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September 8, 2022 Project No. M0747.01.013

Michael R. Warfel, LG, LHG, RG Washington State Department of Ecology 15700 Dayton Avenue N Shoreline, Washington 98133

Re: Eighth Quarterly Compliance Groundwater Monitoring Event North Cascade Ford Property, Sedro-Woolley, Washington VCP Number: NW3031; CSID: 12075; FSID: 58313566

Dear Michael Warfel:

In June 2022, on behalf of VSF Properties, LLC, Maul Foster & Alongi, Inc. (MFA), conducted the eighth quarterly monitoring well sampling activities at the North Cascade Ford property, located at 116 W Ferry Street in Sedro-Woolley, Washington (the Property) (see Figure 1). The North Cascade Ford Site (the Site) includes the Property and a portion of the adjacent property to the north, owned by the BNSF Railway (see Figures 1 and 2).

Activities were conducted consistent with the groundwater compliance monitoring plan (CMP) (MFA 2020a), the addendum to the groundwater CMP (MFA 2020c), and the Washington State Model Toxics Control Act (MTCA; Washington Administrative Code 173-340-410(b)) requirements for performance monitoring.

BACKGROUND

Previous investigations identified environmental impacts in three areas of the Site, referred to as areas of concern (AOCs) 1 through 3 (MFA 2020b). In March 2020, a remedial action was completed in AOCs 1 through 3 (MFA 2020b). In the summer of that year, the groundwater CMP and the associated addendum were developed in coordination with the Washington State Department of Ecology (Ecology) to guide performance groundwater monitoring at the Site (MFA 2020a,c). Per Washington Administrative Code 173-340(b), the purpose of performance monitoring is to confirm that a remedial action has attained cleanup levels (CULs). Seven previous quarterly compliance groundwater monitoring events related to the March 2020 remedial action were conducted between September 2020 and March 2022 (MFA 2020d; 2021a,b,c,d; 2022a,b).

Chemicals of concern in AOCs 1 through 3 include diesel-range organics (DRO), lube-oil-range organics (ORO), gasoline-range organics, BTEX constituents (benzene, toluene, ethylbenzene, and total xylenes), and/or total naphthalenes. Groundwater compliance

Michael R. Warfel, LG, LHG, RG September 8, 2022 Page 2

monitoring is limited to DRO and ORO following Ecology approval on September 9, 2021 (Ecology 2021a). Table 1 shows historical groundwater analytical results associated with monitoring wells in AOCs 1 and 2 and reconnaissance groundwater samples collected in AOC 3 prior to initiating compliance monitoring in September 2020.

On September 9, 2021, Ecology approved the reduction of monitoring for constituents at the Site (i.e., limiting monitoring to DRO and ORO), as well as the removal of monitoring wells MW06 and MW12 from the compliance monitoring network (Ecology 2021a).

On December 10, 2021, Ecology requested additional analysis for two monitoring wells—1,4-dichlorobenzene for MW09 and naphthalenes for MW10—due to previous detections in those areas of the Site above the vapor intrusion screening level (Ecology 2021b). These additional constituents were not detected in groundwater analyses conducted during the December 2021 monitoring event at MW09 and MW10. On March 15, 2022, Ecology concurred with eliminating sampling for naphthalenes and 1,4-dichlorobenzene for future groundwater monitoring events (Ecology 2022a).

On April 6, 2022, Ecology approved the removal of monitoring well MW11 from the compliance monitoring network (Ecology 2022b).

FIELD AND ANALYTICAL METHODS

All June 2022 groundwater monitoring activities were conducted consistent with the groundwater CMP (MFA 2020a), the addendum to the groundwater CMP (MFA 2020c), and Ecology-approved modifications to the CMP provided via email (Ecology 2021a,b; 2022a,b). Compliance monitoring well locations are shown on Figure 2.

Potentiometric Surface Evaluation

On June 6, 2022, MFA measured static water levels in the compliance monitoring wells (see Table 2). A potentiometric surface map is provided as Figure 3. The estimated potentiometric surface contours indicate that shallow groundwater at the Site is relatively hydraulically discontinuous and show groundwater migration to the south and southwest with some localized variations, consistent with previous observations. Water levels measured during this event were generally 0.45 feet lower than levels in the March 2022 monitoring event. The average height of the water table in June 2022 was approximately two feet higher than in June 2021.

Monitoring Well Sampling

On June 6, 2022, MFA collected seven groundwater samples from six compliance monitoring wells on the Property (MW01R, MW02R, MW04, MW07, MW09, and MW10), including a field duplicate sample from monitoring well MW02R. Water quality field parameters (temperature,

Michael R. Warfel, LG, LHG, RG September 8, 2022 Page 3

specific conductance, pH, dissolved oxygen, oxygen reduction potential, and turbidity) were stabilized before sample collection. During purging, the flow rates, water levels, and water quality parameters were recorded on field sampling data sheets (see Attachment A). Under standard chain-of-custody procedures, groundwater samples were submitted to Friedman & Bruya, Inc., of Seattle, Washington, for laboratory analysis.

RESULTS

The laboratory analytical report is provided as Attachment B, and analytical data are presented in Table 3. Exceedances of the MTCA Method A CUL for heavy oils (the sum of DRO and ORO) are shown on Figure 4, and site trends for DRO, ORO, and heavy oils are presented in Figures 5, 6, and 7, respectively. Figure 8 shows the site trends for heavy oils from 2019 to 2022 to more clearly depict concentration trends that have occurred since the 2020 remedial action. Analytical data and the laboratory's internal quality assurance and quality control data were reviewed to assess whether they met project-specific data quality objectives. A data validation memorandum summarizing data evaluation procedures, data usability, and deviations from specific field and/or laboratory methods is included as Attachment C. The data, with the appropriate data qualifiers assigned, are considered acceptable for their intended use.

All groundwater samples were analyzed for DRO and ORO, and heavy oils were calculated by summing DRO and ORO concentrations (one-half the method reporting limit is used for non-detect values) for comparison to the DRO MTCA Method A CUL.

AOC 1: Former Auto Repair Shop

Three groundwater samples were collected from AOC 1 monitoring wells: one each from MW01R, MW07, and MW09.

All detections of DRO and ORO, as well as the sum of heavy oils in AOC 1, were below their respective MTCA Method A CULs.

AOC 2: Former Underground Storage Tanks

Four groundwater samples, including one field duplicate at MW02R, were collected from AOC 2 monitoring wells MW02R, MW04, and MW10.

Detections of DRO and ORO in groundwater samples at MW02R, MW04, and MW10 were all below their respective MTCA Method A CULs. Two samples, including a field duplicate, were collected at MW02R with an average sum of heavy oils concentration at 495 micrograms per liter (ug/L), slightly below the MTCA Method A CUL of 500 ug/L. The sum of heavy oils in MW10 slightly exceeded the MTCA Method A CUL at 730 ug/L.

AOC 3: Former Coal Storage Sheds/Possible Buried Object

Ecology approved the removal of MW11 from the compliance monitoring network (Ecology 2022b). Therefore, no groundwater samples were collected from AOC 3.

SUMMARY

Results from the groundwater monitoring indicate the following:

AOC 1

 No detections of DRO, ORO, or heavy oils exceeded their respective MTCA Method A CULs.

AOC 2

- No detections of DRO or ORO exceeded their respective MTCA Method A CULs.
- The sum of heavy oils (DRO and ORO) slightly exceeded the MTCA Method A CUL for DRO in MW10.

AOC 3

- Compliance monitoring has been discontinued in this AOC.

Recommendations and Request for Opinion

Eight compliance monitoring events have been completed at the Property since the remedial action in spring 2020 in accordance with the CMP and subsequent revisions approved by Ecology (MFA 2020a,b) (Ecology 2021a,b; 2022a,b). Trend plots show heavy-oils concentrations are generally decreasing in monitoring wells during the compliance monitoring period and suggest that continual decreases in heavy-oils concentrations in groundwater likely will be observed during future quarterly monitoring events (see Figures 5 through 8). Additionally, free product has not been observed since quarterly compliance groundwater monitoring began in September 2020.

The trend plots developed for the last eight quarters of groundwater sampling clearly identify that the plume at the Property is decreasing. However, CULs have not been met at all monitoring network wells; therefore, the following modification is proposed for subsequent groundwater monitoring events at the Property, consistent with recommendations provided by Ecology following the seven quarterly groundwater monitoring reports (Ecology 2022b):

• Reduction in monitoring frequency to 15-month intervals for a span of five years, until the time of the first periodic review by Ecology in 2027, as follows:

- September 2022
- December 2023
- March 2025
- June 2026

This reduction in sampling frequency will continue to allow assessment of seasonal trends at the Property and monitor concentrations until compliance with CULs is achieved. It is anticipated that additional modifications to the groundwater CMP would be assessed during the first periodic review in 2027. An environmental covenant is currently being executed for the Property that is consistent with this proposed sampling modification.

In accordance with this proposed sampling modification, the next groundwater monitoring event would be conducted in September 2022.

If you have any questions, please feel free to contact us.

Project No. M0747.01.013

Sincerely,

Maul Foster & Alongi, Inc.

09-08-2022

Carolyn R. Wise, LHG Project Hydrogeologist Christian Sifford, GIT

Staff Geologist

Attachments: Limitations

References Tables Figures

A—Water Field Sampling Data Sheets B—Analytical Laboratory Report C—Data Validation Memorandum

cc: Larry Setchell, Setchell NW Legal Services, P.S. Holly Stafford, Chmelik, Sitkin & Davis, P.S.

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

Ecology. 2021a. M. Warfel, Washington State Department of Ecology. VCP NW3031 North Cascade Ford, Sedro-Woolley, W.A. Email to C. Wise, Maul Foster & Alongi, Inc. September 9.

Ecology. 2021b. M. Warfel, Washington State Department of Ecology. *VSF Sedro-Woolley—fifth quarterly GW Report (VCP: NW3031)*. Email to C. Wise, Maul Foster & Alongi, Inc. December 10.

Ecology. 2022a. M. Warfel, Washington State Department of Ecology. VCP NW3031 North Cascade Ford, Sedro-Woolley, W.A. Email to C. Wise, Maul Foster & Alongi, Inc. March 15.

Ecology. 2022b. M. Warfel, Washington State Department of Ecology. *VSF Sedro-Woolley – Seventh Quarterly GW Report (VCP: NW3031)*. Email to C. Wise, Maul Foster & Alongi, Inc. April 6.

MFA. 2016. Interim remedial action completion report, North Cascade Ford property, Sedro-Woolley, Washington. Maul Foster & Alongi, Inc., Bellingham, Washington. November 8.

MFA. 2020a. Groundwater Compliance Monitoring Plan, North Cascade Ford Property, Sedro-Woolley, Washington. Prepared for VSF Properties, LLC. Maul Foster & Alongi, Inc., Bellingham, Washington. July 8.

MFA. 2020b. Remedial Action Completion Report, North Cascade Ford Property, Sedro-Woolley, Washington. Prepared for VSF Properties, LLC. Maul Foster & Alongi, Inc., Bellingham, Washington. July 13.

MFA. 2020c. J. Maul, Maul Foster & Alongi, Inc. Addendum to Groundwater Compliance Monitoring Plan, North Cascade Ford Property, 116 W. Ferry Street, Sedro-Woolley, Washington, Facility Site ID: 58313566; Cleanup Site ID: 12075. Memorandum to M. Warfel, Washington State Department of Ecology. August 10.

MFA. 2020d. J. Maul and C. Wise, Maul Foster & Alongi, Inc. Monitoring Well Installation and First Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. November 24.

MFA. 2021a. J. Maul and C. Wise, Maul Foster & Alongi, Inc. Second Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. January 26.

MFA. 2021b. M. Murray and C. Wise, Maul Foster & Alongi, Inc. *Third Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566.* Letter to M. Warfel, Washington State Department of Ecology. April 8.

- MFA. 2021c. M. Murray and C. Wise, Maul Foster & Alongi, Inc. Fourth Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. August 9.
- MFA. 2021d. C. Wise and A. Bixby, Maul Foster & Alongi, Inc. Fifth Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. November 11.
- MFA. 2022a. C. Wise and A. Bixby, Maul Foster & Alongi, Inc. Sixth Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. January 25.
- MFA. 2022b. C. Wise and C. Sifford, Maul Foster & Alongi, Inc. Seventh Quarterly Compliance Groundwater Monitoring Event, North Cascade Ford Property, Sedro-Woolley, Washington, VCP Number: NW3031, CSID: 12075, FSID: 58313566. Letter to M. Warfel, Washington State Department of Ecology. April 4.
- ZGA. 2017. Draft remedial action report, North Cascade Ford, 116 West Ferry Street, Sedro-Woolley, Skagit County, Washington. Prepared for 116 West Ferry Street, LLC, and Lane Properties. Zipper Geo Associates, LLC, Lynnwood, Washington. September 1.

TABLES







| | | | | | | | | | | | | O-WOOHEY, W |
|-----|------------------------------------|------------------|--------------------|------------------------------------------------|---------|--------------|---------|------------------------|--------------------------------|--------------------------|--------------------------------|-----------------------|
| AOC | Location | Sample Name | Collection Date | Collection Depth (ft bgs) ^(a) | Benzene | Ethylbenzene | Toluene | Xylenes ^(b) | Gasoline- Range Organics | Diesel-Range Organics | Lube-Oil- Range Organics | Total Naphthalenes |
| | | | 5 | 700 | 1,000 | 1,000 | 800 | 500 | 500 | 160 | | |
| | | MW1-W-8.5 | 05/15/0010 | 5 (1 10 44 | 0.3 | 0.2 U | 0.2 U | 0.4 U | 400 | 1,300 | 240 | 10.53 |
| | | FIELD DUPLICATE | 05/15/2012 | 5.61-13.44 | 0.3 | 0.2 U | 0.2 U | 0.4 U | 380 | 1,200 | 220 | 11.36 |
| | | MW01-GW-20121019 | 10/09/2012 | 9.87-13.44 | | | | | | 1,800 | 490 | 11.18 |
| | | MW01 | 0.4/10/001.4 | NIA | 0.2 U | 0.2 U | 0.2 U | 0.4 U | 250 U | 1,700 | 870 | |
| | | MWDUP | 04/10/2014 | NM | 0.2 U | 0.2 U | 0.2 U | 0.4 U | 250 U | 1,600 | 930 | |
| | | MW01-GW-140618 | 07/10/0014 | / 00 10 45 | | | | | | 1,400 | 310 | |
| | | FD-GW-140618 | 06/18/2014 | 6.09-13.45 | | | | | | 1,700 | 350 | |
| | | MW01-GW-091014 | 00/10/0014 | 7.74.10.44 | | | | | | 1,300 | 300 | |
| | MW01 | FD-091014 | 09/10/2014 | 7.74-13.44 | | | | | | 1,400 | 390 | |
| | | MW01-GW-121014 | 10/10/0014 | / 00 10 4/ | | | | | | 2,400 | 1,400 | |
| | | FD-121014 | 12/10/2014 | 6.08-13.46 | | | | | | 1,900 | 1,200 | |
| | | MW01-GW-112816 | 11/00/001/ | / 10 10 40 | | | | | | 1,300 | 610 U | |
| | | MWDUP-GW-112816 | 11/28/2016 | 6.12-13.43 | | | | | | 1,300 | 590 U | |
| 1 | | MW01-GW-042617 | 04/07/0017 | 5 25 12 40 | | | | | 100 U | 620 | 510 J | |
| | | MWDUP-GW-042617 | 04/26/2017 | 5.35-13.40 | | | | | 100 U | 560 | 410 U | |
| | | MW01-GW-101718 | 10/17/2018 | 9.70-13.40 | | | | | 500 U | 900 | 1,500 | |
| | | MW01-GW-032819 | 03/28/2019 | 6.82-13.41 | | | | | 370 J | 2,400 | 2,200 | |
| | A A VA / O.F. | MW05-GW-042617 | 04/26/2017 | 5.76-10.60 | | | | | 490 | 1,300 | 1,100 | |
| | MW05 | MW05-GW-032819 | 03/28/2019 | 6.93-10.63 | | | | | 600 J | 1,500 | 460 | |
| | | MW07-GW-042617 | 04/26/2017 | 7.85-19.74 | | | | | 100 U | 260 U | 410 U | |
| | MW07 | MW07-GW-101718 | 10/17/2018 | 9.25-19.74 | | | | | 100 U | 250 U | 400 U | |
| | | MW07-GW-032819 | 03/28/2019 | 7.95-19.74 | | | | | 100 U | 250 U | 410 U | |
| | | MW08-GW-042617 | 04/26/2017 | 7.38-15.80 | | | | | 400 U | 1,000 | 690 | |
| | | MW08-GW-101718 | 10/17/0010 | 10.05-15.80 | | | | | 100 U | 700 | 580 | |
| | MW08 | MWDUP-GW-101718 | 10/17/2018 | 10.05-15.60 | | | | | 500 U | 780 | 970 | |
| | | MW08-GW-032819 | 02/00/0010 | / 05 15 00 | | | | | 100 U | 950 | 460 | |
| | | MWDUP-GW-032819 | 03/28/2019 | 6.85-15.82 | | | | | 100 U | 1,000 | 510 | |
| | | MW2-W-9 | 05/16/2012 | 6.65-13.85 | 0.2 U | 0.2 U | 0.2 U | 0.4 U | 250 U | 1,900 | 240 | ND |
| | | MW02-GW-20121019 | 10/09/2012 | 9.29-13.84 | | | | | | 690 | 200 U | |
| | MW02 | MW02 | 04/10/2014 | 6.12-13.81 | | | | | | 11,000 | 1,300 | |
| | (decommissioned in September 2016) | MW02-GW-140618 | 06/18/2014 | 6.98-13.80 | | | | | | 3,800 | 410 | |
| 2 | JOPICHIDE ZUIUJ | MW02-GW-091014 | 09/10/2014 | 8.37-13.84 | | | | | | 770 | 200 U | |
| | | MW02-GW-121014 | 12/10/2014 | 7.11-13.85 | | | | | | 1,300 | 410 | |
| | MW02R | MW02R-GW-042617 | 04/26/2017 | 6.60-14.80 | | | | | | 750 | 410 U | |
| • | (replacement well | MW02R-GW-101718 | 10/17/2018 | 9.90-14.80 | | | | | | 480 | 450 | |
| | for MW02) | MW02R-GW-032819 | 03/28/2019 | 7.60-14.79 | | | | | | 680 | 470 | |

M0747.01.013, 9/8/2022, Tf_1 Historical Groundwater Analytical Results



Table 1 Historical Groundwater Analytical Results VSF Properties, LLC, North Cascade Ford Property Sedro-Woolley, Washington

| AOC | Location | Sample Name | Collection Date | Collection Depth (ft bgs) ^(a) | Benzene | Ethylbenzene | Toluene | Xylenes ^(b) | Gasoline- Range Organics | Diesel-Range Organics | Lube-Oil- Range Organics | Total Naphthalenes |
|-----|----------|----------------|--------------------|------------------------------------------------|---------|--------------|---------|------------------------|--------------------------------|--------------------------|--------------------------------|-----------------------|
| | • | • | N | MTCA Method A CUL: | 5 | 700 | 1,000 | 1,000 | 800 | 500 | 500 | 160 |
| | | MW04-GW-042617 | 04/26/2017 | 6.39-13.60 | - | | | | | 260 | 450 | |
| | MW04 | MW04-GW-101718 | 10/17/2018 | 10.23-13.60 | | | | | | 250 U | 420 U | |
| 2 | | MW04-GW-032819 | 03/28/2019 | 7.40-13.58 | | | | | | 260 U | 410 U | |
| 2 | | MW06-GW-042617 | 04/26/2017 | 7.66-19.74 | - | | | | | 260 U | 410 U | |
| | MW06 | MW06-GW-101718 | 10/17/2018 | 10.6-19.74 | - | | | | 100 U | 250 U | 400 U | |
| | | MW06-GW-032819 | 03/28/2019 | 5.73-13.88 | - | | | | 100 U | 260 U | 410 U | |
| 3 | GP51 | GP51-W-11.0 | 11/16/2016 | 8.85-12.0 | 15 J | 480 J | 6.1 J | 1000 J | 7,400 J | | | |
| 3 | GP76 | GP76-W-10.0 | 04/25/2017 | 6.0-15.0 | 5.8 | 230 | 10 U | 8.4 | 6,900 | 2,800 J | 420 U | 428 |

Notes

Analytical results are shown in micrograms per liter (parts per billion).

Bolding indicates a detection.

Shading indicates a MTCA Method A CUL exceedance; non-detect results ("U") were not compared with screening criteria.

-- = not analyzed.

AOC = area of concern.

CUL = cleanup level.

ft bgs = feet below ground surface.

J = result is estimated.

MTCA = Model Toxics Control Act.

MW = monitoring well.

ND = not detected.

NM = water level not measured because of unanticipated presence of free product.

U = analyte not detected at or above method reporting limit.

^(a)Sample collection depths are from top of water table or top of screened interval, whichever is deeper, to bottom of screened interval.

(b)Total xylenes are sum of m,p-xylene and o-xylene. When both results are non-detect, the higher reporting limit is used.



| Location | MP Elevation (feet, NAVD 88) | Measurement Date | NAPL Thickness (feet) | Depth to Water (feet bgs) | NAPL-Corrected Depth to Water (feet bgs) ^(a) | Groundwater Elevation (feet, NAVD 88) |
|--------------------|---------------------------------|---------------------|-----------------------------|------------------------------|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | 05/15/2012 | | 5.61 | NA | 50.48 |
| | | 10/09/2012 | | 9.87 | NA | 46.22 |
| | | 12/03/2012 | | 6.96 | NA | 49.13 |
| | | 04/10/2014 | NM ^(b) | NM ^(b) | NA | NM ^(b) |
| | | 06/17/2014 | NM ^(c) | 6.01 | NA | 50.16 |
| MW01 | | 06/18/2014 | | 6.09 | NA | 50.00 |
| (decommissioned in | 56.09 | 09/10/2014 | NM ^(c) | 7.74 | NA | 48.43 |
| February 2020) | | 12/10/2014 | 0.01 ^(d) | 6.09 | 6.08 | 50.09 |
| | | 04/26/2017 | | 5.35 | NA | 50.74 |
| | | 05/31/2017 | | 5.96 | NA | 50.13 |
| | | 10/17/2018 | 0.02 | 9.70 | 9.69 | 46.40 |
| | | 12/06/2018 | NM ^(e) | NA ^(e) | NA ^(e) | A 50.48 A 46.22 A 49.13 A NM(b) A 50.16 A 50.00 A 48.43 D8 50.09 A 50.74 A 50.13 A 50.13 A 46.40 A 50.13 A 50.48 A 50.93 A 48.50 A 48.50 A 50.93 A 49.05 A 48.53 A 52.13 A 51.40 |
| | | 03/28/2019 | NM ^(e) | NA ^(e) | NA ^(e) | NA ^(e) |
| | | 09/22/2020 | | 9.94 | NA | 46.38 |
| | | 10/14/2020 | | 7.82 | NA | 48.50 |
| | | 12/16/2020 | | 5.84 | NA | 50.48 |
| | | 03/17/2021 | | 5.39 | NA | 50.93 |
| MW01R | 56.32 | 06/22/2021 | | 7.27 | NA | 49.05 |
| | | 09/27/2021 | | 7.79 | NA | 48.53 |
| | | 12/16/2021 | | 4.19 | NA | 52.13 |
| | | 03/15/2022 | | 4.92 | NA | 51.40 |
| | | 06/06/2022 | | 5.20 | NA | 51.12 |



| Location | MP Elevation (feet, NAVD 88) | Measurement Date | NAPL Thickness (feet) | Depth to Water (feet bgs) | NAPL-Corrected Depth to Water (feet bgs) ^(a) | Groundwater Elevation (feet, NAVD 88) | | | |
|----------------------------|---------------------------------|---------------------|-----------------------------|------------------------------|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| | | 05/15/2012 | | 6.65 | NA | 50.08 | | | |
| | | 10/09/2012 | | 9.29 | NA | 47.44 | | | |
| | | 12/03/2012 | | 8.45 | NA | 48.28 | | | |
| MW02 (decommissioned in | 56.73 | 04/10/2014 | | 6.12 | NA | Elevation (feet, NAVD 88) 50.08 47.44 48.28 50.61 49.77 49.75 48.36 49.62 49.99 49.52 46.69 47.79 48.99 47.31 47.18 48.80 50.36 48.47 | | | |
| September 2016) | 36.73 | 06/17/2014 | | 6.96 | NA | 49.77 | | | |
| 00010111001 2010) | | 06/18/2014 | | 6.98 | NA | 49.75 | | | |
| | | 09/10/2014 | | 8.37 | 8.37 NA 4 | | | | |
| | | 12/10/2014 | | 7.11 | NA | 49.62 | | | |
| | | 04/26/2017 | | 6.60 | NA | 49.99 | | | |
| | | 05/31/2017 | | 7.07 | NA | th to Water Feet bgs) (a) (feet, NAVD 88) (feet bgs) (b) (feet, NAVD 88) (feet | | | |
| | | 10/17/2018 | | 9.90 | NA | 46.69 | | | |
| | | 12/06/2018 | | 8.80 | NA | 47.79 | | | |
| | | 03/28/2019 | | 7.60 | NA | 48.99 | | | |
| | | 09/22/2020 | | 9.28 | NA | 47.31 | | | |
| AAAAAAA D | 57.50 | 10/14/2020 | | 9.41 | NA | 47.18 | | | |
| MW02R | 56.59 | 12/16/2020 | | 7.79 | NA | 48.80 | | | |
| | | 03/17/2021 | | 6.23 | NA | 50.36 | | | |
| | | 06/22/2021 | | 8.12 | NA | 48.47 | | | |
| | | 09/27/2021 | | 10.04 | NA | 46.55 | | | |
| | | 12/16/2021 | | 5.31 | NA | 51.28 | | | |
| | | 03/15/2022 | | 5.88 | NA | 50.71 | | | |
| | | 06/06/2022 | | 6.24 | NA | 50.35 | | | |



| Location | MP Elevation (feet, NAVD 88) | Measurement Date | NAPL Thickness (feet) | Depth to Water (feet bgs) | NAPL-Corrected Depth to Water (feet bgs) ^(a) | Groundwater Elevation (feet, NAVD 88) |
|----------|---------------------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|---------------------------------------------------------------|---------------------------------------------|
| | | 05/15/2012 | | 5.40 | NA | 49.68 |
| | | 10/09/2012 | | 8.11 | NA | 46.97 |
| | | 12/03/2012 | | 5.28 | NA | 49.80 |
| | | 04/10/2014 | | 5.00 | NA | 50.08 |
| | | 06/17/2014 | | 5.66 | NA | 49.42 |
| A 414/02 | FF 00 | 06/18/2014 | | 5.87 | NA | 49.21 |
| MW03 | 55.08 | 09/10/2014 | | 6.94 | NA | 48.14 |
| | | 12/10/2014 | | 5.10 | NA | 49.98 |
| | | 05/31/2017 | | 5.75 | NA | 49.33 |
| | | 10/17/2018 | | 7.72 | NA | 47.36 |
| | | 12/06/2018 | | 5.92 | NA | 49.16 |
| | 03/28/2019 | | | 5.73 | NA | 49.35 |
| | | 04/26/2017 | | 6.39 | NA | 49.93 |
| | | 05/31/2017 | 10/09/2012 8.11 NA 46.97 12/03/2012 5.28 NA 49.80 04/10/2014 5.00 NA 50.08 06/17/2014 5.66 NA 49.42 06/18/2014 5.87 NA 49.21 09/10/2014 6.94 NA 48.14 12/10/2014 5.10 NA 49.98 05/31/2017 5.75 NA 49.98 05/31/2017 5.75 NA 49.33 10/17/2018 7.72 NA 47.36 12/06/2018 5.92 NA 49.16 03/28/2019 5.73 NA 49.35 04/26/2017 6.39 NA 49.93 05/31/2017 6.88 NA 49.44 10/17/2018 10.23 NA 46.09 12/06/2018 <td< td=""><td>49.44</td></td<> | 49.44 | | |
| | | 10/17/2018 | | 10.23 | NA | 46.09 |
| | | 12/06/2018 | | 8.62 | NA | 47.70 |
| | | 03/28/2019 | | 7.40 | NA | 48.92 |
| | | 09/22/2020 | | 9.06 | NA | 47.26 |
| MW04 | 56.32 | 12/16/2020 | | 7.71 | NA | 48.61 |
| | | 03/17/2021 | | 6.04 | NA | 50.28 |
| | | 06/22/2021 | | 7.96 | NA | 48.36 |
| | | 09/27/2021 | | 10.31 | NA | 46.01 |
| | | 12/16/2021 | | 5.12 | NA | 51.20 |
| | | 03/15/2022 | | 5.69 | NA | 50.63 |
| | | 06/06/2022 | | 6.35 | NA | 49.97 |



| Location | MP Elevation (feet, NAVD 88) | Measurement Date | NAPL Thickness (feet) | Depth to Water (feet bgs) | NAPL-Corrected Depth to Water (feet bgs) ^(a) | Groundwater Elevation (feet, NAVD 88) | | | | | | | | |
|--------------------|---------------------------------|---------------------|-----------------------------|------------------------------|---------------------------------------------------------------|---------------------------------------------|-------|------------|-------|------------|----|-------|----|-------|
| | | 04/26/2017 | | 5.76 | NA | 50.49 | | | | | | | | |
| MW05 | | 05/31/2017 | | 6.35 | NA | 49.90 | | | | | | | | |
| (decommissioned in | 56.25 | 10/17/2018 | | NA ^(f) | NA ^(f) | NA ^(f) | | | | | | | | |
| February 2020) | | 12/06/2018 | | 8.05 | NA | 48.20 | | | | | | | | |
| | | 03/28/2019 | | 6.93 | NA | 49.32 | | | | | | | | |
| | | 04/26/2017 | | 7.66 | NA | 48.92 | | | | | | | | |
| | | 05/31/2017 | | 8.06 | NA | 48.52 | | | | | | | | |
| | | 10/17/2018 | | 10.60 | NA | 45.98 | | | | | | | | |
| | | 12/06/2018 | | 9.10 | NA | 47.48 | | | | | | | | |
| | | 03/28/2019 | | 5.73 | NA | 50.85 | | | | | | | | |
| | | 09/22/2020 | | 10.84 | NA | 45.74 | | | | | | | | |
| MW06 | 56.58 | 56.58 | 56.58 | 56.58 | 56.58 | 56.58 | 56.58 | 56.58 | 56.58 | 12/16/2020 | | 8.25 | NA | 48.33 |
| | | | | | | | | 03/17/2021 | | 7.11 | NA | 49.47 | | |
| | | 06/22/2021 | | 8.72 | NA | 47.86 | | | | | | | | |
| | | 09/27/2021 | | 10.83 | NA | 45.75 | | | | | | | | |
| | | 12/16/2021 | | 5.60 | NA | 50.98 | | | | | | | | |
| | | 03/15/2022 | | 6.12 | NA | 50.46 | | | | | | | | |
| | | 06/06/2022 | | 6.40 | NA | 50.18 | | | | | | | | |



| Location | MP Elevation (feet, NAVD 88) | Measurement Date | NAPL Thickness (feet) | Depth to Water (feet bgs) | NAPL-Corrected Depth to Water (feet bgs) ^(a) | Groundwater Elevation (feet, NAVD 88) |
|--------------------|---------------------------------|---------------------|-----------------------------|------------------------------|---------------------------------------------------------------|-------------------------------------------------------------------------|
| | | 04/26/2017 | | 7.85 | NA | 48.61 |
| | | 05/31/2017 | | 8.02 | NA | 48.44 |
| | 56.46 | 10/17/2018 | | 9.25 | NA | 47.21 |
| | | 12/06/2018 | | 9.15 | NA | 47.31 |
| | | 03/28/2019 | | 7.95 | NA | 48.51 |
| | NA ^(g) | 09/22/2020 | | 10.42 ^(g) | NA ^(g) | NA ^(g) |
| MW07 | | 12/16/2020 | | 8.24 | NA | 48.06 |
| | | 03/17/2021 | | 6.92 | NA | 49.38 |
| | | 06/22/2021 | | 8.80 | NA | 47.50 |
| | 56.30 | 09/27/2021 | | 10.21 | NA | 46.09 |
| | | 12/16/2021 | | 5.17 | NA | 51.13 |
| | | 03/05/2022 | | 4.51 | NA | IA 49.38 IA 47.50 IA 46.09 IA 51.13 IA 51.79 IA 51.17 IA 49.10 IA 48.47 |
| | | 06/06/2022 | | 5.13 | NA | 51.17 |
| | | 04/26/2017 | | 7.38 | NA | 49.10 |
| MW08 | | 05/31/2017 | | 8.01 | NA | 48.47 |
| (decommissioned in | 56.48 | 10/17/2018 | | 10.05 | NA | 46.43 |
| February 2020) | | 12/06/2018 | | 9.02 | NA | 47.46 |
| | | 03/28/2019 | | 6.85 | NA | 49.63 |
| | | 09/22/2020 | | 9.26 | NA | 47.40 |
| | | 10/14/2020 | | 8.46 | NA | 48.20 |
| | | 12/16/2020 | | 6.17 | NA | 50.49 |
| MW09 | | 03/17/2021 | | 5.70 | NA | 50.96 |
| | 56.66 | 06/22/2021 | | 7.57 | NA | 49.09 |
| | | 09/27/2021 | | 8.74 | NA | 47.92 |
| | | 12/16/2021 | | 4.51 | NA | 52.15 |
| | | 03/15/2022 | | 5.23 | NA | 51.43 |
| | | 06/06/2022 | | 5.53 | NA | 51.13 |



| Location | MP Elevation (feet, NAVD 88) | Measurement Date | NAPL Thickness (feet) | Depth to Water (feet bgs) | NAPL-Corrected Depth to Water (feet bgs) ^(a) | Groundwater Elevation (feet, NAVD 88) | | | |
|-----------|---------------------------------|---------------------|-----------------------------|------------------------------|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| | | 09/22/2020 | | 9.71 | NA | 46.55 | | | |
| | | 10/14/2020 | | 9.21 | NA | 47.05 | | | |
| | | 12/16/2020 | | 7.13 | NA | 49.13 | | | |
| | | 03/17/2021 | | 5.80 | NA | 50.46 | | | |
| MW10 | 56.26 | 06/22/2021 | | 7.62 | NA | 48.64 | | | |
| | | 09/27/2021 | | 9.42 | NA | 46.84 | | | |
| | | 12/16/2021 | | 4.78 | NA | 51.48 | | | |
| | | 03/15/2022 | | 5.44 | NA | 50.82 | | | |
| | | 06/06/2022 | | 5.99 | NA | 50.27 | | | |
| | | 09/22/2020 | 09/22/2020 10.48 NA | | | | | | |
| | | 12/16/2020 | | 6.51 | NA | 49.69 | | | |
| | | 03/17/2021 | | 5.46 | NA | 50.74 | | | |
| A 41A/11 | 54.0 | 06/22/2021 | | 7.72 | NA | 48.48 | | | |
| MW11 | 56.2 | 09/27/2021 | | 9.21 | NA | 46.99 | | | |
| | | 12/16/2021 | | 4.28 | NA | 51.92 | | | |
| | | 03/15/2022 | | 5.03 | NA | 51.17 | | | |
| | | 06/06/2022 | | 5.45 | NA | 50.75 | | | |
| | | 09/22/2020 | | 10.24 | NA | 46.15 | | | |
| | | 12/16/2020 | | 7.85 | NA | 48.54 | | | |
| | | 03/17/2021 | | 6.67 | NA | 49.72 | | | |
| MW12 | 56.39 | 06/22/2021 | | 8.69 | NA | Elevation (feet, NAVD 88) 46.55 47.05 49.13 50.46 48.64 46.84 51.48 50.82 50.27 45.72 49.69 50.74 48.48 46.99 51.92 51.17 50.75 46.15 48.54 | | | |
| 1V(VV 1 Z | 30.37 | 09/27/2021 | | 10.59 | NA | 45.80 | | | |
| | | 12/16/2021 | | 5.79 | NA | 50.60 | | | |
| | | 03/15/2022 | | 6.33 | NA | 50.06 | | | |
| | | 06/06/2022 | | 6.93 | NA | 49.46 | | | |



Notes

-- = NAPL not observed.

bgs = below ground surface.

MP = measuring point.

MW = monitoring well.

NA = not applicable.

NAPL = nonaqueous-phase liquid.

NAVD 88 = North American Vertical Datum of 1988.

NM = not measured.

^(a)Water level corrected for presence of NAPL, using assumed product density of 0.8 grams per cubic centimeter.

(b) NAPL was observed, but interface probe was not available to measure NAPL thickness and water level.

^(c)NAPL was observed on probe and tubing, but measurable and extractable quantity was not present.

^(d)NAPL thickness was measured, but extractable quantity was not present.

(e)NAPL was present, coating entire probe tip and tubing; coated probe tip prevented measurement of thickness or water level.

^(f)Water level may not be representative of groundwater elevation because screened interval was above low water table.

(g) Well monument was compressed during implementation of remedial action, and casing had to be cut down to properly secure monument. Water level measurement not collected. New well monument installed on 10/01/2020.



Table 3 Groundwater Analytical Results—Compliance Monitoring VSF Properties, LLC, North Cascade Ford Property Sedro-Woolley, Washington

| AOC | Location | Collection Date | Benzene | Ethyl- benzene | Toluene | Total Xylenes | GRO | DRO | ORO | Heavy Oils ^(a) | 1,4-Dichloro- benzene | Total Naphth. ^(b) |
|-----|-----------------------------------|--------------------|---------|-------------------|---------|------------------|----------------------|-------|-------|------------------------------|--------------------------|---------------------------------|
| | | Units: | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L |
| | MTCA Method A CUL: ⁽¹⁾ | | 5 | 700 | 1,000 | 1,000 | 1,000 ^(c) | 500 | 500 | 500 | NV | 160 |
| | | 09/22/2020 | 1 U | 1 U | 1 U | 3.7 | 160 | 1,900 | 610 | 2,510 | | |
| | | 10/14/2020 | 20 U | 20 U | 20 U | 60 U | 100 U | 200 | 260 U | 330 | | 20 U |
| | | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 250 | 250 U | 375 | | |
| | | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 120 | 250 U | 245 | | |
| | MW01R | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 370 | 250 U | 495 | | |
| | | 09/27/2021 | - | | | | | 93 | 250 U | 218 | | |
| | | 12/16/2021 | - | | | | | 70 | 250 U | 195 | | |
| | | 03/15/2022 | - | | | | | 79 | 250 U | 204 | | |
| | | 06/06/2022 | - | | | | | 50 U | 250 U | 250 U | | |
| | | 09/22/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 130 | 250 U | 255 | | |
| | | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 89 | 250 U | 214 | | |
| | | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 96 | 250 U | 221 | | |
| 1 | MW07 | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 360 | 290 | 650 | | |
| ' | 1010007 | 09/27/2021 | | | | | | 160 | 250 U | 285 | | |
| | | 12/16/2021 | | | | | | 59 | 250 U | 184 | | |
| | | 03/15/2022 | | | | | | 50 U | 250 U | 250 U | | |
| | | 06/06/2022 | | | | | | 50 U | 250 U | 250 U | | |
| | | 09/22/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 640 | 620 | 1,260 | | |
| | | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 230 | 300 | 530 | | |
| | | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 210 | 390 | 600 | | |
| | | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 120 | 250 U | 245 | | |
| | MW09 | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 150 | 250 U | 275 | | |
| | | 09/27/2021 | | | | | | 270 | 290 | 560 | | |
| | | 12/16/2021 | | | | | | 91 | 300 U | 241 | 1 U | |
| | | 03/15/2022 | | | | | | 69 | 250 U | 194 | | |
| | | 06/06/2022 | | | | | | 50 U | 250 U | 250 U | | |
| | | 09/22/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 780 | 450 | 1,230 | | |
| | | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 600 | 390 | 990 | | |
| 0 | 1.414/005 | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 680 | 310 | 990 | | |
| 2 | MW02R | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 580 | 270 | 850 | | |
| | | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 560 | 250 U | 685 | | |
| | | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 530 | 250 U | 655 | | |



Table 3 Groundwater Analytical Results—Compliance Monitoring VSF Properties, LLC, North Cascade Ford Property Sedro-Woolley, Washington

| AOC | Location | Collection Date | Benzene | Ethyl- benzene | Toluene | Total Xylenes | GRO | DRO | ORO | Heavy Oils ^(a) | 1,4-Dichloro- benzene | Total Naphth. ^(b) |
|-----|-------------|--------------------|---------|-------------------|---------|------------------|----------------------|-------|-------|------------------------------|--------------------------|---------------------------------|
| | | Units: | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L |
| | MTCA M | lethod A CUL:(1) | 5 | 700 | 1,000 | 1,000 | 1,000 ^(c) | 500 | 500 | 500 | NV | 160 |
| | 7411 67 474 | 09/27/2021 | | | | | | 440 | 250 U | 565 | | |
| | | 12/16/2021 | | | | | | 580 | 330 | 910 | | |
| | | 12/16/2021 | | | | | | 390 | 250 U | 515 | | |
| | MW02R | 03/15/2022 | | | | | | 400 | 250 U | 525 | | |
| | | 06/06/2022 | | | | | | 340 | 250 U | 465 | | |
| | | 06/06/2022 | | | | | | 400 | 250 U | 525 | | |
| | | 09/22/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 260 | 250 U | 385 | | |
| | | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 220 | 280 | 500 | | |
| | | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 220 | 250 U | 345 | | |
| | | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 300 | 250 U | 425 | | |
| | MW04 | 09/27/2021 | | | | | | 290 | 250 U | 415 | | |
| | | 09/27/2021 | | | | | | 180 | 250 U | 305 | | |
| | | 12/16/2021 | | | | | | 150 | 250 U | 275 | | |
| | | 03/15/2022 | | | | | | 190 | 250 U | 315 | | |
| | | 06/06/2022 | | | | | | 260 | 300 U | 410 | | |
| | | 09/22/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | |
| 2 | 1 4140 (| 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | |
| | MW06 | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | |
| | | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | |
| | | 09/22/2020 | 1 U | 1 U | 1 U | 3 U | 370 | 1,900 | 250 U | 2,025 | | |
| | | 10/14/2020 | 20 U | 20 U | 20 U | 60 U | 550 | 2,000 | 400 | 2,400 | | 65.1 |
| | | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 160 | 250 U | 285 | | |
| | | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 140 | 250 U | 265 | | |
| | MW10 | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 100 | 250 U | 225 | | |
| | 7414410 | 09/27/2021 | | | | | | 2,200 | 280 | 2,480 | | |
| | | 12/16/2021 | | | | | | 110 | 250 U | 235 | | 0.4 U |
| | | 03/15/2022 | | | | | | 200 | 250 U | 325 | | |
| | | 03/15/2022 | | | | | | 230 | 280 | 510 | | |
| | | 06/06/2022 | | | | | | 260 | 470 | 730 | | |
| | | 09/22/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | |
| | MW12 | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | |
| | | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | |
| | MW12 | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | |



Table 3 Groundwater Analytical Results—Compliance Monitoring VSF Properties, LLC, North Cascade Ford Property Sedro-Woolley, Washington

| AOC | Location | Collection Date | Benzene | Ethyl- benzene | Toluene | Total Xylenes | GRO | DRO | ORO | Heavy Oils ^(a) | 1,4-Dichloro- benzene | Total Naphth. ^(b) |
|-----|----------|-----------------------------|---------|-------------------|---------|------------------|----------------------|------|-------|------------------------------|--------------------------|---------------------------------|
| | | Units: | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L | ug/L |
| | MTCA M | ethod A CUL: ⁽¹⁾ | 5 | 700 | 1,000 | 1,000 | 1,000 ^(c) | 500 | 500 | 500 | NV | 160 |
| | | 09/22/2020 | 1 U | 30 | 1 U | 16 | 390 | 350 | 300 U | 500 | | 18.8 |
| | | 09/22/2020 | 1 U | 30 | 1 U | 17 | 380 | 200 | 250 U | 325 | | 21.7 |
| | | 12/16/2020 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | 0.4 U |
| 3 | MW11 | 03/17/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | 0.4 U |
| 3 | 7010011 | 06/22/2021 | 1 U | 1 U | 1 U | 3 U | 100 U | 50 U | 250 U | 250 U | | 0.4 U |
| | | 09/27/2021 | | | - | | | 230 | 250 U | 355 | | |
| | | 12/16/2021 | | | | | | 50 U | 250 U | 250 U | | |
| | | 03/16/2022 | | | | | | 50 U | 250 U | 250 U | | |

Table 3



Groundwater Analytical Results—Compliance Monitoring VSF Properties, LLC, North Cascade Ford Property Sedro-Woolley, Washington

Notes

Detected values are shown in bold font.

Shading indicates a MTCA Method A CUL exceedance; non-detect results (U) were not compared with screening criteria.

-- = not analyzed.

AOC = area of concern.

CUL = cleanup level.

DRO = diesel-range organics.

GRO = gasoline-range organics.

MTCA = Model Toxics Control Act.

Naphth. = naphthalenes.

NV = no value.

ORO = lube-oil-range organics.

U = result is non-detect at the reporting limit.

ug/L = micrograms per liter (parts per billion).

^(a)Heavy oils are the sum of DRO and ORO. When results are non-detect, half the reporting limit is used. When all results are non-detect, the highest reporting limit is shown.

(b)Total naphthalenes are the sum of 1-methylnaphthalene, 2-methylnaphthalene, and naphthalene. Where 1- and 2-methylnaphthalene are not analyzed, total naphthalene is represented by the naphthalene result. When all results are non-detect, the highest reporting limit is shown.

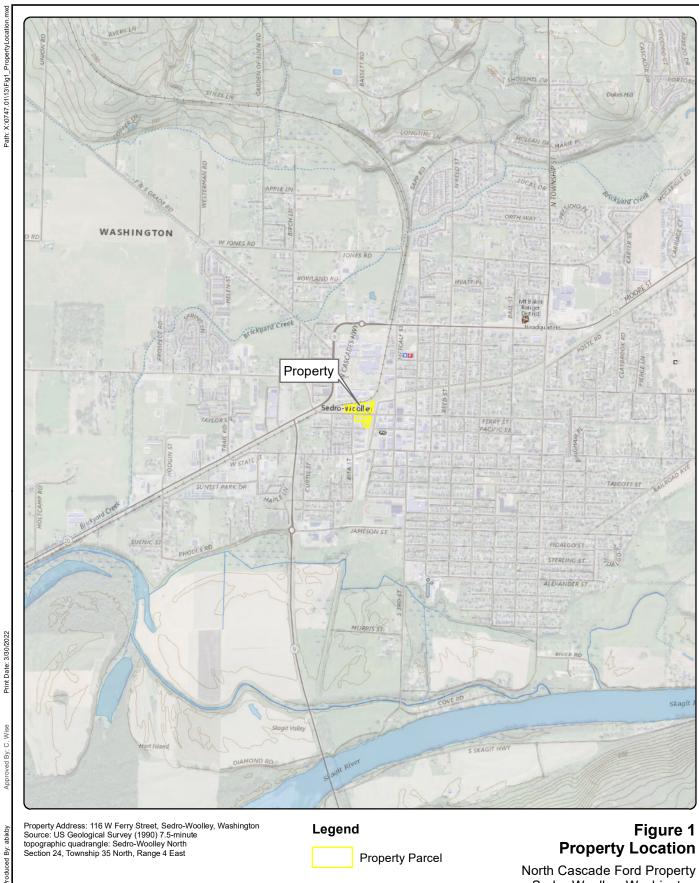
^(c)MTCA Method A CUL with no detectable benzene.

Reference

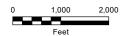
(1) Washington State Department of Ecology. 2021. Cleanup Levels and Risk Calculation (CLARC) table. Washington State Department of Ecology - Toxics Cleanup Program. July.

FIGURES

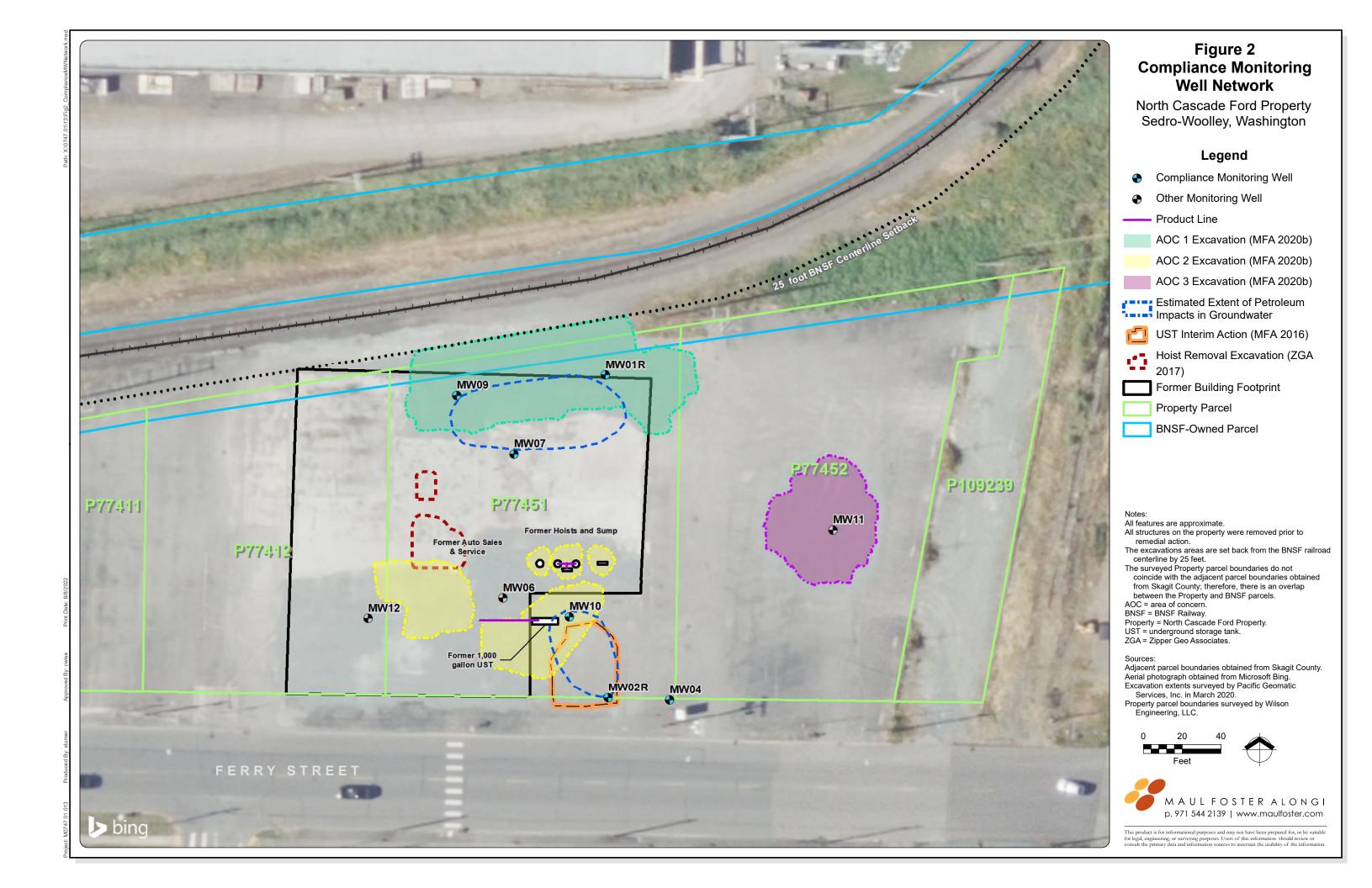


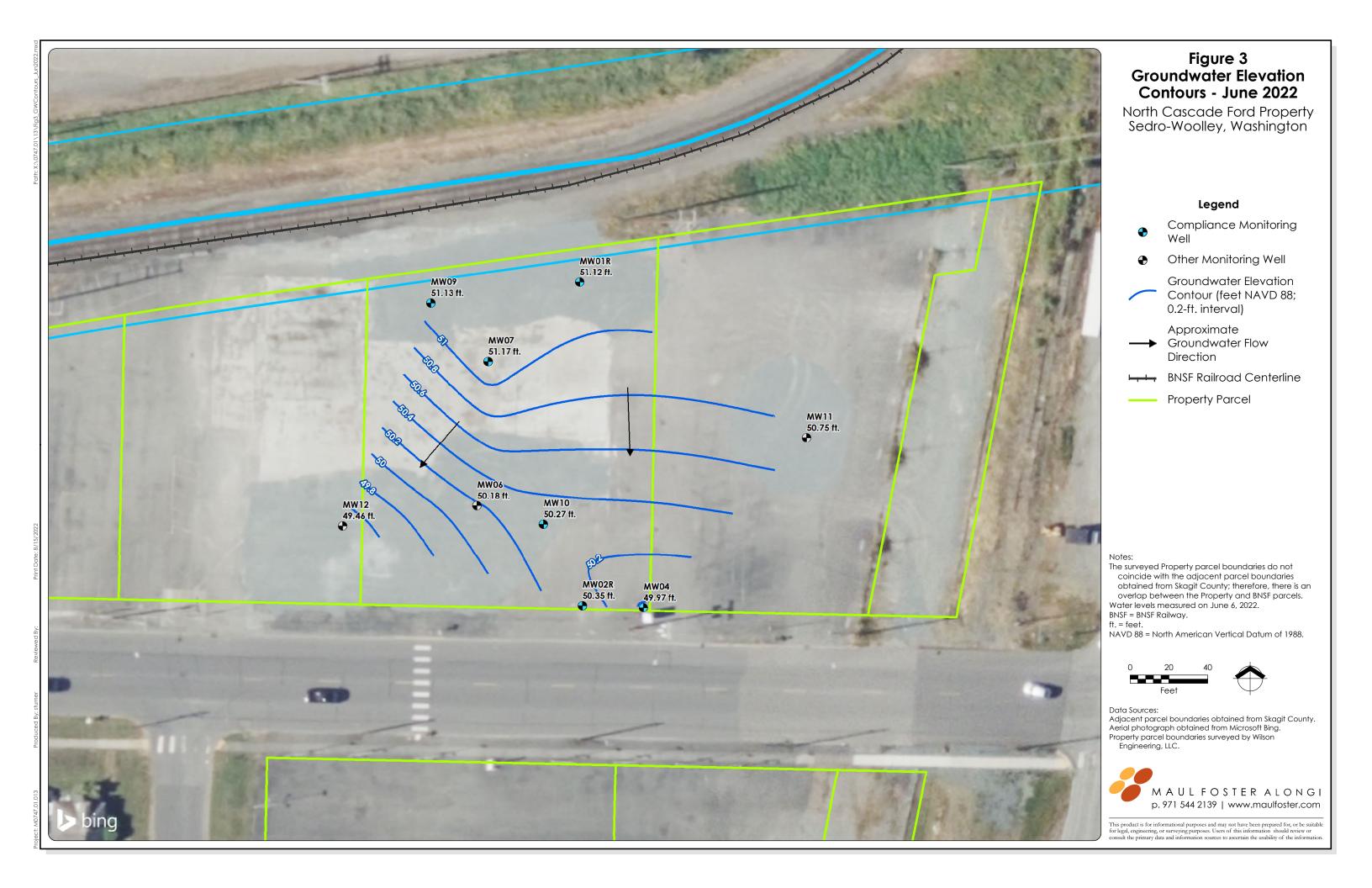


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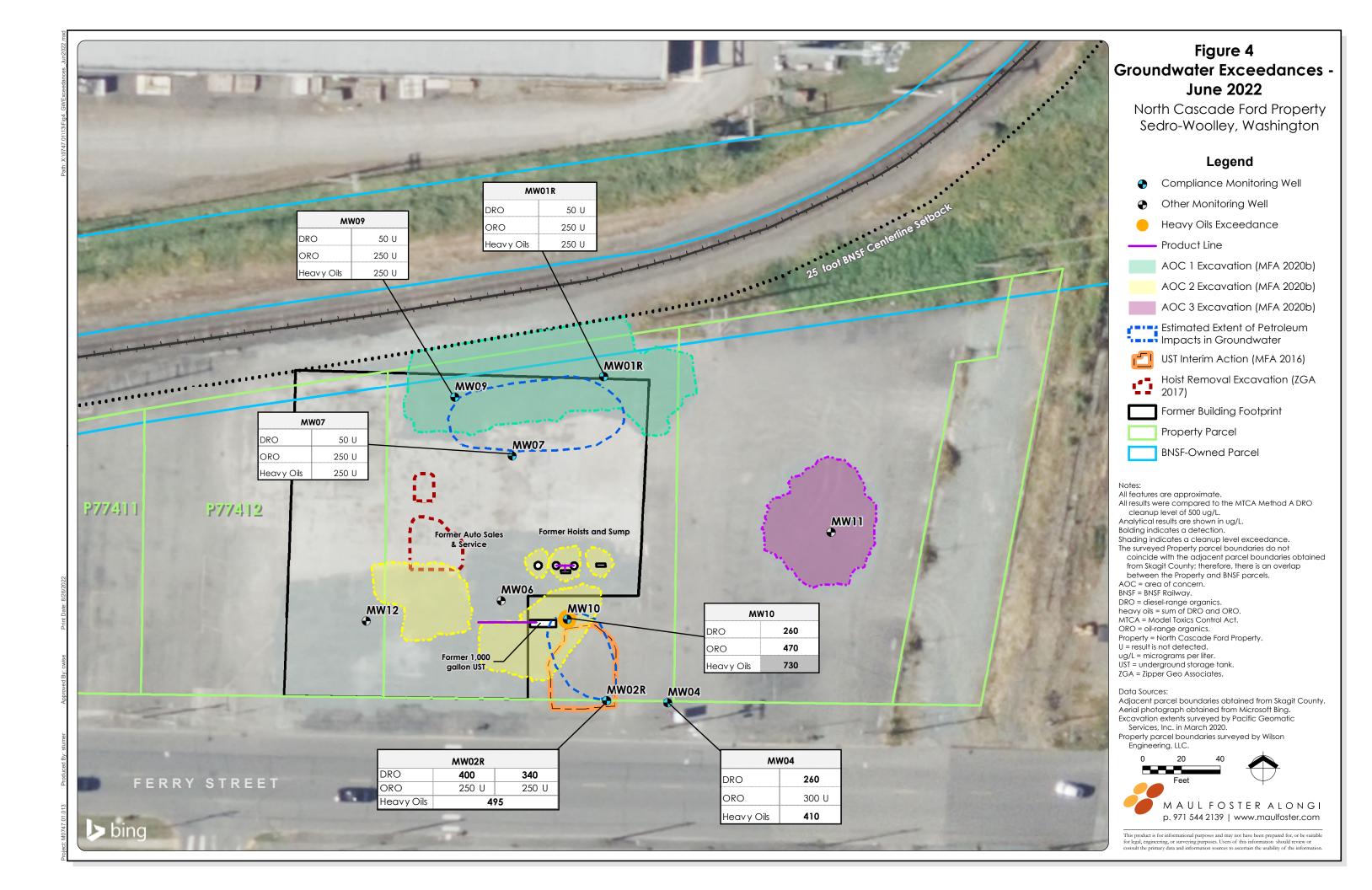




Figure 5 Diesel-Range Organics Concentrations North Cascade Ford Property Sedro-Woolley, Washington

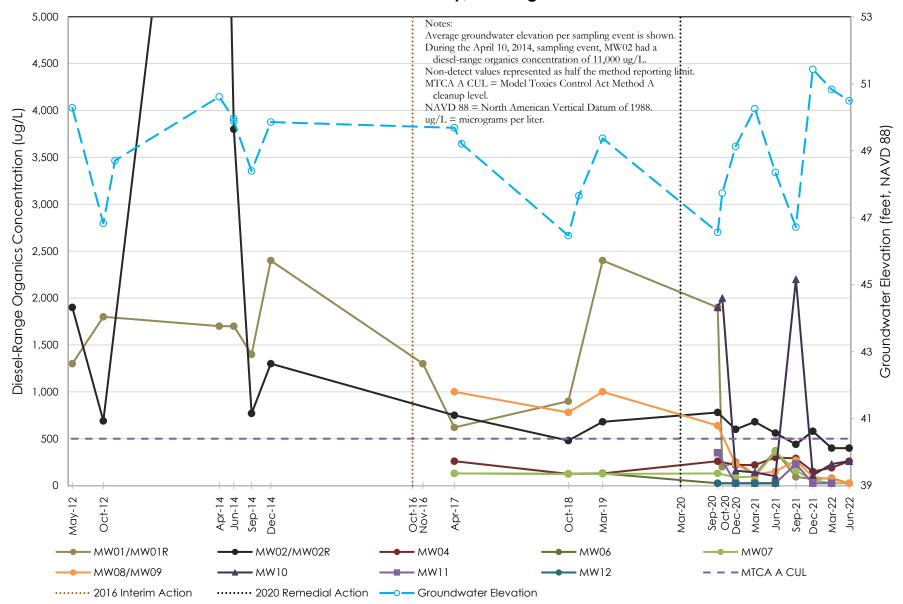
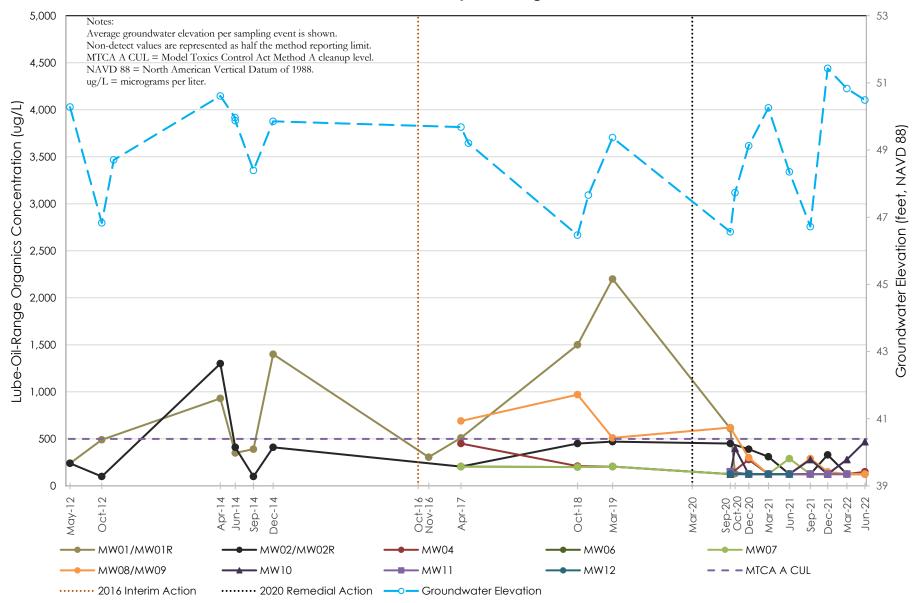




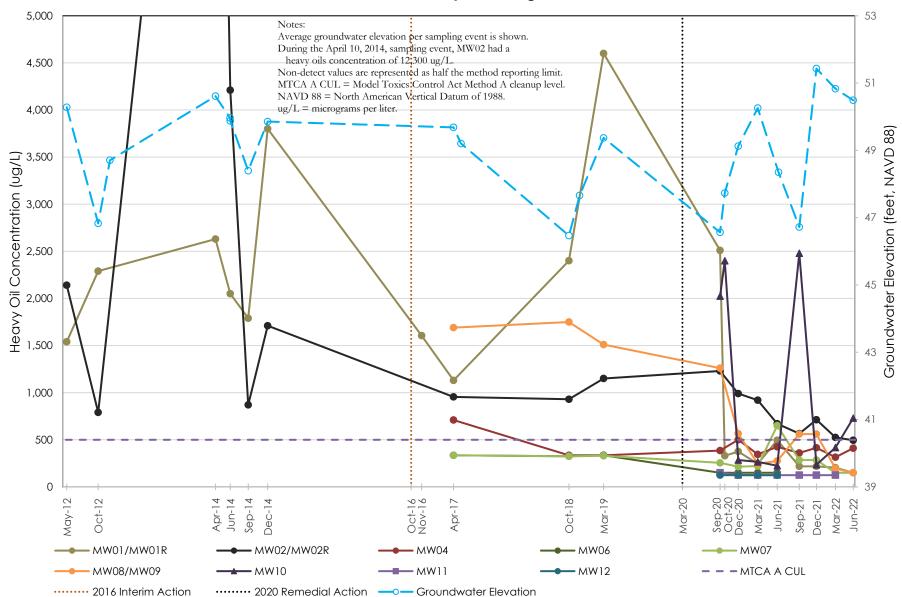
Figure 6 Lube-Oil-Range Organics Concentrations North Cascade Ford Property Sedro-Woolley, Washington



M0747.01.013, 9/8/2022, ORO Page 1 of 1



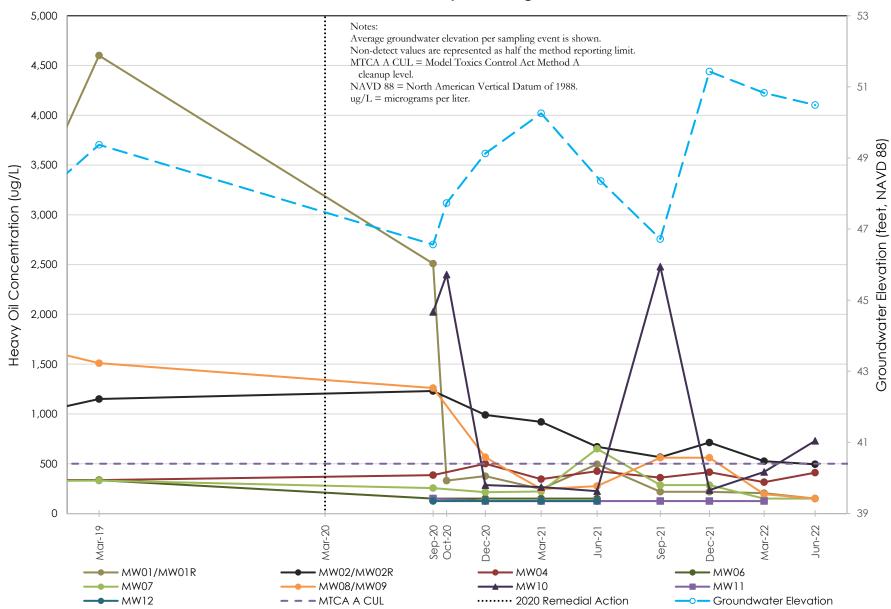
Figure 7
Heavy Oil Concentrations
North Cascade Ford Property
Sedro-Woolley, Washington



M0747.01.013, 9/8/2022, Heavy Oil Page 1 of 1



Figure 8 Heavy Oil Concentrations 2019 to 2022 North Cascade Ford Property Sedro-Woolley, Washington



ATTACHMENT A

WATER FIELD SAMPLING DATA SHEETS



Maul Foster & Alongi, Inc.

109 East 13th Street, Vancouver, WA 98660 (360) 694-2691 Fax. (360) 906-1

Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW01R |
|----------------|---------------------|-----------------|-----------------|
| Project # | M0747.01.013 | Sampler | C. Sifford |
| Project Name | North Cascade Ford | Sampling Date | 6/6/2022 |
| Sampling Event | Q8, June 2022 | Sample Name | MW01R-GW-060622 |
| Sub Area | AOC 1 | Sample Depth | 10 |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC |

Hydrology/Level Measurements

| | | | | | (Product Thickness) | (Water Column) | (Gallons/ft x Water Column) |
|----------|------|-----------|------------|----------|---------------------|----------------|-----------------------------|
| Date | Time | DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| 6/6/2022 | 9:40 | 14.54 | | 5.2 | | 9.34 | 1.52 |

 $(0.75" = 0.023 \text{ gal/ft}) \ (1" = 0.041 \text{ gal/ft}) \ (1.5" = 0.092 \text{ gal/ft}) \ (2" = 0.163 \text{ gal/ft}) \ (3" = 0.367 \text{ gal/ft}) \ (4" = 0.653 \text{ gal/ft}) \ (6" = 1.469 \text{ gal/ft}) \ (8" = 2.611 \text{ gal/ft}) \ (8" = 2.611$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|-------------|-----------------|----------------|------|----------|----------------|-----------|-------|-----------|
| (2) Peristaltic Pump | 11:41:00 AM | 3.7 | 0.25 | 6.89 | 15 | 630 | 6.5 | 156.3 | 5.16 |
| | 11:47:00 AM | 4 | 0.25 | 7.69 | 14.8 | 387.2 | 5.68 | 140.1 | 5.1 |
| | 11:55:00 AM | 4.2 | 0.25 | 8.17 | 14.9 | 321.9 | 5.28 | 123.7 | 5.05 |
| | 11:58:00 AM | 4.4 | 0.25 | 8.24 | 14.9 | 318 | 5.09 | 120.1 | 4.5 |
| | | | | | | | | | |
| | | | | | | | | | |
| Final Field Parameters | 12:01:00 PM | 4.6 | 0.25 | 8.28 | 14.9 | 313.3 | 5.25 | 115.6 | 5.19 |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

Water Quality Observations:

Clear; colorless; no odor; no sheen.

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | 12:05:00 PM | VOA-Glass | | |
| | | <u> </u> | Amber Glass | 1 | No |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 1 | |

General Sampling Comments

Begin purge at 10:54. DTW at start of purging was 5.19 feet bgs.

Maul Foster & Alongi, Inc.

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Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW02R | | |
|----------------|---------------------|------------------------|-----------------|--|--|
| Project # | M0747.01.013 | Sampler | C. Sifford | | |
| Project Name | North Cascade Ford | Sampling Date 6/6/2022 | | | |
| Sampling Event | Q8, June 2022 | Sample Name | MW02R-GW-060622 | | |
| Sub Area | AOC 2 | Sample Depth | 12.5 | | |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC | | |

Hydrology/Level Measurements

| (Product Thickness) (Water Column) (Gallons/ft x We | | | | | | | |
|-----------------------------------------------------|-------|-----------|------------|----------|---------|---------|-------------|
| Date | Time | DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| 6/6/2022 | 10:30 | 14.78 | | 6.24 | | 8.54 | 1.39 |

 $(0.75" = 0.023 \text{ gal/ft}) \ (1" = 0.041 \text{ gal/ft}) \ (1.5" = 0.092 \text{ gal/ft}) \ (2" = 0.163 \text{ gal/ft}) \ (3" = 0.367 \text{ gal/ft}) \ (4" = 0.653 \text{ gal/ft}) \ (6" = 1.469 \text{ gal/ft}) \ (8" = 2.611 \text{ gal/ft}) \ (8" = 2.611$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|------------|-----------------|----------------|------|----------|----------------|-----------|------|-----------|
| (2) Peristaltic Pump | 2:28:00 PM | 1.3 | 0.2 | 7.33 | 14.4 | 641 | 1.65 | 98.3 | 3.87 |
| | 2:31:00 PM | 1.5 | 0.2 | 7.25 | 14.5 | 640 | 1.05 | 95.8 | 3.85 |
| | 2:34:00 PM | 1.7 | 0.2 | 7.23 | 14.4 | 641 | 0.93 | 94.5 | 3.99 |
| | 2:37:00 PM | 2.1 | 0.2 | 7.21 | 14.6 | 642 | 0.8 | 91.5 | 3.65 |
| | | | | | | | | | |
| | | | | | | | | | |
| Final Field Parameters | 2:40:00 PM | 2.3 | 0.2 | 7.2 | 14.6 | 642 | 0.73 | 89.6 | 3.61 |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

Water Quality Observations:

Clear; colorless; no odor; no sheen.

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | 2:45:00 PM | VOA-Glass | | |
| | | | Amber Glass | 1 | No |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 1 | |

General Sampling Comments

Begin purge at 14:04. MWDUP-GW-060622 collected here. DTW at start of purging was 6.24 feet bgs.

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Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW04 |
|-----------------------|---------------------|----------------------------|--------------|
| Project # | M0747.01.013 | Sampler | C. Sifford |
| Project Name | North Cascade Ford | Sampling Date | 6/6/2022 |
| Sampling Event | Q8, June 2022 | Sample Name MW04-GW-060622 | |
| Sub Area | AOC 2 | Sample Depth | 10 |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC |

Hydrology/Level Measurements

| | | | | | (Product Thickness) | (Water Column) | (Gallons/ft x Water Column) |
|----------|-------|-----------|------------|----------|---------------------|----------------|-----------------------------|
| Date | Time | DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| 6/6/2022 | 14:30 | 13.55 | | 6.45 | | 7.1 | 1.15 |

 $(0.75" = 0.023 \text{ gal/ft}) \ (1" = 0.041 \text{ gal/ft}) \ (1.5" = 0.092 \text{ gal/ft}) \ (2" = 0.163 \text{ gal/ft}) \ (3" = 0.367 \text{ gal/ft}) \ (4" = 0.653 \text{ gal/ft}) \ (6" = 1.469 \text{ gal/ft}) \ (8" = 2.611 \text{ gal/ft}) \ (8" = 2.611$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|------------|-----------------|----------------|------|----------|----------------|-----------|------|-----------|
| (2) Peristaltic Pump | 3:00:00 PM | 1.15 | 0.145 | 7.42 | 16.2 | 636 | 10.16 | 90.4 | 3.61 |
| | 3:04:00 PM | 1.25 | 0.145 | 7.02 | 15.9 | 634 | 1.63 | 91.3 | 3.8 |
| | 3:07:00 PM | 1.3 | 0.145 | 6.95 | 15.8 | 638 | 1.21 | 90.6 | 3.49 |
| | 3:10:00 PM | 1.4 | 0.145 | 6.9 | 15.8 | 640 | 0.95 | 89.4 | 3.53 |
| | 3:13:00 PM | 1.5 | 0.145 | 6.87 | 15.8 | 642 | 0.85 | 87.7 | 3.58 |
| | | | | | | | | | |
| Final Field Parameters | 3:16:00 PM | 1.6 | 0.145 | 6.85 | 15.7 | 643 | 0.8 | 86.9 | 3.05 |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

Water Quality Observations:

Clear; colorless; no odor; no sheen.

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | 3:21:00 PM | VOA-Glass | | |
| | | | Amber Glass | 1 | No |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 1 | |

General Sampling Comments

Begin purge at 14:30. DTW at start of purging was 6.45 feet bgs.

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Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW06 |
|----------------|---------------------|-----------------|------------------|
| Project # | M0747.01.013 | Sampler | C. Sifford |
| Project Name | North Cascade Ford | Sampling Date | |
| Sampling Event | Q8, June 2022 | Sample Name | |
| Sub Area | AOC 2 | Sample Depth | |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC TOC |

Hydrology/Level Measurements

| 6/6/2022 10:14 19.72 6.4 13.32 2.17 | | | | | | (Product Thickness) | (Water Column) | (Gallons/ft x Water Column) |
|-------------------------------------|----------|-------|-----------|------------|----------|---------------------|----------------|-----------------------------|
| 6/6/2022 10:14 19.72 6.4 13.32 2.17 | Date | Time | DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| 0/0/2022 10.14 17.72 0.4 | 6/6/2022 | 10:14 | 19.72 | | 6.4 | | 13.32 | 2.17 |

 $(0.75" = 0.023 \; gal/ft) \; (1" = 0.041 \; gal/ft) \; (1.5" = 0.092 \; gal/ft) \; (2" = 0.163 \; gal/ft) \; (3" = 0.367 \; gal/ft) \; (4" = 0.653 \; gal/ft) \; (6" = 1.469 \; gal/ft) \; (8" = 2.611 \; gal/ft) \;$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|------|-----------------|----------------|----|----------|----------------|-----------|-----|-----------|
| (2) Peristaltic Pump | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| Final Field Parameters | | | | | | _ | | | |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

| T T 7 | A 114 | α | |
|--------------|---------|--------------|-----|
| Water | Onality | Observation | ıc: |
| 114661 | Vuuiit | Obser intion | 100 |

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | | VOA-Glass | | |
| | | | Amber Glass | | |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 0 | |

| ~ 1 | ~ | | ~ |
|------------|------|------|-----------------|
| General | Samp | ling | Comments |

| Well not included in comp | oliance network for s | ampling. | | |
|---------------------------|-----------------------|----------|--|--|
| | | | | |
| | | | | |
| | | | | |

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Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW07 |
|----------------|---------------------|-----------------|----------------|
| Project # | M0747.01.013 | Sampler | C. Sifford |
| Project Name | North Cascade Ford | Sampling Date | 6/6/2022 |
| Sampling Event | Q8, June 2022 | Sample Name | MW07-GW-060622 |
| Sub Area | AOC 1 | Sample Depth | 12 |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC |

Hydrology/Level Measurements

| | | | | | (Product Thickness) | (Water Column) | (Gallons/ft x Water Column) |
|----------|------|-----------|------------|----------|---------------------|----------------|-----------------------------|
| Date | Time | DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| 6/6/2022 | 9:56 | 19.59 | | 5.13 | | 14.46 | 2.35 |

 $(0.75" = 0.023 \; \text{gal/ft}) \; (1" = 0.041 \; \text{gal/ft}) \; (1.5" = 0.092 \; \text{gal/ft}) \; (2" = 0.163 \; \text{gal/ft}) \; (3" = 0.367 \; \text{gal/ft}) \; (4" = 0.653 \; \text{gal/ft}) \; (6" = 1.469 \; \text{gal/ft}) \; (8" = 2.611 \;$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|------------|-----------------|----------------|------|----------|----------------|-----------|------|-----------|
| (2) Peristaltic Pump | 1:20:00 PM | 2.3 | 0.25 | 7.83 | 16.7 | 117.3 | 7.78 | 82.1 | 33.1 |
| | 1:24:00 PM | 2.6 | 0.25 | 7.42 | 16.4 | 115.4 | 5.38 | 84.6 | 25.3 |
| | 1:28:00 PM | 2.8 | 0.25 | 7.2 | 16 | 113.7 | 4.98 | 86.2 | 24.3 |
| | 1:31:00 PM | 3 | 0.25 | 7 | 16.2 | 113.2 | 5.04 | 84 | 23.3 |
| | | | | | | | | | |
| | | | | | | | | | |
| Final Field Parameters | 1:34:00 PM | 3.2 | 0.25 | 6.94 | 16.3 | 112.9 | 4.97 | 83.1 | 22.9 |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

Water Quality Observations:

Cloudy; orange tint; no odor; no sheen.

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | 1:45:00 PM | VOA-Glass | | |
| | | 1 | Amber Glass | 1 | No |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 1 | |

General Sampling Comments

Begin purge at 12:28. DTW at start of purging was 5.21 feet bgs.

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Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW09 |
|----------------|---------------------|-----------------|----------------|
| Project # | M0747.01.013 | Sampler | C. Sifford |
| Project Name | North Cascade Ford | Sampling Date | 6/6/2022 |
| Sampling Event | Q8, June 2022 | Sample Name | MW09-GW-060622 |
| Sub Area | AOC 1 | Sample Depth | 15 |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC |

Hydrology/Level Measurements

| | | | | | (Product Thickness) | (Water Column) | (Gallons/ft x Water Column) |
|----------|-------|-----------|------------|----------|---------------------|----------------|-----------------------------|
| Date | Time | DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| 6/6/2022 | 11:03 | 19.96 | | 5.53 | | 14.43 | 2.35 |

 $(0.75" = 0.023 \; \text{gal/ft}) \; (1" = 0.041 \; \text{gal/ft}) \; (1.5" = 0.092 \; \text{gal/ft}) \; (2" = 0.163 \; \text{gal/ft}) \; (3" = 0.367 \; \text{gal/ft}) \; (4" = 0.653 \; \text{gal/ft}) \; (6" = 1.469 \; \text{gal/ft}) \; (8" = 2.611 \;$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|-------------|-----------------|----------------|------|----------|----------------|-----------|-------|-----------|
| (2) Peristaltic Pump | 12:20:00 PM | 2.5 | 0.15 | 7.96 | 15.2 | 368.1 | 4.46 | 109.2 | 4.34 |
| | 12:23:00 PM | 2.6 | 0.15 | 7.91 | 15.4 | 370.9 | 3.69 | 105.7 | 4.56 |
| | 12:27:00 PM | 2.8 | 0.15 | 7.9 | 15.6 | 368.2 | 3.54 | 101.4 | 4.77 |
| | 12:30:00 PM | 2.9 | 0.15 | 7.89 | 15.5 | 367.4 | 3.49 | 100.5 | 4.61 |
| | | | | | | | | | |
| | | | | | | | | | |
| Final Field Parameters | 12:33:00 PM | 3 | 0.15 | 7.89 | 15.7 | 365.7 | 3.31 | 97.5 | 4.64 |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

Water Quality Observations:

Clear; colorless; no odor; no sheen.

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | 12:39:00 PM | VOA-Glass | | |
| 1 | | | Amber Glass | 1 | No |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 1 | |

General Sampling Comments

| Begin | purge at 1 | 1:10. | | |
|-------|-------------|-----------|----------|-----------|
| DTW | at start of | purging w | vas 5.54 | feet bgs. |

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Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW10 |
|----------------|---------------------|------------------------|----------------|
| Project # | M0747.01.013 | Sampler | C. Sifford |
| Project Name | North Cascade Ford | Sampling Date 6/6/2022 | |
| Sampling Event | Q8, June 2022 | Sample Name | MW10-GW-060622 |
| Sub Area | AOC 2 | Sample Depth | 15 |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC |

Hydrology/Level Measurements

| | | | | | (Product Thickness) | (Water Column) | (Gallons/ft x Water Column) |
|----------|-------|-----------|------------|----------|---------------------|----------------|-----------------------------|
| Date | Time | DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| 6/6/2022 | 10:21 | 19.8 | | 5.99 | | 13.81 | 2.25 |

 $(0.75" = 0.023 \; \text{gal/ft}) \; (1" = 0.041 \; \text{gal/ft}) \; (1.5" = 0.092 \; \text{gal/ft}) \; (2" = 0.163 \; \text{gal/ft}) \; (3" = 0.367 \; \text{gal/ft}) \; (4" = 0.653 \; \text{gal/ft}) \; (6" = 1.469 \; \text{gal/ft}) \; (8" = 2.611 \;$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|------------|-----------------|----------------|------|----------|----------------|-----------|-------|-----------|
| (2) Peristaltic Pump | 1:55:00 PM | 2 | 0.12 | 7.74 | 14.9 | 763 | 3.5 | 103.9 | 5.39 |
| | 2:00:00 PM | 2.1 | 0.12 | 7.8 | 14.9 | 764 | 3.22 | 102.5 | 4.17 |
| | 2:03:00 PM | 2.2 | 0.12 | 7.87 | 15 | 765 | 3.08 | 100 | 4.22 |
| | 2:06:00 PM | 2.3 | 0.12 | 7.9 | 14.8 | 766 | 2.94 | 98.8 | 4.24 |
| | | | | | | | | | |
| | | | | | | | | | |
| Final Field Parameters | 2:09:00 PM | 2.5 | 0.12 | 7.94 | 14.9 | 766 | 2.93 | 96.6 | 3.61 |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

Water Quality Observations:

Clear; colorless; no odor; no sheen.

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | 2:15:00 PM | VOA-Glass | | |
| | | 1 | Amber Glass | 1 | No |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 1 | |

General Sampling Comments

Begin purge at 13:04. DTW at start of purging was 5.99 feet bgs.

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Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW11 |
|----------------|---------------------|-----------------|------------------|
| Project # | M0747.01.013 | Sampler | C. Sifford |
| Project Name | North Cascade Ford | Sampling Date | |
| Sampling Event | Q8, June 2022 | Sample Name | |
| Sub Area | AOC 3 | Sample Depth | |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC TOC |

Hydrology/Level Measurements

| | | | (Product Thickness) | (Water Column) | (Gallons/ft x Water Column) |
|---------------------|------------|----------|---------------------|----------------|-----------------------------|
| Date Time DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| 6/6/2022 9:31 19.66 | | 5.45 | | 14.21 | 2.37 |

 $(0.75" = 0.023 \; gal/ft) \; (1" = 0.041 \; gal/ft) \; (1.5" = 0.092 \; gal/ft) \; (2" = 0.163 \; gal/ft) \; (3" = 0.367 \; gal/ft) \; (4" = 0.653 \; gal/ft) \; (6" = 1.469 \; gal/ft) \; (8" = 2.611 \; gal/ft) \;$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|------|-----------------|----------------|----|----------|----------------|-----------|-----|-----------|
| (2) Peristaltic Pump | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| Final Field Parameters | | | | | | | | | |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

| T T 7 | A 114 | α | 4 • |
|--------------|------------|-----------|---------|
| Water | (Dirality | Observa (| atione. |
| vv atti | Vuant | CDSCI V | auvns. |

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | | VOA-Glass | | |
| | | | Amber Glass | | |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 0 | |

| General | Samp | ling | Comment | S |
|---------|------|------|---------|---|

| Well not included in comp | oliance network for s | ampling. | | |
|---------------------------|-----------------------|----------|--|--|
| | | | | |
| | | | | |
| | | | | |

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Water Field Sampling Data Sheet

| Client Name | VSF Properties, LLC | Sample Location | MW12 |
|----------------|---------------------|-----------------|--------------|
| Project # | M0747.01.013 | Sampler | C. Sifford |
| Project Name | North Cascade Ford | Sampling Date | |
| Sampling Event | Q8, June 2022 | Sample Name | |
| Sub Area | AOC 2 | Sample Depth | |
| FSDS QA: | C. Wise 8/8/22 | Easting | Northing TOC |

Hydrology/Level Measurements

| Date Time DT-Bottom DT-Product DT-Water DTP-DTW DTB-DTW Pore Volume 6/6/2022 10:04 14.58 6.93 7.65 1.24 | | | | | | (Product Thickness) | (Water Column) | (Gallons/ft x Water Column) |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------|-----------|------------|----------|---------------------|----------------|-----------------------------|
| 6/6/2022 10:04 14.58 6.93 7.65 1.24 | Date | Time | DT-Bottom | DT-Product | DT-Water | DTP-DTW | DTB-DTW | Pore Volume |
| | 6/6/2022 | 10:04 | 14.58 | | 6.93 | | 7.65 | 1.24 |

 $(0.75" = 0.023 \; gal/ft) \; (1" = 0.041 \; gal/ft) \; (1.5" = 0.092 \; gal/ft) \; (2" = 0.163 \; gal/ft) \; (3" = 0.367 \; gal/ft) \; (4" = 0.653 \; gal/ft) \; (6" = 1.469 \; gal/ft) \; (8" = 2.611 \; gal/ft) \;$

Water Quality Data

| Purge Method | Time | Purge Vol (gal) | Flowrate l/min | pН | Temp (C) | E Cond (uS/cm) | DO (mg/L) | ORP | Turbidity |
|------------------------|------|-----------------|----------------|----|----------|----------------|-----------|-----|-----------|
| (2) Peristaltic Pump | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| Final Field Parameters | | | | | | | | | |

Methods: (1) Submersible Pump (2) Peristaltic Pump (3) Disposable Bailer (4) Vacuum Pump (5) Dedicated Bailer (6) Inertia Pump (7) Other (specify)

| **7 4 | O 1'4 | α | 4 • |
|-------|---------|----------|---------|
| water | Quality | Observ | ations: |

Sample Information

| Sampling Method | Sample Type | Sampling Time | Container Code/Preservative | # | Filtered |
|----------------------|-------------|---------------|-----------------------------|---|----------|
| (2) Peristaltic Pump | Groundwater | | VOA-Glass | | |
| | | | Amber Glass | | |
| | | | White Poly | | |
| | | | Yellow Poly | | |
| | | | Green Poly | | |
| | | | Red Total Poly | | |
| | | | Red Dissolved Poly | | |
| | | | Total Bottles | 0 | |

| Camanal | C | 1: ~ | C | . ~ |
|---------|------|------|---------|-----|
| Generai | Samp | nng | Comment | S |

| Well not included in compli | ance network for samp | ling. | | |
|-----------------------------|-----------------------|-------|--|--|
| | | | | |
| | | | | |
| | | | | |

ATTACHMENT B

ANALYTICAL LABORATORY REPORTS



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

June 13, 2022

Carolyn Wise, Project Manager Maul Foster Alongi 1329 N State St, Suite 301 Bellingham, WA 98225

Dear Ms Wise:

Included are the results from the testing of material submitted on June 7, 2022 from the North Cascade Ford M0747.01.013, F&BI 206116 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 should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures MFA0613R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on June 7, 2022 by Friedman & Bruya, Inc. from the Maul Foster Alongi North Cascade Ford M0747.01.013, F&BI 206116 project. Samples were logged in under the laboratory ID's listed below.

| <u>Laboratory ID</u> | Maul Foster Alongi |
|----------------------|--------------------|
| 206116 -01 | MW01R-GW-060622 |
| 206116 -02 | MW09-GW-060622 |
| 206116 -03 | MW07-GW-060622 |
| 206116 -04 | MW10-GW-060622 |
| 206116 -05 | MW02R-GW-060622 |
| 206116 -06 | MWDUP-GW-060622 |
| 206116 -07 | MW04-GW-060622 |

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 06/13/22 Date Received: 06/07/22

Project: North Cascade Ford M0747.01.013, F&BI 206116

Date Extracted: 06/08/22 Date Analyzed: 06/08/22

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)

| | | | Surrogate |
|-----------------------------------|--------------------------|------------------------|----------------|
| Sample ID | <u>Diesel Range</u> | <u>Motor Oil Range</u> | (% Recovery) |
| Laboratory ID | $(C_{10}\text{-}C_{25})$ | $(C_{25}-C_{36})$ | (Limit 41-152) |
| MW01R-GW-060622 206116-01 | <50 | <250 | 120 |
| MW09-GW-060622 206116-02 | <50 | <250 | 107 |
| MW07-GW-060622 206116-03 | <50 | <250 | 114 |
| MW10-GW-060622 206116-04 | 260 x | 470 x | 116 |
| MW02R-GW-060622 206116-05 | 340 x | <250 | 114 |
| MWDUP-GW-060622 206116-06 | 400 x | <250 | 128 |
| MW04-GW-060622 206116-07 1/1.2 | 260 x | <300 | 110 |
| Method Blank 02-1370 MB | <50 | <250 | 115 |

ENVIRONMENTAL CHEMISTS

Date of Report: 06/13/22 Date Received: 06/07/22

Project: North Cascade Ford M0747.01.013, F&BI 206116

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

| | | | Percent | Percent | | |
|-----------------|------------|-------|----------|----------|------------|------------|
| | Reporting | Spike | Recovery | Recovery | Acceptance | RPD |
| Analyte | Units | Level | LCS | LCSD | Criteria | (Limit 20) |
| Diesel Extended | ug/L (ppb) | 2,500 | 108 | 116 | 63-142 | 7 |

ENVIRONMENTAL CHEMISTS

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.

| _ | | | | | |
|-----|------------------|--------|-----------------------------------------|-------|-----|
| • | Page#_ | i | of _ | | |
| | TURNA | ROUI | VD TI | ME | |
| | tandard t USH | | | | |
| | h charges | | | by: | |
| | SAMPI | LE DIS | SPOS. | AL | |
| | rchive sar | mples | | | |
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|-----------------|--------|-----------------|-----------------|----------------|--------------|-----------------------|----------|---------------|------------|---------------|---------------|---------------|----------|------|---|-------|
| Sample ID | Lab ID | Date Sampled | Time Sampled | Sample Type | # of Jars | OKO + DRO NWTPH-Dx | NWTPH-Gx | BTEX EPA 8021 | NWTPH-HCID | VOCs EPA 8260 | PAHs EPA 8270 | PCBs EPA 8082 | ~ | | | Notes |
| MWOIR-GW-060622 | 01 | 6/6/22 | 12:05 | water | l | X | | | | | | · | | | | |
| MW09-GW-060622 | 02 | 6/6/22 | 12:39 | water | (| X | | | | | | | | | · | |
| MW07-GW-060622 | 03 | 6/6/22 | 13:45 | water | 1 | ፠ | | | | | | | | | | |
| MW10-GW-060622 | 04 | 6/6/22 | 14:15 | water | İ | X | | | | , | | | | | | |
| MW02R-GW-060622 | 05 | 6/6/22 | 14:45 | water | l | X | | | | | | | | | | |
| MUDUP-GU-060622 | 06 | 6/6/22 | 14:45 | water | i | \mathcal{X} | | | | | | | | | | |
| MW04-GW-060622 | 04 | €/6/2z | 15:21 | water | l | Х | | | | | | | | | | |
| | | | | ~ | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | , |

Project specific RLs? - Yes / No

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

| | SIGNAT <u>U</u> RE | PRINT NAME | COMPANY | DATE | TIME |
|----|--------------------|-------------------|-----------------|--------|-------|
| 2. | Relinquished by | Christian Sifford | MFA | 6/6/22 | 17.04 |
| | Received by: | Liz Webber-Bruya | F?B | 6/7/22 | 1658 |
| | Relinquished by: | | | | |
| | Received by: | | Samples receive | dat 7 | |

SAMPLE CONDITION UPON RECEIPT CHECKLIST

| PROJECT # 206116 CLIENT MFA | INITIALS/ DATE: | ENB6/7 | |
|----------------------------------------------------------------------------------------------------------------------------|-------------------------------|------------|------|
| If custody seals are present on cooler, are they intact? | Ø NA 🗆 | YES 🗆 | NO |
| Cooler/Sample temperature | | 4 | °C |
| Were samples received on ice/cold packs? | 7 | YES \Box | NO |
| How did samples arrive? ☐ Over the Counter ☐ Picked up by F&BI ☑ FedEx/UPS/GSO | | | |
| Number of days samples have been sitting prior to receipt a | at laboratory | da | ays |
| Is there a Chain-of-Custody* (COC)? *or other representative documents, letters, and/or shipping memos | Ø | YES | NO |
| Are the samples clearly identified? (explain "no" answer below) | Þ | YES 🗆 | NO |
| Is the following information provided on the COC*? (explain | |) | • |
| Sample ID's Yes I No # of Containers Y Y Date Sampled Yes I No Relinquished Y Y Time Sampled Yes I No Requested analysis Y | es □ No es □ No es □ No | | • |
| Were all sample containers received intact (i.e. not broken, leaking etc.)? (explain "no" answer below) | , | YES | NO |
| Were appropriate sample containers used? | ES 🗆 NO | □ Unkr | ıown |
| If custody seals are present on samples, are they intact? | NA D | YES [| NO |
| Are samples requiring no headspace, headspace free? | NA O | YES [| NO |
| Air Samples: Were any additional canisters received? If Yes, number of unused 1L canisters number of unused 6L canisters | NA O | YES [| NO |
| Explain "no" items from above (use the bac | k if needed) | | |
| | | | |
| | | - | |

ATTACHMENT C

DATA VALIDATION MEMORANDUM



DATA QUALITY ASSURANCE/QUALITY CONTROL REVIEW

PROJECT NO. M0747.01.013 | JUNE 15, 2022 | VSF PROPERTIES, LLC

Maul Foster & Alongi, Inc. (MFA), conducted an independent stage 2A review of the quality of analytical results for groundwater samples and associated quality control samples collected at the North Cascade Ford site at 116 W Ferry Street, Sedro-Woolley, Washington, on June 6, 2022.

Friedman & Bruya, Inc. (FBI), performed the analyses. FBI report number 206116 was reviewed. The analyses performed and samples analyzed are listed below.

| Analysis | Reference |
|------------------------------------------------------|-----------|
| Diesel- and motor-oil-range hydrocarbons | NWTPH-Dx |
| Note NWTPH = Northwest Total Petroleum Hydrocarbons. | |

DATA QUALIFICATION

Analytical results were evaluated according to applicable sections of U.S. Environmental Protection Agency (EPA) guidelines for data review (EPA 2020) and appropriate laboratory-and method-specific guidelines (EPA 1986, FBI 2019).

Data validation procedures were modified, as appropriate, to accommodate quality control requirements for methods that EPA data review procedures do not specifically address (e.g., Northwest Total Petroleum Hydrocarbons [NWTPH]-Dx).

Based on the results of the data quality review procedures described below, the data are considered acceptable for their intended use, with the appropriate final data qualifiers assigned. Final data qualifiers represent qualifiers originating from the laboratory and accepted by the reviewer, as well as data qualifiers assigned by the reviewer during validation.

- Final data qualifier:
 - U = result is non-detect at the method reporting limit (MRL).

According to report 206116, FBI flagged all detected NWTPH-Dx diesel- and motor-oil-range hydrocarbons results for having chromatographic patterns that did not resemble the fuel standards used for quantitation. These results were reported as diesel- and oil-range hydrocarbons instead of specific fuel products; thus, qualification was not required.

HOLDING TIMES, PRESERVATION, AND SAMPLE STORAGE

Holding Times

Extractions and analyses were performed within the recommended holding time criteria.

Preservation and Sample Storage

The samples were preserved and stored appropriately.

BLANKS

Method Blanks

Laboratory method blanks are used to assess whether laboratory contamination was introduced during sample preparation and analysis. Laboratory method blank analysis was performed at the required frequency. For purposes of data qualification, the laboratory method blank was associated with all samples prepared in the analytical batch.

All laboratory method blank results were non-detect to MRLs.

Equipment Rinsate Blanks

Equipment rinsate blanks are used to evaluate field equipment decontamination. These blanks were not required for this sampling event, as all samples were collected using dedicated, single-use equipment.

Trip Blanks

Trip blanks are used to evaluate whether volatile organic compound contamination was introduced during sample storage and shipment between the sampling location and the laboratory.

Trip blank samples were not required for this sampling event because samples were not analyzed for volatile organic compounds.

LABORATORY CONTROL SAMPLE/LABORATORY CONTROL SAMPLE DUPLICATE RESULTS

A laboratory control sample (LCS) and a laboratory control sample duplicate (LCSD) are spiked with target analytes to provide information about laboratory precision and accuracy. The LCS and LCSD were extracted and analyzed at the required frequency.

All LCS and LCSD results were within acceptance limits for percent recovery and relative percent difference (RPD).

LABORATORY DUPLICATE RESULTS

Laboratory duplicate results are used to evaluate laboratory precision.

FBI did not report laboratory duplicate results for method NWTPH-Dx. Laboratory precision was evaluated using LCS and LCSD results.

MATRIX SPIKE/MATRIX SPIKE DUPLICATE RESULTS

Matrix spike (MS) and matrix spike duplicate (MSD) results are used to evaluate laboratory precision and accuracy as well as the effect of the sample matrix on sample preparation and analysis.

FBI did not report MS or MSD results for NWTPH-Dx, in accordance with the method.

SURROGATE RECOVERY RESULTS

The samples were spiked with surrogate compounds to evaluate laboratory performance for individual samples.

All surrogate results were within percent recovery acceptance limits.

FIELD DUPLICATE RESULTS

Field duplicate samples measure both field and laboratory precision. The following field duplicate and parent sample pair was submitted for analysis:

| Report | Parent Sample | Field Duplicate Sample |
|--------|-----------------|------------------------|
| 206116 | MW02R-GW-060622 | MWDUP-GW-060622 |

MFA uses acceptance criteria of 100 percent RPD for results that are less than five times the MRL, or 50 percent RPD for results that are greater than five times the MRL. Non-detect data are not used in the evaluation of field duplicate results.

All field duplicate results met the RPD acceptance criteria.

REPORTING LIMITS

FBI used routine reporting limits for non-detect results, except for samples requiring dilutions because of high analyte concentrations and/or matrix interferences.

DATA PACKAGE

The data package was reviewed for transcription errors, omissions, and anomalies. None were found

REFERENCES

EPA. 1986. Test Methods for Evaluating Solid Waste, Physical/Chemical Methods. EPA publication SW-846. 3rd ed. U.S. Environmental Protection Agency. Final updates I (1993), II (1995), IIA (1994), IIB (1995), III (1997), IIIA (1999), IIIB (2005), IV (2008), V (2015), VI phase I (2017), VI phase II (2018), VI phase II (2019), VII phase I (2019), and VII phase II (2020).

EPA. 2020. National Functional Guidelines for Organic Superfund Methods Data Review. EPA 540-R-20-005. U.S. Environmental Protection Agency, Office of Superfund Remediation and Technology Innovation: Washington, DC. November.

FBI. 2019. Quality Assurance Manual. Rev. 17. Friedman & Bruya, Inc.: Seattle, WA. November 6.