/QC) criteria applied to the validation were in accordance with the current performance-based control limits established by the laboratory (laboratory control limits). The frequency of QC analyses and analytical sequence requirements were evaluated against the respective analytical methods.

Review findings are discussed in each section pertinent to the QC parameter for each type of analysis. Qualified data with applied data qualifiers are summarized in the **SUMMARY** section at the end of this report. Samples and the associated analyses validated herein are summarized as follows:

Field Sample ID	Laboratory Sample ID	Sampling Date	Sample Type	Analysis		
				TPH-Dx	VPH	EPH
RW1-W	206517-01	6/28/2022	Water	X	X	X
RW2-W	206517-02	6/28/2022	Water	X	X	X

Notes:
EPH: Extractable petroleum hydrocarbon
TPH-Dx: Diesel and motor oil range total petroleum hydrocarbon
VPH: Volatile petroleum hydrocarbon
X: The analysis was requested and performed on the sample.

The analytical parameters requested for the samples, the respective analytical methods, and the analytical laboratories are summarized below:

Parameter	Analytical Method	Analytical Laboratory
TPH - Diesel & Motor Oil Range	NWTPH-Dx	Friedman & Bruya, Inc. Seattle, WA
Extractable Petroleum Hydrocarbon (EPH)	NWTPH-EPH	Fremont Analytical Seattle, WA
Volatile Petroleum Hydrocarbon (VPH)	NWTPH-VPH	OnSite Environmental, Inc., Seattle, WA

Notes:
NWTPH Methods – *Washington State Department of Ecology, Analytical Methods for Petroleum Hydrocarbons*, Publication No. ECY 97-602, June 1997.

DATA VALIDATION FINDINGS

1. TPH Diesel & Motor Oil by GC/FID (Method NWTPH-Dx)

1.1 Sample Management and Holding Time

Samples were received in the laboratory intact and in consistence with the accompanying chain-of-custody (COC) documentation based on sample receipt documentation.

Water samples should be preserved to pH <2 at the time of collection and analyzed within 14 days of collection. All samples were preserved properly and analyzed within the required holding times.

1.2 Method Blank

A method blank was prepared and analyzed as required. Target compounds were not detected at or above the reporting limits (RLs).

1.3 Laboratory Control Sample (LCS) and LCS Duplicate (LCSD)

LCS and LCSD were prepared and analyzed as required by the method. The Percent recovery (%R) and relative percent difference (RPD) values met the laboratory control limits.

1.4 Surrogate Spikes

Surrogate spikes were added to all samples as required by the method. All surrogate spike %R values were within the laboratory control limits.

1.5 Overall Assessment of TPH Diesel and Motor Oil Data Usability

Based on the information provided by the laboratory, TPH Diesel and Motor Oil data are of known quality at the level of quality evaluation (*i.e.,* Stage 2A) and acceptable for use. As noted by the laboratory, the detections of diesel range TPH reported for both samples did not resemble chromatographic pattern of standards used for quantitation.

2. Extractable Petroleum Hydrocarbon (EPH) by GC/FID (Method NWTPH-EPH)

2.1 Holding Times

Acid-preserved water samples should be extracted within 14 days and extracts be analyzed within 40 days of extraction. All samples were extracted and analyzed within the recommended holding times.

2.2 Method Blank

A method blank was prepared and analyzed as required. Target compounds were not detected at or above the RLs in the method blanks.

2.3 Surrogate Spikes

Surrogate spikes were added to all samples as required by the method. All surrogate spike %R values were within the laboratory control limits, except for the following:

Sample ID	Surrogate Spike	%R	%R Control Limit	Affected Analytes	Data Qualifier
RW1-W	1-Chlorooctcane	44.2%	50-150%	Aliphatic (C8-C10) Aliphatic (C10-C12) Aliphatic (C12-C16) Aliphatic (C16-C21) Aliphatic (C21-C34)	**UJ** **UJ** **UJ** **UJ** **UJ**

2.4 Matrix Spike (MS)

MS analyses were performed on sample RW2-W. The %R values were within the laboratory control limits.

2.5 Laboratory Control Sample (LCS) and LCS Duplicate (LCSD)

LCS and LCSD analyses were performed as required by the method. All %R and RPD values were within the laboratory control limits, except for the following:

LCS ID	Analyte	%R	%R Control Limit	Affected Sample	Data Qualifier
LCS-37022 LCSD-37022	Aliphatic (C10-C12)	65.8% 57.9%	70-130%	RW1-W RW2-W	**UJ** **UJ**

2.6 Overall Assessment of EPH Data Usability

Based on the information provided by the laboratory, EPH data are of known quality at the level of quality evaluation (*i.e.,* Stage 2A) and acceptable for use.

3. Volatile Petroleum Hydrocarbon (VPH) by GC/FID/PID (Method NWTPH-VPH)

3.1 Holding Times

Water samples should be preserved to pH <2 at the time of collection and analyzed within 14 days of collection. All samples were preserved properly and analyzed within the required holding times.

3.2 Method Blank

A method blank was prepared and analyzed as required. Target analytes were not detected at or above the RL in the method blank.

3.3 Surrogate Spikes

Surrogate spikes were added to all samples as required by the method. All surrogate spike %R values were within the laboratory control limits.

3.4 Matrix Spike (MS) and MS Duplicate (MSD)

MS/MSD analyses were performed on a batch QC sample for BTEX. All %R and RPD values were within the laboratory control limits.

3.5 Laboratory Control Sample (LCS)

LCS analyses were performed as required by the method. All %R values were within the project control limits.

3.6 Overall Assessment of VPH Data Usability

Based on the information provided by the laboratory, VPH data are of known quality at the level of quality evaluation (*i.e.,* Stage 2A) and acceptable for use.

SUMMARY

Table I. Data Affected by QC Anomalies:

Laboratory Sample ID	Sample ID	Analytical Method	Analyte	Data Qualifier	Reason
206517-01	RW1-W	NWTPH-EPH	Aliphatic (C8-C10) Aliphatic (C10-C12) Aliphatic (C12-C16) Aliphatic (C16-C21) Aliphatic (C21-C34)	**UJ** **UJ** **UJ** **UJ** **UJ**	The surrogate spike %R value was less than the lower control limits.
206517-01 206517-02	RW1-W RW2-W	NWTPH-EPH	Aliphatic (C10-C12)	**UJ** **UJ**	The LCS and LCSD %R values were less than the lower control limit.

Note:

UJ -The analyte was not detected at the reporting limit, and the reporting limit is an estimated value.

REFERENCES

USEPA. 2020. *Contract Laboratory Program National Functional Guidelines for Organic Superfund Data Review.* Office of Superfund Remediation and Technical Innovation. November 2020. OLEM 9240.0-51. EPA-540-R-20-005.

USEPA. 2009. *Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use*. January 13, 2009. USEPA 540-R-08-005.

Ecology (Washington State Department of). 1997. *Analytical Methods for Petroleum Hydrocarbons.* Publication No. ECY 97-602. June 1997.