State of Washington
POLLUTION LIABILITY INSURANCE AGENCY
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(360) 407-0520 • (800) 822-3905
www.plia.wa.gov

September 29, 2022

JTN Investments Inc.
16510 Aurora Avenue North
Seattle, WA 98133

Re: No Further Action at the Property Associated with the Following Site:

- **Facility/Site (owner) Name:** Unocal 4725 (Phillips #3195)
- **Facility/Site Address:** 16510 Aurora Avenue North, Shoreline, WA 98133
- **Facility Site ID:** 95618672
- **Technical Assistance Program No.:** PNW025

Dear Mr. Ed Ralston:

The Washington State Pollution Liability Insurance Agency (PLIA) received your request for an opinion on your independent cleanup of the Unocal 4725 property located at 16510 Aurora Avenue North, Shoreline, WA 98133 (Site). This letter provides our opinion. Opinions by PLIA are made under the authority of Chapter 70A.330 RCW and Chapter 374-80 WAC. PLIA appreciates your initiative in pursuing this administrative option for cleaning up a contaminated site under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Opinion on Cleanup

Property: PLIA has determined that **no further remedial action is necessary on the Property** (address indicated above) to clean up contamination associated with the overall Site.

Site: PLIA has also determined that **further remedial action is still necessary** to clean up contamination **elsewhere within the Site.**

PLIA has determined that a Property-specific No Further Action (NFA) is warranted, based on the requirements of the MTCA and in conjunction with the following Site conditions:

- Impacted soil remaining on the Property **poses a *de minimis* risk to potential human and environmental receptors** due to Site contaminants of concern (COCs) indicated by analytical data to be located at a depth greater than a human may come into contact with and due to depth of groundwater which has not been encountered at drilling depths of up to 115' below ground surface (bgs).

- This lack of groundwater at the explored depth of 115' bgs and the lowest known (deepest) soil contamination indicates **a *de minimis* risk of Site COCs to leach from overlying contaminated soil and impact the deeper groundwater beneath the Property.** The relatively fine-grained geologic units beneath the contamination have an inherently slow vertical migration rate due to low vertical hydraulic conductivity values. These factors combine to make the soil to groundwater leaching pathway incomplete on the Property, as discussed further herein.

- Soil analytical data demonstrates **a *de minimis* risk to the building occupants due to vapor intrusion from the remaining contaminated soil beneath the Property.** The extensive soil dataset indicates the vapor intrusion pathway is incomplete at the Property, as discussed further herein.

- **Site soil contamination above MTCA Method A cleanup levels (CULs) identified off the Property (within the public right-of-way [ROW]) has been addressed by an indemnification agreement between Phillips 66 and the city of Shoreline.** The agreement documents that **the city is aware of the soil impacts and it indemnifies the city** if the contamination (at 60' below the sidewalk) should ever need to be disturbed for any reason.

Based on the existing dataset for the Property, no unacceptable risks currently exist to human health or the environment. Pursuant to the MTCA, the **current Site conditions** warrant a determination of **NFA for the Property**.

Further remedial action is still necessary to clean up contamination elsewhere within the Site.

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

Description of the Site

This opinion applies only to the petroleum release at the **Property** located at 16510 Aurora Avenue North, Shoreline, WA 98133 and includes the (one) King County tax parcel

described below. This opinion does not apply to any other hazardous substance release(s) that may affect the Property or the overall Site.

1. Description of the Property:

The **Property** is located at 16510 Aurora Avenue North, Shoreline, WA 98133 and includes the following tax parcel(s) in King County **affected by the Site** and will be addressed by your cleanup (Figure 1):

- Tax Parcel No.: 5254300005

The Location of the **Property within the overall Site** is illustrated in **Enclosure A.**

2. Description of the Site:

The tax parcel (indicated above) is located within the Site. The overall Site includes a section of the sidewalk within the ROW of Aurora Avenue North to the west of the Property and is defined by the nature and extent of contamination associated with the following release (Figure 3):

- Total petroleum hydrocarbons as gasoline, diesel and oil (TPH-g, TPH-d and TPH-o); associated benzene, toluene, ethylbenzene and xylenes (BTEX); and potentially naphthalene into the soil/vapor.

Enclosure A includes a detailed description and diagram of the Property within the Site (Figures 2 and 3), as currently is known to PLIA.

3. Identification of other sites that may affect the Property:

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that this Property is being affected by multiple sites.

Basis of the Opinion

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

1. *Indemnification and Defense Agreement.* Prepared by Phillips 66 Company and City of Shoreline on March 11, 2022. Received March 11, 2022.
2. *Cleanup Action Report, Former Unocal Service Station 4725, Phillip 66 Site 3195, 16510 Aurora Avenue North, Shoreline, Washington, Project No. 11211336*. Prepared by GHD Services, Inc. on January 18, 2021.
3. *Request for Site Closure, Former Unocal Station 4725, 16510 Aurora Avenue North, Shoreline, WA 98133, Facility Site ID: 95618672*. Prepared by Arcadis U.S., Inc. on August 23, 2012.

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

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

Establishment of Cleanup Standards and Points of Compliance

PLIA has determined the Site CULs and points of compliance (POCs) on the Property meet the substantive requirements of MTCA. It is presumed that if you meet the Site cleanup standards under MTCA, the Property will be protective of human health and the environment **for the current use of the Property** under existing zoning regulations.

i. CULs:

Table 1. The soil and groundwater cleanup levels are:

Contaminants of Concern (COCs)	**Method A** Soil Cleanup Level Unrestricted Land Use mg/kg	**Method B** Soil Cleanup Level Unrestricted Land Use mg/kg	**Method A** Groundwater Cleanup Level ug/l
TPH-d	2,000	3,606	500
TPH-g	30*/100	--	800*/1,000
TPH-o	2,000	--	500
Benzene (carcinogen)	0.03	320	5
Toluene	7	6400	1,000
Ethylbenzene	6	800	700
Xylene	9	16,000	1,000
Total Lead	250	--	15
EDC		480	
Naphthalene	5	250	

*When Benzene is present.

Table 2. The air cleanup levels are:

Contaminants of Concern (COCs)	**Method B** Sub-Slab/Soil Gas Screening Levels ug/m^3	**Method B** Indoor/Air Cleanup Levels ug/m^3
Benzene (carcinogen)	10.7	0.321
Toluene	15,600	2,290
Ethylbenzene	15,200	457
Xylene	310	45.7
Total Lead	-	-
Naphthalene (carcinogen) (does not include 1-methyl and 2-methyl naphthalene)	2.45	0.0735
Total Petroleum	4,700*	140

Hydrocarbon (TPH)		

* Based on the current attenuation factor of 0.03.

ii. POCs:

The proposed CULs must be met at the following POCs:

Soil-Direct Contact: For CULs based on human exposure via direct contact, the standard POC is: "*…throughout the site from the ground surface to fifteen feet below the ground surface.*" This is in compliance with WAC 173-340-740(6)(d) and represents a reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of Site development activities.

Groundwater: For groundwater, the standard POC as established under WAC 173-340-720(8) is: "*…throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the site. Groundwater cleanup levels shall be attained in all groundwaters from the point of compliance to the outer boundary of the hazardous substance plume*". The definition of "hazardous substance plume" is Site COCs above Site CULs.

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

Analysis of the Cleanup

PLIA has concluded that **no further remedial action is necessary at the Property**. Our conclusion is based on the following analysis of subsurface conditions beneath the Property and on an evaluation of the laboratory analytical data:

1. History and Characterization of the Property associated with the Site:

PLIA has determined your characterization of the Site was sufficient to select a cleanup action. The physical locations of the Property and the Site are described in this letter, in the documents (previously cited herein) and shown in Figure 2 of the *Cleanup Action Report*.

Petroleum contaminated soil (PCS) detected on the Site is associated with the historical use of the Property, the Unocal 4725 station located at 16510 Aurora Avenue North in Shoreline, Washington, King County Parcel No. 5254300005 (Figure 2). The medias of concern associated with the Unocal 4725 release includes soil, groundwater, and air.

Site: MTCA defines a Site as where contamination has come to be located. The Site is described above and in **Enclosure A.** For the Phillips 66 071363 Site, that

includes the tax parcel described above (**5254300005, the Property**) and **portions of the sidewalk of the public ROW of Aurora Avenue North to the west of the Site** (Enclosure A - Figures 2 and 3).

Residual contamination above the MTCA Method A CULs remain near the western edge of the Property at sample locations B-8 and B-11 and **in the sidewalk within the public ROW of Aurora Avenue North at location B-19 (Enclosure A - Figures 3, 4 and 5).**

PCS above the MTCA Method A CULs located beyond limits of the Property boundary has been addressed by an indemnification agreement between Phillips 66 and the city of Shoreline. The agreement documents that the city is aware of the soil impacts, and it indemnifies the city if the contamination (at approximately 60' below the sidewalk) should ever need to be disturbed for any reason.

Conceptual Site Model (Exposure Pathways)

A conceptual site model is a description of how contamination at the Site can potentially come into contact with, and impact, a human or other ecological receptor. **The Washington State Model Toxics Control Act (MTCA) defines "site" (Site) as all the area that is affected by the petroleum release associated with the Property** and potentially adjacent parcels. Based on investigation analytical data, the MTCA Site boundary is shown in Enclosure A, Figures 2 and 3.

i. Soil Direct Contact:

- During the conversion to a Stage II vapor recovery system in 1994, impacted soil was encountered **on the Property underneath three of the former dispensers.** Soil impacts were primarily observed under dispensers located in the northwest portion of the canopy (Enclosure A - Figure 2).
    - Soil impacts were detected above the MTCA Method B CULs for TPH-g and benzene under the northwestern fuel dispenser and (at relatively lower concentrations) beneath the middle dispenser on the western island.
    - The highest concentrations (above MTCA Method B CULs) of Site COCs were detected in samples collected from soil at a location near the northwestern dispenser. **The maximum concentrations, detected in a sample collected from B3 at 7' bgs were 7,000 and 72 mg/kg for TPH-g and benzene, respectively**. TPH-G concentrations were also detected above MTCA Method B CULs in

soil samples near the middle and northern dispensers on the western island.

- **Other potential Site COCs associated with this type of contamination were not detected above their respective MTCA CULs.** Soil impacts were vertically delineated by samples collected by ATC in 2001 **at 25' to 35' bgs.** Site COCs were not detected in these deeper samples at concentrations above MTCA Method B CULs indicating that **petroleum hydrocarbon impacts at this location were limited to shallow subsurface soils (<15'). This depth is within the limit of what can be removed by standard excavation practices.** Historic soil constituent concentrations and analytical results are presented in Table 1 and Soil boring locations are shown on Figure 3 of Arcadis U.S., Inc.'s *Request for Site Closure, Former Unocal Station 4725, 16510 Aurora Avenue North, Shoreline, WA 98133 Facility Site ID: 95618672, August 23, 2012*.

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

ii. Groundwater:

- **Groundwater was not encountered beneath the Site at the maximum explored depth of 115' bgs.** Surface elevation of the Site is approximately 445' above mean sea level (msl).

  Result: The soil to groundwater exposure pathway did not exist at this Site. This means that there is a de minimis risk that PCS comes into contact with and can leach into groundwater that may be used for drinking water purposes.

iii. Air (Soil or Groundwater to Vapor):

- The structure on the Site was within the previous lateral inclusion zone of PCS, with concentrations of 3,990 mg/kg of TPH-g at sample location B6 (Enclosure A - Figures 3, 4 and 5).

  Result: The air exposure pathway existed at this Site. This means that PCS was in a location where it could potentially produce harmful vapors that could enter nearby commercial or residential structures.

iv. Surface Water:

- Not applicable for the Site.

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

Selection of Cleanup Action:

The conceptual site model (Section 1: i-iv above) details which exposure pathways existed prior to conducting cleanup activities at the Site. Cleanup actions performed at the Property must adequately address all known exposure pathways of concern in order to satisfy the substantive requirements of MTCA. Cleanup actions taken, along with their effect on any known exposure pathways, are described in Section 2.

2. Cleanup of the Property:

PLIA has determined that the cleanup action(s) you performed meet(s) cleanup standards established for the Site.

i. Soil:

- In July 1994, a Unocal contractor excavated soil from the sides of dispenser islands running to the underground storage tank complex during the vapor recovery system installation. The excavation extended approximately 2' to 3' bgs. The exact amount of soil removed is not known; however, O'Sullivan Omega reported that approximately 10 cubic yards of soil were stockpiled at the Site (O'Sullivan Omega 1994).

- In January 2001, a TOSCO contractor removed the pump islands, six fuel dispensers and excavated soil to approximately 2' bgs from beneath the dispenser islands and product lines (SECOR 2001).

A total of 121 soil samples were collected for laboratory analysis from borings and excavations conducted in 1994, 1997, 2001, 2007, and 2017 through 2020. The approximate **sample depths were between 1.5' and 115' bgs**. Soil sampling results are listed in the following table:

- Table 1, Summary of Soil Analytical Data, Former Union Oil Facility, Phillips 66 Site 3195, 16510 Aurora Avenue North Seattle, Washington, *Cleanup Action Report,* GHD Services, Inc., January 18, 2021.

- Between 2018 and 2020, GHD completed additional Site characterization activities. A total of 18 borings (B-6 through B-24) were advanced to delineate soil impacts laterally and vertically at the Site. **Laboratory analysis of soil samples collected from the borings reported concentrations of TPH-g and BTEX above MTCA Method A screening levels ranging from 5' to 90' bgs.**

- Current data indicates soil beneath the Property is below the Site-specific calculated MTCA Method B CULs with the exception of one soil sample, which contained a concentration of TPH-g above the Site-specific CULs. **However, the depth of this contamination is at 20' bgs, which is below the POC for direct contact with soil (15' bgs). Based on the existing dataset, COC concentrations in soil that remains on the Property is less than Site-specific MTCA Method B CULs or at a depth that is below the POC for direct contact (15' bgs).**

- **The highest soil concentrations occur above an approximately 30' thick, fine-grained geologic unit. This fine-grained unit in the vadose zone soil beneath the contamination has a relatively slow vertical migration rate due to low vertical hydraulic conductivity (K) values.**

- **The type of fine-grained soil lithology in the vadose zone beneath the Property (generally) will preclude the downward vertical migration of contaminants. Analytical data provided evidence of this, as soil concentrations within the upper 1'-2' of the fine-grained unit decreased markedly with depth, with subsurface soil concentrations decreasing to less than MTCA Method A CULs within only a few feet vertically.**

- **Residual on-Site soil contamination above the MTCA Method A CULs was detected near the western edge of the Property at soil sample locations B-8 and B-11, and in the sidewalk of the public ROW of Aurora Avenue North at sample location B-19.** Location of the contaminated soil within the Site is shown in Enclosure A, Figures 3 and 4 and depicted in cross-section on Figure 5.

- **The city of Shoreline has agreed to an 'Indemnification and Defense Agreement' with Phillips 66 to leave soil contamination in the Aurora Avenue North ROW (*Indemnification and Defense Agreement, 2022*).**

Result: The data indicate there is **no unacceptable risk to human health or the environment from the soil direct contact exposure pathway on the Property. The remedial action(s) removed the soil from the Property with known concentrations of PCS above CULs. <u>This remedial action mitigated the potential risk for PCS on the Property to come into contact with humans or ecological receptors.</u>**

<u>Soil contamination above MTCA Method A CULs remains at the Site.</u> An indemnification agreement between Phillips 66 (Property owner) and the city of Shoreline demonstrates **the city is aware of the impacts at approximately 60' below the sidewalk and indemnifies the city should the impacted soil ever be encountered.**

The agreement also documents the **<u>residual contaminated soil with concentrations of petroleum above CULs does not pose an unacceptable risk due to the direct contact exposure pathway</u>.** There is minimal risk for the Site soil contamination to come into contact with humans or any ecological receptors due to its depth, surface cover and the estimated depth to groundwater beneath the contamination.

ii. Groundwater:

- Groundwater was not encountered at the Site to the maximum explored depth of 115' bgs. **The deepest observed soil impacts were at approximately 90' bgs. Based on this condition, groundwater is, at a minimum, 25' below vadose zone soil impacts.**

- Locations with the highest soil concentrations occur above an approximately 30' thick fine-grained geologic unit. Site COCs will absorb onto organic matter contained within this fine-grained unit, reducing the downward vertical migration rate of Site contaminants within the subsurface. **During this process, concentrations will biodegrade and continue to attenuate. The fine-grained geologic units that exist beneath the contamination have an inherently slow vertical migration rate due to relatively low vertical hydraulic conductivity values.**

- **Based on these factors, the fine-grained subsurface lithologic material beneath the Site will generally preclude COCs from leaching to the deeper water table. <u>Evidence of this is that concentrations within the upper 1'-2' of the fine-grained unit decrease markedly with depth to levels below MTCA Method A CULs and then to non-detect ND within only a few feet vertically.</u>**

- No groundwater has been encountered beneath the Site to the maximum explored depth of 115' bgs. **Groundwater within the area of the Site could be as deep as 125'-150' bgs. Additionally, another fine-grained unit occurs at approximately 95' bgs, between the lowest known soil contamination and the top of the local groundwater table. This lithologic unit will also act to preclude the downward vertical migration of Site COCs within the vadose zone.**

- **Based on the subsurface lithology of the geologic units encountered, beneath the Property and the vertical separation between the lowest known soil contamination and the estimated depth to groundwater, the risk is considered de minimis for PCS contaminants to leach vertically through 25' (minimum) to 100' (maximum) of vadose zone soil and impact groundwater beneath the Property.**

Result: The lack of groundwater occurrence at the explored depth, the lithology of the vadose zone geologic units beneath the Property and the known soil contamination depth indicate there is no unacceptable risk of exposure to groundwater from the soil to groundwater (leaching) pathway on the Property.

iii. Soil or Groundwater to Vapor/Air:

- Based on soil data collected on the Property, **no soil impacts are present above the vertical separation distance of 15' bgs** within the lateral inclusion zone (30') of the building located on the Property.

- **Shallow soil impacts are present in soil underneath the western dispenser island.** Electrical utility lines as well as a water line serving the Property building intersects areas of shallow soil impacts and had the potential to provide a preferential pathway for soil vapor to migrate to the Property building. **To address the preferential pathways, GHD completed one soil vapor probe (VP-1) near the building foundation** and shallow utility lines that intersect the area of soil impacts in June, October, and November 2020.

- **Laboratory analytical results for samples collected during the June 2020 monitoring event indicated no concentrations of volatile organic compounds (VOCs) or hydrocarbon fractions were present at or above laboratory MTCA Method B Sub-Slab Soil Vapor Screening Levels.**

- **Laboratory analytical results for the sample collected from VP-1**

during the October 2020 sampling event reported a naphthalene concentration of 37 micrograms per cubic meter (ug/m^3), exceeding the applicable MTCA method B screening level of 2.5 ug/m^3. Laboratory analytical results did not indicate concentrations above applicable screening levels (MTCA Method B) for the remaining analyzed constituents.

- **Naphthalene was not detected in the previous soil vapor sample collected from VP-1.** GHD returned to the Property in November 2020 to confirm the naphthalene results from the October 2020 sampling event. **Split samples were collected for analysis by two separate laboratories** (ALS and Eurofins Air Toxics of Folsom, California [Eurofins]) from vapor probe VP-1. **Laboratory analytical results indicated concentrations of naphthalene at 1.1 ug/m^3 and 0.91 ug/m^3, which are below the MTCA Method B CUL for vapor intrusion.**

Result: The analytical data indicate there is no longer a risk of exposure from the soil or groundwater to vapor exposure pathway at the Property.

The results of soil vapor sampling events and analytical data evaluation confirm that the vapor intrusion pathway is incomplete for the Property building. **These data demonstrate soil vapor concentrations are less than Site-applicable screening levels (MTCA Method B). This eliminates from consideration the potential for contaminated soil or groundwater on the Property to give off harmful vapors that could enter nearby commercial or residential structures.**

3. Cleanup of the Site

PLIA has concluded that further remedial action is necessary on the Site where contamination above MTCA Method A CULs has migrated off the Property. This means that, although your cleanup constitutes the final action for the Property, it constitutes only an "interim action" for the overall Site, as a whole. Location of the contaminated soil within the Site is shown in Enclosure A, Figures 3 and 4 and depicted in cross-section on Figure 5.

Data indicates Site COCs in subsurface soil above MTCA Method A CULs have migrated into the city of Shoreline ROW immediately adjacent to the Property. This subsurface soil contamination is documented and addressed in an administrative agreement between Phillips 66 and the city of Shoreline (*Indemnification and Defense Agreement, March 11, 2022*).

The agreement between Phillips 66 and the city of Shoreline documents the city is aware of the contamination and it communicates that the residual contaminated soil does not pose a risk to any potential receptors due to the lack of a direct contact exposure pathway. This removes from concern the potential for soil with concentrations of Site COCs above CULs to come into contact with humans, environmental or ecological receptors, due to contamination depth, surface cover (paving) and the estimated depth to groundwater. The agreement also indicates that the city of Shoreline indemnifies Phillips 66 if Site contaminated soil is disturbed for any reason.

PLIA will not issue a NFA determination for the overall Site until additional remedial actions are completed to address the subsurface soil within the city of Shoreline ROW in a manner that satisfies the substantive requirements of MTCA.

The Property will remain listed as part of the Site under the Ecology Database of Contaminated Sites until the residual PCS beneath the sidewalk of the Aurora Avenue is resolved.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

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

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

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

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

To recover remedial action costs from other liable persons under the MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology- supervised action. This opinion does not determine whether the action you performed is equivalent. Courts make that determination (RCW 70A.305.080 and WAC 173-340-545).

3. State is immune from liability.

The state, PLIA, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion.

Contact Information

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

Sincerely,

Ulysses Cooley
Hydrogeologist

Enclosure A:
Figure 1: Site Vicinity & Topographic Map
Figure 2: Site Plan Map
Figure 3: Current Extent of Petroleum Contaminated Soil (PCS)
Figure 4: Map of Vertical Cross-Section B-B' Showing Extent of PCS
Figure 5: Vertical Cross-Section B-B' Showing Extent of PCS

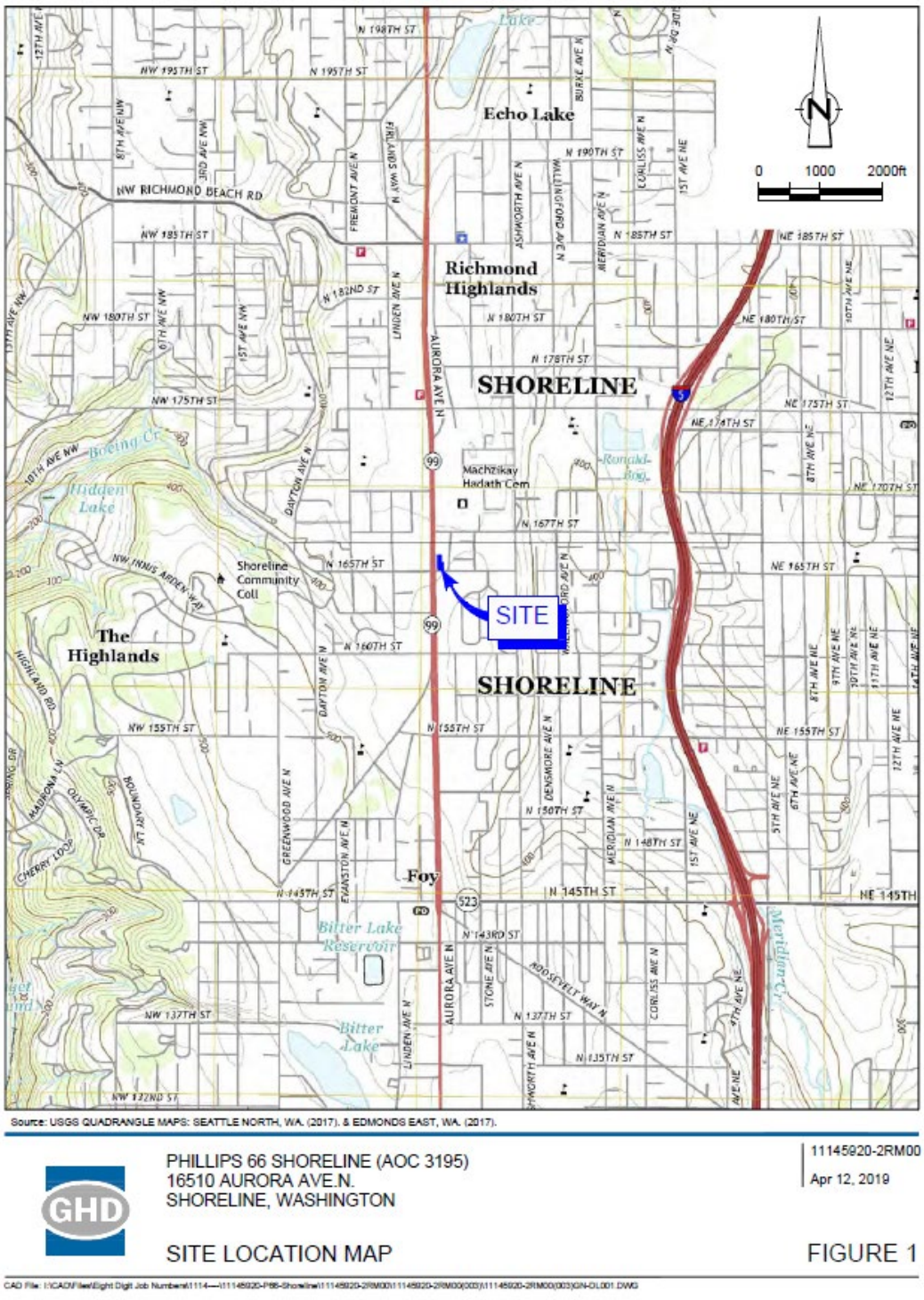
Enclosure B:

cc: Mr. Ed Ralston, Phillip 66 (email only) Mr. Brian Peters, GHD (email only)
Ms. Moshghan Mansoori, GHD (email only)
Ms. Carrie Pederson, PLIA (email only)
Ms. Kristin Evered, PLIA (email only)

Enclosure A:

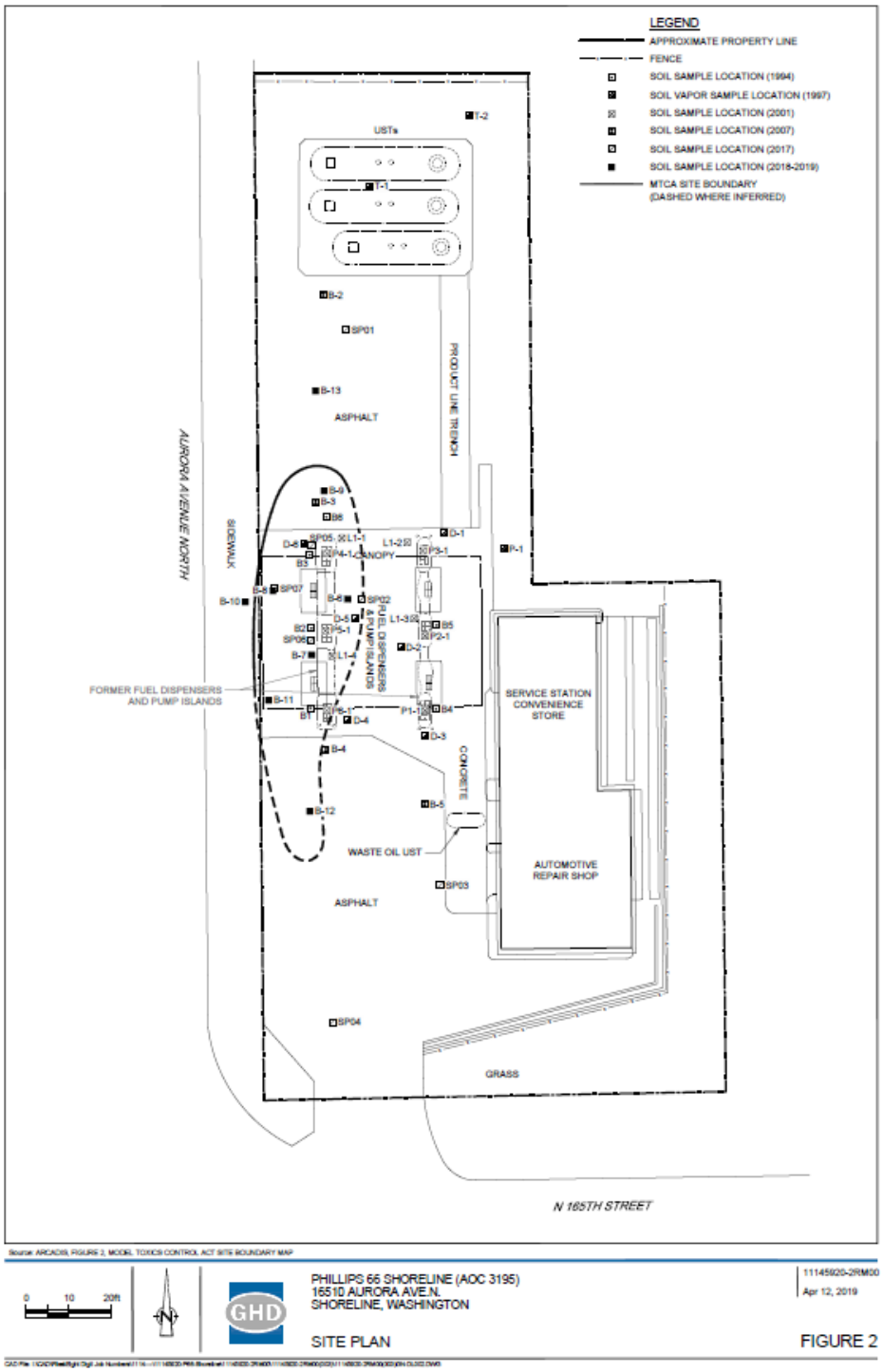
Unocal 4725 (Phillips #3195) Site
TAP Project No. PNW025

Figure 1: Site Vicinity & Topographic Map



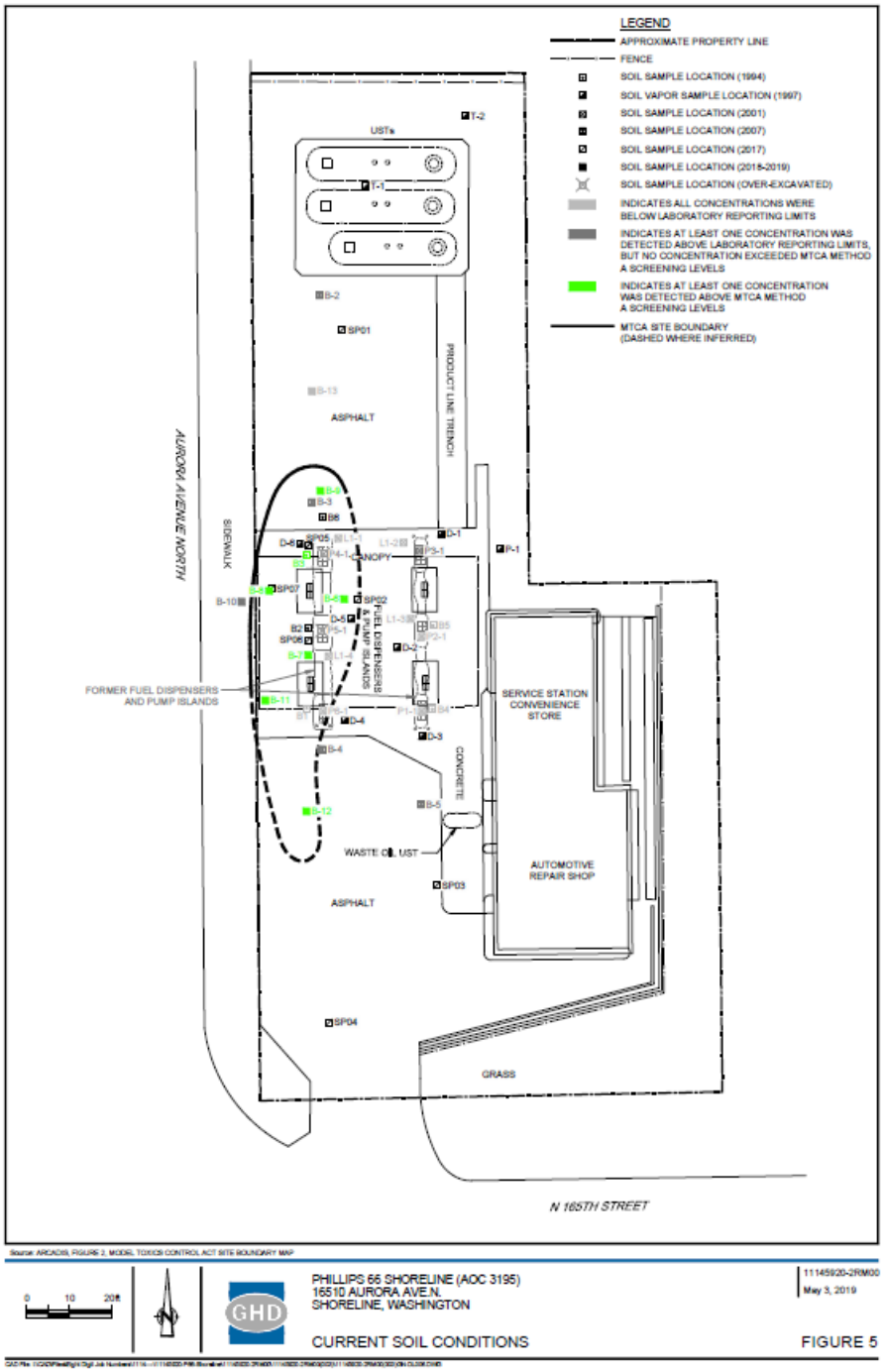
Source: *Site Investigation Summary Report.* Prepared by GHD Services, Inc. on June 3, 2019.

Figure 2: Site Plan Map



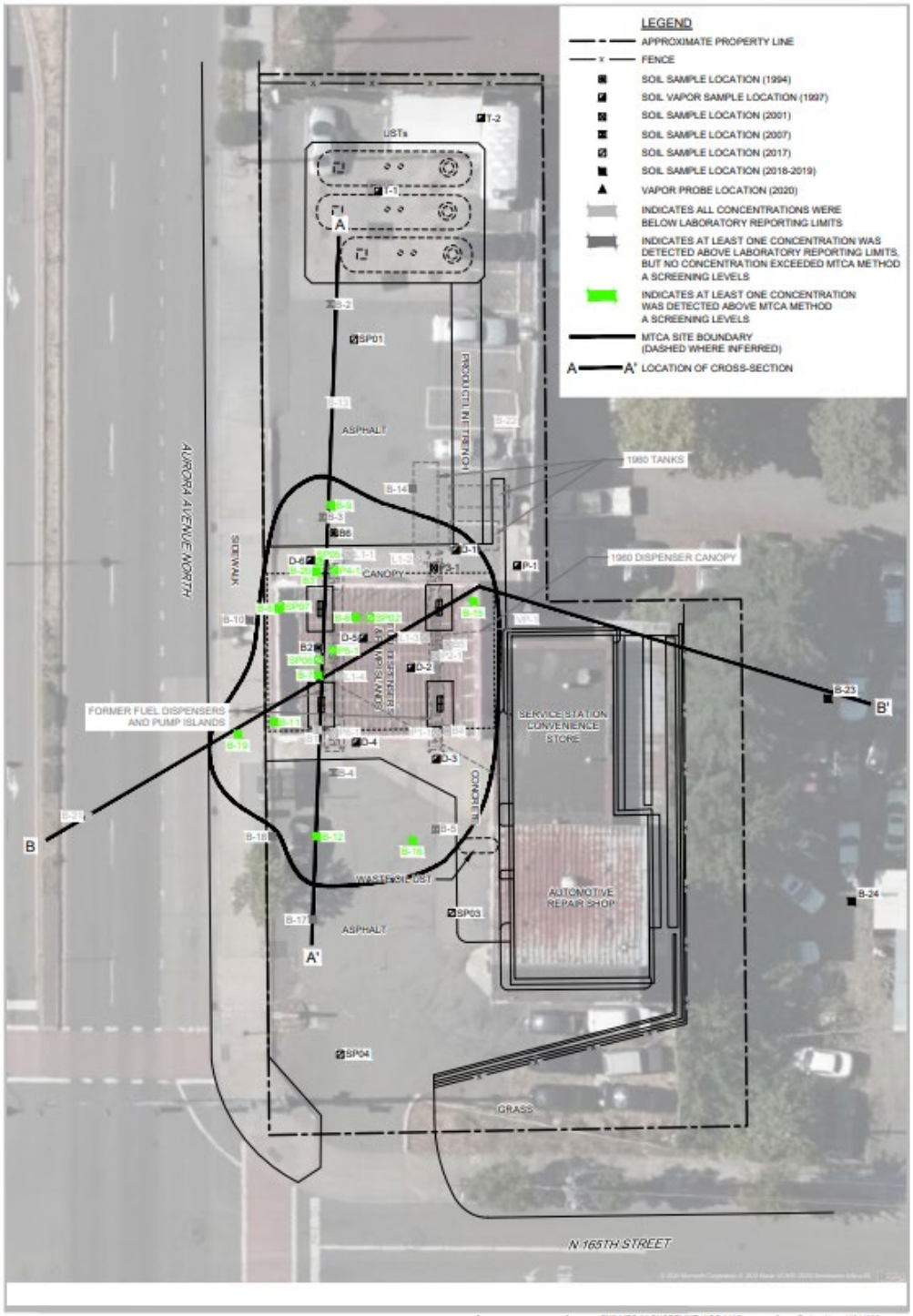
Source: *Site Investigation Summary Report.* Prepared by GHD Services, Inc. on June 3, 2019.

Figure 3: Current Extent of Petroleum Contaminated Soil (PCS)



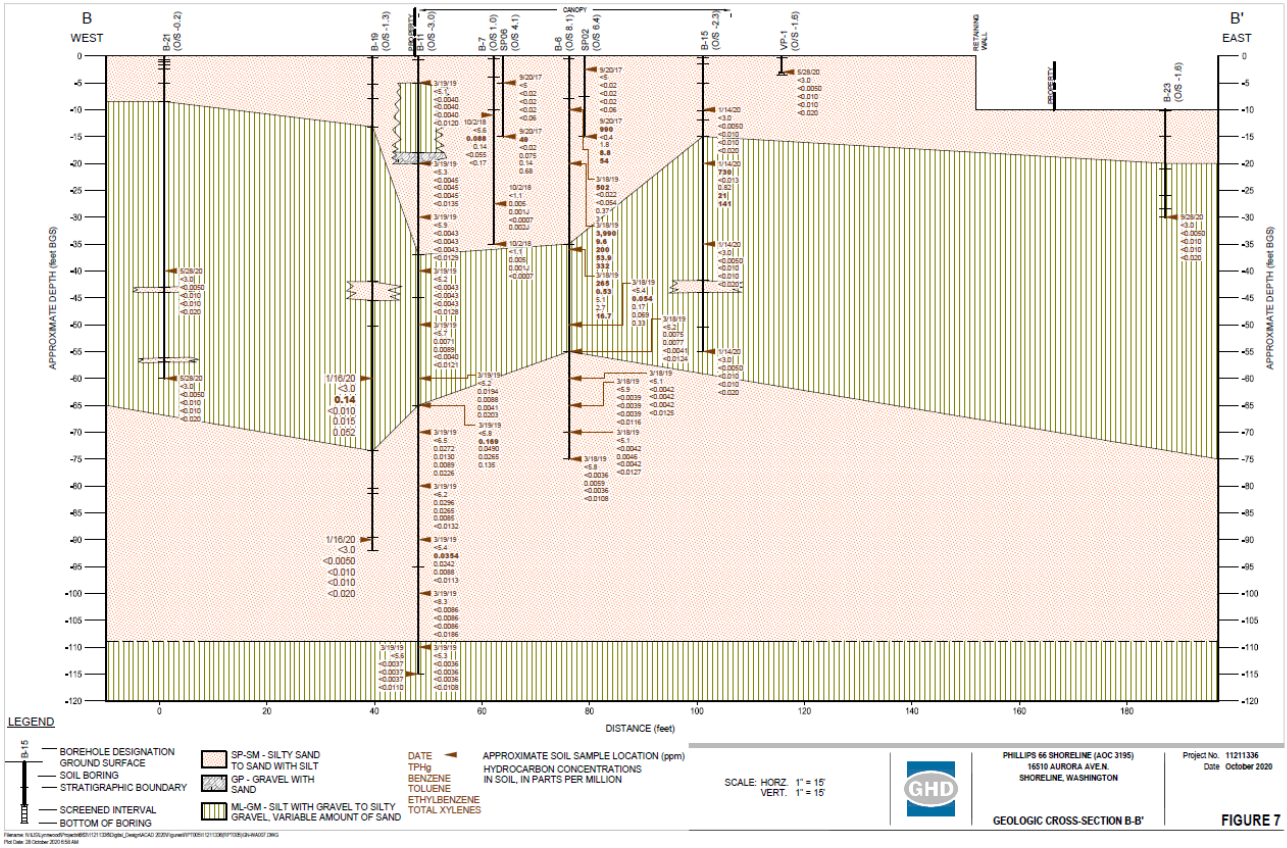
Source: *Site Investigation Summary Report.* Prepared by GHD Services, Inc. on June 3, 2019.

Figure 4: Map of Vertical Cross-Section B-B' Showing Extent of PCS



Source: *Site Investigation Summary Report.* Prepared by GHD Services, Inc. on June 3, 2019.

Figure 5: Vertical Cross-Section B-B' Showing Extent of PCS



Source: *Site Investigation Summary Report.* Prepared by GHD Services, Inc. on June 3, 2019.