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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 3, 2023

Maninder Singh
8701 Greenwood, LLC
12620 NW 85th Avenue, Suite 108
Kirkland, WA 98033
(msingh@kagreaterseattle.com)

Re: Opinion on Proposed Cleanup of the following Site:

Site Name: Texaco 211544
Site Address: 8701 Greenwood Avenue N, Seattle, WA 98103
Cleanup Site ID: 6416
Facility/Site ID: 63538329
VCP Project ID: NW3329

Dear Maninder Singh:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup of the Texaco 211544 facility (Site) under the [Voluntary Cleanup Program](#)¹. This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter [70A.305 RCW](#)².

Issue Presented and Opinion

Upon completion of the recommended cleanup, will further remedial action likely be necessary to clean up contamination at the Site?

NO. Ecology has determined that, upon completion of additional recommended cleanup, no further remedial action will likely be necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter [173-340 WAC](#)³ (collectively "substantive requirements of MTCA"). The analysis is provided as follows.

¹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

³ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

Description of the Site

This opinion applies to the only Site described as follows. The Site is defined by the nature and extent of contamination associated with the following releases:

- Gasoline (TPH-G)-, diesel (TPH-D)-, and oil (TPH-O)-range total petroleum hydrocarbons, benzene, and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into the Soil.
- TPH-G, TPH-D, TPH-O, and benzene into the Groundwater.

Enclosure A includes a detailed description and diagrams of the Site, as currently known to Ecology.

Please note the SMI Inc. Trust facility (#Facility Site ID No. 74731271) also affects the parcel of real property (the Property) associated with the Site. As discussed below in Section 4 of this opinion letter, due to the presence of contamination from the SMI facility on the Site, an environmental covenant is needed on the Property to protect human health and the environment. This opinion does not apply to any contamination associated with the SMI Inc. Trust facility that is not located on the Property.

Basis for the Opinion

This opinion is based on the information contained in the documents listed in **Enclosure B**. A number of these documents are accessible in electronic form from the [Site webpage](#)⁴. The complete records are stored in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Visit our [Public Records Request page](#)⁵, to submit a public records request or get more information about the process. If you require assistance with this process, you may contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or 360-407-6040.

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

Analysis of the Cleanup

Ecology has concluded that, upon completion of the recommended cleanup, **no further remedial action** will likely be necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

- **Soil contamination at the Site has been sufficiently characterized.**

Soil at the Site contained TPH, benzene, and cPAHs above the Method A and Method B cleanup levels. Contamination at the Site originated from former fuel and waste oil underground storage tanks (USTs) and auto maintenance operations on the Site. Use of the Property as a service station began by the 1940s and continued until 1994, when the USTs were removed and cleanup of the Site began.

⁴ <https://apps.ecology.wa.gov/cleanupsearch/site/6416>

⁵ <https://ecology.wa.gov/Footer/Public-records-requests>

In 1994, six USTs were excavated and removed from the Site, including three gasoline, one diesel, one waste-oil, and one heating-oil UST. Approximately 1,000 cubic yards of soil was also excavated from the areas around the gasoline and waste oil USTs (see **Enclosure A, Figure 5**). Confirmation samples collected from the limits of the excavation indicated that some soil contaminated with TPH above the Method B cleanup level remained on the west and east sides of the waste-oil UST excavation.

Following the documentation of the cleanup effort in the Independent Remedial Action Report dated January 5, 1996, Ecology issued a No Further Action Opinion Letter (NFA) for the Site. As part of the NFA, a restrictive covenant was recorded on the Property, to document the location of the remaining soil in place exceeding the Method A cleanup level and prevent additional contamination at the Site.

Additional excavations in 1996 and 1997 were completed on the Site to remove additional soil contaminated with TPH. An additional 360 cubic yards of soil were excavated and removed from the western and southeastern portions of the Property for disposal at a permitted facility. Soil samples were collected from some of the sidewalls and bottoms of excavations (see **Enclosure A, Figure 3**). Confirmation samples were not collected from the excavation along the western property boundary. Soil samples collected from Excavation 1 and 1B on the southeast portion of the Property contained TPH and benzene above the Method A cleanup level.

Additional soil contaminated with TPH was discovered along the north property boundary during due diligence investigations conducted in 2020 and 2021 (see **Enclosure A, Figure 3**). Soil samples collected from Well-12 at 10 feet bgs contained TPH-D in excess of the Method A cleanup level. Soil samples collected from SB2, B4, and GSB-3 constrained the limits of contaminated soil in this area to the east, west, and south to a relatively limited areal extent. Considering to the absence of historical Site features in this area and its proximity to the north-adjacent SMI Inc. Trust Site, Ecology concurs with your conclusion that contamination in this portion of the Property originated from the SMI Inc. Trust Site.

Additional soil sampling conducted in 2022 constrained the limits of TPH impacts to soils in the southeast corner of the Site and on the western side of the Site, where confirmation samples had not been collected from remedial excavations. Soil samples collected during this investigation were also submitted for analysis of extractable and volatile petroleum hydrocarbons (EPH/VPH), to aid in establishing a site-specific Method B cleanup level for TPH.

- **Groundwater at the Site has been sufficiently characterized.**

Groundwater samples were first collected from the Site in 1991. Initial results indicated that groundwater containing benzene above the Method A cleanup level was present in the southeast portion of the Property. Groundwater samples were not analyzed for TPH during this investigation. Additional groundwater samples collected prior to remedial actions in 1994 indicated that groundwater on the southern portion of the Property was contaminated with TPH-G and benzene above the Method A cleanup level.

Following the removal of contaminated soil discussed above, groundwater sampling continued at the Site until August 1998. At that time, concentrations of TPH-G, TPH-D, TPH-O, and benzene had fallen below cleanup levels at MW-8 in the southwestern portion of the Site.

Additional groundwater investigation was conducted at the Site in 2020 through 2022 as part of due diligence following purchase of the Property. Groundwater samples collected from four temporary wells installed by Partner Engineering and Science across the Site in 2021 contained TPH-D and TPH-O above the Method A cleanup level (see **Enclosure A, Figure 3**). Groundwater samples collected from permanent monitoring wells installed in the same area during four consecutive quarters from January 2022 to October 2022 did not contain TPH or benzene above the Method A cleanup level.

Please provide the following information to supplement the *Model Remedy Site Closure Report, Former Texaco 211544 Facility, 8701 Greenwood Avenue North, Seattle, WA 98103*, dated November 22, 2022 (*November 2022 Closure Report*):

- Average and seasonal high and low groundwater elevations should be displayed on existing cross sections.
 - Please provide a rose diagram displaying the estimated groundwater flow directions and gradients for all monitoring events, in addition to including groundwater elevation contour maps provided in quarterly groundwater monitoring reports.
 - Provide a table that includes historical depth to water measurements, total well depth, well diameter, top of casing elevation, and well screen interval. Wells damaged or destroyed during remedial excavations and decommissioned according to [WAC 173-160-460](#)⁶ should also be included in this table.
- **Vapor intrusion risk at the Site has been sufficiently evaluated.**

In January 2022, a vapor intrusion assessment was conducted at the Site. Six sub-slab soil vapor samples were collected to supplement indoor air samples collected in April 2021 (see **Enclosure A**).

Laboratory analysis of sub-slab soil vapor samples indicated that benzene exceeded the Method B screening level for unrestricted use at one location in the southwest corner of the building. However, concentrations of benzene in indoor air samples collected from the building did not exceed the Method B cleanup level for unrestricted use when corrected for ambient background concentrations. Based on the documented extents of contaminated soil at the Site and lack of benzene detected above Method B screening levels in groundwater at the Site, the vapor intrusion pathway may be considered incomplete.
 - **Environmental Information Management (EIM) Database Submittal.**

Site data has not been uploaded to the Ecology [Environmental Information Management \(EIM\)](#)⁷ database. Electronic submittal of all sampling data into EIM is a requirement in order to receive a No Further Action opinion for this Site. Please refer to [Ecology Policy 840: Data](#)

⁶ <https://app.leg.wa.gov/wac/default.aspx?cite=173-160-460>

⁷ <https://ecology.wa.gov/Research-Data/Data-resources/Environmental-Information-Management-database>

[Submittal Requirements](#)⁸, revised April 12, 2016 for further information regarding EIM submittal requirements. Any laboratory data generated prior to the availability of electronic lab reports may be excepted from EIM submittal requirements.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

- **Soil.**

Based on results of investigations described in the *November 2022 Closure Report*, cleanup levels protective of direct contact are appropriate for soils at the Site. Groundwater analytical results are discussed in section 1 and **Enclosure A** and indicate that remaining contamination in soil is not adversely affecting groundwater quality at the Site. Ecology concurs with the use of an empirical demonstration at the Site per WAC 173-340-747(9).

As discussed in Section 1 of this opinion letter, a soil sample collected from EB-01 was submitted for analysis of EPH/VPH to develop a site-specific cleanup level for the Site. Using the [MTCA TPH Workbook](#)⁹, the site-specific TPH Method B cleanup level for direct contact in soils was calculated to be 1,706 mg/kg. Due to the calculated value falling below the Method A cleanup level for of 2,000 mg/kg TPH-D+TPH-O, Ecology concurs with your use of Method A cleanup level for TPH at the Site.

Method A cleanup levels are appropriate for Site contaminants benzene and cPAHs (WAC 173-340-740(2), Table 740-1). The direct contact point of compliance to a maximum depth of 15 feet bgs is appropriate (WAC 173-340-740(6)(d)).

Ecology understands that former Site features including USTs and hoists were located on the southern portion of the Property (see **Enclosure A Figure 2**). Therefore, contaminated soils located along the north property boundary are likely related to the SMI Inc. Trust Site. The Method A cleanup level should be used to evaluate soil contaminated with TPH in this portion of the Property.

Ecology appreciates your completion of a Terrestrial Ecological Evaluation (TEE) for the Site. Based on its location 500 feet away from 1.5 acres of contiguous undeveloped land, the Site qualifies for an exemption from the TEE process. Therefore, Method A and B cleanup levels and point of compliance as discussed above are appropriate at the Site.

- **Groundwater.**

The highest beneficial use for groundwater is considered to be as a potable source, unless it can be demonstrated that groundwater is non-potable. MTCA Method A cleanup levels, which are protective of groundwater as a potable source, are appropriate for the Site (WAC 173-340-720(3), Table 720-1).

3. Selection of cleanup action.

Ecology has determined the cleanup action you proposed for the Site meets the substantive requirements of MTCA.

⁸ <https://apps.ecology.wa.gov/publications/SummaryPages/1609050.html>

⁹ <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools>

Further excavations conducted at the Site in 1996 and 1997, discussed above in section 1 and in **Enclosure A** removed additional soil contaminated with TPH, benzene, and cPAHs from the Site. Ecology concurs with your finding that soils at the Site meet the cleanup standards established for the Site. However, soil in the vicinity of Well-12 on the northern property boundary still contains TPH-G and TPH-D above the Method A cleanup level. As discussed above, this contamination is likely related to the SMI Inc. Trust Site and is not used for determination of compliance of the three-part statistical rule, discussed below.

The three-part statistical rule was used to demonstrate compliance with soil cleanup levels at the Site (WAC 173-340-740(7)(d)(i)(A), WAC 173-340-740(7)(e)). The three-part statistical rule requires the following:

- The 95% upper confidence limit (UCL) must fall below the cleanup level.
- Fewer than 10% of samples may exceed the cleanup level.
- No one sample result may be twice the cleanup level.

Based on information provided in the *November 2022 Closure Report*, Ecology concurs that the soil at the site meets the requirements of the three-part statistical rule for TPH. The 95% UCL for soil samples was calculated to be 619 mg/kg, approximately 4.8% of samples exceeded the cleanup level, and no single sample had concentrations of TPH greater than twice the cleanup level.

Samples EXE-5 and EX-WN-4, collected in 1997 from the east sidewall of Excavation 1A and the west sidewall of Excavation 1b, respectively, contained benzene above the Method A cleanup level (**Enclosure A, Figure 3**). Borings EB-01 and EB-04, advanced in 2022 in the vicinity of these samples did not contain benzene above the cleanup level.

Groundwater samples from monitoring Well 11 contained 1-methylnaphthalene above the Method B cleanup level of 1.5 µg/L in January, April, and July 2022 (2.8, 1.8, and 2.6 µg/L, respectively), and less than 0.2 µg/L in October 2022. A Mann-Kendall non-parametric analysis of these data indicated that the 1-methylnaphthalene plume is stable at this well, and further sampling is not necessary. Additionally, as discussed in the notes of [MTCA Table 720-1](#)¹⁰, the Method A cleanup level for naphthalenes includes 1-meyhtlnaphthalene and 2-methylnaphthalene. Concentrations of total naphthalenes in Well 11 do not exceed the Method A cleanup level.

Your *November 2022 Closure Report* includes the discussion of the applicability of a Model Remedy for the Site. Based on compliance with Method A and Method B cleanup levels for soil and groundwater, Ecology has determined that Groundwater Model Remedy 5 will be applicable for the Site.

4. Next Steps.

Ecology appreciates your efforts in documenting the extent of remaining contamination at the Site. As discussed above in Sections 1 and 2 of this opinion letter, soil and groundwater contamination related to the SMI Inc. Trust Site remains above the Method A cleanup level in the north central portion of the Property.

¹⁰ <https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-900>

Due to the depth and limited extent of contamination in this area of the Property, additional remedial action is not feasible at this time. Since soil in this portion of the Property does not comply with cleanup standards, institutional controls in the form of an environmental covenant (EC) are necessary to protect human health and the environment. Ecology will work with you to draft and record an EC for the Property to maintain the necessary institutional controls. Please refer to [Toxics Cleanup Program Procedure 440A: Establishing Environmental Covenants under the Model Toxics Control Act](#)¹¹ for further information on Ecology's procedure for establishing environmental covenants.

Since soil and groundwater at the Site meets cleanup standards, institutional controls are no longer necessary on the Property for contamination related to the Texaco 211544 Site. Ecology will work with you to remove the existing restrictive covenant that was placed on the Property on July 26, 1996, Please refer to [Toxics Cleanup Program Procedure 440C: Releasing Environmental Covenants Under the Model Toxics Control Act](#)¹² for further information on Ecology's procedure for removing the existing restrictive covenant at the Site. Ecology looks forward to working with you to complete the final steps to demonstrate the successful cleanup of the Site.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion does not:

- 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 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 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 proposed will be substantially equivalent. Courts make that determination. See RCW 70A.305.080 and WAC 173-340-545.

3. Opinion is limited to proposed cleanup.

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the Voluntary Cleanup Program (VCP).

¹¹ <https://apps.ecology.wa.gov/publications/SummaryPages/1509054.html>

¹² <https://apps.ecology.wa.gov/publications/SummaryPages/1509057.html>

4. State is immune from liability.

The state, Ecology, 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. See RCW 70A.305.170(6).

Contact Information

Thank you for choosing to clean up the Site under the VCP. As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our webpage¹³. If you have any questions about this opinion, please contact me by phone at (206) 459-6287 or e-mail at david.unruh@ecy.wa.gov.

Sincerely,



David Unruh
Site Manager
Toxics Cleanup Program, NWRO

Enclosures (2): A – Site Description and Diagrams
B – Basis for the Opinion: List of Documents

cc: Lynn D. Green, EVREN Northwest (LynnG@EVREN-NW.com)
Sonia Fernández, VCP Coordinator (sonia.fernandez@ecy.wa.gov)
Tra Thai, VCP Analyst (tra.thai@ecy.wa.gov)

¹³ <https://www.ecy.wa.gov/vcp>

Enclosure A

Description and Diagrams of the Site

Site Description

This section provides Ecology's understanding and interpretation of Site conditions, and is the basis for the opinions expressed in the body of the letter.

Site: The Site is defined as releases of the following in Seattle, King County, Washington:

- TPH-G, TPH-D + TPH-O, benzene, and cPAHs to the Soil.
- TPH-G, TPH-D +TPH-O, and benzene to the Groundwater.

The Site is located at 8701 Greenwood Avenue North and consists of one 0.75-acre King County Tax Parcel (Parcel no. 292070-0030; the Property; **Figure 1, Figure 2**). The Property is located on the northwest corner of the Greenwood Avenue N and N 87th Street intersection.

Area and Property Description: The Property is located in a mixed commercial and residential area in Seattle. The Property is currently developed with a rectangular, single story, vacant commercial building and a parking lot.

The current use of surrounding properties includes the following:

- Single-family residences are located to the west.
- Multi-family residences are located to the north.
- Multi-story mixed-use commercial and residential buildings are located to the east and south.

The north-adjointing property is listed on Ecology's Hazardous Sites List (HSL) as SMI Trust, Inc. (Facility Site ID No. 74731271). Historical operations at the SMI Trust site included auto maintenance and waste oil storage. According to Ecology records, interviews with tenants indicated that some waste oils and other fluids were either stored in an aboveground storage tank or discharged to a storm sewer. A Site Hazard Assessment conducted in 2005 noted oil staining on surface soils in the southwestern portion of the SMI Trust parcel adjacent to the Property. Shallow soil samples indicated the presence of TPH-D and TPH-O, and exceeded the Method A cleanup levels for cadmium and lead.

Property History and Current Use: The Property was initially developed in the 1940s as a service station. The initial configuration of the site is not well understood due to poor documentation, but records indicate that one 4,000-gallon, one 3,500-gallon, and one 2,000-gallon fuel underground storage tanks (USTs) were part of the initial development. One 550-gallon waste oil storage UST, one pump island, and two service bays was also reportedly located on the Property. In 1967, the property was upgraded with two pump islands, two 10,000-gallon gasoline USTs (replacing the existing fuel storage USTs), and one 1,000-gallon heating oil UST. An additional 4,000-gallon gasoline UST was installed in 1971. From 1951 to 1955, a dry-cleaning business operated in the central portion of the Property. The approximate locations of historical Site features are shown on **Figure 2**.

In 1986, the previously existing gasoline storage USTs were removed and replaced with four 10,000-gallon USTs, one of for diesel and the remainder for gasoline. All four USTs were removed as part of a remedial action in 1994. During the UST removal, petroleum-contaminated soil was discovered and removed from the site, as described below in this Site description. Following the remedial action,

Ecology issued a no further action (NFA) letter with a restrictive covenant due to contaminated soil left in place after excavations were completed.

Following the remedial action, the Property was redeveloped with a single-story commercial building. In 2017, the building was vacated and has remained unoccupied since that date.

Sources of Contamination: The sources of petroleum hydrocarbon contamination at the Site are releases from the waste oil and gasoline USTs, dispenser islands, and product piping associated with former service station operations. Soil and groundwater contaminated with petroleum hydrocarbons were initially discovered during reports of leaks from product lines as early as 1979.

Soil contaminated with TPH-G and TPH-D above the Method B cleanup level was discovered in the central portion of the north Property boundary in May 2021 during Site investigation activities (**Figure 3**). As previously noted, this contamination is assumed to be part of the SMI Trust Inc. Site.

Physiographic Setting: In general, the Seattle region sits on a complex and incomplete succession of glacial and nonglacial deposits that overlie an irregular bedrock surface. The region straddles the Seattle uplift, the Seattle fault zone, and the Seattle basin, three major bedrock structures that reflect north-south crustal shortening in the Puget Sound Lowland. The landforms and near-surface deposits covering much of the Seattle area include the upland glacial till, that in many areas was cut into channels during glaciation by recessional meltwater.

The glacial till can display north-south axes oriented in the former ice-flow direction. Glacially overridden deposits underlie most of the uplands, whereas loosely consolidated postglacial deposits fill deep valleys and recessional meltwater channels. Soft organic-rich deposits have filled former lakes, bogs, and sloughs.

The Site is situated at an elevation of approximately 260 feet above mean sea level (amsl). The ground surface is generally flat, sloping slightly to the west-southwest. Phinney Ridge, an upland with a maximum elevation of 360 feet amsl, is located 600 feet northeast of the Site.

Surface/Storm Water System: The nearest surface water is Green Lake, located approximately 1 mile southeast of the Site. Stormwater runoff on and in the vicinity of the Property disperses via sheet flow to catch basins connected to the City of Seattle stormwater system.

Ecological Setting: Land surfaces on the Property and adjacent properties are primarily covered by residential and commercial buildings and asphalt and concrete pavement, with some small landscaped areas. The nearest unpaved areas with potential wildlife habitat are a playground and park located approximately 800 feet northwest and 1,100 feet east of the Site, respectively.

Geology: The [geologic map of the area](https://ngmdb.usgs.gov/Prodesc/proddesc_72190.htm)¹⁴ indicates that the Site is underlain by Holocene-aged peat deposits. Peat deposits consist of wood and plant fragments with some sand- to clay-sized clasts. Data from Site borings shows fill materials from 0.5 feet to a maximum of 4 feet below ground surface (bgs). Fill materials are underlain by interbedded layers of soft silt and peat to approximately 15 feet bgs. A

¹⁴ https://ngmdb.usgs.gov/Prodesc/proddesc_72190.htm

soft to medium- stiff clayey silt occurs below the silt and peat, to the maximum exploration depth of 20 feet bgs.

Groundwater: From 1991 to 2022, a total of 21 groundwater monitoring wells were installed at the Site (AGW-1 through AGW-7, EMW-01, MW-8, Well-2 through Well-13; **Figure 3**). These monitoring wells were installed with 10- to 15-foot-long screens from 4.5 to 26 feet bgs. Monitoring wells AGW-1 through AGW-7 were decommissioned following Site redevelopment in 1997. A total of 14 wells are currently active (EMW-01, MW-8, Well-2 through Well-13).

Shallow groundwater on the site occurs in the silt and peat layers below fill. Depth to groundwater has been observed at 0 to 7 feet bgs. Despite the periodically very shallow depth to water, no seeps have been noted on the Property. Groundwater flow at the Site is oriented to the west on the northern portion of the Property and to the southwest on the southern portion of the Property (**Figure 4**). The average hydraulic gradient is approximately 0.044 feet/foot.

Water Supply: Drinking water is supplied to the Property by water mains operated by the City of Seattle. Water for the City is sourced from the Cedar and Tolt River Watersheds, located approximately 35 miles southeast and 30 miles east of the Site, respectively. The Site is located approximately 6 miles southwest from the closest 10-year wellhead protection zone for a municipal water supply well.

Extent of Contamination and Remediation: A detailed chronological summary of Site investigations and remedial actions is provided in **Table 1**. Site investigations on the Property began in 1991 and documented the presence of soil and groundwater contaminated with TPH-G and BTEX. Remedial actions on the Property began in 1994 with the removal of all USTs and hoists. Further remedial excavations occurred on the Site in 1996 to remove the remaining gas station infrastructure and additional contaminated soil. Following conclusion of this remedial action, Ecology issued a NFA letter through its Independent Remedial Action Program (IRAP) process. The NFA for the Site included a restrictive covenant intended to prevent remaining contamination at the Site from being disturbed.

Additional remedial excavations occurred at the Site in 1997 which removed additional contaminated soil in the southern portion of the Property (**Figure 7, Figure 8, Figure 9**). Reports detailing these excavations were submitted to Ecology, but the existing restrictive covenant was not updated with the new information regarding the extent of contaminated soil.

Following the sale and proposed redevelopment of the Property in 2020, several soil and groundwater investigations were conducted to evaluate the extent of contamination remaining in place at the Site. Investigations confirmed that soil and groundwater impacts from Site sources do not extend off the Property. With the exception of two locations, Site contaminants of concern were not detected above their respective Method A and Method B cleanup levels. Soil samples collected from B-4 at 5 feet bgs and Well-12 at 10 feet bgs exceeded the calculated Method B cleanup level for TPH. Based on their location adjacent to the north Property boundary, these exceedances are attributed to contamination from the SMI Trust, Inc. Site.

Enclosure A Table 1

Report Date	Author	Investigation Summary	Results
7/1/1991 Figure 3	Texaco Environmental Services	Initial Site Assessment – Seven borings (A4, A5, AGW1 to AGW5) were advanced on the Site to assess soil and groundwater conditions in the vicinity of former and current USTs. Five borings were completed as monitoring wells (AGW1 to AGW5).	<ul style="list-style-type: none"> • TPH, BTEX, and lead were not detected above Method A in soil. • Benzene was detected above Method A in groundwater samples collected from AGW-1, AGW-4, and AGW-5. Samples were not analyzed for TPH-G, -D, or -O.
1992 – 1993	EMCON Northwest	Quarterly Groundwater Monitoring Reports – Groundwater samples were collected from monitoring wells installed in 1991.	<ul style="list-style-type: none"> • BTEX and TPH-G were detected above Method A in samples collected from AGW-1, AGW-2, and AGW-4. Lead was not detected above laboratory detection limits.
9/9/1994 Figure 5	EMCON Northwest	Underground Storage Tank Decommissioning – One diesel, one waste oil, one heating oil, and three gasoline USTs were excavated and removed from the Site. Two hoists were also excavated and removed from the Site. Two oil-water separators were discovered during excavation. One was removed and the other left in place to avoid disturbing confining layers. Soil samples were collected from the sidewalls and bottom of each excavation at depths ranging from approximately 1.5 to 7 feet bgs. Approximately 1,000 cubic yards of soil was excavated during this remedial action. Two monitoring wells (AGW-6 and -7) were installed to replace decommissioned monitoring well AGW-4. An air-sparge soil vapor extraction system (AS/SVE) was installed in the former gasoline UST nest to treat TPH contamination in groundwater. In order to expose sufficient soil for the AS/SVE system to operate, a dewatering pump was installed in the excavation, which discharged directly to the sanitary sewer.	<ul style="list-style-type: none"> • Soil sidewall and bottom confirmation samples collected from the gasoline UST nest area, dispenser islands, hoists, and heating oil excavations did not contain TPH, BTEX, or lead above Method A. • Soil with TPH-G, -D, and -O concentrations above Method A was left in place in the bottom, western, and eastern sidewall of the waste oil UST excavation due to concerns with compromising the silty confining layer at the bottom of the excavation and breaching groundwater which had accumulated in the gasoline UST excavation. • Soil samples collected from AGW-6 and -7 contained TPH-D and -O over Method A. • Groundwater samples collected from AGW-1, -2, and -6 exceeded Method A for TPH-G and BTEX following excavation.

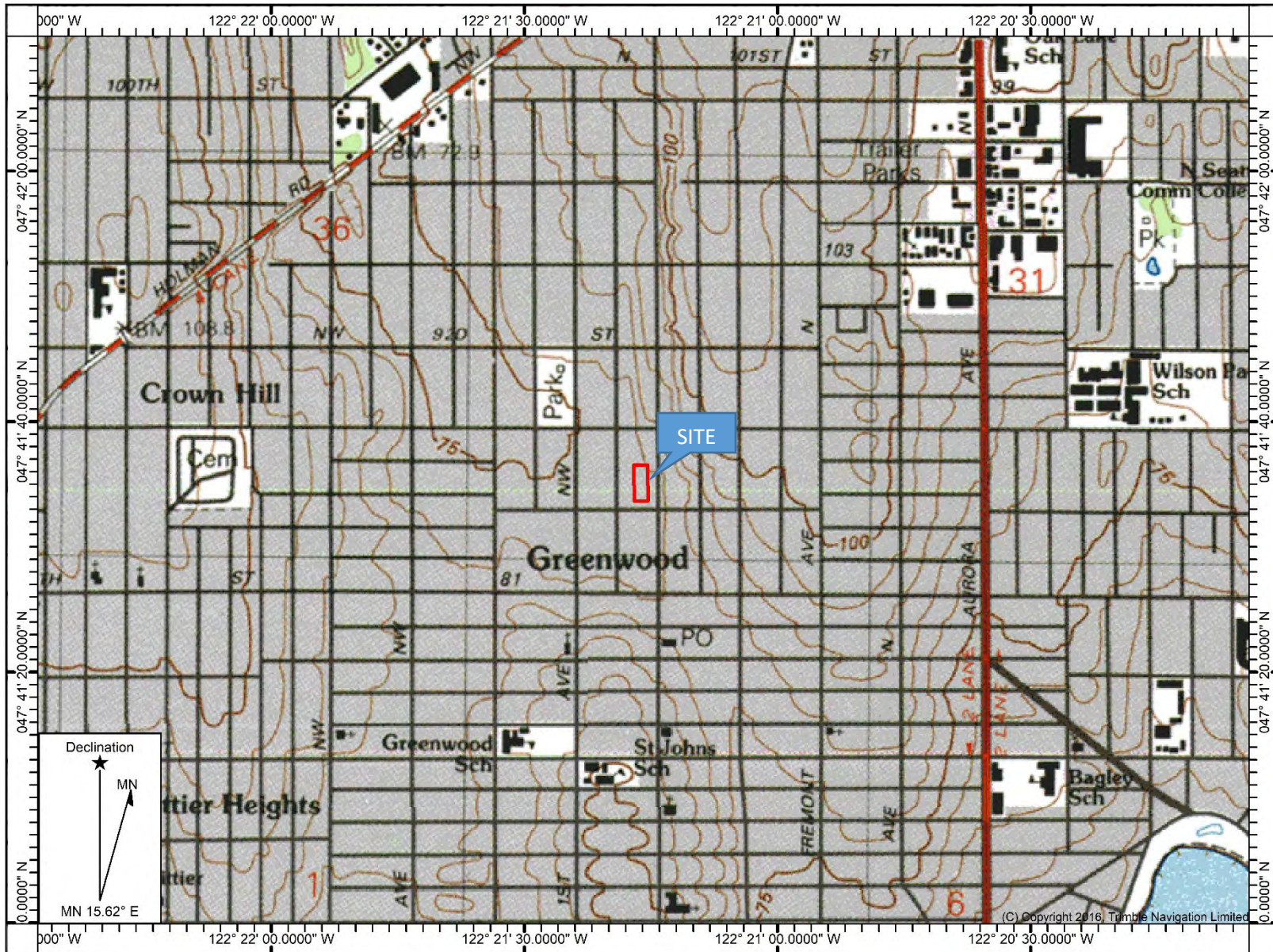
Report Date	Author	Investigation Summary	Results
11/10/1995	EMCON Northwest	Remediation Status Report – summarizes remedial action and performance monitoring to this point. Site activities included collection of quarterly groundwater samples from existing monitoring wells on site and monitoring of the AS/SVE system.	<ul style="list-style-type: none"> • The AS/SVE system was operated for seven months and removed approximately 46 pounds of volatile hydrocarbons from the subsurface. • Effluent samples collected in February and May 1995 from the dewatering system discharging to sanitary sewer contained TPH-G and TPH-D over Method A. • The last groundwater monitoring samples collected in September 1995 contained TPH and BTEX below Method A in all wells.
1/5/1996	Environmental Resolutions, Inc.	Independent Remedial Action Report – details excavation activities to remove remediation system piping and remaining abandoned UST piping. Excavation expanded the limits of the 1994 pump island excavation. Approximately 125 cubic yards of contaminated soil were removed during excavation. Following excavation, 18 sidewall confirmation samples were collected.	<ul style="list-style-type: none"> • Final excavation limit samples did not contain TPH or BTEX above Method A.
7/31/1996	Ecology	No Further Action Opinion Letter and Environmental Covenant – Opinion states remedial actions resulted in the reduction of TPH and BTEX to levels that do not pose a threat to human health and the environment. The opinion is contingent on the recording of a restrictive covenant on the Property. The covenant has requirements for property use and long-term monitoring due to the presence of soil with concentrations of TPH remaining in the west and north of the waste oil UST excavation.	<ul style="list-style-type: none"> • N/A
9/9/1996 Figure 6	Environmental Resolutions, Inc.	Soil Sampling Report – This report details the results of shallow soil samples collected to the west of the Property in the alleyway and west-adjointing property.	<ul style="list-style-type: none"> • Soil samples collected from 0.5 to 4.5 feet bgs did not exceed Method A for TPH or BTEX.

Report Date	Author	Investigation Summary	Results
2/4/1997 Figure 7, Figure 8	Environmental Resolutions, Inc.	Excavation, Soil Sampling, and Construction Coordination – details excavation and soil sampling activities in support of new building construction. During construction, additional soil with TPH/BTEX concentrations suspected above Method A was removed in the southwest portion of the Property in the vicinity of the former waste oil/oil water separator. Six new excavations including 4 test pits (Excavations 1, 2, 3, and 6) were advanced to aid in building construction. Approximately 275 cubic yards of contaminated soil were disposed of off-site.	<ul style="list-style-type: none"> • Based on excavation limit and test pit sampling, soil with concentrations of TPH-O exceeding Method A cleanup levels remains along the western boundary of Excavation 5 and Excavation 6 (Figure 6). • An excavation to install a detention pipe on the western side of the Property reportedly removed contaminated soils encountered in the western extent of Excavation 5 and Excavation 6 to a maximum depth of 8 feet bgs (Figure 7). • Soil with concentrations exceeding Method A also was left in place on the eastern boundary of Excavation 5, and in the western boundary of Excavation 6.
5/30/1997 Figure 9	Environmental Resolutions, Inc.	Excavation and Soil Sampling – two additional excavations (Excavations 1A and 1B) and two test pits (Excavation 2 and 4) were completed on the southeastern corner of the Property in support of construction. Approximately 85 cubic yards of contaminated soil was removed from the property disposal. A total of 18 soil samples were submitted for analysis of TPH and BTEX.	<ul style="list-style-type: none"> • Six of 18 soil samples from excavations 1A and 1B exceeded Method A cleanup levels for TPH-D/O and cPAHs, mostly concentrated in the southern portion of Excavation 1B and the eastern sidewall of Excavation 1A. • Four of 18 soil samples contained TPH-G above Method A cleanup levels.
9/15/1997	Environmental Resolutions, Inc.	Monitoring Well Installation, Sampling, and Laboratory Analysis – Monitoring well MW8 was installed to replace AGW-6, which was paved over during building construction activities earlier in the year. Soil and groundwater samples were collected from the well.	<ul style="list-style-type: none"> • Soil samples collected from the boring did not contain TPH or BTEX. • The groundwater sample collected from the well contained TPH-G, benzene, and total xylenes above Method A.
11/25/1998	Environmental Resolutions, Inc.	Groundwater Sampling and Laboratory Analysis – Details 4 quarters of groundwater samples collected from MW8. No samples were collected from the other downgradient wells AGW-1 and -2.	<ul style="list-style-type: none"> • TPH, BTEX, and total lead were not detected above Method A.

Report Date	Author	Investigation Summary	Results
1/14/1999	Equiva Services (Shell, Texaco, Saudi Aramco)	Request for Review – Requests review of soil and groundwater data gathered following remedial actions and monitoring conducted from 1994 to 1996. Requested to cease monitoring and decommission remaining wells.	<ul style="list-style-type: none"> • N/A
10/1/2020	Partner Engineering	Phase I ESA – Details past site use and cleanup actions occurring to date. This report did not contain any information not detailed above.	<ul style="list-style-type: none"> • N/A
11/23/2020 Figure 3	Left Coast Services	Limited Site Characterization – four soil borings were advanced near the location of the former dry cleaners on the central eastern portion of the Property (GSB-1 and -2) to assess potential releases from former operations. Two additional borings were advanced near the north Property boundary (GSB-3 and -4) to assess for TPH impacts to soil. One groundwater sample was collected from existing monitoring well MW8 (referred to as MW6 and MW-1 in this report).	<ul style="list-style-type: none"> • The sample collected from GSB-3 contained TPH-D contained TPH-D below Method A. No other samples contained TPH or BTEX above laboratory PQLs. • Chlorinated volatile organic compounds (CVOCs) were not detected above laboratory PQLs in samples collected from GSB-1 and -2.
12/30/2020	EVREN Northwest Inc.	Focused Phase II ESA – No new sampling conducted. Details of the 11/23/2020 Left Coast sampling are detailed, and stamped by a licensed geologist.	<ul style="list-style-type: none"> • N/A
2/10/2021	Broderick Architects	Summary of Proposed Ground Disturbance – details proposed renovation to improve existing building for use as a childcare facility. Renovations include curb cuts, installation of artificial turf in the parking lot area, new fencing, and new interior plumbing.	<ul style="list-style-type: none"> • N/A
3/8/2021	Ecology	Response to Change of Use Request – outlines concerns with the proposed renovations due to remaining contaminated soil left in place after remedial excavations during construction activities in 1997.	<ul style="list-style-type: none"> • N/A

Report Date	Author	Investigation Summary	Results
3/9/2021 Figure 3	Partner Engineering and Science	Phase II Subsurface Investigation Report – Five borings (B1 to B5) were advanced on the Property to address data gaps identified in Ecology’s Response to Change of Use Request. Borings were advanced in the proposed play areas, former dry cleaner location, and the north property boundary. Grab groundwater samples were collected from each of the borings. Four soil gas samples were collected from borings B2 through B5 and three sub-slab soil gas samples were collected from inside the existing building (SS1 to SS3).	<ul style="list-style-type: none"> • TPH-G, -D, and –O were detected above Method A in the soil at B4. TPH and VOCs were not detected above Method A in the remaining borings. • Groundwater samples collected from B1, B2, B4, and B5 contained TPH-D and –O above Method A. Groundwater collected from B2 contained TPH-G and benzene above Method A. • Soil gas samples collected from B2 and B3 contained total xylenes above the Method B screening level. Benzene was detected in soil gas above Method B screening levels at B3.
4/2021 Figure 3	Environmental Specialties	Soil Sampling and Well Installation – eight soil borings (SB-1 to SB-8) and twelve wells (Well-2 to Well-13) were installed on the property to assess soil and groundwater conditions across the Site.	<ul style="list-style-type: none"> • Soil containing TPH-G and –D over Method A was present in Well 12 at 10 feet bgs. Soil samples collected from other explorations did not contain TPH or BTEX above Method A. • A groundwater sample collected from Well 3 contained TPH-D and –O above Method A. Groundwater samples from the remaining wells on site did not contain TPH or BTEX above Method A.
2/23/2022 Figure 10	EVREN Northwest, Inc.	Focused Sub-Slab Vapor Investigation – Six sub-slab vapor samples (SUB01 to SUB06) were collected from temporary sample ports at regularly spaced intervals inside the existing building footprint.	<ul style="list-style-type: none"> • Concentrations of benzene in sub-slab soil gas exceeded the Method B screening level at SUB04, located in the southwest corner of the building. Benzene and other VOCs were not detected in any other samples.
2/28/2022	EVREN Northwest, Inc.	Groundwater Monitoring: First Quarter 2022 – Groundwater samples were collected from Well-1 through Well-13.	<ul style="list-style-type: none"> • Groundwater sampled during this event did not contain TPH, BTEX, VOCs, or PAHs above Method A.

Report Date	Author	Investigation Summary	Results
4/7/2022	EVREN Northwest, Inc.	Focused Right-of-Way Investigation – three direct-push borings (EB01 to EB03) were advanced in the southeast corner of the building to evaluate the extents of soil and groundwater contamination in the adjacent right-of-way.	<ul style="list-style-type: none"> • Soil from EB-01, located close to the limits of Excavation-1B contained TPH-G and TPH-D above Method A. Soil from other borings did not contain TPH, BTEX, or cPAHs above Method A. • Grab groundwater samples collected from each boring did not contain TPH, BTEX, or cPAHs above Method A. •
5/9/2022	EVREN Northwest, Inc.	Groundwater Monitoring: Second Quarter 2022 – Groundwater samples were collected from Well-1 through Well-13.	<ul style="list-style-type: none"> • Groundwater samples did not contain TPH-G, TPH-D, TPH-O, BTEX, VOCs, or PAHs above their respective Method A cleanup levels.
8/24/2022	EVREN Northwest, Inc.	Groundwater Monitoring: Third Quarter 2022 – A permanent monitoring well was installed at EMW-01, co-located from EB-01. Based on results from previous monitoring results and historical Property use, groundwater samples were collected from Well-2 through Well-5, Well-11, Well-12, EMW-01, and MW-8.	<ul style="list-style-type: none"> • Groundwater samples collected from monitoring wells on the Site did not contain TPH-G, TPH-D, TPH-O, BTEX, VOCs, PAHs, lead, or cadmium above their respective Method A cleanup levels.
10/29/2022	EVREN Northwest, Inc.	Groundwater Monitoring: Fourth Quarter 2022 – Groundwater samples were collected from Well-2 through Well-5, Well-11, Well-12, EMW-01, and MW-8.	<ul style="list-style-type: none"> • Groundwater samples collected from monitoring wells on the Site did not contain TPH-G, TPH-D, TPH-O, BTEX, VOCs, PAHs, lead, or cadmium above their respective Method A cleanup levels.



Name: SEATTLE NORTH
Date: 09/20/21



Location: 047° 41' 35.3419" N, 122° 21' 15.9186" W
Contour Interval: 16 ft

Enclosure A Figure 1

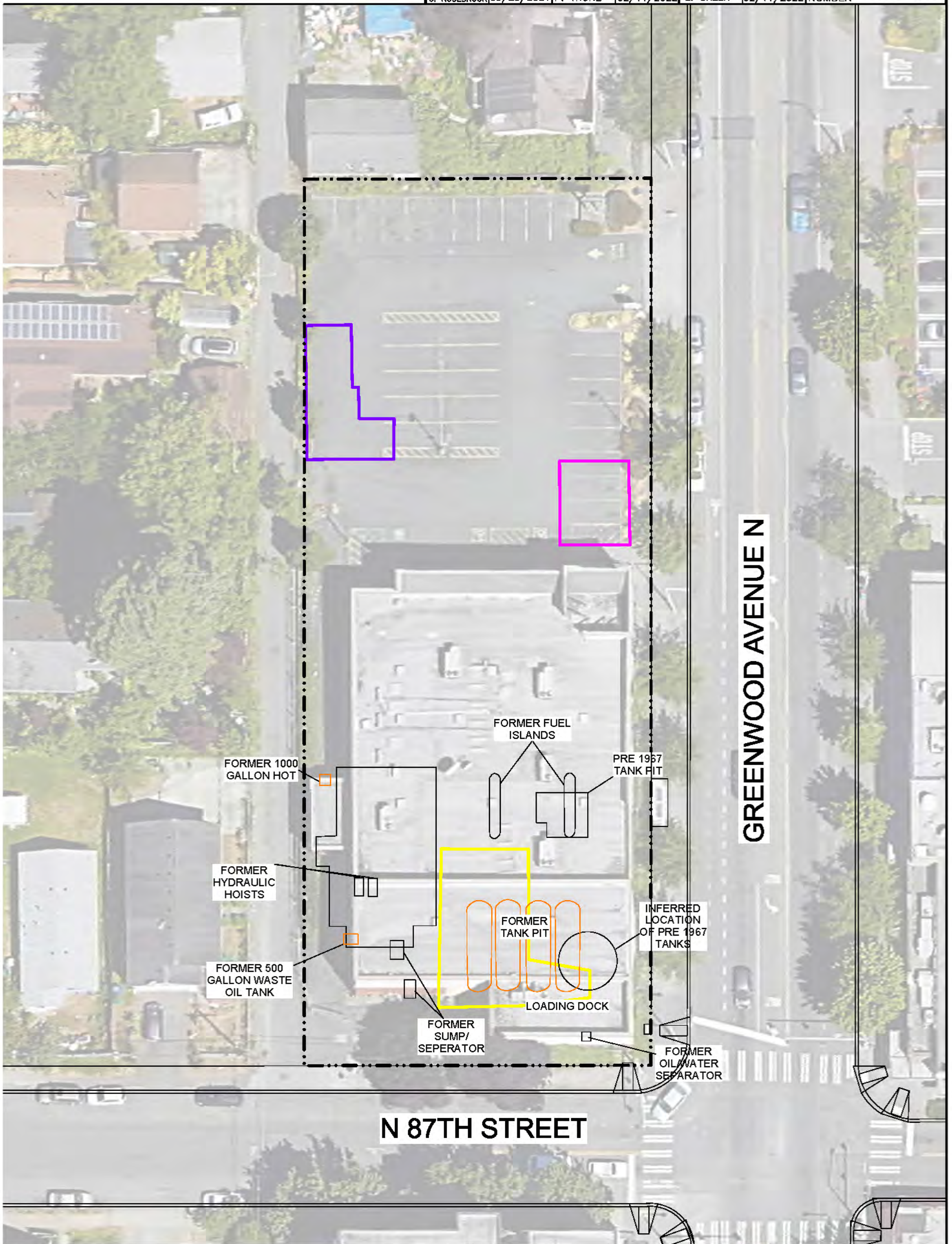


Date Drawn: 11/22/2022
CAD File Name: 1581-21001-01_fig1sv_map
Drawn By: CLR
Approved By: LDG






Former Texaco 211544 Facility
8701 Greenwood Avenue N
Seattle, Washington

Site Vicinity Map

Project No.
1581-21001
Figure No.
1



LEGEND:

-  SUBJECT BUILDINGS
 -  SUBJECT PROPERTY BOUNDARIES
 -  FORMER GAS STATION PER 1950 HISTORICAL SANBORN MAP
 -  FORMER VANITY CLEANERS PER CITY DIRECTORY 1951-1955, LOCATION BASED ON 1950-1966 SANBORN MAP
 -  FORMER LAUNDRY PER 1930 HISTORICAL SANBORN MAP
- * FORMER FEATURES PER 1994 EMCON NORTHWEST INC. AND TEXACO 1991 AND ENVIRO. RESOLUTION INC. 1994 AND 1996

NOTES:

1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2019 AND ENW FIELD NOTES.
2. ALL BUILDING, STREET, AND FEATURE LOCATIONS ARE APPROXIMATE.
3. SYMBOLS REPRESENT LOCATION AND DO NOT ALWAYS REPRESENT EXACT SHAPE, SIZE, OR ORIENTATION.

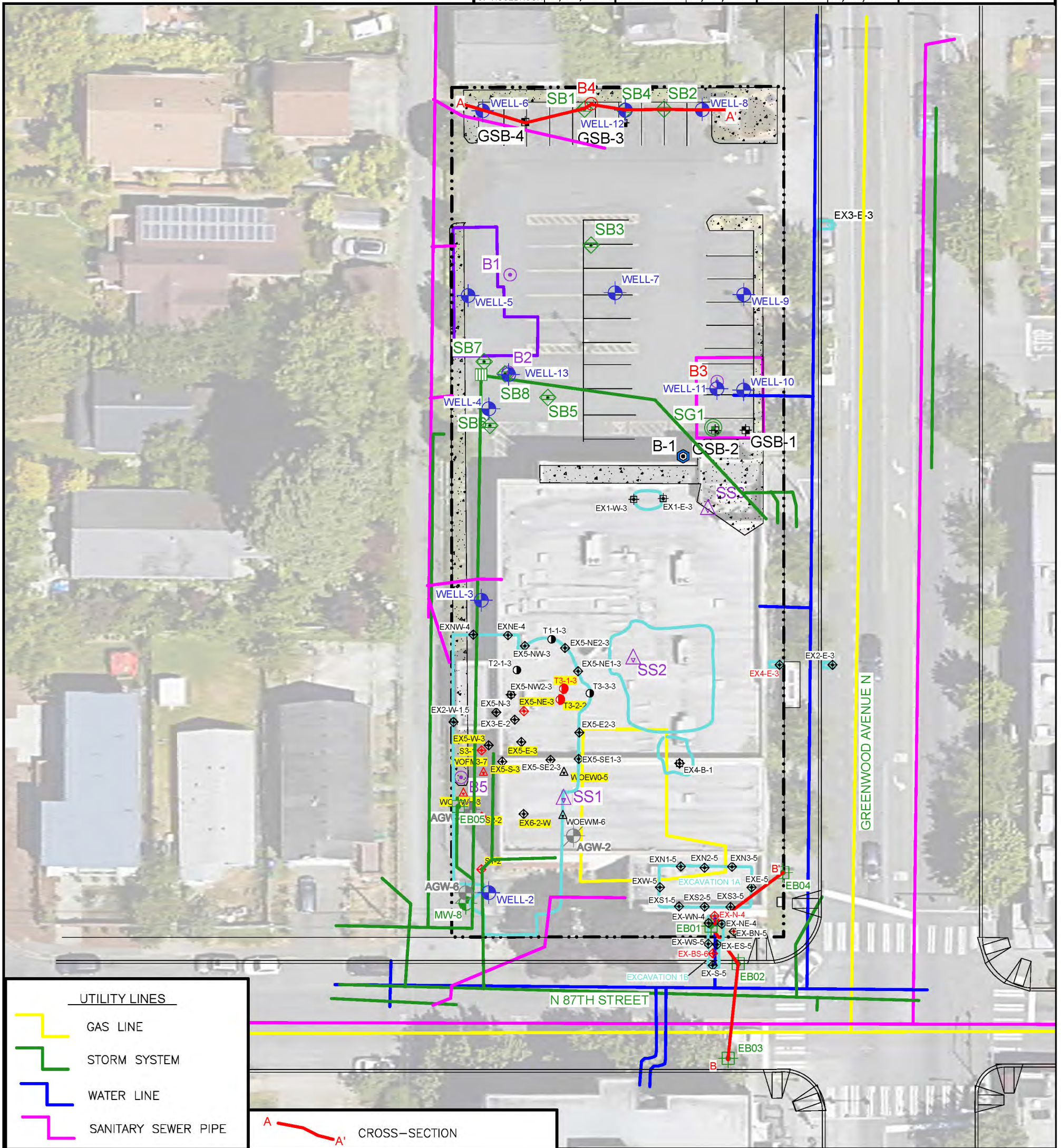
APPROXIMATE SCALE



PO BOX 14488, PORTLAND, OREGON 97293
P: (503)452-5561, E. ENW@EVREN-NW.COM

**FIGURE 2
SITE PLAN WITH HISTORICAL
FEATURES OF INTEREST**

FORMER TEXACO 211544 FACILITY
8701 GREENWOOD AVENUE N
SEATTLE, WASHINGTON



LEGEND:

- PROPOSED STRUCTURE LOCATION
- SUBJECT PROPERTY BOUNDARIES
- ENVIRONMENTAL ASSOCIATES, INC SOIL BORING LOCATION APRIL 1997
- LEFT COAST SERVICES LLC SOIL BORING LOCATION NOVEMBER 2020
- PARTNER SOIL BORING LOCATION MARCH 2021
- PARTNER SUB-SLAB SOIL GAS PROBE LOCATION MARCH 2021
- ENVIRO. RESOLUTION INC. SOIL SAMPLE LOCATION REMAINING FOLLOWING EXCAVATION 1996
- MONITORING WELL LOCATION PER ENVIRO RESOLUTIONS INC.
- FORMER VANITY CLEANERS PER CITY DIRECTORY 1951-1955, LOCATION BASED ON 1950 SANBORN MAP
- FORMER LAUNDRY PER 1930 HISTORICAL SANBORN MAP
- PRIOR PCS EXCAVATION MARGINS

- SG1 ENVIRONMENTAL SPECIALTIES SOIL GAS PROBE LOCATION MARCH 2021
- SB1 ENVIRONMENTAL SPECIALTIES SOIL BORING LOCATION MAY 2021
- MONITORING WELL LOCATION PER ENVIRONMENTAL SPECIALTIES MAY 2021
- SP-0217 YELLOW INDICATES SOIL WHERE SAMPLE WAS COLLECTED HAS BEEN REMOVED
- EXE-5 LABELS IN RED EXCEED MTCA METHOD A CLEANUP LEVELS
- ENW BORING LOCATION

NOTES:

1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2019 AND ENW FIELD NOTES.
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





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FIGURE 3
SAMPLE LOCATION DIAGRAM

FORMER TEXACO 211544 FACILITY
8701 GREENWOOD AVENUE N
SEATTLE, WASHINGTON

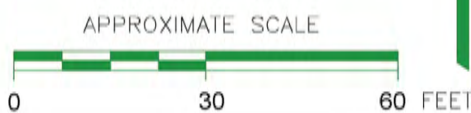


LEGEND:

-  SUBJECT BUILDING
-  SUBJECT PROPERTY BOUNDARIES
-  PRIOR PCS EXCAVATION MARGINS
-  MONITORING WELL LOCATION PER ENVIRONMENTAL SPECIALTIES MAY 2021
-  INFERRED AREA OF RESIDUAL PETROLEUM IMPACTED SOIL EXCEEDING THE SITE-SPECIFIC CUL FOR TOTAL PETROLEUM HYDROCARBONS (>1706 MG/KG)
-  GROUND WATER POTENTIOMETRIC SURFACE CONTOURS (THIRD QUARTER 2022)

NOTES:

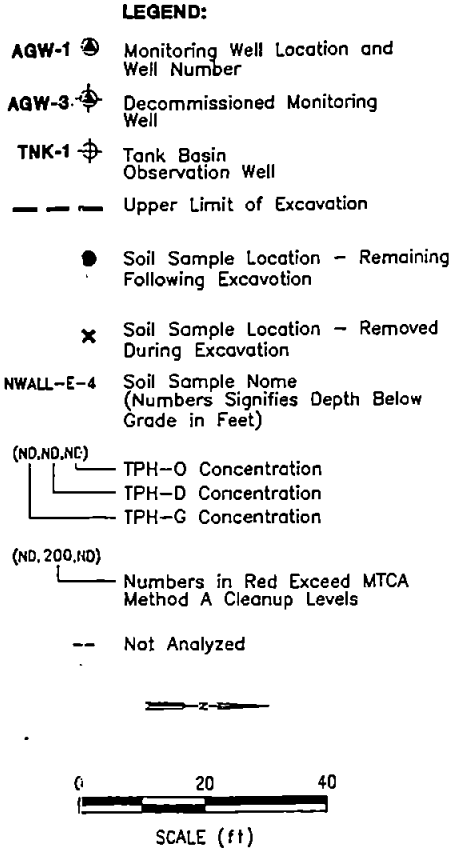
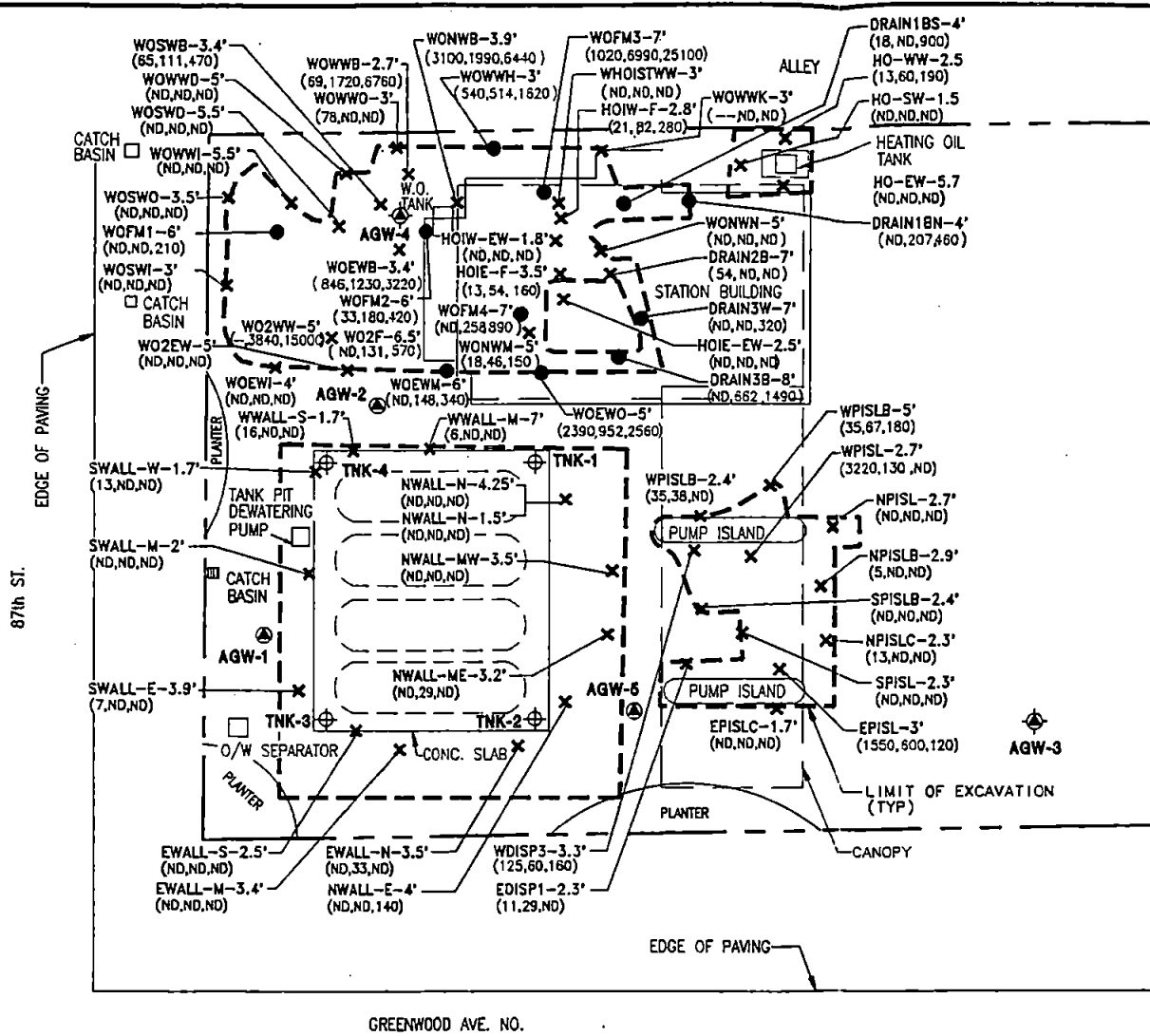
1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2019 AND ENW FIELD NOTES.
2. ALL BUILDING, STREET, AND FEATURE LOCATIONS ARE APPROXIMATE.
3. SYMBOLS REPRESENT LOCATION AND DO NOT ALWAYS REPRESENT EXACT SHAPE, SIZE, OR ORIENTATION.



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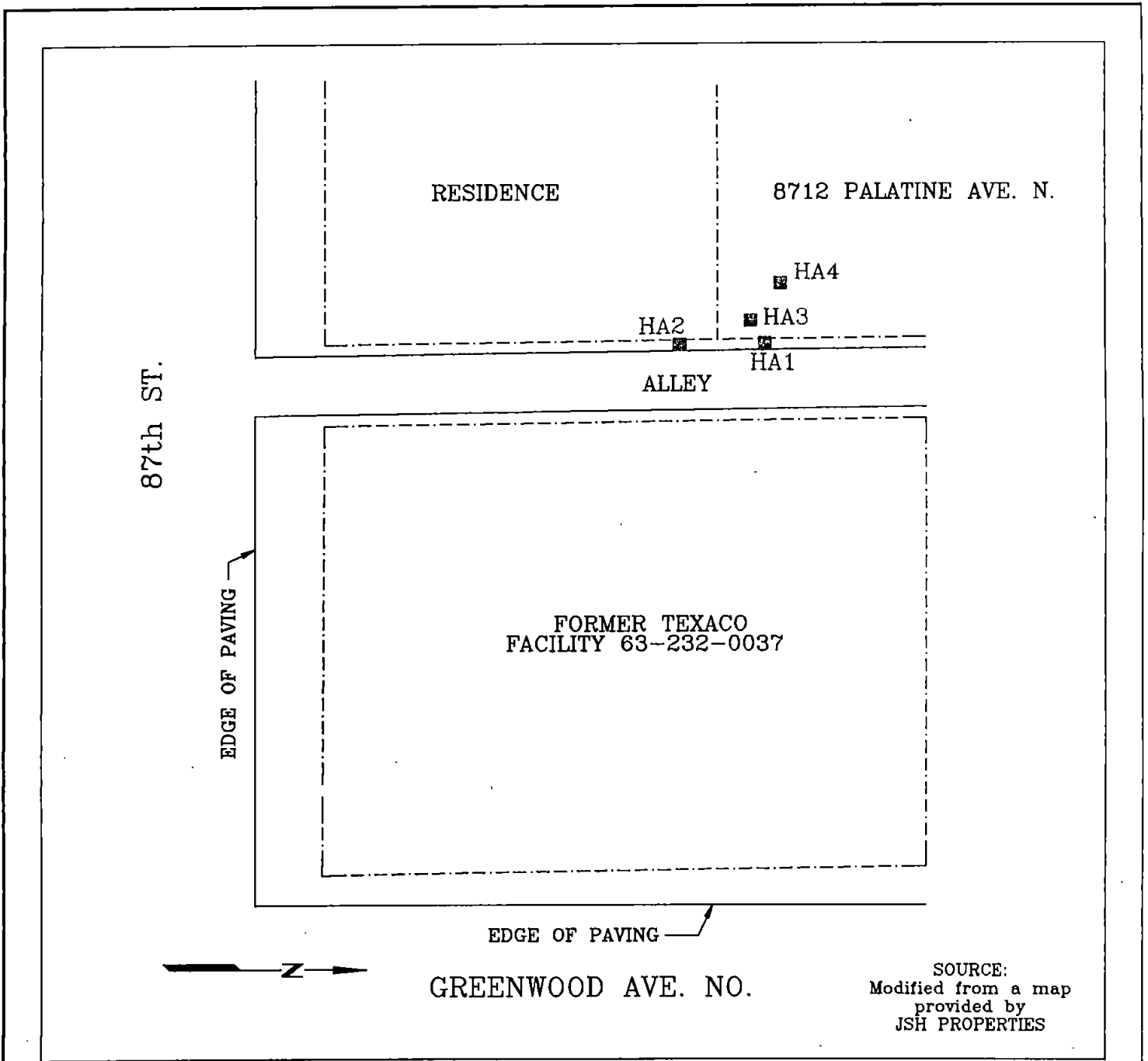
FIGURE 3
GROUND WATER POTENTIOMETRIC SURFACE MAP - FOURTH QUARTER 2022

PROPOSED KIDDIE ACADEMY PROPERTY
8701 GREENWOOD AVENUE N
SEATTLE, WASHINGTON



DATE 9-94
 DWN. MLP
 REV. _____
 APPR. _____
 PROJECT NO. 0388-013.10

Figure 3
 8701 GREENWOOD AVENUE NORTH
 SEATTLE, WASHINGTON
 SOIL SAMPLE LOCATIONS AND
 LABORATORY RESULTS

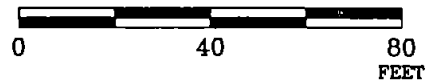


FN 31001004

EXPLANATION

■ HA4 Hand Auger Boring

APPROXIMATE SCALE



Enclosure A Figure 6



**HAND AUGER
BORING LOCATIONS**
FORMER TEXACO FACILITY 63-232-0037
8701 Greenwood Avenue North
Seattle, Washington

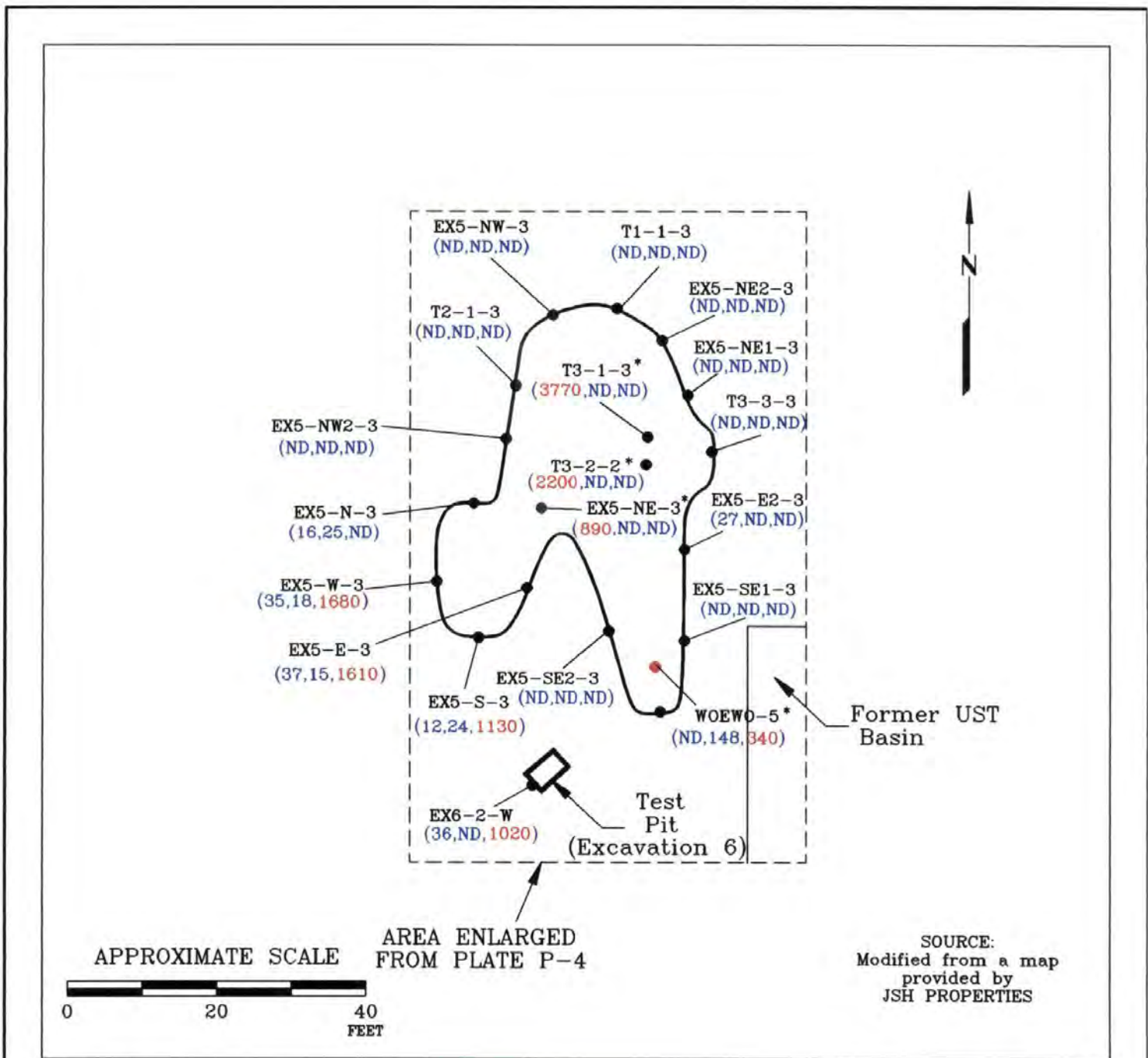
PROJECT NO.

31001

PLATE

P-1

DATE: 8/5/96

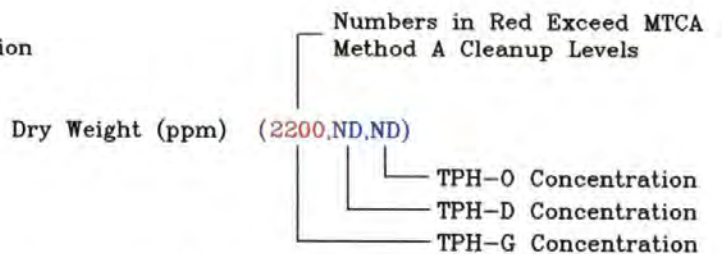


FN 31001001

EXPLANATION

Enclosure A Figure 7

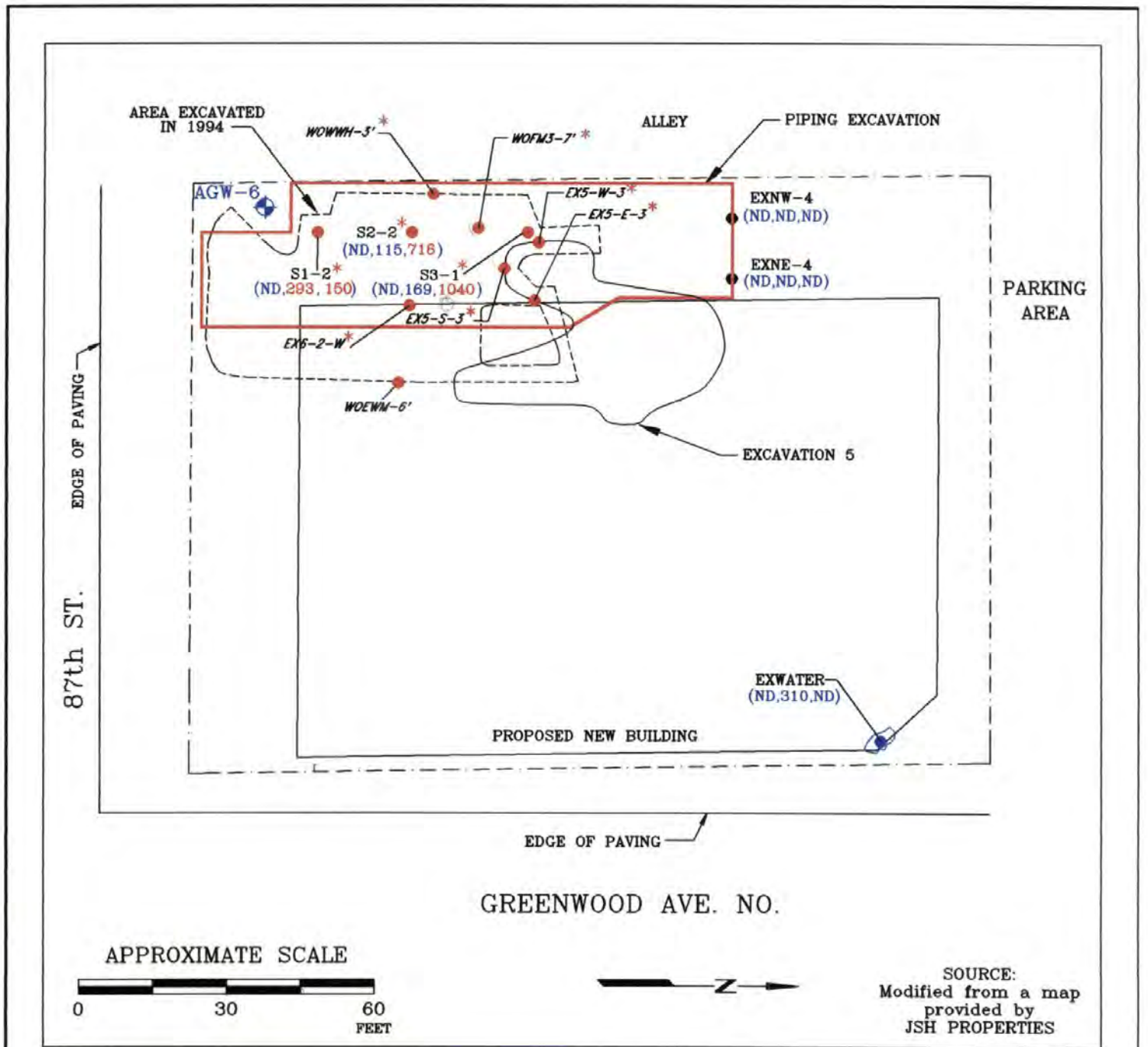
- 1994 Soil Sample with Hydrocarbon Concentration Exceeding MTCA Method A Cleanup Level
- 1996 Soil Sample Location
- T1-1-3 Soil Sample Name
- * Removed During Excavation



SOIL SAMPLE ANALYSES MAP

FORMER TEXACO FACILITY 63-232-0037
8701 Greenwood Avenue North
Seattle, Washington

PROJECT NO.
31001
PLATE
P-5
DATE: 11/26/96



SOURCE:
Modified from a map
provided by
JSH PROPERTIES

FN 31001003

EXPLANATION

Enclosure A Figure 8

- Soil Sample Location
- Soil Sample With Hydrocarbon Concentration Exceeding MTCA Method A Cleanup Level
- Water Sample Location
- WOFM3-7 Soil Sample Names (Numbers Signify Depth Below Grade in Feet)
- * Removed During Excavation
- AGW-6 Groundwater Monitoring Well

Hydrocarbon Concentration (ppm)

(ND, 169, 1040)

- Numbers in Red Exceed MTCA Method A Cleanup Levels
- TPH-0 Concentration
- TPH-D Concentration
- TPH-G Concentration

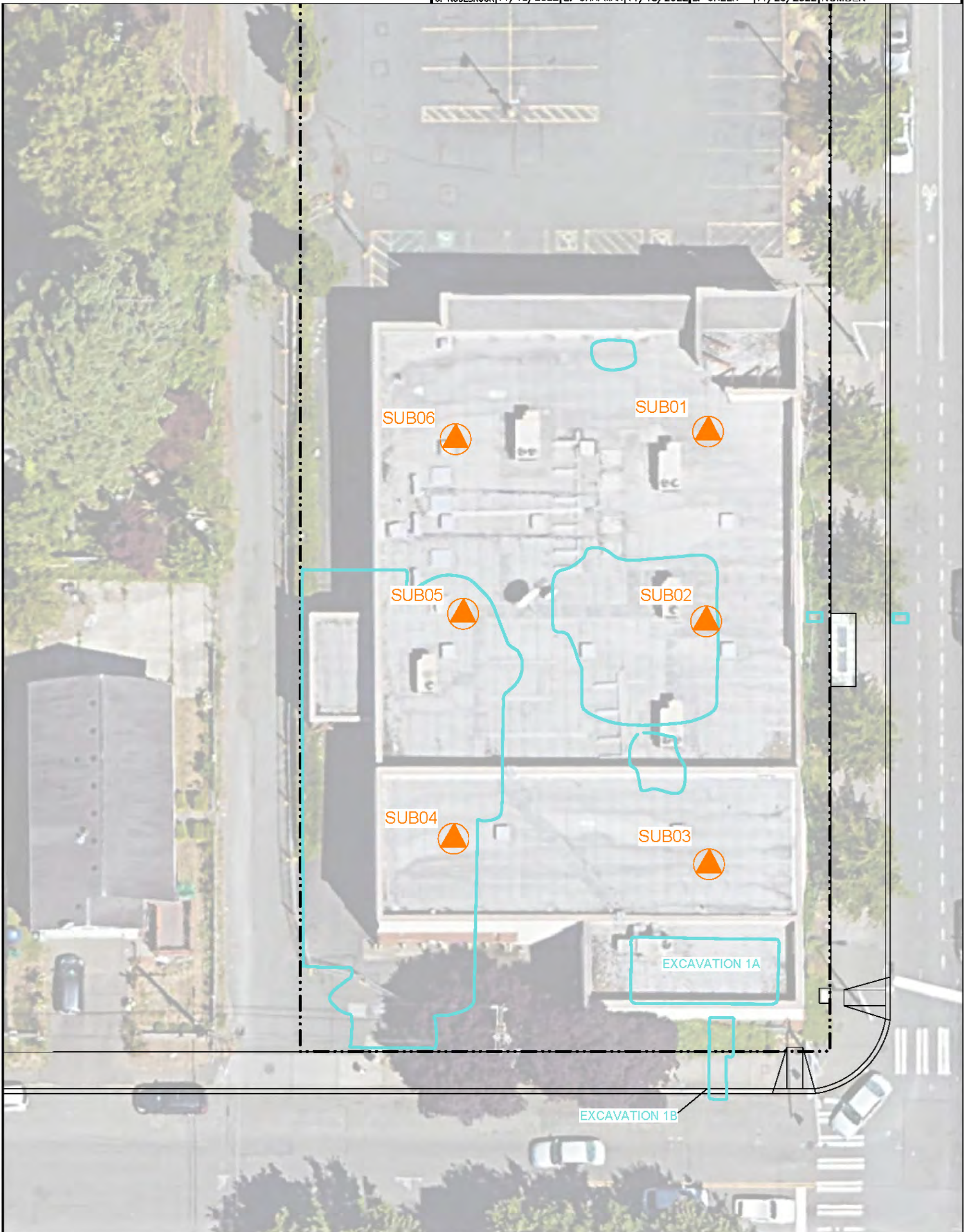






AREA OF PIPING EXCAVATION
FORMER TEXACO FACILITY 63-232-0037
8701 Greenwood Avenue North
Seattle, Washington

PROJECT NO.
31001

PLATE
P-6

DATE: 11/28/96



- LEGEND:**
-  SUBJECT BUILDING
 -  SUBJECT PROPERTY BOUNDARIES
 -  PRIOR PCS EXCAVATION MARGINS
 -  ENW SUB-SLAB VAPOR SAMPLE LOCATION

NOTES:

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APPROXIMATE SCALE



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FIGURE 3B

**SAMPLE LOCATION DIAGRAM
(SUB-SLAB VAPOR SAMPLES)**

FORMER TEXACO 211544 FACILITY
8701 GREENWOOD AVENUE N
SEATTLE, WASHINGTON

Enclosure B

Basis for the Opinion: List of Reference Documents

1. EVREN Northwest, Inc., *Model Remedy Site Closure Report, Former Texaco 211544 Facility, 8701 Greenwood Avenue North, Seattle, WA*, November 22, 2022.
2. EVREN Northwest, Inc., *Ground Water Monitoring: Fourth Quarter 2022, Future Kiddie Academy Property (FMR Texaco 211544), 8701 Greenwood Avenue North, Seattle, WA*, October 29, 2022.
3. EVREN Northwest, Inc., *Ground Water Monitoring: Third Quarter 2022, Future Kiddie Academy Property, 8701 Greenwood Avenue North, Seattle, WA*, August 24, 2022.
4. EVREN Northwest, Inc., *Ground Water Monitoring: Second Quarter 2022, Future Kiddie Academy Property, 8701 Greenwood Avenue North, Seattle, WA*, May 9, 2022.
5. EVREN Northwest, Inc., *Focused Right-of-Way Investigation, Future Kiddie Academy Property, 8701 Greenwood Avenue North, Seattle, WA*, April 7, 2022.
6. EVREN Northwest, Inc., *Ground Water Monitoring: First Quarter 2022, Future Kiddie Academy Property, 8701 Greenwood Avenue North, Seattle, WA*, February 28, 2022.
7. EVREN Northwest, Inc., *Focused Sub-Slab Vapor Investigation, Future Kiddie Academy Property, 8701 Greenwood Avenue North, Seattle, WA*, February 23, 2022.
8. EVREN Northwest, Inc., *December 2021 Work Plan for Focused Data Gap Investigation, Future Kiddie Academy, Former Texaco #211544, 8701 Greenwood Avenue North, Seattle, Washington*, December 8, 2021.
9. Broderick Architects, *Summary of Proposed Ground Disturbance – Updated, 8701 Greenwood Avenue North, Seattle, WA*, March 9, 2021.
10. Partner Engineering and Science, Inc., *Phase II Subsurface Investigation Report, Maninder Singh – Expansion, 8701 Greenwood Avenue North, Seattle, Washington*, March 9, 2021.
11. Washington Department of Ecology, *Response to Change of Use Request at the Following Cleanup Site: Texaco 211544, 8701 Greenwood Ave N, Seattle, Washington*, March 8, 2021.
12. Broderick Architects, *Summary of Proposed Ground Disturbance, 8701 Greenwood Avenue North, Seattle, WA*, February 10, 2021.
13. EVREN Northwest, Inc., *Focused Phase II Environmental Site Assessment, Commercial Property, 8701 Greenwood Avenue North, Seattle, Washington*, December 30, 2020.
14. Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, Maninder Singh – Expansion, 8701 Greenwood Avenue North, Seattle, Washington*, October 1, 2020.
15. Environmental Resolutions, Inc., *Groundwater Sampling and Laboratory Analysis, Former*

- Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, November 25, 1998.*
16. Environmental Resolutions, Inc., *Groundwater Sampling and Laboratory Analysis, Former Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, May 29, 1998.*
 17. Environmental Resolutions, Inc., *Groundwater Sampling and Laboratory Analysis, Former Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, March 5, 1998.*
 18. Environmental Resolutions, Inc., *Groundwater Sampling and Laboratory Analysis, Former Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, January 26, 1998.*
 19. Environmental Resolutions, Inc., *Monitoring Well Installation, Sampling, and Laboratory Analysis Report, Former Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, September 15, 1997.*
 20. Environmental Resolutions, Inc., *Excavation and Soil Sampling at Former Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, May 30, 1997.*
 21. Environmental Resolutions, Inc., *Excavation, Soil Sampling, and Construction Coordination at Former Texaco Facility 62-323-0037, 8701 Greenwood Avenue North, Seattle, Washington, February 4, 1997.*
 22. Environmental Resolutions, Inc., *Hand Auger Soil Sampling, Former Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, August 27, 1996.*
 23. Washington Department of Ecology, *Independent Remedial Action Program Review, Former Texaco Service Station # 63-232-0037, July 31, 1996.*
 24. Village/Seattle Partners, *Restrictive Covenant on the former TEXACO property, 8701 Greenwood Ave. North, Seattle, WA, July 26, 1996.*
 25. Environmental Resolutions, Inc., *Excavation and Soil Sampling Report at Former Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, March 15, 1996.*
 26. EMCON, *Groundwater Sampling Report, Texaco Service Station 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, March 8, 1996.*
 27. EMCON, *Groundwater Sampling Report, Texaco Service Station 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, January 25, 1996.*
 28. Environmental Resolutions, Inc., *Independent Remedial Action Report at Former Texaco Facility 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington, January 5, 1996.*

29. EMCON, *Remediation Status Report, Texaco Service Station 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington*, November 10, 1995.
30. EMCON, *Groundwater Sampling Report, Texaco Service Station 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington*, November 9, 1995.
31. EMCON, *Groundwater Sampling Report, Texaco Service Station 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington*, August 8, 1995.
32. EMCON, *1994 Progress Report, Texaco Service Station 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington*, August 8, 1995.
33. EMCON, *Groundwater Sampling Report, Texaco Service Station 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington*, June 13, 1995.
34. EMCON Northwest, Inc., *Underground Storage Tank Decommissioning, Texaco Service Station 63-232-0037, 8701 Greenwood Avenue North, Seattle, Washington*, September 9, 1994.
35. EMCON Northwest, Inc., *Groundwater Sampling Report, Texaco Service Station, 8701 Greenwood Avenue North, Seattle, Washington*, September 23, 1993.
36. EMCON Northwest, Inc., *Groundwater Sampling Report, Texaco Service Station, 8701 Greenwood Avenue North, Seattle, Washington*, July 1, 1993.
37. EMCON Northwest, Inc., *Groundwater Sampling Report, Texaco Service Station, 8701 Greenwood Avenue North, Seattle, Washington*, December 4, 1992.
38. EMCON Northwest, Inc., *Groundwater Sampling Report, Texaco Service Station, 8701 Greenwood Avenue North, Seattle, Washington*, May 7, 1992.
39. Texaco Environmental Services, *Quarterly Update Report, August – October 1991, Texaco Service Station, 8701 Greenwood Avenue North, Seattle, Washington*, November 15, 1991.
40. Texaco Environmental Services, *Report on Initial Site Assessment, Texaco Service Station, 8701 Greenwood Avenue North, Seattle, Washington*, July 1, 1991.