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STATE OF WASHINGTON DEPARTMENT OF ECOLOGY Northwest Region Office

PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

May 17, 2023

Charlie Foushee Skanska USA Commercial Development 221 Yale Ave N, Suite 400 Seattle, WA 98109-5409 (charlie.foushee@skanska.com)

Re: No Further Action opinion for the following contaminated Site

Site name: Corner Court The Eight Bellevue

Site address: 10640, 10650, and 10660 NE 8th St, Bellevue, WA 98004

Facility/Site ID: 11652 Cleanup Site ID: 12896 VCP Project No.: NW3341

Dear Charlie Foushee:

The Washington State Department of Ecology (Ecology) received your request on May 10, 2022, for an opinion regarding the sufficiency of your independent cleanup of the Corner Court The Eight Bellevue (Site) under the Voluntary Cleanup Program (VCP).¹ To provide an opinion, we requested additional information from you in writing on September 21, 2022. We received the additional information on February 17, 2023. This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.²

Opinion

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter 173-340 WAC ³ (collectively called "MTCA").

Site Description

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

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

- Gasoline and diesel total petroleum hydrocarbons (TPH-G and TPH-D) and tetrachloroethene (PCE)
 in soil.
- TPH-G, TPH-D, benzene, PCE, vinyl chloride (VC), and arsenic in groundwater.

Enclosure A includes the Site description, history, and diagrams.

Please note that releases from multiple sites can affect a parcel of real property. At this time, Ecology has no information that other sites affect the parcel associated with this Site.

Basis for the Opinion

Ecology bases this opinion on the information contained in the following documents:

- 1. Aspect Consulting, Groundwater Conditions at Corner Court The Eight Bellevue (Letter), The Eight Redevelopment, 10770 (formerly 10630) NE 8th Street, Bellevue, Washington. February 16, 2023.
- 2. Aspect Consulting, Cleanup Action Report, The Eight Redevelopment, 10770 (formerly 10630) NE 8th Street, Bellevue, Washington. April 26, 2022.
- 3. Aspect Consulting, Remedial Investigation/Feasibility Study and Cleanup Action Plan, The Eight Redevelopment, 10770 (formerly 10630) NE 8th Street, Bellevue, Washington. April 26, 2022.
- 4. SoundEarth Strategies, Summary of Limited Subsurface Investigation Activities, Former Town & Country Cleaners, 10640-10650 Northeast 8th Street, Bellevue, Washington. April 8, 2011.

You can request these documents by filing a <u>records request</u>. For help making a request, contact the Public Records Officer at <u>recordsofficer@ecy.wa.gov</u> or call (360) 407-6040. Before making a request, check if the documents are available on the <u>Site webpage</u>. 5

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

Analysis of the Cleanup

Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action for the Site. **Enclosure A** describes the Site.

Site Investigations conducted at the Site from 2003 to 2020 discovered soil and groundwater contamination within the Property boundaries. Soil contamination has been confirmed on the Property to approximately 40 feet below the ground surface (bgs). Groundwater contamination has been limited

⁴ https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests

⁵ https://apps.ecology.wa.gov/cleanupsearch/site/12896

to the uppermost perched water zone (9 to 40 feet bgs) and does not extend off the Property. The shallow groundwater zone is discontinuous across the Site. Groundwater contamination was not found in deep groundwater (80 to 90 feet bgs). The lateral and vertical extents of contamination are fully delineated.

Setting cleanup standards for the Site

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

Cleanup Levels

Soil

The Site is in an area with limited terrestrial habitat and qualified for a Terrestrial Ecological Evaluation (TEE) exclusion, based on WAC 173-340-7491(1)(c)(i). There are less than 1.5 acres of contiguous undeveloped land on the Site or within 500 feet of any area of the Site. Land use at the Site and surrounding area makes substantial wildlife exposure unlikely. Therefore, cleanup levels protective of terrestrial species are not needed at this Site.

The Site is in a mixed commercial and retail area and is zoned as "DT-O-2-N" (Downtown Office) by the City of Bellevue. MTCA Method A soil cleanup levels for unrestricted land uses were selected for the Site. These MTCA Method A soil cleanup levels are based on protection of groundwater and are therefore appropriate (WAC 173-340-740(2); Table 740-1).

Groundwater

The highest beneficial use for groundwater under MTCA is considered to be as a drinking water source, unless it can be demonstrated that the groundwater is not potable. MTCA Method A groundwater cleanup levels are protective of potable use and are therefore appropriate (WAC 173-340-720(3); Table 720-1). Where Method A cleanup levels do not exist for individual contaminants, the standard Method B cleanup level may be used (WAC 173-340-720[4][b]).

Points of Compliance

Soil

The point of compliance for soil at the Site for the protection of groundwater is soils throughout the Site, per WAC 173-340-740(6)(b).

Groundwater

The standard point of compliance for groundwater is throughout the Site, from the uppermost level of the saturated zone extending vertically to the lowest depth that could be affected, per WAC 173-340-720(8)(b).

Selecting the cleanup action

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

The cleanup action selected for the Site consisted of the following:

- Excavation and off-Site disposal of contaminated soil and perched groundwater;
- Confirmational sampling of soil to document compliance with cleanup levels; and
- Confirmational groundwater monitoring to document compliance with cleanup levels.

Implementing the cleanup action

Ecology has determined your cleanup meets the standards set for the Site. The cleanup action consisted of the following activities:

- Mass excavation of soil from lot-line to lot-line to a depth of approximately 60 feet bgs during Property redevelopment activities. The mass excavation encompassed the areas of soil and groundwater contamination which extended to approximately 40 feet bgs and was subsequently removed (remedial excavation).
- A total of 16,930 tons of petroleum hydrocarbon-contaminated soil above MTCA Method A cleanup levels were removed from the remedial excavation.
- A total of 18,963 tons of PCE-contaminated soi (including breakdown products) above and below the MTCA Method A cleanup levels were removed from the remedial excavation. This soil was disposed under an Ecology Contained-In Determination.
- A total of 13,867 tons of soil with detections of contaminants (excluding chlorinated solvents) below the MTCA Method A cleanup levels were removed outside of the remedial excavation area.
- A total of 49,760 tons of soil were excavated from the Property and disposed at approved offsite disposal facilities.
- Performance soil samples confirmed that contamination did not extend vertically beyond 40
 feet bgs or laterally off the Property. Final confirmation soil sample results confirmed
 compliance with Method A soil cleanup levels throughout the Site.
- Contaminated shallow perched groundwater (9 to 40 feet bgs) was removed during excavation activities and disposed with the soil.
- Groundwater was not encountered up to approximately 55 feet bgs during the construction of the north-adjacent building (929 Office Tower building) in 2016. Shallow perched groundwater in the north-adjacent property appears to be either absent or removed during the construction.
- Groundwater samples collected from shallow monitoring wells located on the northwestadjacent property (The Nine property) did not contain chlorinated solvents at detectable levels, indicating that historical shallow groundwater contamination did not extend off the Property.

- All 23 groundwater monitoring wells (7 shallow and 16 deep) at the Property were decommissioned in March and April 2021 in accordance with <u>WAC 173-160-460</u>⁶ prior to Property redevelopment activities.
- Site data has been uploaded to the Ecology Environmental Management (EIM) database.

Listing of the Site

Based on this opinion, Ecology will update the Site status on the Confirmed and Suspected Contaminated Sites List.

Limitations of the Opinion

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).⁷

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 if the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080⁸ and WAC 173-340-545.⁹

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 $\underline{\text{RCW}}$ $\underline{\text{70A.305.170}}$ (6). 10

Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. NW3341.

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

⁷ https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040

⁸ https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080

⁹ https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545

¹⁰ https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 206-556-5258 or by email at kim.vik@ecy.wa.gov.

Sincerely,

Kim Vik, LG

VCP Site Manager

Thimson

Toxics Cleanup Program, NWRO

Enclosures (1): A – Site Description, History, and Diagrams

cc: Jessica Smith, Aspect Consulting LLC (jsmith@aspectconsulting.com)

Sonia Fernandez, VCP Coordinator (sonia.fernandez@ecy.wa.gov)

Fiscal, VCP Fiscal Analyst (w/o encl) (ecyrevcp@ecy.wa.gov)

TCP, Operating Budget Analyst (w/o encl)

Enclosure A

Site Description, History, and Diagrams

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms the basis for the opinions in this letter.

<u>Site:</u> The site is defined as releases of the following at 10770 (formerly 10630) NE 8th Street in Bellevue, King County, Washington (Property, **Figure 1**).

- Gasoline- and diesel- total petroleum hydrocarbons (TPH-G and TPH-D), and tetrachloroethene (PCE) in soil.
- TPH-G, TPH-D, benzene, PCE, vinyl chloride (VC) and arsenic in groundwater.

The rectangular-shaped Property covers 76,992 square feet (1.77 acres) and is identified as King County Parcel Number 154460-0150. The Property is located at 10770 NE 8th Street, on the northwest corner of the intersection of NE 8th Street and 108th Avenue NE in Bellevue, Washington. This parcel has historically been associated with 10630, 10644, 10660, and 10692 NE 8th Street.

According to MTCA, the Site is defined as all areas where contamination has come to be located. Based on Site investigation data, the Site is confined within the Property boundaries.

<u>Area and Property Description:</u> The Property is in a mixed commercial and retail area and is zoned as "DT-O-2-N" (Downtown Office) by the City of Bellevue. The Property is currently being redeveloped into a high-rise, multi-story, multi-tenant, office building with subgrade parking.

The current uses of the surrounding properties include:

- North: Nine Two Nine Office Tower (office building)
- South: NE 8th Street and The Artise building (active construction)
- West: Vacant building and asphalt parking
- East: 108th Avenue NE and US Bank Plaza Building (office building)

The Property is in an area with known PCE-contaminated shallow groundwater. Nearby properties with known contamination include the Thinker Toys site (CSID 2477, VCP NW 2338) and the Bellevue Corner UNOCAL 4511 site (CSID 7649, VCP 3259). The Thinker Toys site is located approximately 100 feet west of the Property and is currently used as a parking lot. The Bellevue Corner UNOCAL 4511 site is located south of the Property across NE 8th Street and is an active construction site (Artise building).

The Thinker Toys site is the location of a former service station that operated from the 1950s to 1976. A dry-cleaning business which used PCE as a dry-cleaning solvent operated on the site from 1976 to 1986. A release of petroleum hydrocarbons and chlorinated solvents to the soil and groundwater is confirmed at the Thinker toys site as a result of past operations. The contamination has migrated south and downgradient and has impacted the properties on the south side of NE 8th Street, including the Bellevue

Corner UNOCAL 4511 site. Available investigation data confirmed that the Site (Corner Court the Eight Bellevue) is not adversely impacted by these two cleanup sites.

Property History and Current Use: The Property was first developed in the early-1950s as residential and contained several single-family residences. These residences were demolished in 1955 and the Property was redeveloped with three commercial buildings (East, West, and Central Buildings) (Figure 2). The East and West Buildings were constructed in 1956 and 1977, respectively, and were used for retail purposes. The Central Building was constructed in 1955 and was used as a dry-cleaning business from 1955 through at least 1977. An auto body shop was located just north of the Central Building along the north Property boundary and was in operation from 1990 to 1999. All the buildings were demolished in 2021 as part of the Property redevelopment.

The redevelopment started in early 2021 and is expected to be completed in 2023. The redevelopment plans include constructing a high-rise office tower with ground-level retail and subgrade parking. The construction included a mass excavation to approximately 56 feet below ground surface (bgs) (elevation 124 feet above mean sea level, amsl) to accommodate the below-ground parking garage. Localized areas were excavated to 60 feet bgs (elevation 115 feet amsl) to accommodate structural footings and other deeper structures. Property mass excavation was conducted from May 2021 to November 2021.

<u>Physiographic Setting:</u> The Property is located within the Puget Sound Lowland Physiographic Province, a north-south trending structural and topographic depression that is bordered on its west side by the Olympic Mountains, and to the east by the Cascade Mountain foothills. The Puget Sound Lowland is underlain by Tertiary volcanic and sedimentary bedrock and has been filled to the present-day land surface with Pleistocene-aged glacial and non-glacial sediments.

The Property is situated near the middle of the Interlake Drift Upland, a topographic highland bordered by Lake Washington on the west and the Lake Sammamish/Sammamish River Valley on the east. The upland surface is molded into a series of north-south trending ridges and valleys, and slopes gently to the southwest near the Site. The ground elevations at the Property range from about 170 to 180 feet amsl. The topography in the area of the Property slopes toward the southwest.

<u>Surface/Storm Water System:</u> Surface water runoff from the Property and surrounding area is captured in the City of Bellevue's storm water drainage system. The runoff is likely directed to the southwest towards Meydenbauer Creek. This creek and its tributaries historically drained much of downtown Bellevue, but now that drainage is mostly underground in culverts. The creek daylights approximately 3,500 feet to the southwest, where it continues flowing to the south and then west before discharging into Lake Washington.

Ecological Setting: The densely developed downtown area near the Property has little ecological habitat, except for limited landscaping around commercial buildings. The closest area of potential terrestrial habitat is the Bellevue Downtown Park, approximately 2,000 feet southwest of the Property.

<u>Geology:</u> The Property is underlain by up to 6 feet of imported fill overlying glacial deposits typical of glacial outwash consisting of a silty sand with discontinuous layers and lenses of silt, sand, and gravel to approximately 90 feet bgs. The interbedded silty sand layer is underlain by a silt unit to the maximum explored depth of 100 feet bgs. Layers with higher silt content were present primarily in the center of the Property at approximately 40 feet bgs and at 90 feet bgs. These layers of higher silt content may be functioning as a semi-confining layer in this portion of the Property. More permeable layers containing higher sand, gravel, and cobbles content were generally present between 25 and 35 feet bgs (center portion of the Property) and at 70 feet bgs (east and west portions of the Property). A north-south trending cross-section of the Property is shown on **Figure 3**.

<u>Groundwater:</u> Two distinct groundwater zones were encountered beneath the Property during previous investigations. A discontinuous, perched shallow zone has been encountered from 9 to 40 feet bgs and a deep zone has been encountered at 80 to 90 feet bgs. Seven groundwater monitoring wells were installed in the shallow zone and 16 groundwater monitoring wells were installed in the deep zone.

The shallow groundwater occurs in the more permeable layers consisting of more sands and gravels underlain by a semi-confining silt layer observed at approximately 40 feet bgs. Shallow perched groundwater was not encountered in all shallow wells installed across the Property, especially those along the south Property boundary, indicating that the shallow perched groundwater is discontinuous across the Site. The groundwater flow direction in the shallow perched zone recorded prior to Property redevelopment was to the northwest; however, the documented groundwater flow direction in the area is to the south-southwest. Drainage features for the north-adjacent building (929 Office Tower) underground parking garage may have been affecting localized groundwater flow on the Property prior to redevelopment activities.

Deep groundwater occurs in the more permeable layer at approximately 80 to 90 feet bgs, underlain by the silt layer observed at approximately 90 feet bgs. The groundwater flow direction in the deep groundwater zone is to the southwest. Groundwater contours for the shallow and deep groundwater zones in March 2021 are shown on **Figure 4**.

All monitoring wells on the Property (total of 22) and the one monitoring well located in the south Property right-of-way were decommissioned in March and April 2021.

<u>Water Supply:</u> Drinking water is provided to the Property by the Cascade Water Alliance (Cascade). Cascade purchases drinking water from Seattle which is obtained from the protected watersheds of the Cedar and South Fork Tolt rivers in the Cascade Mountains.

Release and Extent of Contamination: Subsurface investigations were conducted on the Property in 2003, 2011, and 2018 through 2020. Soil contamination was confirmed within the Property boundaries up to approximately 35 feet bgs. Groundwater contamination was detected in shallow perched water zone (9 to 40 feet bgs) and does not appear to extend off Property. Groundwater contamination was not found in deep groundwater (80 to 90 feet bgs).

Soil

Soil contaminated with petroleum hydrocarbons above the MTCA Method A cleanup levels (namely TPH-G and TPH-D) was detected near the former auto body shop at depths ranging from 5 to 30 feet bgs. The highest TPH-G concentration (230 milligrams per kilogram [mg/kg]) was in boring AB-05 at 30 feet bgs and the highest TPH-D concentration (8,200 mg/kg) was in boring FMW-04 at 15 feet bgs. The soil samples collected below these two samples did not contain TPH-G or TPH-D above the method reporting limits (MRLs).

A soil sample collected at approximately 35 feet bgs from boring B07, located near the former dry-cleaning building, contained PCE above the MTCA Method A cleanup level. A sample collected at approximately 36 feet bgs in the same boring did not contain PCE above the MRL. No other chlorinated solvent exceedance was detected in soil.

Other volatile organic compounds (VOCs), metals (including arsenic), and polycyclic aromatic hydrocarbons (PAHs) concentrations in soil were either below the MRLs or below the Method A cleanup levels. Soil exceeding the Method A cleanup levels have been primarily located around the former dry cleaners (Central Building).

The extent of known soil contamination was delineated laterally and vertically. **Figure 5** shows the results for soil samples collected from 0 to 40 feet bgs, and **Figure 6** shows the results for soil samples collected from 40 to 100 feet bgs.

Groundwater

Shallow groundwater was first investigated in 2003 and was found to contain TPH-G, TPH-D, total petroleum hydrocarbons as oil (TPH-O), benzene, PCE, and VC at concentrations above the MTCA Method A cleanup levels in borings B02, B03, and B04. Subsequent investigations from 2018 to 2021 confirmed PCE, VC and arsenic in shallow groundwater and arsenic in deep groundwater above the

Method A cleanup levels. Cis-1,2-dichloroethene (CIS) was detected in shallow groundwater above the Method B cleanup levels for the first time in 2018.

Petroleum hydrocarbon and chlorinated solvent contamination in groundwater have been limited to shallow groundwater; however, TPH-D was detected at a concentration slightly above the cleanup level in one deep well (FMW-09) in 2018. The sample results from the same well in 2019 showed TPH-D below the cleanup level. Other than this one detection, arsenic has been the only analyte detected above the Method A cleanup levels in deep groundwater. Total arsenic concentrations in deep groundwater exceeded the Method A cleanup levels; however, corresponding dissolved arsenic concentrations were below the natural background groundwater arsenic concentrations for Puget Sound basin (8 μ g/L)¹¹.

Figure 4 shows the shallow and deep groundwater sample results for March 2021, prior to remedial excavation activities.

<u>Cleanup Action:</u> The soil and groundwater remedial excavation was conducted concurrently with the Property redevelopment activities in May 2021. The mass excavation for the below ground parking garage extended laterally from lot-line to lot-line, except on the east where the limit of the excavation was offset from the Property boundary approximately 10 feet. The mass excavation extended vertically to an elevation of 124 feet amsl (approximately 46 to 56 feet bgs), and deeper to an elevation of 115 feet amsl (approximately 55 to 65 feet bgs) in localized areas. The remedial excavation that removed contaminated soil and shallow groundwater extended to approximately 40 feet bgs.

Confirmation and/or performance soil samples were collected during remedial excavation activities, and the results are shown in 10-foot intervals on **Figure 7 through Figure 10**. TPH-contaminated soil was found up to 40 feet bgs beneath the former Central Building and extended southwesterly near the southern Property boundary. PCE was the only chlorinated solvent found exceeding the MTCA Method A cleanup level and was localized in one area beneath the former Central Building at approximately 35 feet bgs (**Figure 10**). The results of the final confirmation soil samples collected in the areas of remedial excavation were either below the MRLs or below the Method A cleanup levels (**Figure 11**).

Perched groundwater was only encountered near the former West Building at approximate 45 feet bgs during the mass excavation activities (**Figure 11**). The seep in this area was observed in a lens of higher sand and gravel content where no impacts were documented. A small pit was excavated to collect the water to pump out; however, the volume of groundwater that collected in the pit was too small to

¹¹ Ecology, Natural Background Groundwater Arsenic Concentrations in Washington State Study Results, January 2022; https://apps.ecology.wa.gov/publications/documents/1409044.pdf

pump so the water was excavated with the soil. No sheens or odors were noted on the groundwater. No other groundwater zones evidenced by saturated soil, pooling, or seeps were encountered during mass excavation activities. It was determined that any perched groundwater that was previously beneath the Property was discontinuous and has been removed with the soil.

In addition, soil samples were collected between 40 and 60 feet bgs from the areas outside the remedial excavation where soil was excavated for deeper structures (**Figure 12 and Figure 13**). These soil samples did not contain contaminants above the MTCA Method A cleanup levels, further confirming that soil contamination did not extend beyond 40 feet bgs.

A total of 49,760 tons of soil were excavated and removed from the Property during mass excavation activities, including:

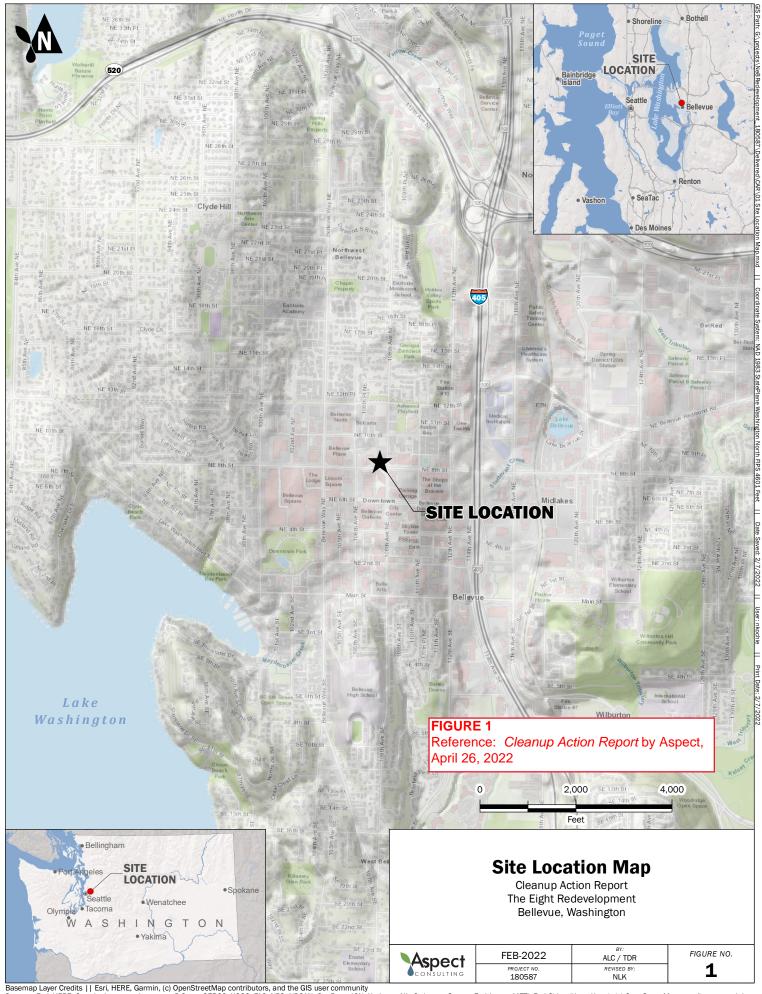
- 16,940 tons (petroleum contaminated soil above MTCA Method A cleanup levels).
- 18,963 tons (PCE-contaminated soil above MTCA Method A cleanup levels).
- 13,867 tons (non-chlorinated solvent impacted soil below the MTCA Method A cleanup levels).

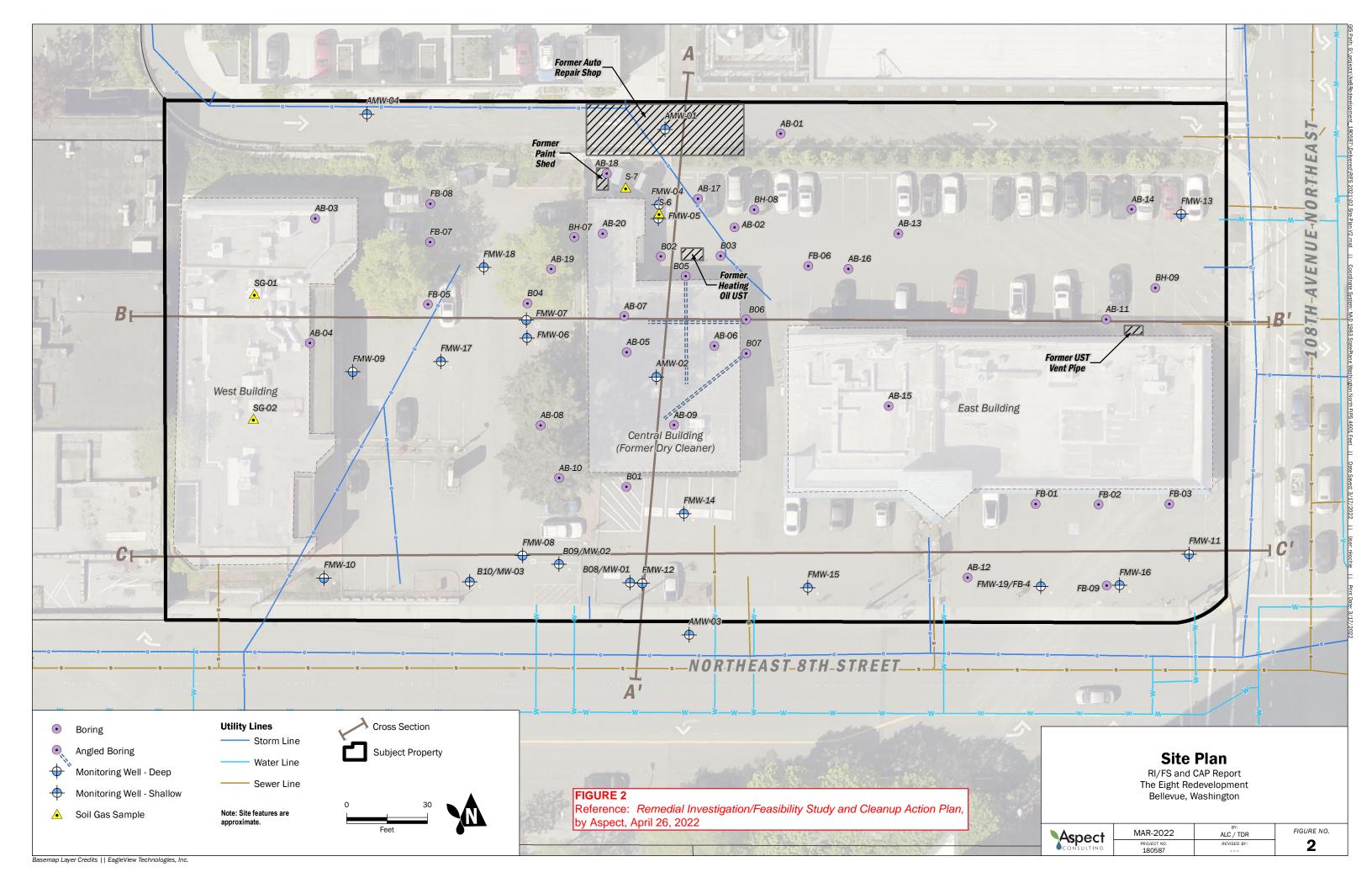
All excavated soil was transported and disposed of at approved disposal facilities. A Contained-In Determination was approved by Ecology for the disposal of the PCE-contaminated soil.

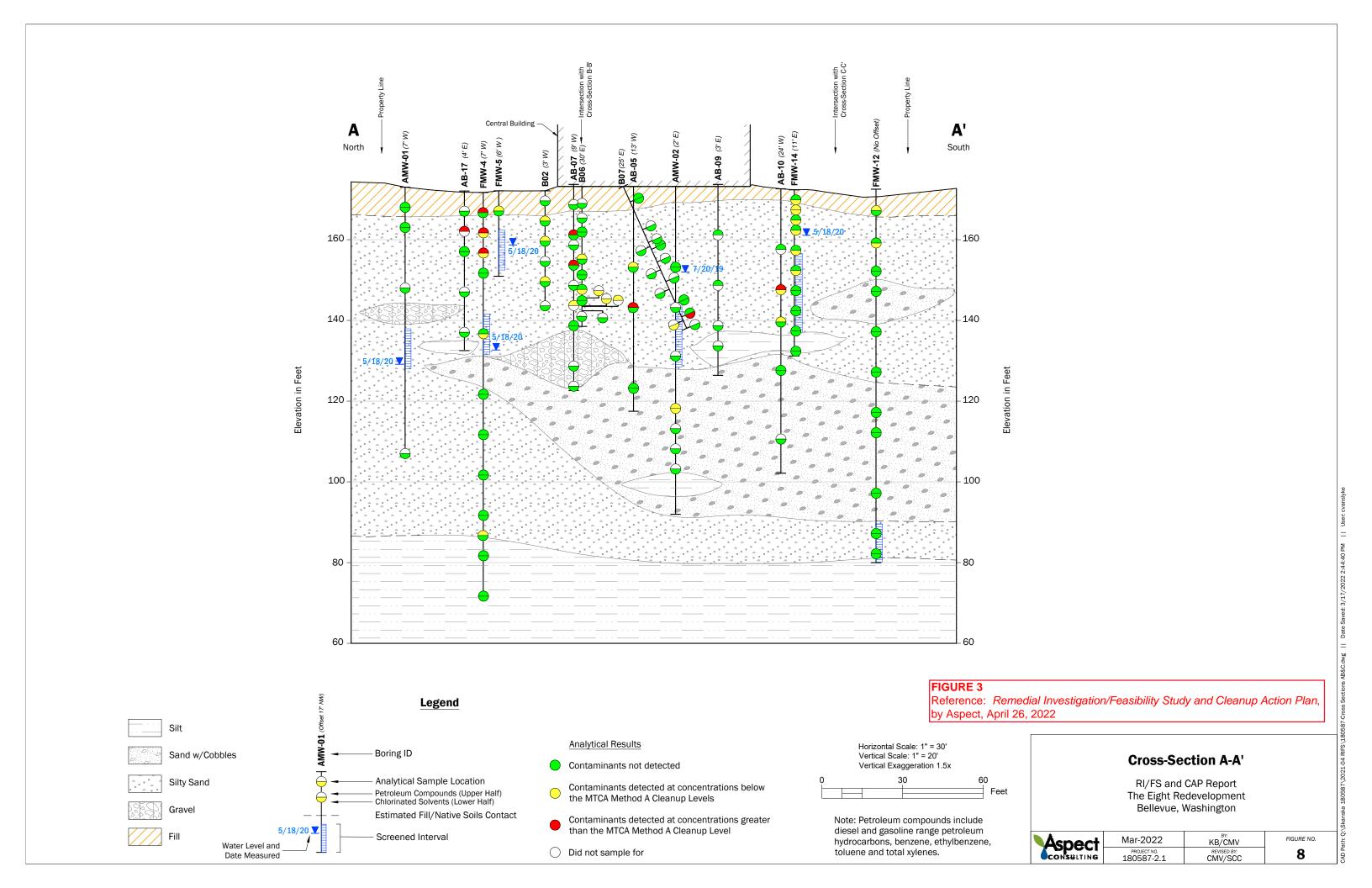
Post-Cleanup Groundwater Evaluation: Historically, a downgradient shallow well located at the northern boundary of the Property (AMW-04) contained VC exceeding the MTCA Method A cleanup level (Figure 4). Due to the presence of the adjacent building to the north (929 Office Tower building), an off-Property groundwater well to the north could not be installed. However, during construction of the 929 Office Tower building, the property was excavated to an elevation of 113 feet amsl (approximately 55 feet bgs). This encompassed the perched groundwater zone observed on the Property (approximately 9 to 40 feet bgs). Groundwater was not encountered during the construction of 929 Office Tower building. It was also noted that during the redevelopment of the Property the tiebacks for the north shoring wall extended into the south wall of the 929 Office Tower building underground garage, approximately 7 feet north. It was documented that seeps were not observed in the 929 Building underground garage south wall during the installation of the tiebacks. These observations support that any perched shallow groundwater at the Property and the north-adjacent property, if present, was removed during redevelopment activities.

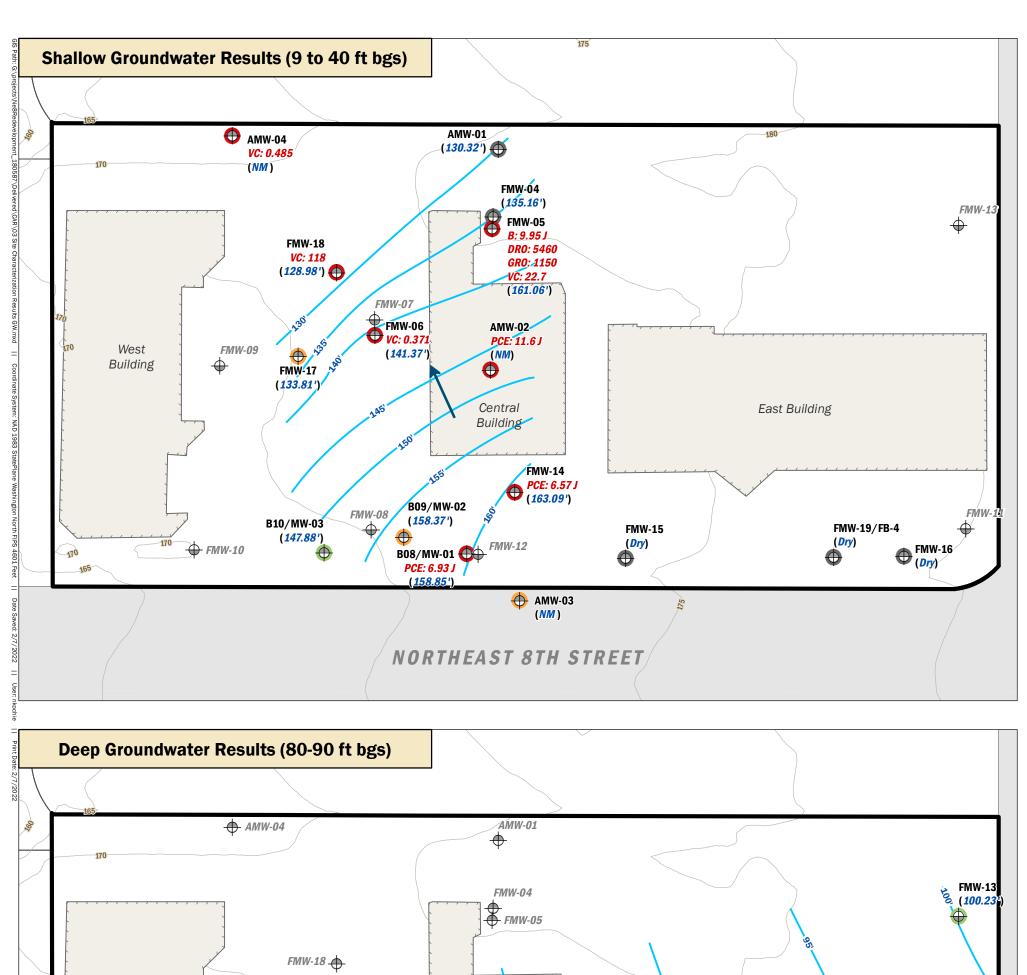
There are seven groundwater monitoring wells (6 shallow and 1 deep) at The Nine property located northwest of the Property (**Figure 12**). The 6 shallow wells are downgradient of the Property. All the wells were sampled in March and December 2022. VOCs were either detected at concentrations below

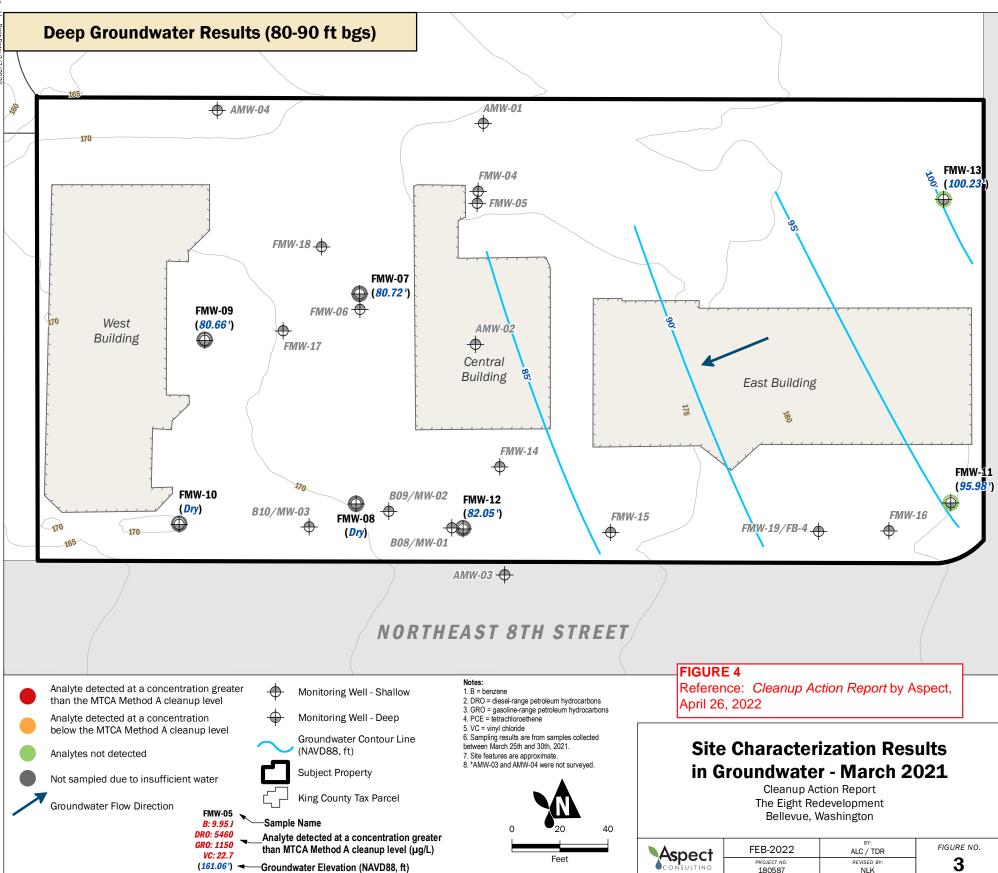
the MTCA Method A cleanup levels or were not detected at or above the MRLs in the groundwater samples collected from all the wells (shallow and deep) during both sampling events. Chlorinated solvents including PCE, VC, and other PCE breakdown products were not detected above the MRLs in any groundwater sample collected from the wells during both sampling events (**Figure 15**). The results for the samples collected from the downgradient shallow wells further suggest that groundwater contamination detected on the Property did not migrate off the Property.





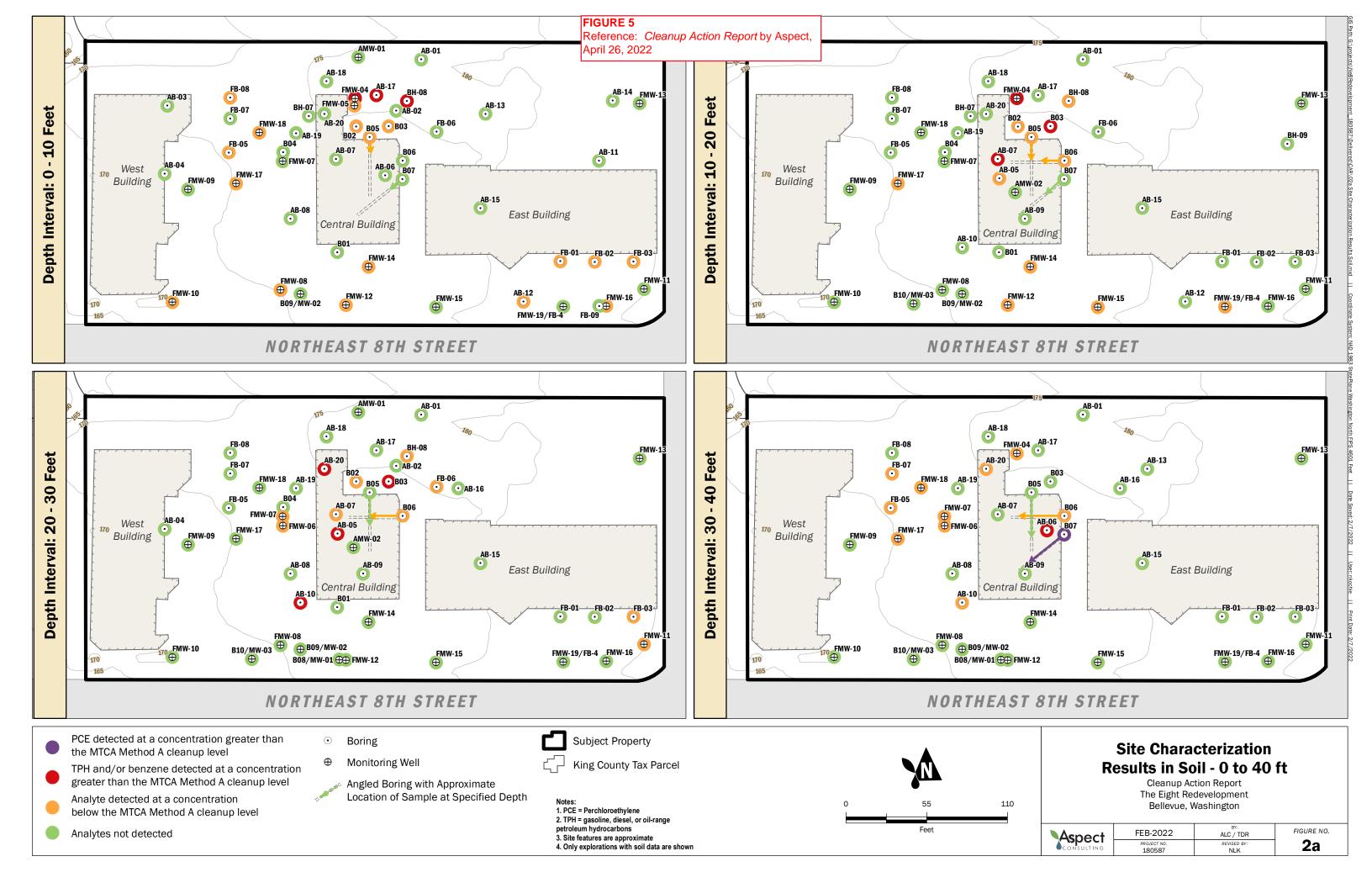


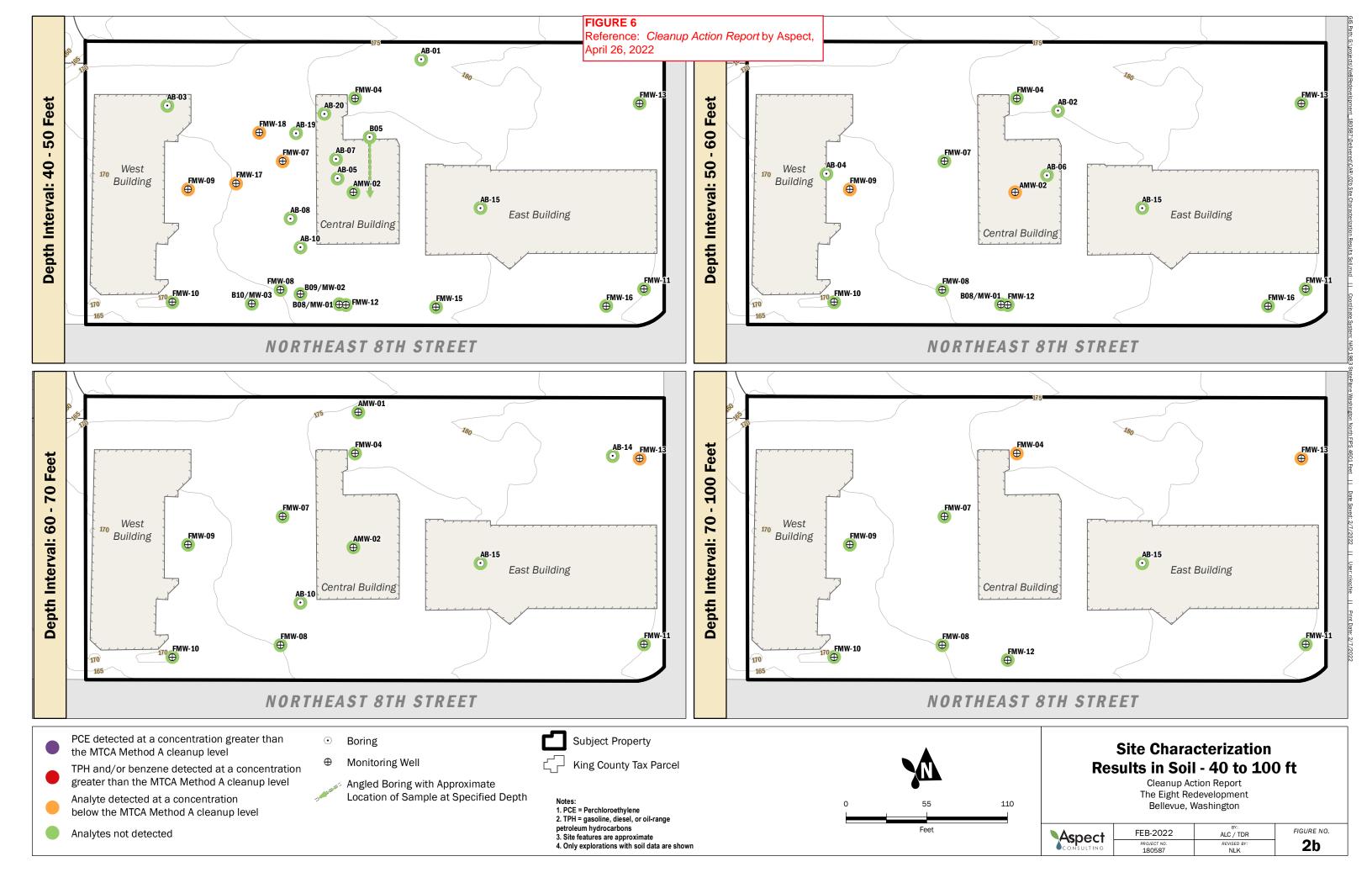




NLK

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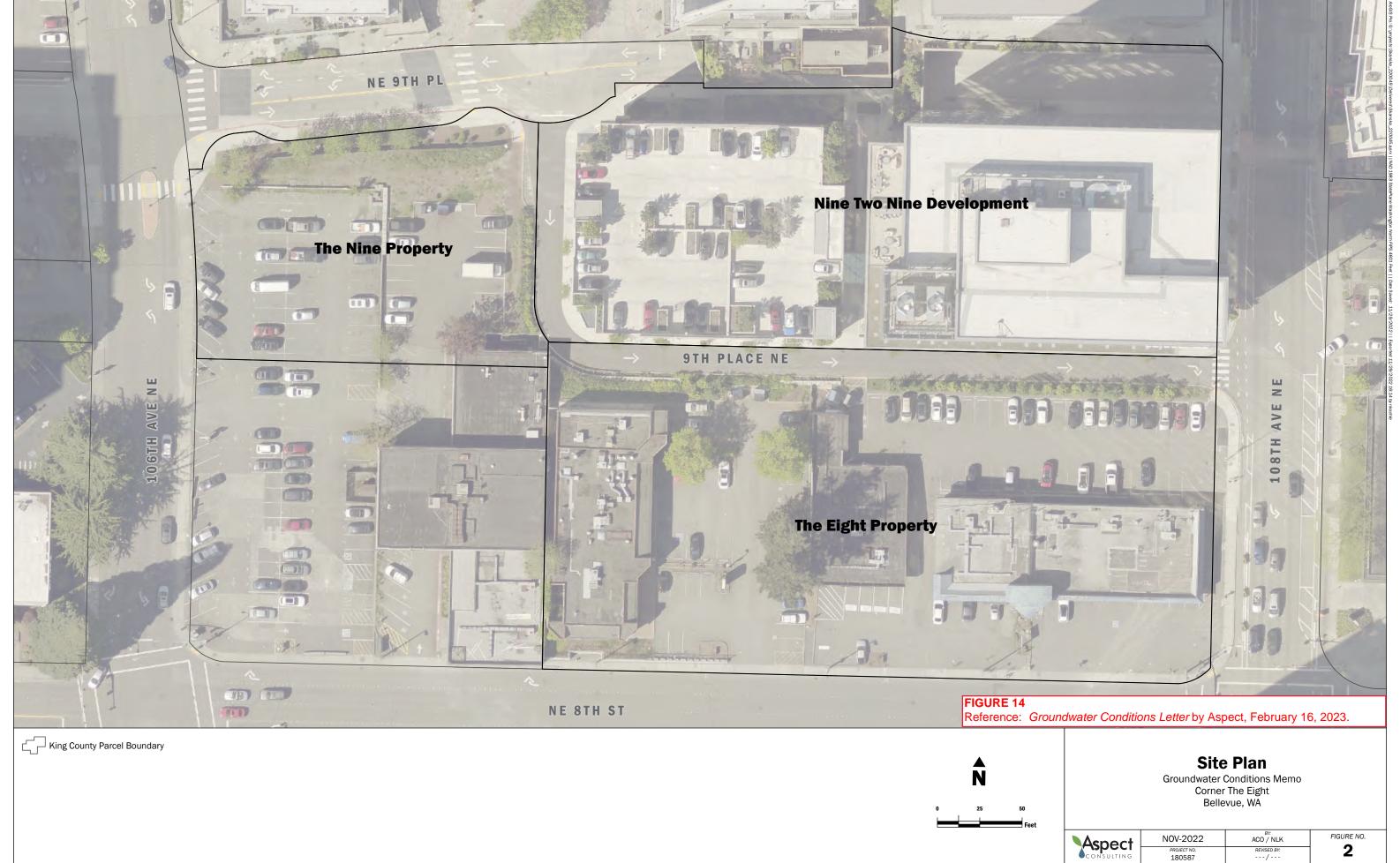




FIGURE NO.

4

ACO / NLK

Aspect

JAN-2023