Compliance Monitoring and Contingency Plan

View Ridge Plaza – VA Everett

220 Olympic Boulevard

Everett, Snohomish County, Washington

May 22, 2023
Terracon Project No. 81207449

Cleanup Site ID: 12644
Facility Site ID: 20079
VCP Project ID: NW3244

Prepared for:
Catalyst Capital Holdings, LLC
Beverly Hills, California

Prepared by:
Terracon Consultants, Inc.
Mountlake Terrace, Washington

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1.0 INTRODUCTION

This Compliance Monitoring and Contingency Plan (CMCP) has been prepared for the View Ridge Plaza – VA Everett (Property) located at 220 Olympic Boulevard in Everett, Washington. This CMCP includes procedures for: (1) long-term compliance groundwater and vapor monitoring; (2) periodic cap inspection and maintenance of the concrete/asphalt foundations, floors, and walkways, and the Vapor Intrusion Mitigation System (VIMS) that are acting as the engineering controls; and (3) a contingency plan describing actions that may trigger contingency and response options, as needed.

An Environmental Covenant (Covenant) is in place at the Property and has been approved by the Washington State Department of Ecology and filed with the Snohomish County Recorder. The Covenant restricts certain activities and uses of the Property to protect human health, the environment, and the integrity of engineering controls at the Property.

This CMCP provides the sample collection locations, sample collection methodologies, sampling frequency, laboratory analyses, and reporting for the long-term groundwater and vapor compliance monitoring program. Furthermore, this CMCICP provides a cap inspection plan and a contingency plan describing actions that may trigger contingency and response options during groundwater compliance monitoring and cap inspections.

This document is organized into the following sections:

- Section 1 (Introduction) presents the purpose of CMCP;
- Section 2 (Site Description and Background) presents a description of the location, facility, and historical operations;
- Section 3 (Compliance Monitoring Plan) presents the compliance monitoring plan, compliance standards, sampling methodologies, and frequencies;
- Section 4 (Cap Inspection) presents a discussion of the on-Property capped area, inspection protocol, frequency, and possible repair procedures;
- Section 5 (Contingency Plan) presents conditions that may trigger contingencies and options; and,
- Section 6 (Reporting and Record Keeping) presents the proposed reporting and record keeping for implementing the CMCP.
- Section 7 (Standard of Care and Limitations)

2.0 SITE DESCRIPTION AND BACKGROUND

This section describes the Site setting and findings from previous subsurface investigations and remedial actions completed at the Property.

2.1 Site Description

The View Ridge Plaza – VA Everett property is located at 220 Olympic Boulevard in Everett, Washington, and is comprised of one tax parcel encompassing approximately 1.89 acres of land (Snohomish County Parcel No. 00606200004102) formerly developed with the View Ridge Plaza building and associated paved parking, drive lanes, and landscaping. The former building was demolished in 2021 and the property has since been redeveloped with an approximate 29,000-square foot, slab on-grade, two-story Everett Veteran Affairs Clinic. A Site Diagram depicting pertinent Property features is included as Exhibit 1 of Appendix A.

A site, as defined by the Washington State Model Toxics Control Act (MTCA), is the area where contamination has come to be located and can consist of a portion or all of one tax parcel or multiple tax parcels, including public rights-of-way (ROWs). With respect to this report, the site, as defined by MTCA, includes the portion of the Snohomish County Parcel No. 00606200004102 with documented chlorinated volatile organic compounds (cVOCs) impacts to soil and groundwater, herein referenced as the Property. As discussed further herein, cVOCs impacts have not been identified in the adjacent ROWs, and therefore ROWs are not included as part of the Property.

Numerous environmental investigations and remedial actions have been conducted by Terracon and others at the Property between 2013 and 2022 in association with the historical on-Property dry-cleaning operations and documented cVOCs in soil and groundwater. Property background information and remedial actions completed at the Property are detailed in the *Cleanup Action Report*, dated December 12, 2022, prepared by Terracon Consultants, Inc., and is on file with the Washington State Department of Ecology (Ecology) and a copy is available upon request.

For the Property, the Contaminants of Concern (COCs) were identified as Tetrachloroethene (PCE), Trichloroethene (TCE), Cis-1,2-Dichloroethene (cDCE), and Vinyl Chloride (VC). Based on the results of the remedial actions and subsequent performance monitoring completed at the Property, soil, groundwater, and soil gas impacted with COCs have been remediated to concentrations below their respective MTCA CULs, with the exception of localized residual soil and groundwater impacts. Approximately 14 cubic yards of impacted soil were left in place in the western sidewall and excavation bottom (at depths of 11 feet to 17 feet under the existing Property surface) and approximately four cubic yards of impacted soil was left in place in the southeastern sidewall of the excavation (at depths of 4 feet to 7 feet below the existing Property surface). During groundwater sampling events conducted after remedial actions at the Property, COCs were only detected in monitoring well MW-13, which was installed within the excavation near residual soil

impacts. The approximate limits of the remedial excavation and locations of residual soil impacts exceeding MTCA CULs levels are presented in Exhibit 1 of Appendix A.

The vapor beneath the Property has not been identified to be impacted with cVOCs. However, the residual soil and groundwater contamination on the Property presents a potential risk to vapor accumulation and intrusion. Therefore, as a part of property redevelopment, the new building incorporated a EPRO Services, Inc., Geo-Seal 100 Vapor Intrusion Mitigation System (VIMS), This VIMS, combined with the concrete floor of the structure are adequately preventing the migration of vapors, if present, into the building. A copy of the VIMS Design Layout is included as Appendix B.

For the selected cleanup action, a Covenant is to be implemented for the residual cVOC-impacted soil and groundwater left in-place beneath the asphalt and concrete surfacing. The purpose of the Covenant is to impose certain obligations on the activities and uses of the Property to protect human health and the environment and the integrity of the engineering controls at the Property. The engineering controls include the VIMS and the impervious surfaces located within the entirety of the building's footprint, associated paved walkways and parking, and the remedial excavation area, identified as the Restricted Area (see Exhibit 1). The Covenant for the Property will remain in force until concentrations of COCs decrease to levels less than the applicable MTCA Method A CULs.

To provide further guidance on the Covenant and its restrictions to current and future property owners, this CMCP has been prepared for that purpose. The following sections detail the Compliance Monitoring, Cap Inspection and Maintenance, and Contingency Action Plans.

3.0 COMPLIANCE MONITORING PLAN

As a part of the Covenant, compliance groundwater and vapor monitoring will be conducted to ensure the long-term effectiveness of the remedial action to protect human health and the environment during the 5-year review period.

A monitoring program will be implemented to assess groundwater and indoor quality associated with the residual cVOCs concentrations in groundwater and soil. The monitoring program will consist of compliance groundwater and vapor monitoring at select sample locations at the Property. Specifically, groundwater monitoring wells MW-6 and MW-10 through MW-14 will be sampled each event, and vapor monitoring points VMP-1 through VMP-3 and air quality samples IA-1, IA-2, and BA-1 will be sampled the first year, as warranted. As discussed in the following sections, groundwater and vapor sampling will be completed semi-annually (i.e., during the first and third quarters) the first year, and annually thereafter, as outlined Table 3.3. This section provides a description of the compliance monitoring plan, including the compliance standards, sample methodologies, frequencies, and reporting.

3.1 Points of Compliance

Points of compliance designate the locations on the Property where cleanup levels must be met for each medium of concern. The selected points of compliance for groundwater for the Property are provided below in Table 3.1.

Table 3.1 - Points of Compliance

Point of Compliance Sample ID	Function
MW-3*	Up-gradient point of compliance or conditional point of compliance. Early warning for potential off-Property migration of impacts or off-Property sources. Sampled as contingency action for MW-14
MW-4*	Up-gradient point of compliance or conditional point of compliance. Warning for potential off-Property migration of impacts. Sampled as contingency action for MW-11 and/or MW-12
MW-5*	Up-gradient point of compliance or conditional point of compliance. Warning for potential off-Property migration of impacts. Sampled as contingency action for MW-11 and/or MW-12
MW-6	Down-gradient point of compliance. Early warning for potential off-Property migration of impacts. Basis for contingency action
MW-8*	Up-gradient point of compliance or conditional point of compliance. Warning for potential off-Property migration of impacts or off-Property sources. Sampled as contingency action for MW-12
MW-10	Down-gradient point of compliance. Early warning for potential off-Property migration of impacts. Basis for contingency action
MW-11	Up-gradient point of compliance. Early warning for potential off-Property migration of impacts or off-Property sources. Basis for contingency action
MW-12	Up-gradient point of compliance. Early warning for potential off-Property migration of impacts or off-Property sources. Basis for contingency action
MW-13	Monitor on-Property residual groundwater impacts. Basis for contingency action and/or reduced monitoring frequency
MW-14	Cross-gradient point of compliance. Early warning for potential off-Property migration of impacts or off-Property sources. Basis for contingency action
VMP-1, VMP-2, VMP-3	Early warning for potential vapor intrusion, basis for reduced and/or continued monitoring
IA-1 and IA-2	Point of compliance and early warning for potential indoor air quality issues, basis for contingency action and/or continued monitoring
BA-1	Background ambient air quality

*: Conditional Point of Compliance based on contingency action

3.2 Cleanup Standards

The selected cleanup standards for groundwater and soil for the Property are provided below in Table 3.2.

Table 3.2 - Cleanup Standards

Contaminants of Concern	Groundwater	Soil	Sub-Slab Soil Gas	Indoor Air
	MTCA Method A Cleanup Level µg/L	MTCA Method A Cleanup Level mg/kg	MTCA Method B Screening Level µg/m^3	MTCA Method B Cleanup Level µg/m^3
Tetrachloroethene	5.0	0.05	320	9.62
Trichloroethene	5.0	0.03	11	0.34
Cis-1,2-Dichloroethene	16*	160*	620	18
Trans-1,2-Dichloroethene	160*	1,600*	620	18
Vinyl Chloride	0.2	0.67*	9.5	0.28

*: MTCA Method B Cleanup level; µg/L: micrograms per liter; mg/kg: milligrams per kilogram; µg/m^3: micrograms per cubic meter.

3.3 Monitoring Frequencies

The groundwater sampling frequency under this plan is presented below in Table 3.3.

Table 3.3 - Monitoring Frequency

First Year*	Second Year*	Third Year*	Fourth Year*	Fifth Year*
• Groundwater, Sub-Slab Soil Gas, and Indoor Air Monitoring (Semi-Annual) • Annual Cap Inspection • Annual Monitoring Report	• Groundwater Monitoring (Annual) • Annual Cap Inspection • Annual Monitoring Report	• Groundwater Monitoring (Annual) • Annual Cap Inspection • Annual Monitoring Report	• Groundwater Monitoring (Annual) • Annual Cap Inspection • Annual Monitoring Report	• Groundwater Monitoring (Annual) • Annual Cap Inspection • Annual Monitoring Report • Ecology conducts 5-year Periodic Review

*: Contingency may occur during any time within the 5-year review period.

Compliance sub-slab soil gas and indoor air monitoring will be reassessed after the first year, monitoring may be discontinued if COCs concentrations in soil gas and indoor air remain stable or below cleanup standards after the first year; and/or if concentrations of COCs in sub-slab soil gas and indoor air remain below cleanup standards for two sampling events (e.g., winter and summer seasons), pending approval from Ecology.

Continuation of compliance monitoring will be reassessed periodically during the initial 5-year performance period, and groundwater monitoring may be discontinued after the 5-year review. For instance, if COCs concentrations in groundwater remain stable or decrease to below MTCA CULs, monitoring may be discontinued after the 5-year monitoring period, pending approval from Ecology.

3.4 Compliance Groundwater Sampling

Groundwater monitoring wells MW-6 and MW-10 through MW-14 will be sampled during each compliance monitoring event, as listed in Table 3.3.

Groundwater sampling will be conducted utilizing low-flow sampling techniques. Field parameters including pH, temperature, dissolved oxygen (DO), oxidation/reduction potential (ORP), and conductivity will be collected utilizing a flow-through cell. Each well will be purged using a peristaltic pump equipped with clean polyethylene tubing. The tubing will be set toward the bottom of the screen in the wells. New tubing will be used at each well. Samples will be transferred directly to laboratory-supplied containers with as little agitation as possible. Groundwater samples will be labeled, placed on ice, and transported, along with appropriate chain-of-custody documentation to a Washington State-accredited laboratory for analyses.

Purge water generated during the monitoring event will be stored on-Property in a United States Department of Transportation (DOT) -approved container pending proper disposal.

The groundwater samples collected from the monitoring wells will be analyzed for cVOCs, such as PCE, TCE, cDCE, and VC by USEPA Method 8260B. The groundwater analytical results will be compared to the cleanup standards listed in Table 3.2.

3.5 Compliance Vapor Sampling

Air quality samples IA-1, IA-2, and BA-1, and vapor monitoring points VMP-1 through VMP-3 will be sampled during each compliance monitoring event, as listed in Table 3.2. Sample locations relative to Property features are depicted on Exhibit 2 of Appendix A.

Air quality sample IA-1 will be located in Hall 8 in the northeastern portion of the building on the ground floor, sample IA-2 will be located in the storage area in the southwestern portion of the building on the ground floor, and background sample BA-1 will be collected from a rooftop location near a fresh air intake for the building. The indoor air sample canister intakes will be set at breathing height, approximately five feet above ground surface. The indoor air quality samples will use six-liter Summa® canisters equipped with laboratory-supplied 8-hour flow regulators allowing for sample collection at a low flowrate over the 8-hour period. After the approximate 8-hour collection period, the Summa® canisters will be closed with at least six inches of mercury negative pressure vacuum remaining within each canister, secured, and appropriately labeled

with pertinent sample information. Canister pressures will be recorded upon initiating sample collection, after sample collection, and after receipt at the laboratory. All air samples will be labeled accordingly and submitted under standard chain-of-custody procedures to a Washington-certified laboratory.

Following the indoor air sampling, sub-slab soil gas samples will be collected from the vapor monitoring points VMP-1, VMP-2, and VMP-3. Vapor monitoring points VMP-1 through VMP-3 were installed inside the wall cavity of the building at each vent riser location and finished with lockable enclosures. The VMPs are accessed via panels that conceal and protect the locations of the ball valves with barbed hose fittings where the sampling equipment is connected. Prior to the start of an equilibration period, approximately three air volumes will be purged from the sampling tubing connected to the vacuum monitoring probe. Once three volumes are purged, the inline quick-connect valve is closed to begin the equilibration process. The completely assembled sampling train will be leak tested by using the low flow purge pump [~250 milliliter per minute (mL/min)] to generate a vacuum on the system, then allowing the sealed sampling train to sit with an approximate 10 inches of mercury negative pressure vacuum during the 30-minute shut-in test period. Once the sampling train has been confirmed to be leak-free based on the vacuum test, and the one-hour equilibration time had passed, the low-flow regulator valve (i.e., <250 mL/min) will be opened to begin sub-slab soil vapor collection. Once the flow regulator indicates the Summa® canisters are nearly full, the Summa® canisters will be closed with at least six inches of mercury negative pressure vacuum remaining within each canister, secured, and appropriately labeled with pertinent sample information. Canister pressures will be recorded upon initiating sample collection, after sample collection, and after receipt at the laboratory. All air samples will be labeled accordingly and submitted under standard chain-of-custody procedures to a Washington-certified laboratory.

The Summa® canisters used for both indoor air quality and sub-slab soil gas samples will be pre-tested and certified as free of COCs by the analytical laboratory.

The indoor air and sub-slab soil gas samples collected will be analyzed for cVOCs, such as PCE, TCE, cDCE, and VC by USEPA Method TO-15. The indoor air and sub-slab soil gas analytical results will be compared to the cleanup standards listed in Table 3.2.

4.0 CAP INSPECTION AND MAINTENANCE PLAN

As a part of the Covenant, a cap inspection and maintenance plan is required in the event that the remedial action is not effective or contaminated soil becomes exposed. This section provides a description of the cap to be inspected; establishes an inspection and maintenance program to identify damaged or disturbed areas of the cap; procedures for timely repair and replacement needed to restore the damaged or penetrated cap; and appropriate record-keeping of inspections, repairs, and reporting.

The cap inspection and maintenance will be conducted by a qualified persons and all inspection and maintenance activities shall follow requirements outlined in this CMCP.

4.1 Cap Description and Restricted Area

The existing Everett VA Clinic is a slab-on-grade building with associated paved parking and drive lanes. In addition, a EPRO Services, Inc., Geo-Seal 100 VIMS was incorporated into the new Everett VA Clinic building's design and extends beneath the entirety of the new structure. In general, the VIMS consists of a permeable aggregate layer, a vapor collection and vent piping network, a 60-mil asphaltic membrane spray applied sub-slab vapor intrusion barrier system (Geo-Seal 100), and associated vent risers and passive ventilator roof turbines. The VIMS was installed under the supervision of a Terracon certified Geo-Seal inspector and the system was installed in accordance with the manufacturer and design requirements and specifications. The VIMS Design Layout is included as Appendix B.

The capped area consists of the entirety of the VIMS, the remedial excavation area, the new building's foundation slab, and associated paved walkways and parking, identified as the Restricted Area as depicted on Exhibit 1 of Appendix A.

During the most recent on-Property groundwater monitoring activities, completed in September 2022, cracks, voids, or other compromised areas of the cap in the Restricted Area were not observed by Terracon at that time.

4.2 Inspection and Maintenance

Inspection and maintenance will be conducted annually to ensure stability and effectiveness of the constructed cap. Inspections would include visual observations for penetrations, settlement, erosion, cracks, and/or holes in all asphalt, concrete, patches, and associated infrastructure. In addition, monitoring would include regular inspections and observations of the accessible VIMS components and any changes or damage to the cap, as summarized on the Cap Inspection Form, included as Appendix C.

An annual inspection of the Restricted Area should be performed by on-Property representatives (e.g., facilities and maintenance workers, owner's representatives, etc.) and documentation of the annual inspection retained. The Cap Inspection Form should be used as an example for future cap inspections and monitoring events.

In the event that the cap integrity is compromised and no longer protective of human health and the environment, mitigation and contingency actions may be implemented. If the cap is disturbed, it must be restored to near original surface completion or with Ecology approved alternative surfaces. Contingency actions are further detailed below in Section 5.0 of this CMCP.

4.3 Planned Restricted Area Disturbance—Notification and Reporting

Property activities may require disturbance in the Restricted Area and excavation of contaminated soil beneath the Restricted Area, for example to install new utilities. Disturbance of the Restricted Area for planned development activities is allowed if the work is conducted in accordance with this CMCP.

At least 30 days before the planned cap disturbance, notification shall be provided to Ecology, including a description and diagrams of the work to be performed, and confirmation that the work will be performed in accordance with this CMCP. Ecology will need to approve any development within the restricted area in accordance with the Covenant. If earthwork is proposed within the limits of the Restricted Area, the Property owner should be prepared to manage cVOC-impacted soil at that time.

After disturbance and repair activities are complete, as-built documentation, photographs of the work, and a letter summarizing that work was conducted according to this CMCP shall be submitted to Ecology within 45 days of completion.

5.0 CONTINGENCY ACTION PLAN

This section provides a summary of the contingency actions for the management of the cap and potential conditions beneath the Property in the event that the cap is damaged or if monitoring results indicate that an unexpected increase of COCs in groundwater and/or vapor exceeding cleanup standards.

5.1 Conditions That May Trigger a Contingency Action

Conditions that may trigger a contingency action would include, but are not limited to, the following:

- Groundwater monitoring results that indicate concentrations of COCs are increasing, and the groundwater plume is potentially expanding off-Property beyond the standard points of compliance.
- Vapor monitoring results that indicate concentrations of COCs are exceeding the cleanup standards (Table 3.1) for both sub-slab soil gas and indoor air.
- Damage to the on-Property engineering controls (i.e., building foundation or VIMS) or failure to conduct the necessary inspections/maintenance and sampling outlined under this CMCP.
- Settlement, erosion, penetrations, and/or damage to the Restricted Area.
- Cracks or fractures in the Restricted Area that are readily accessible and greater than surficial fractures.
- Altering, penetrating, and/or damaging any component of the VIMS.

- Unapproved changes or modifications to the cap or VIMS.

Floor cracks, damage, or other openings, including utility conduits, piping, and floor drains can constitute as a condition that triggers contingency action. Such pathways should be identified and sealed whenever they are readily accessible. Contingency action options are detailed in the following section.

5.2 Groundwater Contingency Action Options

If groundwater monitoring results indicate that concentrations of COCs are increasing, and the groundwater plume is potentially expanding off-Property beyond the standard points of compliance, contingency actions should be implemented. Groundwater contingency action options include, but are not limited to, the following:

- Confirm a new release has not occurred.
- If a new release has not occurred, resample the affected monitoring wells to confirm the reported contaminant concentrations.
- If the reported contaminant concentrations confirm concentrations of COCs are increasing, and the groundwater plume is potentially expanding off-Property beyond the points of compliance, confirm if there is a down-gradient and/or constraining monitoring well to be used as a conditional point of compliance and request Ecology's approval.
- If a conditional point of compliance and/or constraining monitoring well is not applicable or approved, develop a Contingency Action Work Plan for additional assessment and/or remedial action, as necessary, for Ecology's approval.
- Upon completion of the additional assessment and/or remedial action, conduct performance groundwater monitoring for four consecutive quarters and/or semi-annually, as determined by Ecology, to demonstrate compliance pending the next 5-year review.
- If compliance cannot be demonstrated, additional remedial action, such as remedial injections, may be warranted and a Contingency Action Work Plan for additional remedial action should be prepared for Ecology's review and approval.

5.3 Vapor Contingency Action Options

If vapor monitoring results indicate that concentrations of COCs are exceeding the cleanup standards (Table 3.1) for both sub-slab soil gas and indoor, contingency actions should be implemented. Vapor contingency action options include, but are not limited to, the following:

- Confirm a new release has not occurred and/or if there was a non-vapor intrusion related ambient air source that can be potentially attributed to the reported concentrations.

- If a new release has not occurred and a non-vapor intrusion related sources were not identified, resample sub-slab soil gas and indoor air to confirm the reported contaminant concentrations.
- If the reported contaminant concentrations confirm concentrations of COCs are increasing and exceeding the cleanup standards for both sub-slab soil gas and indoor air, confirm if the concentrations of COCs are exceeding the MTCA Sub-Slab Soil Gas and Indoor Air Screening Levels for Commercial Worker and request Ecology's approval to use the adjusted screening levels for a commercial worker exposure scenario.
- If the commercial worker screening levels are not applicable or approved, develop a Contingency Action Work Plan for additional assessment and/or remedial action (i.e., converting the VIMS to an active system), as necessary, for Ecology's approval.
- Upon completion of the additional assessment and/or remedial action, conduct performance vapor monitoring annually, as determined by Ecology, to demonstrate compliance pending the next 5-year review.

5.4 Cap Contingency Action Options

In the event that the engineering controls within the Restricted Area (i.e., cap and/or VIMS) integrity is compromised and no longer protective of human health and the environment, mitigation and contingency actions should be implemented. Those actions would include, but are not limited to, the following steps:

1. Repair, replace, and/or reconstruct the compromised engineering control in the Restricted Area to restore the effectiveness of the engineering control so that the remedy is protective of human health and the environment; and,
2. Document and report any changes to the Restricted Area, the contingency actions implemented, and the condition of the area following implementation of the contingency actions to demonstrate compliance with the Covenant.

Floor cracks or other openings, including utility conduits, piping, and floor drains can constitute as a condition that triggers contingency action. Such pathways should be identified and sealed whenever they are readily accessible. For example, a variety of caulks and other expandable sealant products can be used. For better sealant support, cracks and conduit openings larger than ½ inch should be filled with a foam backer or other compatible material prior to the application of the sealant. Contingency actions should be completed as soon as practical, but before the next Annual Inspection and documented within 30 days of finalizing the contingency action.

6.0 REPORTING AND RECORD KEEPING

All records associated with this CMCP, including annual cap inspections and monitoring reports, will be documented and reported to Ecology upon completion of an Annual Compliance Monitoring Report.

All records associated with any changes to Property use or if something is identified that would appear to trigger a contingency action, will be documented and reported to Ecology within 30 days, as described in this CMCP and the Covenant.

7.0 STANDARD OF CARE AND LIMITATIONS

This CMCP was prepared in general accordance with our Proposal for Remedial Action Professional Services (Terracon Proposal No. P81207449), dated October 2, 2020, and our Supplemental Change Order, dated February 1, 2021, between Terracon and Catalyst Capital Holdings, LLC.

Terracon's services were performed in a manner consistent with generally accepted practices of the profession undertaken in similar studies in the same geographical area during the same time. Terracon makes no warranties, either express or implied, regarding the findings, conclusions, or recommendations. Please note that Terracon does not warrant the work of laboratories, regulatory agencies, or other third parties supplying information used in the preparation of the report.

Findings, conclusions, and recommendations resulting from these services are based upon information derived from the on-Property activities and other services performed under this scope of work; such information is subject to change over time. Certain indicators of the presence of hazardous substances, products, or other constituents may have been latent, inaccessible, unobservable, non-detectable, or not present during these services. We cannot represent that the Property contains no hazardous substances, toxic materials, petroleum products, or other latent conditions beyond those identified during this report. Subsurface conditions may vary from those encountered at specific borings or wells or during other surveys, tests, assessments, investigations, or exploratory services. The interpretations, findings, and our recommendations are based solely upon data obtained at the time and within the scope of these services.

APPENDIX A – EXHIBITS

N

MW-10

MW-4

MW-11

MW-13

MW-6

MW-5

MW-12

MW-14

MW-3

MW-8

ELM STREET

OLYMPIC BOULEVARD

76 GAS STATION

FUELING CANOPY

W MUKILTEO BOULEVARD

LEGEND

RESTRICTED AREA

APPROXIMATE LIMITS OF REMEDIAL EXCAVATION

APPROXIMATE PROPERTY BOUNDARY

APPROXIMATE LOCATION OF RESIDUAL SOILS WITH IMPACTS

CURRENT BUILDINGS

MW-11 APPROXIMATE LOCATION AND NUMBER OF MONITORING WELL

40 0 10 20 40

APPROXIMATE SCALE IN FEET

Project Mngr:	Project No.		**SITE DIAGRAM**
Drawn By:	Scale: AS SHOWN		View Ridge Plaza 220 Olympic Boulevard Everett, Snohomish County, Washington
Checked By:	File No. EXHIBIT 3		
Approved By:	Date: February 2023		EXHIBIT 1

IA-1

IA-2

VR1

VMP-1

VR2

VMP-2

VMP-3

VR3

23'-5"

25'

34'-10"

13'-9"

20'-3"

LEGEND

- 3-INCH I.D. 0.125-INCH SLOTTED SCH 40 PVC VAPOR COLLECTION PIPING
- 3-INCH I.D. SOLID SCH 40 PVC BELOW SLAB CONVEYANCE PIPE
- VACUUM MONITORING PROBE WITH ACCESS PANEL
- EXTENT OF VAPOR INTRUSION MITIGATION SYSTEM MEMBRANE PERIMETER INLET VENT
- VR1 — VENT RISER PIPE FROM SUB-SLAB
- IA — INDOOR AIR SAMPLE LOCATIONS
- VMP-1 — VACUUM MONITORING PROBE SAMPLE LOCATIONS

APPROXIMATE SCALE IN FEET

REV.	DATE	BY	DESCRIPTION

INDOOR AIR AND VACUUM MONITORING PROBE SAMPLES

VIEW RIDGE PLAZA

220 OLYMPIC BOULEVARD

EVERETT WASHINGTON

Terracon Explore with us

21905 64TH AVENUE W. SUITE 100 MOUNTLAKE TERRACE, WA 98043

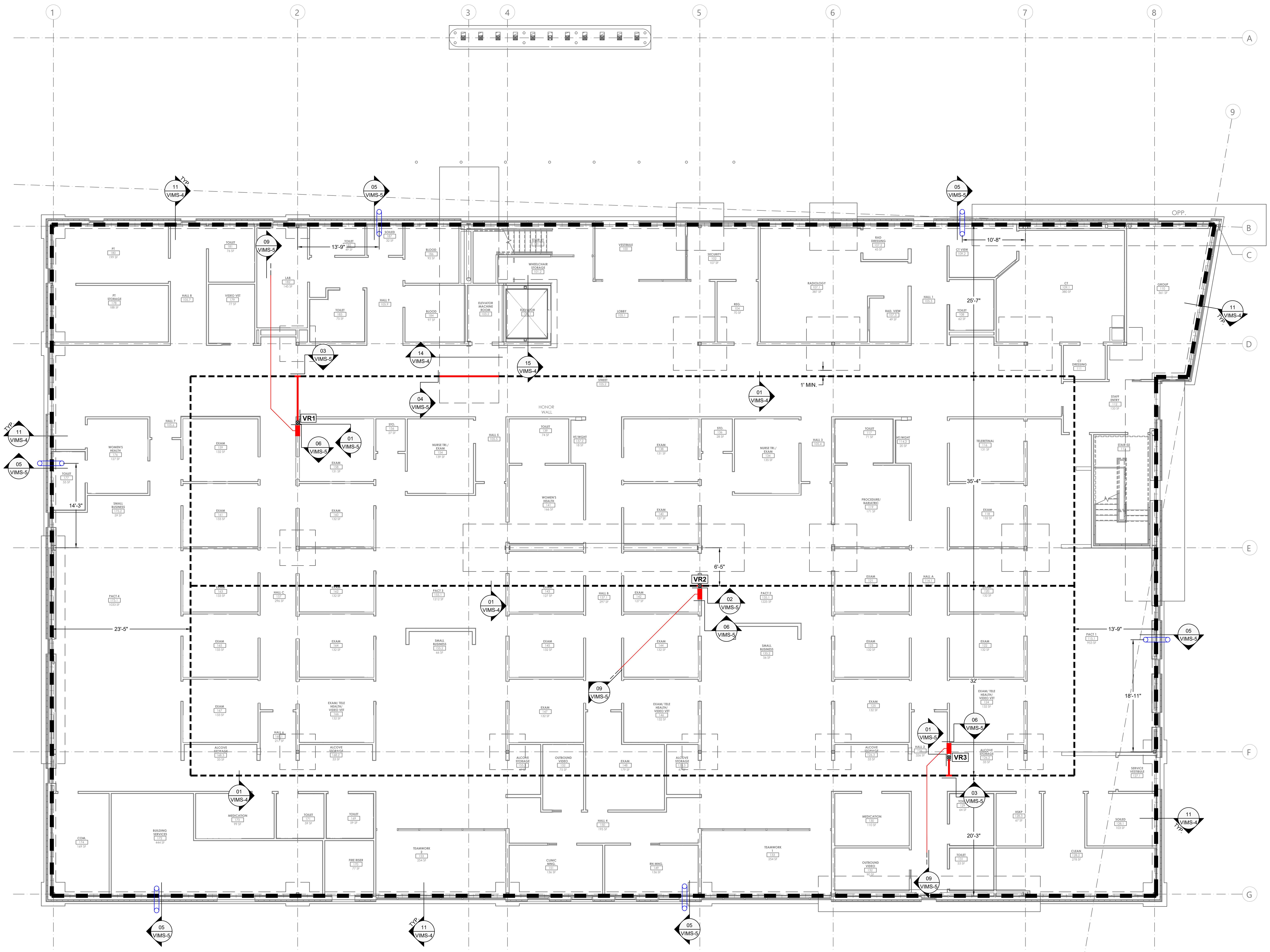
PH. (425) 771-3304 FAX. (425) 771-3549

NOT FOR CONSTRUCTION

Exhibit 2

DESIGNED BY:	ZKB
DRAWN BY:	AMP
APPVD. BY:	KSB
SCALE:	AS SHOWN
DATE:	SEPT. 2022
JOB NO.	81207449
SHEET NO.:	1 OF 2

APPENDIX B - VIMS DESIGN LAYOUT



LEGEND

- 3-INCH I.D. 0.125-INCH SLOTTED SCH 40 PVC VAPOR COLLECTION PIPING
- 3-INCH I.D. SOLID SCH 40 PVC BELOW SLAB CONVEYANCE PIPE
- SUB-SLAB VAPOR PROBE WITH ACCESS PANEL
- EXTENT OF VAPOR INTRUSION MITIGATION SYSTEM MEMBRANE
- PERIMETER INLET VENT
- VR1 4-INCH I.D. VENT RISER TO ROOF LOCATION

N

SCALE IN FEET: 8 0 2 4 8

VIMS MEMBRANE AND VAPOR COLLECTION VENT PIPE LAYOUT 01

SCALE: 1/8" = 1'-0"

ARCHITECT:

CONSULTANT:

Terracon
Consulting Engineers and Scientists
1421 EDINGER AVENUE, SUITE C TUSTIN, CA 92780
PH. (949) 261-0051 FAX. (949) 261-6110

VA CBOC - EVERETT, WA

220 OLYMPIC BLVD, EVERETT, WA 98203

PROJECT: 2014

ISSUANCE:	DATE:
ISSUED FOR PERMIT	5/24/21

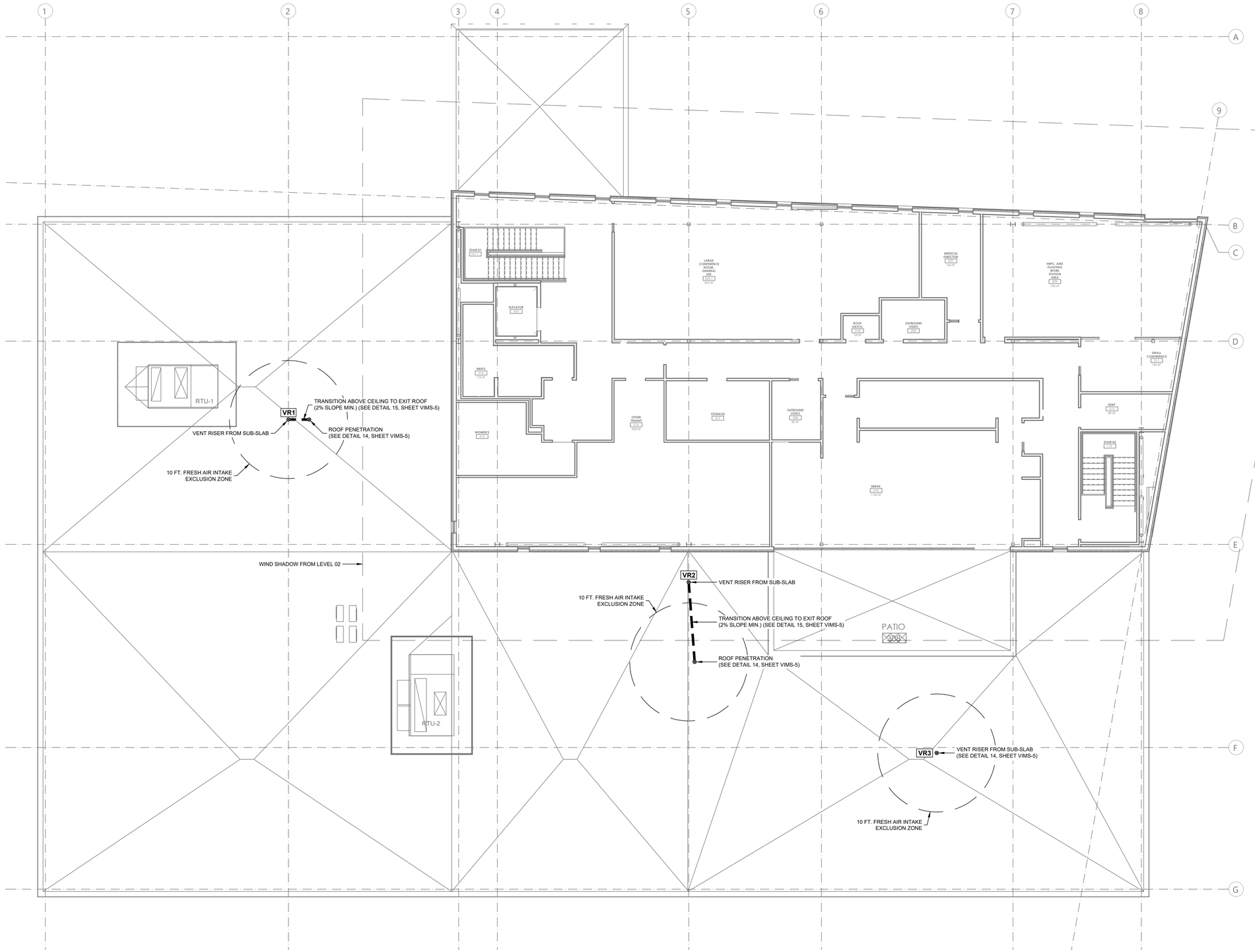
STAMP:

DRAWING TITLE:

VAPOR INTRUSION MITIGATION SYSTEM PLAN - LEVEL 01

SHEET NUMBER:

VIMS-2



LEGEND

VR1 ⊗ VENT RISER FROM SUB-SLAB LOCATION

VENT RISER TRANSITION BELOW THE ROOF DECK

N

SCALE IN FEET 0 2 4 8

LEVEL 2 / LOWER ROOF VENT LAYOUT 01

SCALE: 1/8" = 1'-0"

ARCHITECT:

CONSULTANT:

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VA CBOC - EVERETT, WA

220 OLYMPIC BLVD, EVERETT, WA 98203

PROJECT: 2014

ISSUANCE: DATE:

ISSUED FOR PERMIT 5/24/21

STAMP:

DRAWING TITLE:

VAPOR INTRUSION MITIGATION SYSTEM PLAN - LEVEL 02

SHEET NUMBER:

VIMS-3

APPENDIX C – CAP INSPECTION FORM

Cap Inspection Form: *VA Everett - View Ridge Plaza*
F/S ID: 20079 Cleanup ID: 12644 VCP No.: NW3244

INSPECTION DATE: WEATHER:

SITE ADDRESS: INSPECTOR'S NAME AND TITLE:

(Print Name) (Title)

Criteria		Yes	No	
1 Land Use				
A. Has any unauthorized use or activity taken place on or adjacent to the Restricted Area?				
If yes	Identify the use or activity			
	Identify the current or potential impact			
2 Vegetation				
A. Is vegetation degrading the integrity of the cap?				
If yes	Identify the extent of the damage			
	Identify the recommended corrective action			
B. Is vegetation hindering thorough inspection of the cap?				
If yes	Identify recommended corrective action			
3 Cap and Vapor Intrusion Mitigation System Integrity				
A. Has the cover material or components been damaged?				
If yes	Identify the cause of the disturbance			
	Identify the extent of the damage			
	Identify the recommended corrective action			
B. Has the underlying soil been exposed?				
If yes	Identify the extent of the damage			
	Identify the recommended corrective action			
C. Is there any disturbance on or adjacent to the cap that threatens the cap integrity?				
If yes	Identify the cause of the disturbance			
	Identify the extent of the damage			
	Identify the recommended corrective action			

Criteria		Yes	No	
4 Prior Repairs				
A. Do any previous repair areas require additonal corrective action?				
If yes	Identify the extent of the damage			
	Identify the recommended corrective action			

5 Photo Log

Spray paint or mark any defiencies and photograph
Photograph overall view of capped area
Attach photographs to this inspection form.

6 Repairs

Document and photograph repairs
Attach photographs and any additional documentation to this inspection form.

7 Notes