STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, Washington 98504-7600 • 360-407-6300

August 14, 2023

Steven Cody
Catalyst Capital Holdings, LLC
712 H St NE
Washington, DC 20002
scody@catalystcap.com

SENT BY EMAIL

Re: No Further Action opinion for the following contaminated Site:

Site name:	Everett Masonic Corporation *a.k.a.* View Ridge Plaza
Site address:	220 Olympic Blvd, Everett, Snohomish County, WA 98203
Facility/Site ID:	20079
Cleanup Site ID:	12644
VCP Project No.:	NW3244

Dear Steven Cody:

On December 20, 2022, the Washington State Department of Ecology (Ecology) received your request for an opinion regarding the sufficiency of your independent cleanup of the View Ridge Plaza/Everett Masonic Corporation facility (Site) under the Voluntary Cleanup Program (VCP).[1] This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA),[2] chapter 70A.305 Revised Code of Washington (RCW).[3]

Opinion

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

This opinion depends on the continued performance and effectiveness of the post-cleanup controls and monitoring specified in this letter and in the environmental covenant in **Enclosure D**.

[1] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program
[2] https://apps.ecology.wa.gov/publications/SummaryPages/9406.html
[3] https://app.leg.wa.gov/rcw/default.aspx?cite=70A.305

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[4] (collectively called "MTCA").

Site Description

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Tetrachloroethene (PCE), trichloroethene (TCE), cis 1,2-dichloroethene (cDCE), trans 1,2-dichloroethene (tDCE), and vinyl chloride (VC) in soil and groundwater

Enclosure A includes a Site description 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(s) associated with this Site.

Basis for the Opinion

Ecology bases this opinion on information in the documents listed in **Enclosure B**.

You can request these documents by filing a records request.[5] For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call 360-407-6040. Before making a request, check whether the documents are available on Ecology's Cleanup Site Search web page.[6]

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

[4] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340
[5] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[6] https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=12644

Characterizing the Site

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

In June of 2018, eight interior air samples and three exterior air samples (one ground level and two roof top) were collected and analyzed for PCE, TCE, cDCE, tDCE, VC, 1,1-dichloroethene (1,1-DCE), 1,1,1-trichloroethane (1,1,1-TCE), benzene, carbon tetrachloride, and chloroform.

- The two roof top samples both had detections of chloroform and one had a detection of PCE, with all three concentrations below the MTCA Method B screening levels.
- The ground level exterior sample detected chloroform with a concentration equal to the two roof top air samples.
- tDCE, 1,1-DCE, 1,1,1-TCE, and carbon tetrachloride were not detected in any of the indoor air samples.
- Benzene was detected in all eight indoor air samples, with all eight concentrations exceeding the MTCA Method B screening level.
- Chloroform was detected in all eight indoor air samples, with six of eight concentrations exceeding the MTCA Method B screening level.
- The five indoor air monitoring points farthest from the drycleaners had four detections of PCE, one detection of TCE, and two detections of cDCE, with all seven concentrations below their respective MTCA Method B screening levels.
- The sampling location closest to the drycleaners had detections of PCE, TCE, and cDCE, with the concentrations of PCE and TCE exceeding their respective MTCA Method B screening level.
- The two indoor sampling points located in the drycleaners had detections of PCE, TCE, and cDCE, with all six concentrations exceeding the MTCA Method B screening level, and one detection of VC, also exceeding the MTCA Method B screening level.

In July of 2020, samples were collected in nine of ten existing groundwater monitoring wells and analyzed for PCE, TCE, cDCE, tDCE, VC, and 1,1-DCE.

- Eight of the nine samples had no detections of any analyte.
- One well (MW-1) had a detection of cDCE, with a concentration below the MTCA Method B cleanup level.

In April of 2021, samples were collected in two monitoring wells (MW-1, MW-2) and analyzed for PCE, TCE, cDCE, tDCE, VC, and 1,1-DCE. Both wells were decommissioned following the sampling.

- MW-1 had a detection of cDCE, with a concentration below the MTCA Method B cleanup level.
- None of the other analytes were detected in either sample.

In November of 2021, four additional groundwater monitoring wells were installed on-Site. One soil sample from each well was analyzed for PCE, TCE, cDCE, and VC.

- Only the soil sample from MW-13 had detections of cDCE and VC, with both concentrations below their respective MTCA Method A or B cleanup levels.

Samples were collected from six existing wells and the four new wells and analyzed for PCE, TCE, cDCE, tDCE, VC, and 1,1-DCE.

- Only MW-13 had detections of cDCE and VC, with both concentrations exceeding their respective MTCA Method A or B cleanup levels.

In March, June, and September of 2022, samples were collected from four existing and the four new wells and analyzed for PCE, TCE, cDCE, tDCE, VC, and 1,1-DCE.

- Only MW-13, had detections of cDCE and VC in each round of sampling, with all of the VC concentrations exceeding the MTCA Method A cleanup level and all of the cDCE concentrations being below the MTCA Method B cleanup level.

Earlier site characterization is described in **Enclosure C**.

Setting cleanup standards

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

Hazardous Substance	Method A Soil (mg/kg)[a]	Method A Groundwater (µg/l)[b]	Method B Sub Slab Soil Gas (µg/m^3)[c]	Method B Indoor Air (µg/m^3)
Tetrachloroethylene (PCE)	0.05	5	320	9.6
Trichloroethylene (TCE)	0.03	5	11	0.33
Cis-1,2-dichloroethene (cDCE)	160	16	NONE	NONE
Trans-1,2-dichloroethene (tDCE)	1,600	160	610	18
Vinyl chloride (VC)	0.67 (Method B)	0.20	9.50	0.284
Chloroform	32.3	1.4	3.6	
Benzene	0.03	5	11	0.32

[a] mg/kg = milligrams per kilogram
[b] µg/l = micrograms per liter
[c] µg/m^3 = micrograms per cubic meter

A standard horizontal point of compliance throughout the Site was used for soil contamination.

A standard vertical point of compliance, fifteen feet, was established in the soils throughout the Site from the ground surface to fifteen feet below the ground surface for the direct contact pathway. Fifteen feet is protective for direct contact with the contaminated soil. For the soil-to-groundwater pathway, the vertical point of compliance applies without respect to depth.

A standard vertical point of compliance, from the uppermost level of the saturated zone to the lowest depth that could potentially be affected, was used for groundwater contamination.

Selecting the cleanup action

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

Contaminated soil was excavated and taken off-Site to a permitted facility. Because not all the contaminated soil could be excavated, due to the risk of undermining an adjoining sidewalk, a sanitary sewer, and/or a below ground channelized creek, an environmental covenant (EC) was placed on the property deed to control access to the remaining contaminated soil and contaminated groundwater. A vapor intrusion mitigation system was incorporated into the

design and construction of the replacement building on the property to prevent possible contaminated vapors from the soil and groundwater from entering the building.

Implementing the cleanup action

Ecology has determined your cleanup meets the standards set for the Site. This determination depends on the continued performance and effectiveness of the post-cleanup controls and monitoring specified in this letter.

In January of 2021, six soil borings were installed on-Site, with twenty-nine soil samples collected and analyzed for PCE, TCE, cDCE, and VC. Shallow soil was excavated and taken off-Site to a permitted facility.

Deeper soil was left in-place.

- Four samples (TB-1 through TB-4) had no detections of any analytes.
- PCE was detected in two of six samples from two wells, with one of two concentrations (TB-5) exceeding the MTCA Method A cleanup level.
- TCE was detected in two of six samples from two wells, with both concentrations exceeding the MTCA Method A cleanup level.
- cDCE was detected in three of six samples from both wells, with all concentrations below the MTCA Method B cleanup level.
- VC was detected in two of three soil samples from one well, with one of two concentrations exceeding the MTCA Method A cleanup level.

In April of 2021, additional excavations were performed, with ten additional soil borings installed, thirty-two soil samples collected, and analyzed for PCE, TCE, cDCE, and VC.

Seventeen of the samples were left in place, seven of which had detections of PCE or cDCE.

- PCE was detected in one of seven samples, with a concentration below the MTCA Method A cleanup level.
- cDCE was detected in six of seven samples, with all concentrations below the MTCA Method B cleanup level.

In May of 2021, 2650 tons of contaminated soil were excavated and taken off-Site to a permitted facility. The excavation was backfilled with a mixture of clean soil and a proprietary reagent to further reduce the contamination remaining in the soil. Contaminated soil along the west wall and the southeast area were not excavated to avoid damage to utility lines. Piping was installed in the excavation to allow for future in-situ chemical oxidation if desired. A vapor blocking coating was placed on the subsurface portions of the redeveloped building and a passive soil vapor venting system was installed to use, if needed, to remediate intrusion of contaminated vapors.

In June of 2021, following conclusion of the remedial excavation, eight confirmational soil samples were collected from the base of the excavation and analyzed for PCE, TCE, cDCE, and VC.

- Six samples had no detections of any analyte, one had detections of cDCE and VC and one had a detection of VC, with all three concentrations below their respective MTCA Method A or B cleanup levels.

- Nineteen soil samples were collected from the excavation side walls and analyzed for the same analytes.

- Three samples were collected from the north wall, with one of three samples having detections of cDCE and VC. Both concentrations were below their respective MTCA Method A or B cleanup levels.

- Ten samples were collected from the east wall, with nine of ten samples having no detections of any analyte. One sample (SW-E4, 5 feet) had detections of PCE, TCE, and cDCE, with the concentrations of PCE and TCE exceeding their respective MTCA Method A cleanup levels.

- Two samples were collected from the south wall, with one of two samples having a detection of cDCE with a concentration below the MTCA Method A cleanup level.

- Four samples were collected from the west wall, with one having a detection of all four analytes, one having a detection of PCE, TCE, cDCE, and one having a detection of PCE and TCE. The final sample had no detections of any analyte. Two of four PCE concentrations (SW-W-5 and SW-W-7, both at 12 feet) and two of four TCE concentrations (SW-W-7, at 12 feet, and SW-W-8, at 11 feet) exceeded their respective MTCA Method A cleanup levels. The two detections of cDCE and the one detection of VC were below their respective MTCA Method A and B cleanup levels.

Because concentrations of PCE and TCE above Site cleanup levels remained in the soil following the excavation, Ecology concluded that institutional controls would be needed at the Site. Although the most recent (April 2019, Enclosure C) groundwater monitoring showed no exceedances above Site cleanup levels of contaminants, Ecology determined that the levels of contamination in the soil warranted continued groundwater monitoring as part of the post-excavation remedial action.

In July of 2021, ten additional soil borings were installed, one soil sample collected from each boring, and analyzed for PCE, TCE, cDCE, and VC.

- None of the ten soil samples had detectable concentrations of any of the analytes.

In August of 2022, two indoor air samples, two sub-slab soil vapor samples, and one exterior background sample were collected and analyzed for PCE, TCE, cDCE, tDCE, VC, 1,1-DCE, and 1,1,1-TCE.

- None of the analytes were detected in any of the samples except for the detection of TCE in one soil vapor sample at a concentration below the MTCA Method B screening level.

You **must** decommission resource protection wells installed as part of the remedial action that are not needed to conduct post-cleanup monitoring or for any other purpose at the Site. Wells must be decommissioned in accordance with WAC 173-160-460.[7]

Post-Cleanup Controls and Monitoring

Post-cleanup controls and monitoring are remedial actions performed to ensure compliance with cleanup standards. Ecology is issuing this No Further Action opinion based on the continued performance and effectiveness of the following post-cleanup remedial actions at the Site. Ecology may rescind this opinion if these remedial actions are not performed or do not effectively maintain the cleanup standards.

Compliance with institutional controls

Institutional controls prohibit or limit activities that may interfere with the integrity of engineering controls or result in exposure to contamination. The following site-specific institutional controls are needed at the Site:

- Prevention of contact with contaminated soil or groundwater.

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

To implement the controls, you recorded an environmental covenant on the following parcel of real property in Snohomish County:

- 00606200004102

Ecology approved the recorded environmental covenant (see Enclosure D). To amend or terminate the covenant, you must request additional review under the VCP.

Operation and maintenance of engineering controls

Engineering controls prevent or limit movement of, or exposure to, contamination. The Site has the following engineering controls:

- Vapor intrusion prevention coating beneath the building.
- Passive venting system beneath the building.

Ecology has determined the operation and maintenance plan you submitted for these engineering controls meets the substantive requirements of MTCA. Enclosure E includes this plan as an exhibit to the environmental covenant.

Performance of confirmational monitoring

Confirmational monitoring is needed at the Site to confirm the long-term effectiveness of the cleanup. Ecology will use the monitoring data during periodic reviews of post-cleanup conditions. Ecology has determined the monitoring plan you submitted meets the substantive requirements of MTCA. Enclosure E includes this plan as an exhibit to the environmental covenant.

The plan provides for:

- Periodic inspection of the cap that consists of the permanent structure and clean soil to ensure that no exposure to contaminated soils occurs.
- Continued groundwater monitoring.

Groundwater monitoring is needed at the Site to confirm the long-term effectiveness of the cleanup and to assess contaminant time trends. Ecology will use the monitoring data during periodic reviews of post-cleanup conditions.

Ecology has determined the operational monitoring plan and groundwater monitoring plan you submitted, as modified below, meets the substantive requirements of MTCA.

Cap inspections should be on a minimum frequency of every 12 months. Groundwater monitoring should be on the frequency given below. This frequency allows for collection of a groundwater data set that is not potentially biased by seasonal variation.

The first 5-year review will be scheduled for June 2028. Based on this frequency, the following sampling periods are anticipated:

Requested Monitoring Frequency

Monitoring Round	Anticipated Month/Year
1	August 2023
2	November 2023
3	February 2024
4	May 2024
5	August 2024
6	November 2024
7	February 2025
8	May 2025

Following the eighth round, Ecology will evaluate the groundwater data and determine if adjustments to the sampling frequency are needed.

Seven monitoring wells (HC-MW-1 through HC-MW-7) are located at the Site. The monitoring should include water level measurements in all seven monitoring wells.

Groundwater sampling and analysis should be conducted consistent with the following:

Requested Monitoring Network Sampling and Analysis

Monitoring Well	NWTPH-Dx	NWTPH-Gx	VOCs (Method 8260)
HC-MW-1			
HC-MW-2	X		
HC-MW-3	X		
HC-MW-4	X		X
HC-MW-5	X	X	X
HC-MW-6			
HC-MW-7	X		

A report presenting the methods and results of the above rounds 1 through 4 monitoring events should be submitted to Ecology by June 30, 2024, and rounds 5 through 8 by July 30, 2025. Such a monitoring report should include discussion of sampling methods and results; a Site plan; a cumulative tabulation for the monitoring wells; well purging field forms; and laboratory analytical results. The fourth and eighth monitoring reports should also include discussion of cap inspection activities. If the monitoring report is not submitted to Ecology by July 30, 2024, then this NFA opinion could be rescinded.

Periodic review of post-cleanup conditions

Ecology will conduct periodic reviews of post-cleanup conditions at the Site to evaluate whether they remain protective of human health and the environment. Periodic reviews are anticipated to occur on a five-year basis. Based on a periodic review, if Ecology determines the Site needs further remedial action, Ecology will rescind this opinion. Ecology notes that the need for continued monitoring at the Site after the monitoring periods stipulated above will be determined by Ecology's periodic reviewer. The need for continued monitoring or not would be provided within the Periodic Review Report, the first of which is anticipated to be prepared in the second quarter of 2028.

Periodic review of post-cleanup conditions

Ecology will conduct periodic reviews of post-cleanup conditions at the Site to evaluate if they remain protective of human health and the environment. Based on a periodic review, if Ecology determines the Site needs further remedial action, Ecology will rescind this opinion.

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).[8]

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.305.080[9] and WAC 173-340-545.[10]

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).[11]

Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. NW3244.

[8] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040
[9] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080
[10] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545
[11] 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 360-407-7223 or christopher.maurer@ecy.wa.gov.

Sincerely,

Christopher Maurer

Christopher Maurer, P.E.
Toxics Cleanup Program
Headquarters Office

Enclosures (5): A – Site Description and Diagrams
B – Basis for the Opinion: Documents List
C – Previous Site Characterization
D – Environmental Covenant for Institutional Controls
E – Inspection and Monitoring Plan

cc by email: Kyle Bennett, Terracon, kyle.bennett@terracon.com
Amy Hargrove, Ecology, amy.hargrove@ecy.wa.gov
Treasure Mitchell, Ecology, treasure.mitchell@ecy.wa.gov
Fiscal, VCP Fiscal Analyst
TCP, Operating Budget Analyst
Ecology Site file

Enclosure A

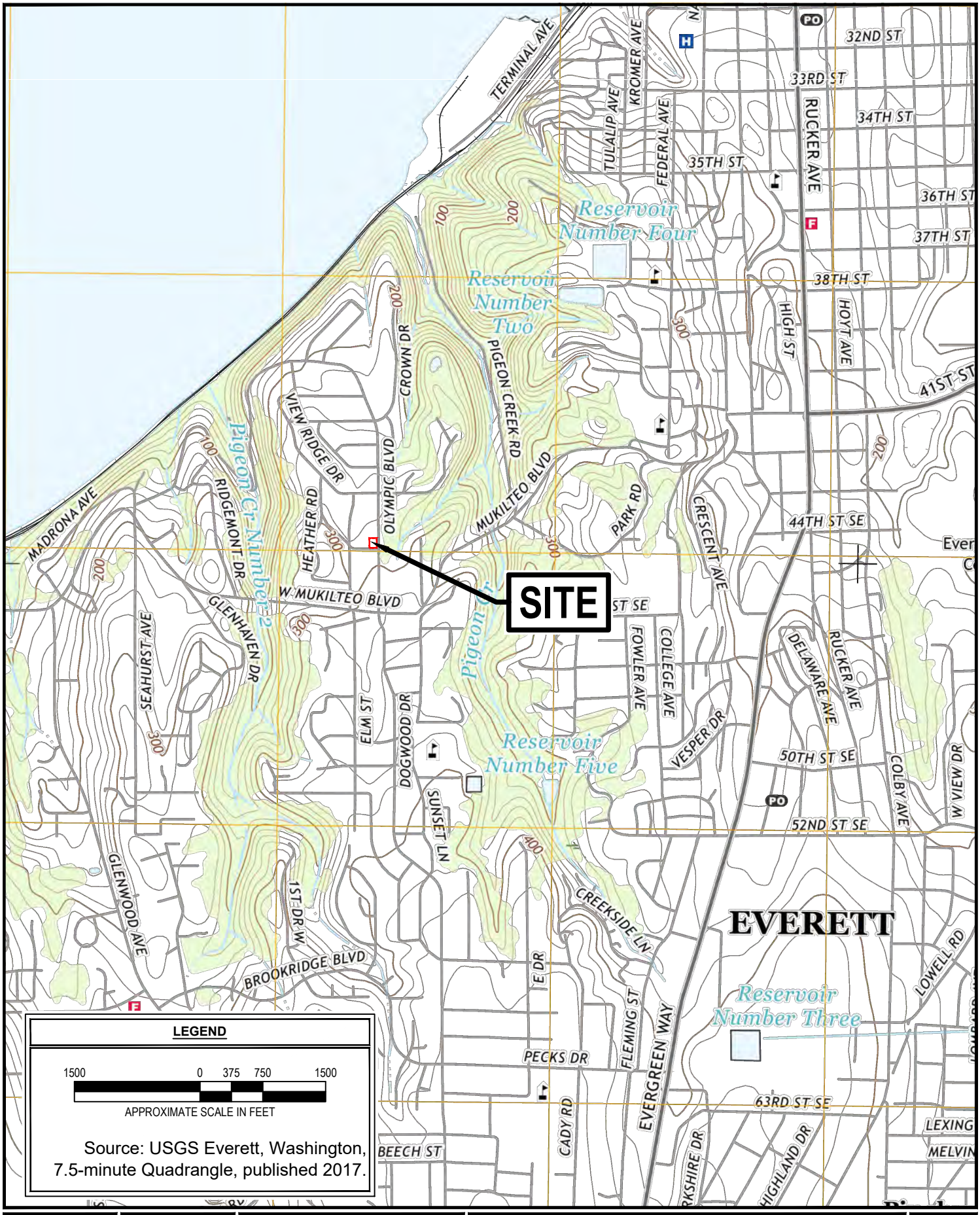
Site Description and Diagrams

Site Description

VIEW RIDGE ADD DIV 2 BLK 000 D-02 - TR 41, AS PER PLAT REC IN VOL 12 OF PLATS, PG 19, RECORDS OF SNO CO; TGW TH PTN VAC ELM ST ADJ THRTO PER CITY OF EV ORD NO 3502 REC AF# 1137481 LY W OF AND ADJ TOSD PREMISES AND ELY OF THE E LN OF THE NEW ELM ST; EXC FR THE FOREGOING THE FDT: BEG SE COR OF TR 41; TH W ON S LN OF SD LT 155 FT TH N PLW E LN OF SD LT 125 FT TH E PLW S LN SD LT 155 FT TO E LNTHOF TH S 125 FT POB - PLUS AN EQUAL & UNDIV INT IN LOT A

Site Diagrams

Figure 1



Project Mngr: KSB	Project No. 81207449	Terracon Consulting Engineers and Scientists	**SITE LOCATION MAP**
Drawn By: AMP	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	VIEW RIDGE PLAZA
Checked By: KSB	File No. EXHIBIT 1	PH. (425) 771-3304 FAX. (425) 771-3549	220 OLYMPIC BOULEVARD
Approved By: MYW	Date: July 2019		EVERETT, SNOHOMISH COUNTY, WASHINGTON

EXHIBIT 1

Figure 2

LEGEND:

- APPROXIMATE SITE BOUNDARY
- CURRENT BUILDINGS
- APPROXIMATE LIMITS OF REMEDIAL EXCAVATION
- **MW-11** — APPROXIMATE LOCATION AND NUMBER OF MONITORING WELL
- **MW-2** — APPROXIMATE LOCATION AND NUMBER OF DECOMMISSIONED MONITORING WELL
- **DP-1 SB-1 TB1** — TERRACON BORING NUMBER AND APPROXIMATE LOCATION
- **SB-1** — EPI BORING NUMBER AND APPROXIMATE LOCATION
- **HA-1** — EPI HAND-AUGERED BORING NUMBER AND APPROXIMATE LOCATION
- **B-1** — STRATUM GROUP BORING NUMBER AND APPROXIMATE LOCATION

Project Mngr:	KSB
Drawn By:	JWD
Checked By:	KSB
Approved By:	MYW
Project No.	81207449
Scale:	AS SHOWN
File No.	EXHIBIT 2
Date:	September 2021

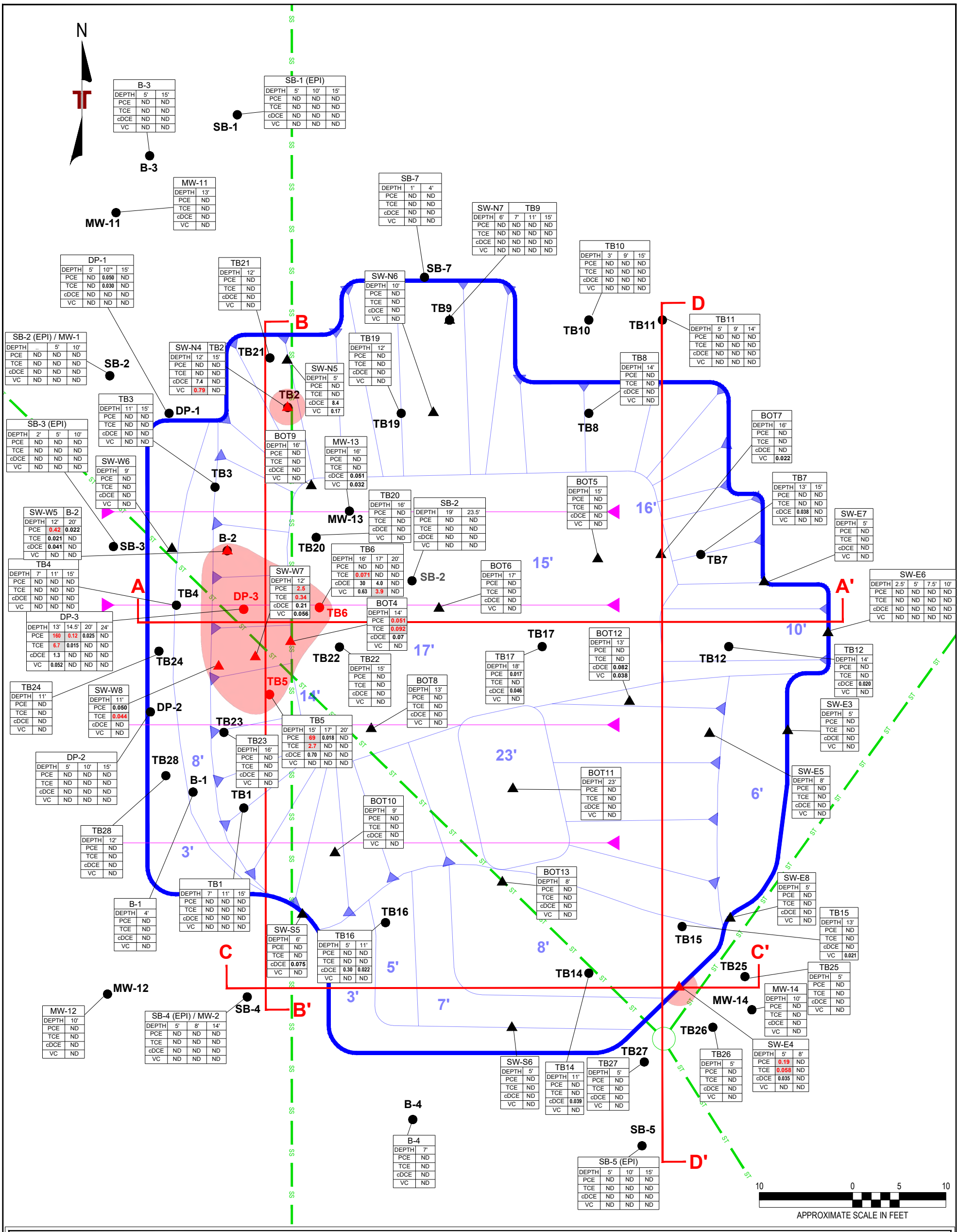
Terracon
Consulting Engineers and Scientists
21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043
PH. (425) 771-3304 FAX. (425) 771-3549

SITE DIAGRAM

View Ridge Plaza
220 Olympic Boulevard
Everett, Snohomish County, Washington

EXHIBIT 2

Figure 3



LEGEND

- APPROXIMATE LIMITS OF REMEDIAL EXCAVATION AND DEPTH IN FEET BGS
- SANITARY SEWER UTILITY LINE (APPROXIMATELY 18 TO 19 FEET BGS)
- STORM SEWER UTILITY LINE
- REMEDIAL INJECTION WELL
- CROSS-SECTION LINE (A – A')
- APPROXIMATE LOCATION OF SOIL IMPACTS ABOVE MTCA CLEANUP LEVELS LEFT IN PLACE
- APPROXIMATELY LOCATION OF SOIL CONFIRMATION SAMPLE (SHADED RED WHERE VALUES DETECTED ABOVE MTCA CLEANUP LEVELS)
- APPROXIMATE LOCATION OF SOIL BORING (SHADED RED WHERE VALUES DETECTED ABOVE MTCA CLEANUP LEVELS)

SAMPLE NUMBER
DEPTH IN FEET
TETRACHLOROETHENE
TRICHLOROETHENE
CIS-1,2-DICHLOROETHENE
VINYL CHLORIDE

SB-2	
DEPTH	1'
PCE	0.05
TCE	0.03
cDCE	160
VC	0.67

ALL CONCENTRATIONS ARE IN MILLIGRAMS PER KILOGRAM (mg/kg).

VALUES DETECTED ARE IN **BOLD** TYPE.

VALUES DETECTED ABOVE MTCA CLEANUP LEVELS ARE IN **RED BOLD** TYPE AND SHADED.

MTCA - MODEL TOXIC CONTROL ACT.

ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMIT.

SEE LABORATORY REPORT FOR FULL LIST OF ANALYSIS.

Project Mngr:	KSB
Drawn By:	JWD
Checked By:	KSB
Approved By:	MYW
Project No.	81207449
Scale:	AS SHOWN
File No.	EXHIBIT 3
Date:	September 2021

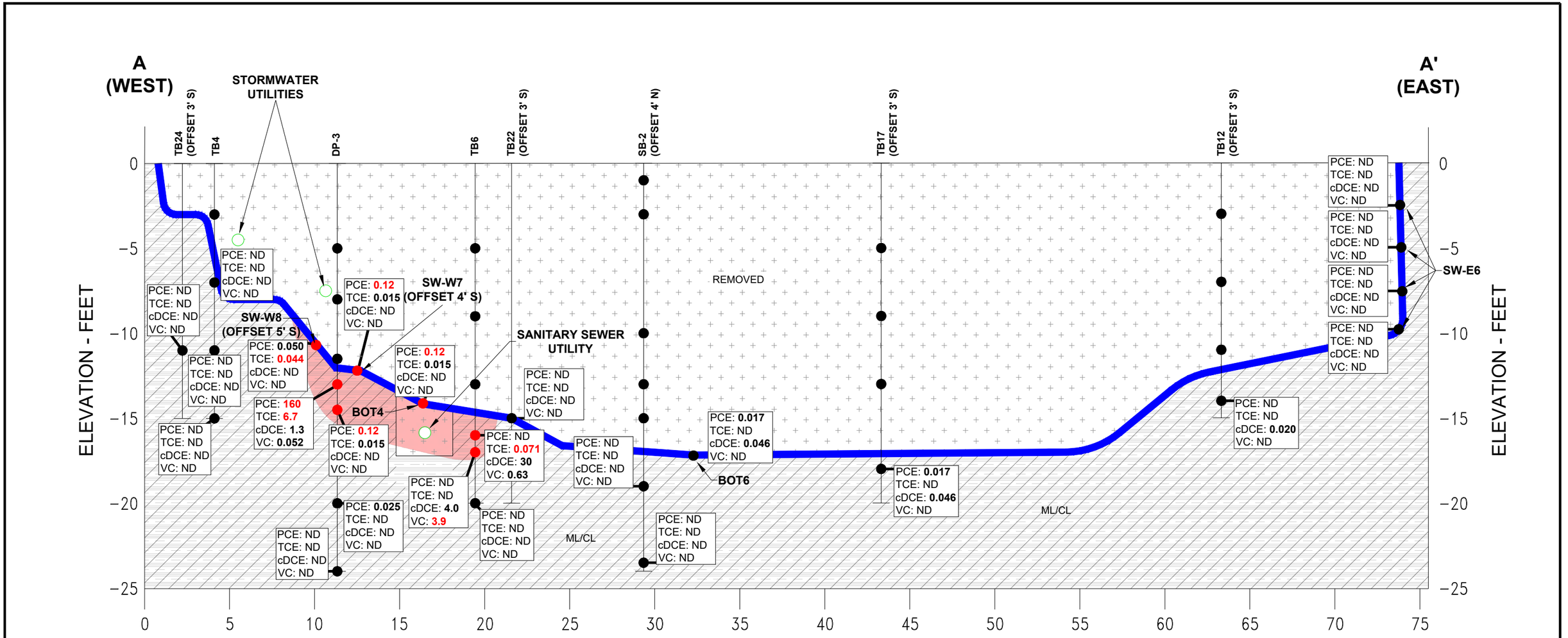
Terracon
Consulting Engineers and Scientists
21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043
PH. (425) 771-3304 FAX. (425) 771-3549

EXCAVATION DIAGRAM WITH IN-PLACE SOIL SAMPLES

View Ridge Plaza
220 Olympic Boulevard
Everett, Snohomish County, Washington

EXHIBIT 3

Figure 4



LEGEND

- SOIL BORING
- TB1 — BORING NUMBER
- OFFSET 8' E — APPROXIMATE DISTANCE AND DIRECTION OF BORING FROM BASELINE
- PCE: 30 TCE: 0.03 cDCE: 7 VC: 6 — NUMBER AND APPROXIMATE SOIL SAMPLE LOCATION WITH ANALYTICAL DATA (mg/kg)
- APPROXIMATE LIMIT OF REMEDIAL EXCAVATION
- APPROXIMATE LOCATION OF SOIL IMPACTS ABOVE MTCA CLEANUP LEVELS LEFT IN PLACE
- REMOVED: CLEAN BACKFILL
- ML/CL: SILT TO SILTY CLAY WITH MINOR AMOUNTS OF SAND AND/ OR GRAVEL
- UNDERGROUND UTILITY LINE
- SOIL SAMPLE WITH cVOC CONCENTRATIONS BELOW MTCA CULs AND/OR LABORATORY REPORTING LIMITS (ANALYTICAL RESULTS NOT DISPLAYED FOR REMOVED SAMPLES)
- SOIL SAMPLE WITH cVOC CONCENTRATIONS EXCEEDING MTCA CULs

TETRACHLOROETHENE	PCE 0.05
TRICHLOROETHENE	TCE 0.03
CIS-1,2-DICHLOROETHENE	cDCE 160
VINYL CHLORIDE	VC 0.67

ALL CONCENTRATIONS ARE IN MILLIGRAMS PER KILOGRAM (mg/kg).
VALUES DETECTED ARE IN **BOLD** TYPE.
VALUES DETECTED ABOVE MTCA CLEANUP LEVELS ARE IN **RED BOLD**
MTCA - MODEL TOXIC CONTROL ACT.
ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMIT.
SEE LABORATORY REPORT FOR FULL LIST OF ANALYSIS.

NOTES:
- PLEASE REFER TO CROSS SECTION LINES ON EXHIBIT 3.

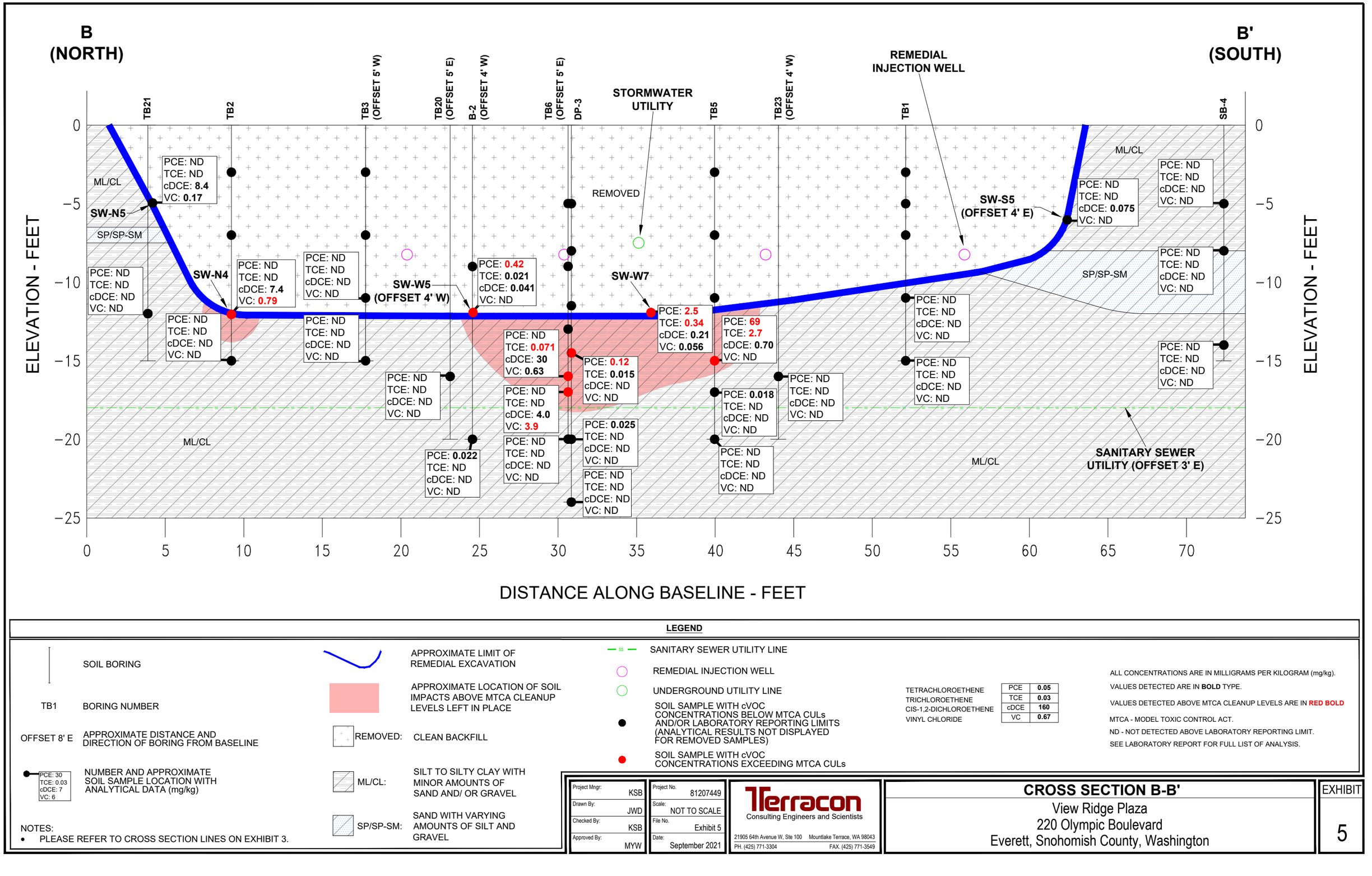
Project Mngr:	KSB
Drawn By:	JWD
Checked By:	KSB
Approved By:	MYW
Project No.	81207449
Scale:	NOT TO SCALE
File No.	Exhibit 4
Date:	September 2021

Terracon
Consulting Engineers and Scientists
21905 64th Avenue W, Ste 100 Mountlake Terrace, WA 98043
PH. (425) 771-3304 FAX. (425) 771-3549

CROSS SECTION A-A'
View Ridge Plaza
220 Olympic Boulevard
Everett, Snohomish County, Washington

EXHIBIT 4

Figure 5



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- APPROXIMATE LIMIT OF REMEDIAL EXCAVATION
- APPROXIMATE LOCATION OF SOIL IMPACTS ABOVE MTCA CLEANUP LEVELS LEFT IN PLACE
- REMOVED: CLEAN BACKFILL
- ML/CL: SILT TO SILTY CLAY WITH MINOR AMOUNTS OF SAND AND/ OR GRAVEL
- SP/SP-SM: SAND WITH VARYING AMOUNTS OF SILT AND GRAVEL
- SS — SANITARY SEWER UTILITY LINE
- REMEDIAL INJECTION WELL
- UNDERGROUND UTILITY LINE
- SOIL SAMPLE WITH cVOC CONCENTRATIONS BELOW MTCA CULs AND/OR LABORATORY REPORTING LIMITS (ANALYTICAL RESULTS NOT DISPLAYED FOR REMOVED SAMPLES)
- SOIL SAMPLE WITH cVOC CONCENTRATIONS EXCEEDING MTCA CULs

NOTES:
- PLEASE REFER TO CROSS SECTION LINES ON EXHIBIT 3.

TETRACHLOROETHENE	PCE 0.05
TRICHLOROETHENE	TCE 0.03
CIS-1,2-DICHLOROETHENE	cDCE 160
VINYL CHLORIDE	VC 0.67

ALL CONCENTRATIONS ARE IN MILLIGRAMS PER KILOGRAM (mg/kg).
VALUES DETECTED ARE IN **BOLD** TYPE.
VALUES DETECTED ABOVE MTCA CLEANUP LEVELS ARE IN **RED BOLD**
MTCA - MODEL TOXIC CONTROL ACT.
ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMIT.
SEE LABORATORY REPORT FOR FULL LIST OF ANALYSIS.

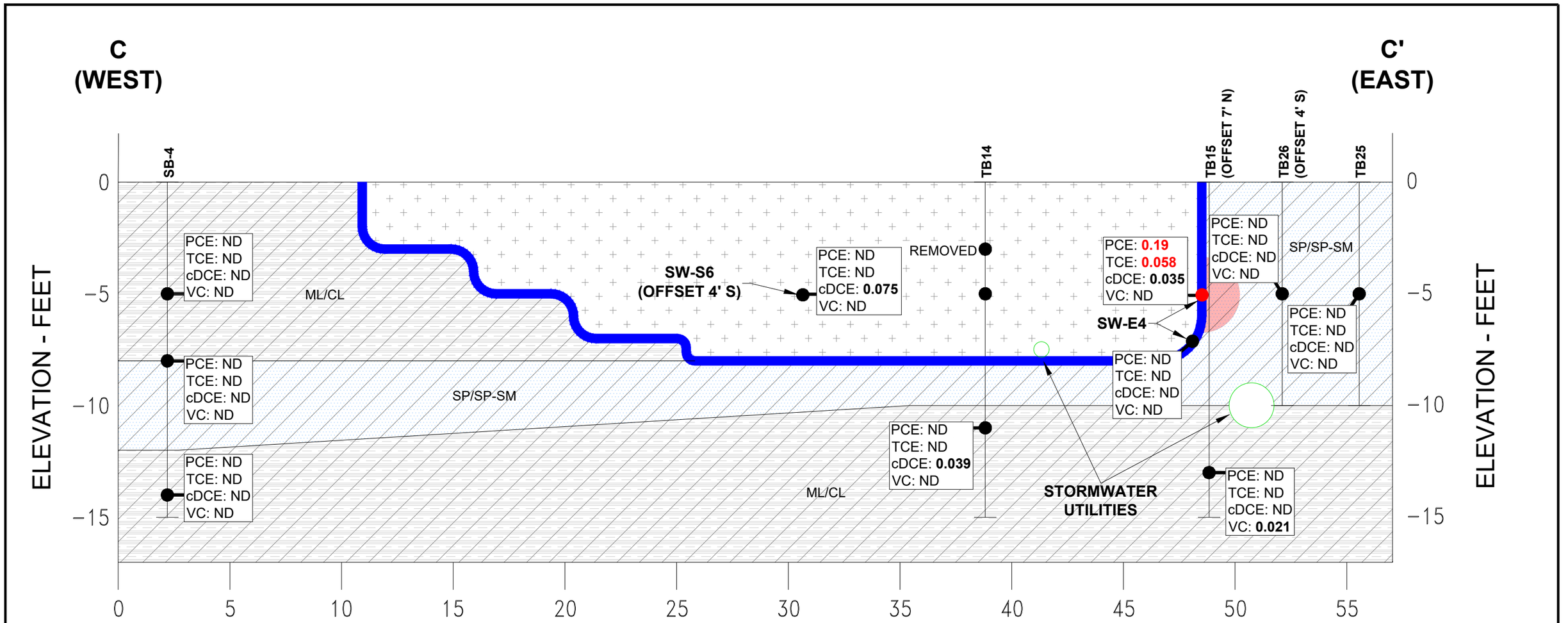
Project Mngr:	KSB
Drawn By:	JWD
Checked By:	KSB
Approved By:	MYW
Project No.	81207449
Scale:	NOT TO SCALE
File No.	Exhibit 5
Date:	September 2021

Terracon
Consulting Engineers and Scientists
21905 64th Avenue W, Ste 100 Mountlake Terrace, WA 98043
PH. (425) 771-3304 FAX. (425) 771-3549

CROSS SECTION B-B'
View Ridge Plaza
220 Olympic Boulevard
Everett, Snohomish County, Washington

EXHIBIT 5

Figure 6



LEGEND

- SOIL BORING
- TB1 — BORING NUMBER
- OFFSET 8' E — APPROXIMATE DISTANCE AND DIRECTION OF BORING FROM BASELINE
- PCE: 30 TCE: 0.03 cDCE: 7 VC: 6 — NUMBER AND APPROXIMATE SOIL SAMPLE LOCATION WITH ANALYTICAL DATA (mg/kg)
- APPROXIMATE LIMIT OF REMEDIAL EXCAVATION
- APPROXIMATE LOCATION OF SOIL IMPACTS ABOVE MTCA CLEANUP LEVELS LEFT IN PLACE
- REMOVED: CLEAN BACKFILL
- ML/CL: SILT TO SILTY CLAY WITH MINOR AMOUNTS OF SAND AND/ OR GRAVEL
- SP/SP-SM: SAND WITH VARYING AMOUNTS OF SILT AND GRAVEL
- UNDERGROUND UTILITY LINE
- SOIL SAMPLE WITH cVOC CONCENTRATIONS BELOW MTCA CULs AND/OR LABORATORY REPORTING LIMITS (ANALYTICAL RESULTS NOT DISPLAYED FOR REMOVED SAMPLES)
- SOIL SAMPLE WITH cVOC CONCENTRATIONS EXCEEDING MTCA CULs

TETRACHLOROETHENE	PCE 0.05
TRICHLOROETHENE	TCE 0.03
CIS-1,2-DICHLOROETHENE	cDCE 160
VINYL CHLORIDE	VC 0.67

ALL CONCENTRATIONS ARE IN MILLIGRAMS PER KILOGRAM (mg/kg).
VALUES DETECTED ARE IN **BOLD** TYPE.
VALUES DETECTED ABOVE MTCA CLEANUP LEVELS ARE IN **RED BOLD**
MTCA - MODEL TOXIC CONTROL ACT.
ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMIT.
SEE LABORATORY REPORT FOR FULL LIST OF ANALYSIS.

NOTES:
- PLEASE REFER TO CROSS SECTION LINES ON EXHIBIT 3.

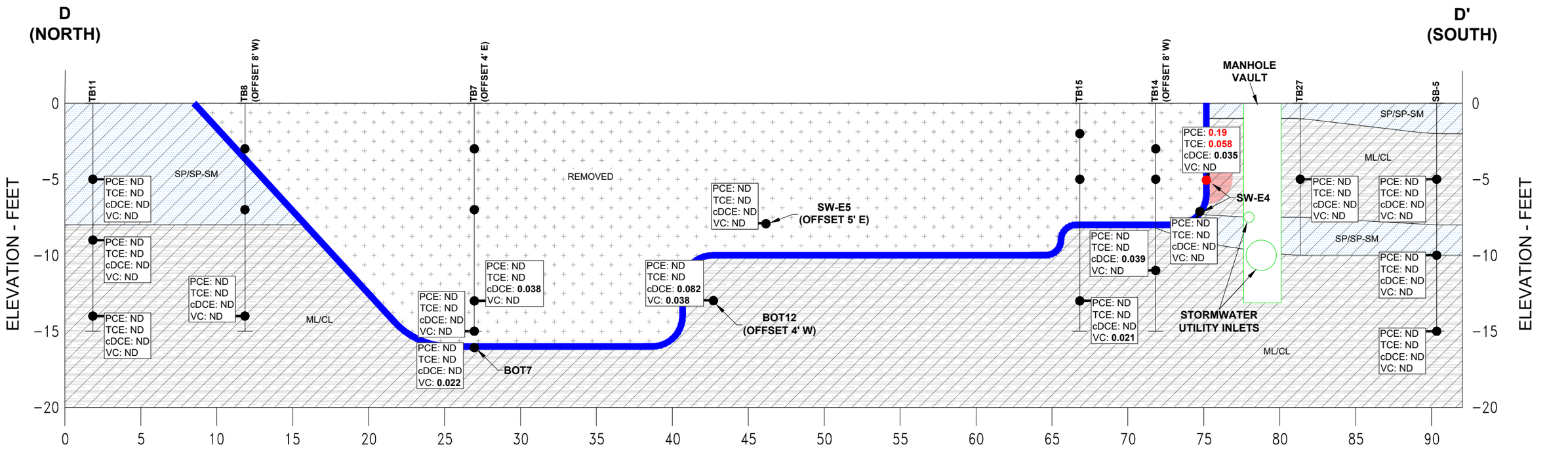
Project Mngr:	KSB
Drawn By:	JWD
Checked By:	KSB
Approved By:	MYW
Project No.	81207449
Scale:	NOT TO SCALE
File No.	Exhibit 6
Date:	September 2021

Terracon
Consulting Engineers and Scientists
21905 64th Avenue W, Ste 100 Mountlake Terrace, WA 98043
PH. (425) 771-3304 FAX. (425) 771-3549

CROSS SECTION C-C'
View Ridge Plaza
220 Olympic Boulevard
Everett, Snohomish County, Washington

EXHIBIT 6

Figure 7



LEGEND

- SOIL BORING
- TB1 — BORING NUMBER
- OFFSET 8' E — APPROXIMATE DISTANCE AND DIRECTION OF BORING FROM BASELINE
- PCE: 30 / TCE: 0.03 / cDCE: 7 / VC: 6 — NUMBER AND APPROXIMATE SOIL SAMPLE LOCATION WITH ANALYTICAL DATA (mg/kg)
- APPROXIMATE LIMIT OF REMEDIAL EXCAVATION
- APPROXIMATE LOCATION OF SOIL IMPACTS ABOVE MTCA CLEANUP LEVELS LEFT IN PLACE
- REMOVED: CLEAN BACKFILL
- ML/CL: SILT TO SILTY CLAY WITH MINOR AMOUNTS OF SAND AND/ OR GRAVEL
- SP/SP-SM: SAND WITH VARYING AMOUNTS OF SILT AND GRAVEL
- MANHOLE VAULT
- SOIL SAMPLE WITH cVOC CONCENTRATIONS BELOW MTCA CULs AND/OR LABORATORY REPORTING LIMITS (ANALYTICAL RESULTS NOT DISPLAYED FOR REMOVED SAMPLES)
- SOIL SAMPLE WITH cVOC CONCENTRATIONS EXCEEDING MTCA CULs

NOTES:
- PLEASE REFER TO CROSS SECTION LINES ON EXHIBIT 2.

TETRACHLOROETHENE	PCE 0.05
TRICHLOROETHENE	TCE 0.03
CIS-1,2-DICHLOROETHENE	cDCE 160
VINYL CHLORIDE	VC 0.67

ALL CONCENTRATIONS ARE IN MILLIGRAMS PER KILOGRAM (mg/kg).
VALUES DETECTED ARE IN **BOLD** TYPE.
VALUES DETECTED ABOVE MTCA CLEANUP LEVELS ARE IN **RED BOLD**
MTCA - MODEL TOXIC CONTROL ACT.
ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMIT.
SEE LABORATORY REPORT FOR FULL LIST OF ANALYSIS.

Project Mngr:	KSB
Drawn By:	JWD
Checked By:	KSB
Approved By:	MYW
Project No.	81207449
Scale:	NOT TO SCALE
File No.	Exhibit 7
Date:	September 2021

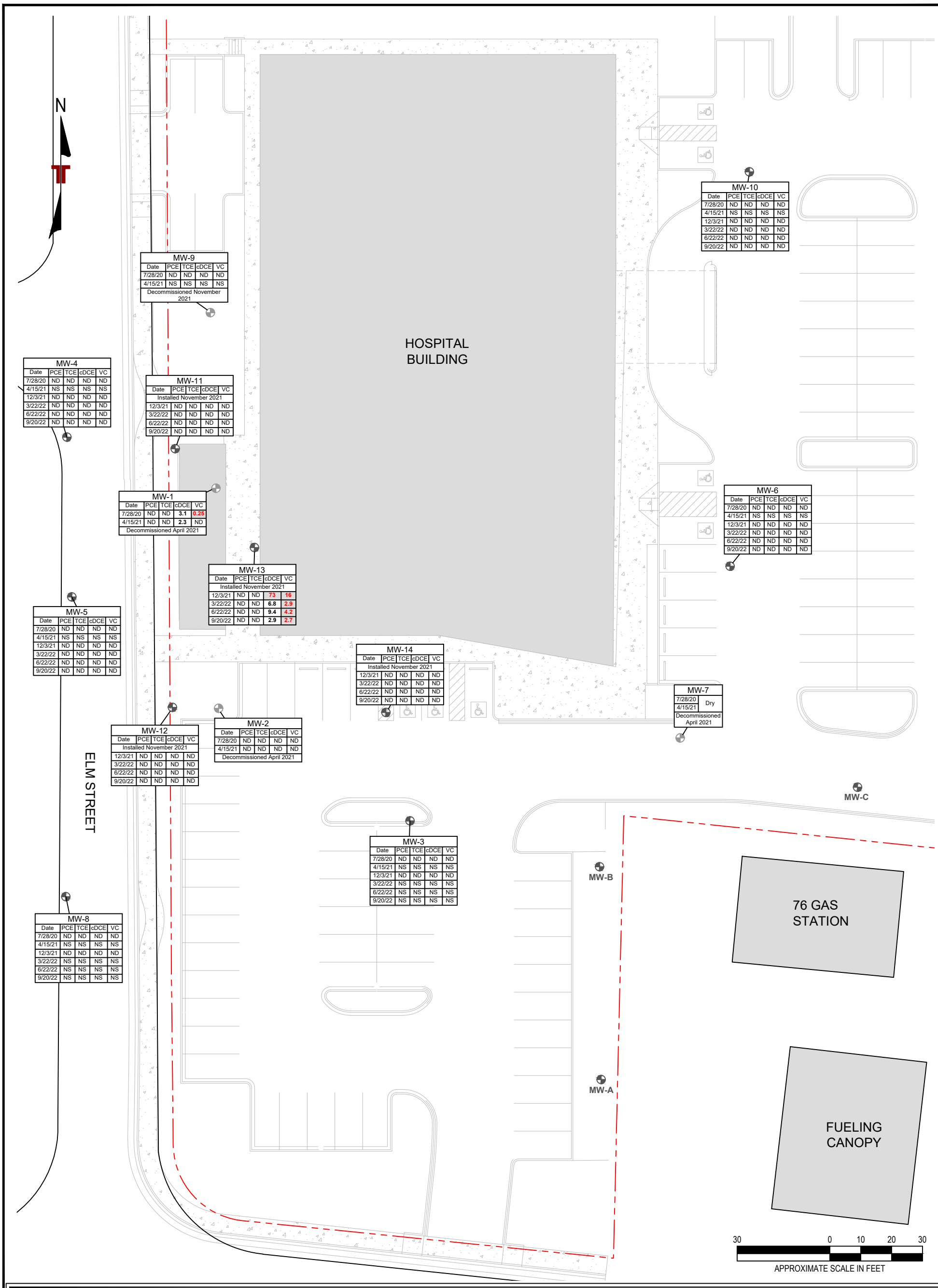
Terracon
Consulting Engineers and Scientists
21905 64th Avenue W, Ste 100 Mountlake Terrace, WA 98043
PH. (425) 771-3304 FAX. (425) 771-3549

CROSS SECTION D-D'

View Ridge Plaza
220 Olympic Boulevard
Everett, Snohomish County, Washington

EXHIBIT 7

Figure 8



LEGEND

APPROXIMATE SITE BOUNDARY

MW-8 APPROXIMATE LOCATION AND NUMBER OF GROUNDWATER MONITORING WELL

MW-2 APPROXIMATE LOCATION AND NUMBER OF DECOMMISSIONED GROUNDWATER MONITORING WELL

SAMPLE NUMBER
TETRACHLOROETHENE
TRICHLOROETHENE
CIS-1,2-DICHLOROETHENE
VINYL CHLORIDE

MW-2	
PCE	5
TCE	5
cDCE	16
VC	0.20

ALL CONCENTRATIONS ARE IN MICROGRAMS PER LITER (ug/L).

VALUES DETECTED ARE IN **BOLD** TYPE.

VALUES DETECTED ABOVE MTCA CLEANUP LEVELS ARE IN **RED BOLD** TYPE AND SHADED.

MTCA - MODEL TOXIC CONTROL ACT.

ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMIT.

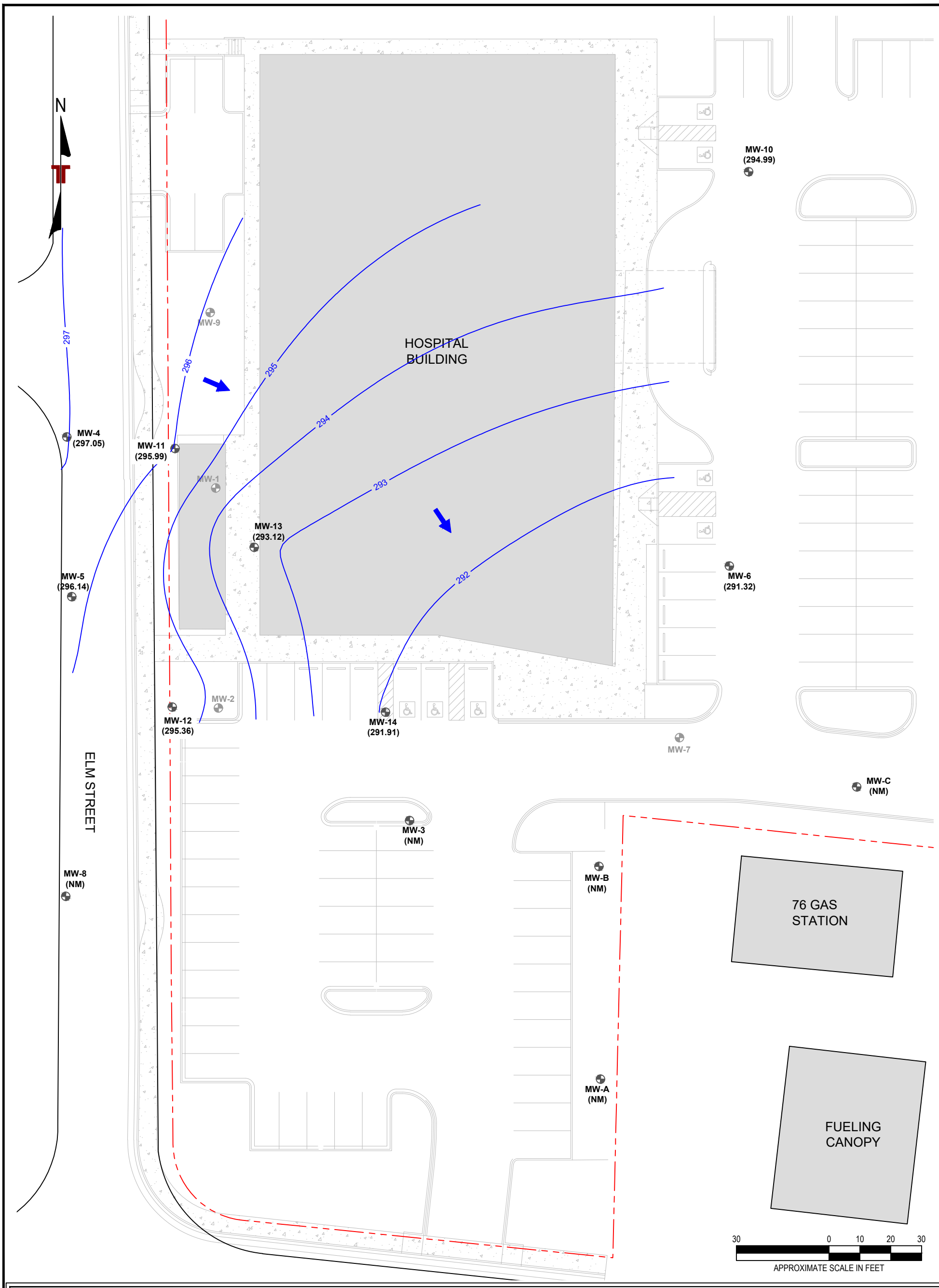
NS - NOT SAMPLED.

SEE LABORATORY REPORT FOR FULL LIST OF ANALYSIS.

Project Mngr: KSB	Project No. 81207449	Terracon Consulting Engineers and Scientists	**GROUNDWATER ANALYTICAL CONCENTRATIONS MAP**
Drawn By: JWD	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	View Ridge Plaza
Checked By: KSB	File No. EXHIBIT 8	PH. (425) 771-3304 FAX. (425) 771-3549	220 Olympic Boulevard
Approved By: MYW	Date: October 2022		Everett, Snohomish County, Washington

EXHIBIT 8

Figure 9



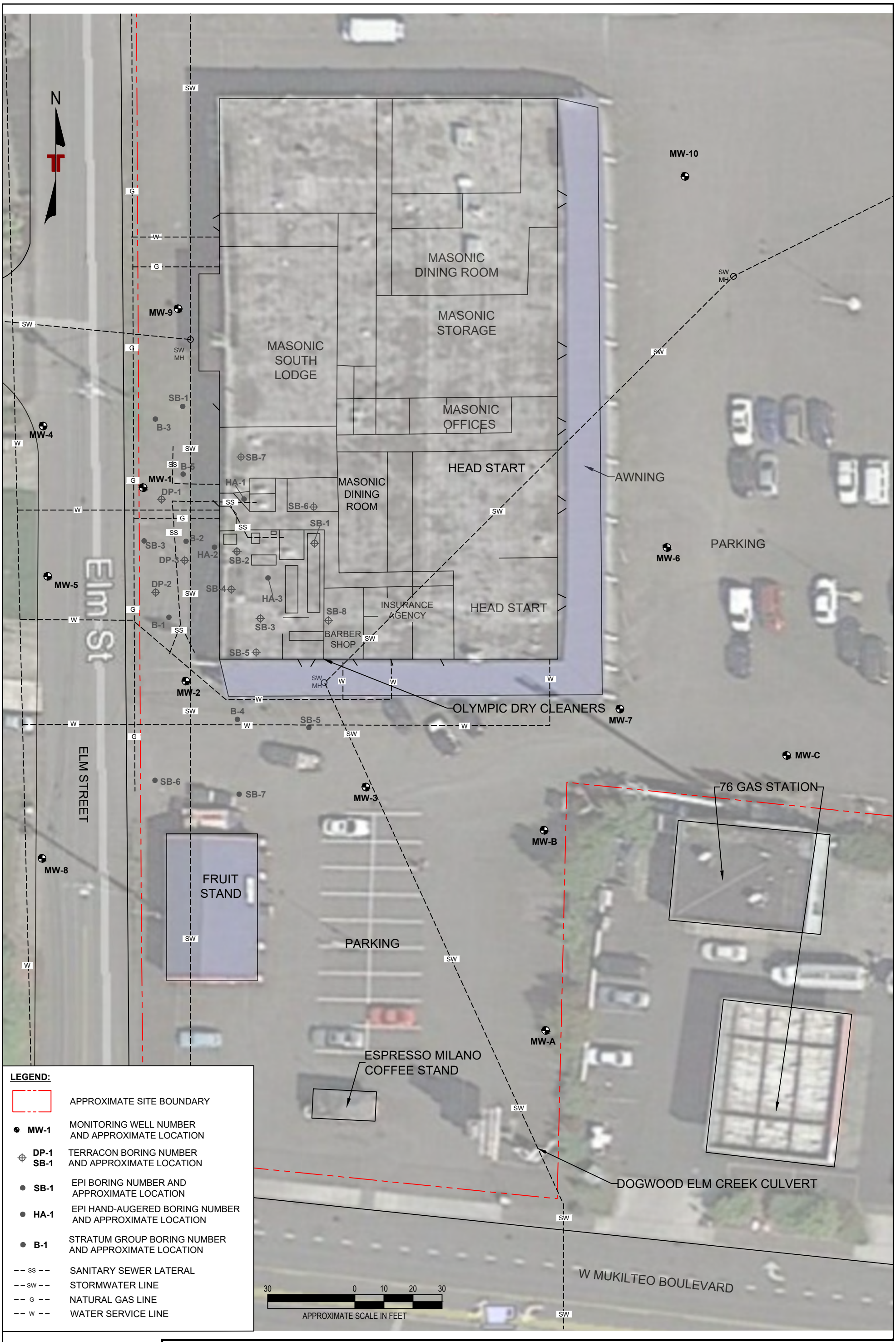
LEGEND

APPROXIMATE SITE BOUNDARY	MW-2 APPROXIMATE LOCATION AND NUMBER OF DECOMMISSIONED GROUNDWATER MONITORING WELL
GROUNDWATER FLOW DIRECTION	MW-12 (295.36) APPROXIMATE LOCATION AND NUMBER OF GROUNDWATER MONITORING WELL WITH GROUNDWATER ELEVATION (FEET)
536 GROUNDWATER ELEVATION CONTOURS WITH GROUNDWATER ELEVATION (FEET)	NM - NOT MEASURED

Project Mngr: KSB	Project No. 81207449	Terracon Consulting Engineers and Scientists	**GROUNDWATER CONTOUR AND FLOW MAP - SEPTEMBER 2022**
Drawn By: JWD	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	View Ridge Plaza
Checked By: KSB	File No. EXHIBIT 9	PH. (425) 771-3304 FAX. (425) 771-3549	220 Olympic Boulevard
Approved By: MYW	Date: October 2022		Everett, Snohomish County, Washington

EXHIBIT 9

Figure 10



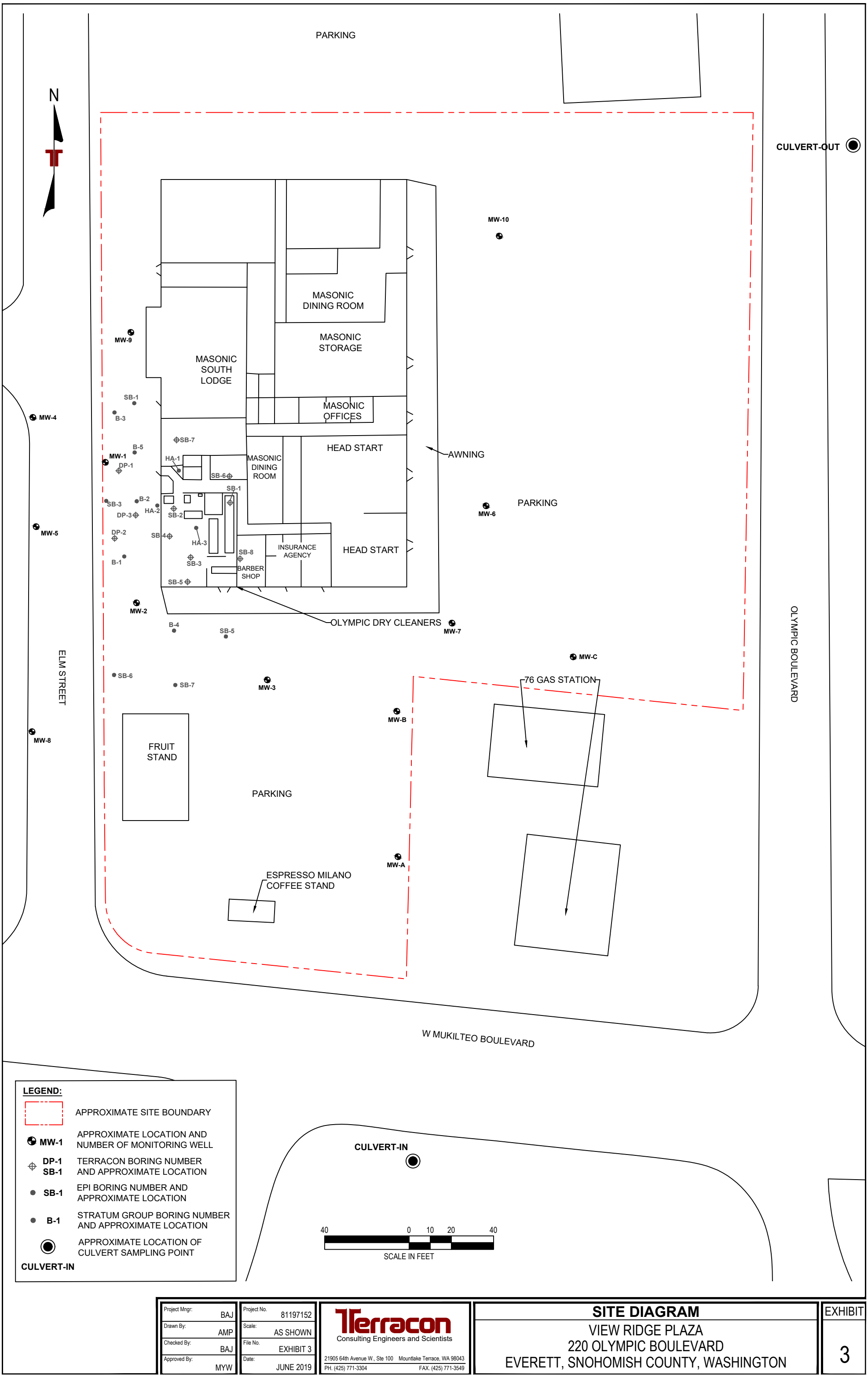
LEGEND:

- APPROXIMATE SITE BOUNDARY
- **MW-1** — MONITORING WELL NUMBER AND APPROXIMATE LOCATION
- **DP-1 / SB-1** — TERRACON BORING NUMBER AND APPROXIMATE LOCATION
- **SB-1** — EPI BORING NUMBER AND APPROXIMATE LOCATION
- **HA-1** — EPI HAND-AUGERED BORING NUMBER AND APPROXIMATE LOCATION
- **B-1** — STRATUM GROUP BORING NUMBER AND APPROXIMATE LOCATION
- SS — SANITARY SEWER LATERAL
- SW — STORMWATER LINE
- G — NATURAL GAS LINE
- W — WATER SERVICE LINE

Project Mngr: BAJ	Project No. 81197152	Terracon Consulting Engineers and Scientists	**AERIAL & UTILITIES MAP**
Drawn By: AMP	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	VIEW RIDGE PLAZA
Checked By: BAJ	File No. EXHIBIT 2	PH. (425) 771-3304 FAX. (425) 771-3549	220 OLYMPIC BOULEVARD
Approved By: MYW	Date: JUNE 2019		EVERETT, SNOHOMISH COUNTY, WASHINGTON

EXHIBIT 2

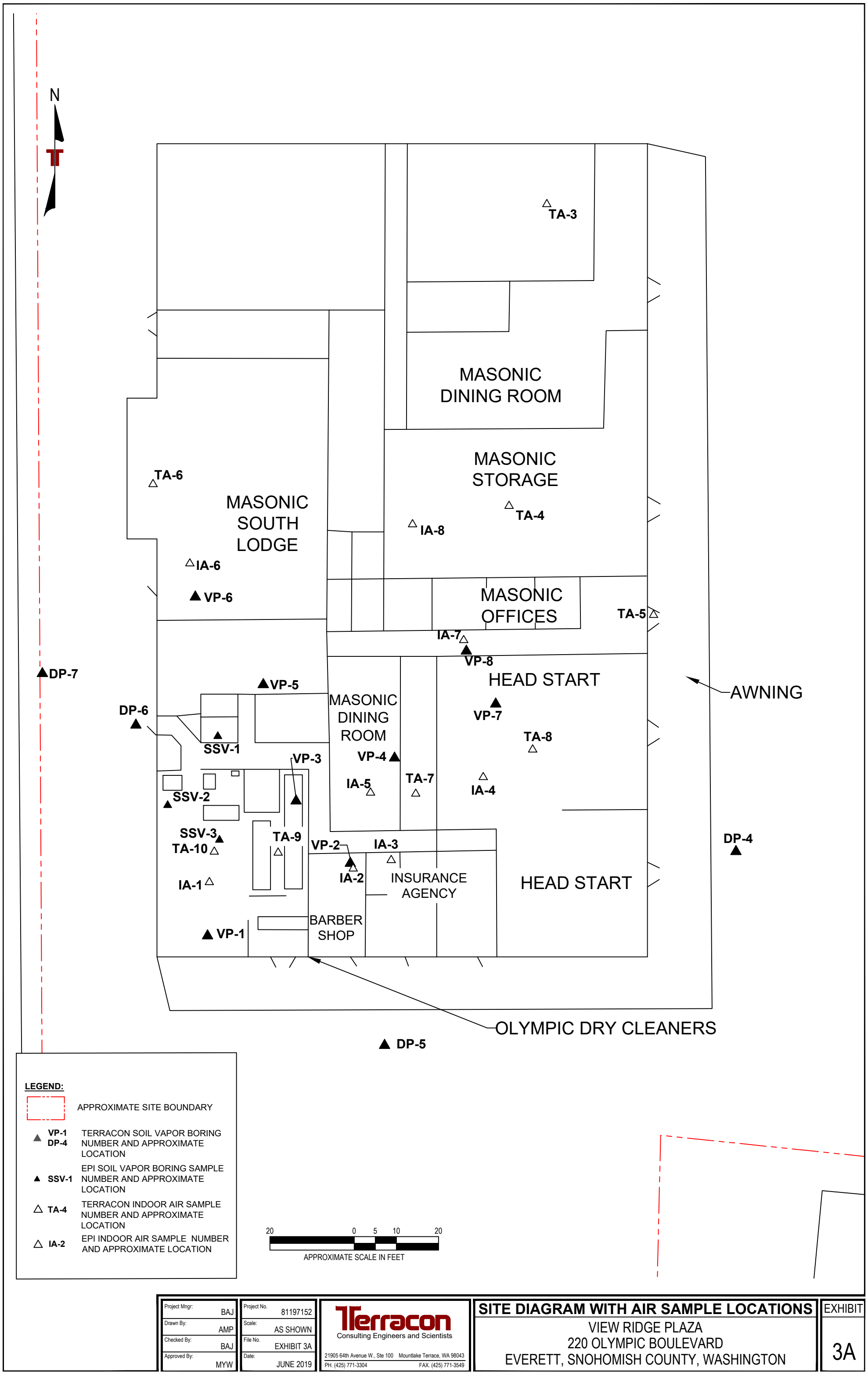
Figure 11



Project Mngr: BAJ	Project No. 81197152	Terracon Consulting Engineers and Scientists	**SITE DIAGRAM**
Drawn By: AMP	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	VIEW RIDGE PLAZA
Checked By: BAJ	File No. EXHIBIT 3	PH. (425) 771-3304 FAX. (425) 771-3549	220 OLYMPIC BOULEVARD
Approved By: MYW	Date: JUNE 2019		EVERETT, SNOHOMISH COUNTY, WASHINGTON

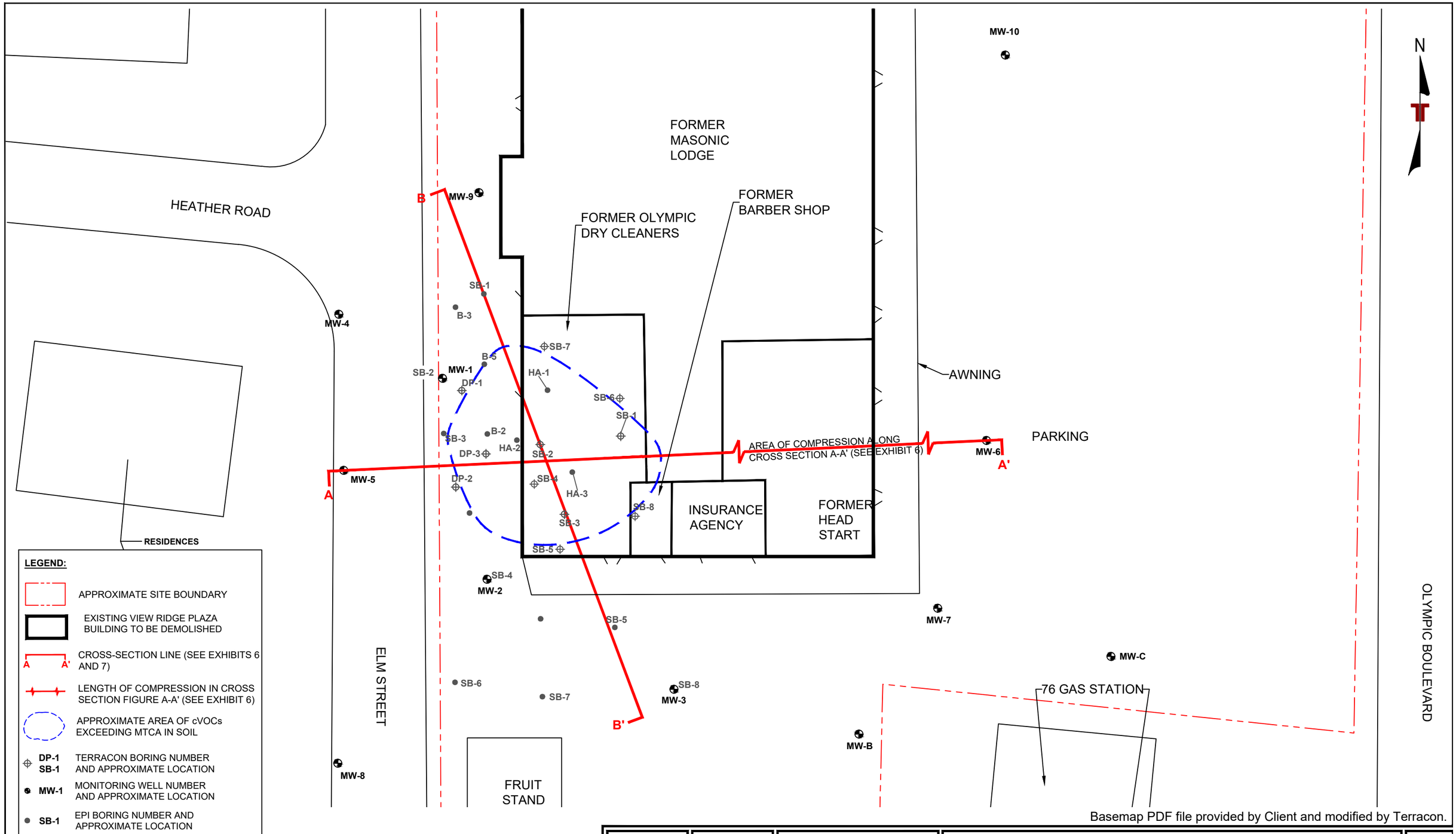
EXHIBIT 3

Figure 12



Project Mngr: BAJ	Project No. 81197152	Terracon Consulting Engineers and Scientists	**SITE DIAGRAM WITH AIR SAMPLE LOCATIONS**	EXHIBIT
Drawn By: AMP	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	VIEW RIDGE PLAZA	3A
Checked By: BAJ	File No. EXHIBIT 3A	PH. (425) 771-3304 FAX. (425) 771-3549	220 OLYMPIC BOULEVARD	
Approved By: MYW	Date: JUNE 2019		EVERETT, SNOHOMISH COUNTY, WASHINGTON	

Figure 13

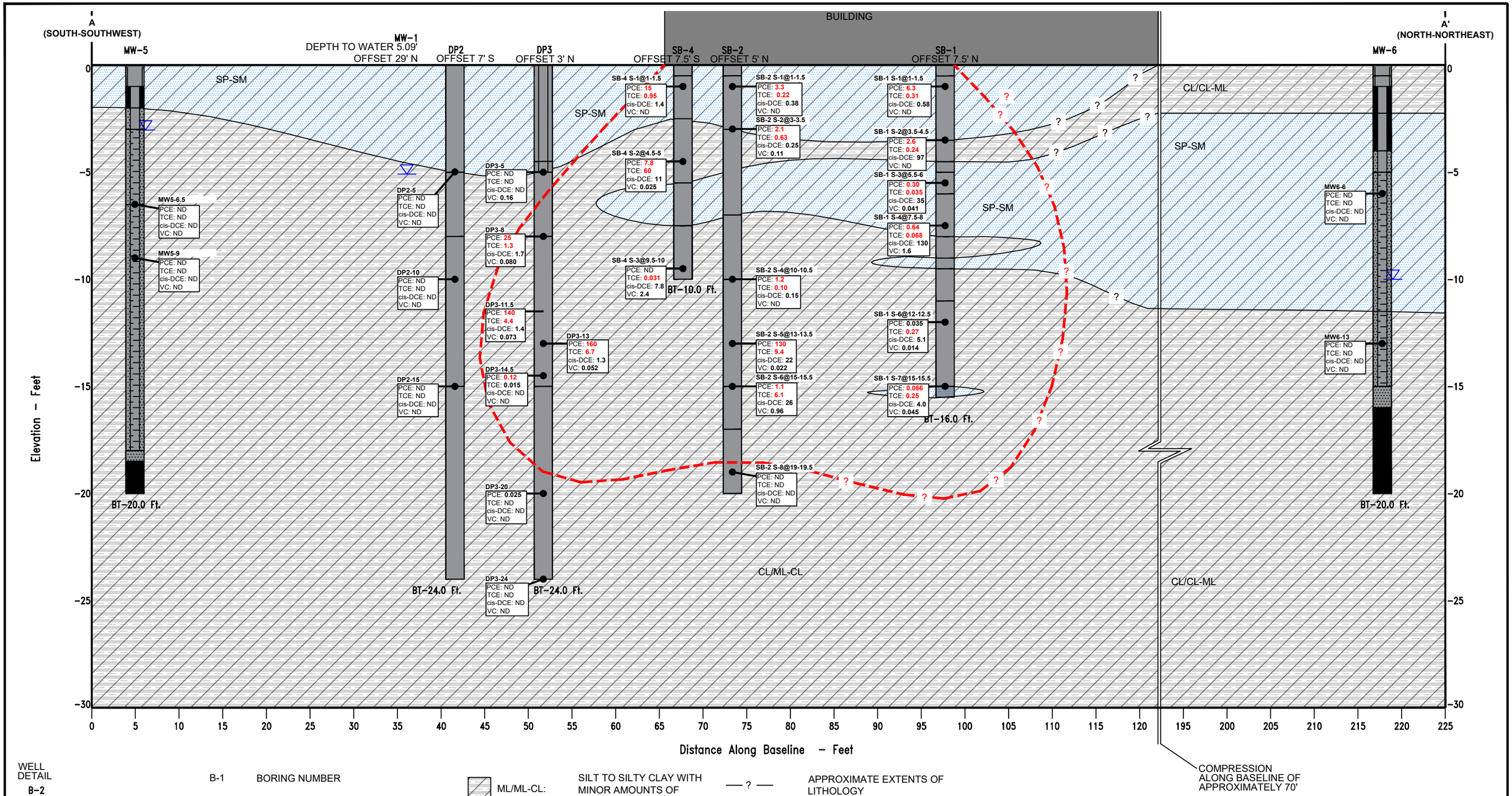


Basemap PDF file provided by Client and modified by Terracon.

Project Mngr: BAJ	Project No. 81197152	Terracon Consulting Engineers and Scientists	**DETAILED SITE DIAGRAM**
Drawn By: SPL	Scale: AS SHOWN	21905 64th Avenue W, Ste 100 Mountlake Terrace, WA 98043	VIEW RIDGE PLAZA
Checked By: BAJ	File No. EXHIBIT 4	PH. (425) 771-3304 FAX. (425) 771-3549	220 OLYMPIC BOULEVARD
Approved By: MYW	Date: JUNE 2019		EVERETT, SNOHOMISH COUNTY, WASHINGTON

EXHIBIT 4

Figure 14



WELL DETAIL

B-2

SCREENING AREA

BENTONITE CHIP BACKFILL

BT-29.0 Ft.

B-1 BORING NUMBER

APPROXIMATE LITHOLOGY CONTACT

BT 26.5' APPROXIMATE BORING TERMINATION DEPTH (FEET)

OFFSET 8' E APPROXIMATE DISTANCE AND DIRECTION OF BORING FROM BASELINE

DP2-5
PCE: 30
TCE: 0.03
cis-DCE: 7
VC: 6

NUMBER AND APPROXIMATE SOIL SAMPLE LOCATION WITH ANALYTICAL DATA (mg/kg)

ML/ML-CL: SILT TO SILTY CLAY WITH MINOR AMOUNTS OF SAND AND/ OR GRAVEL

SP/SP-SM: SAND WITH VARYING AMOUNTS OF SILT AND GRAVEL

FILL: FILL

— ? — APPROXIMATE EXTENTS OF LITHOLOGY

APPROXIMATE LIMIT OF cVOC IMPACTS

NOTES:

- PLEASE REFER TO CROSS SECTION LINES ON EXHIBIT 4.

Project Mngr:	BAJ
Drawn By:	SPL
Checked By:	KSB
Approved By:	MYW
Project No.	81197152
Scale:	NOT TO SCALE
File No.	Exhibit 6
Date:	August 2019

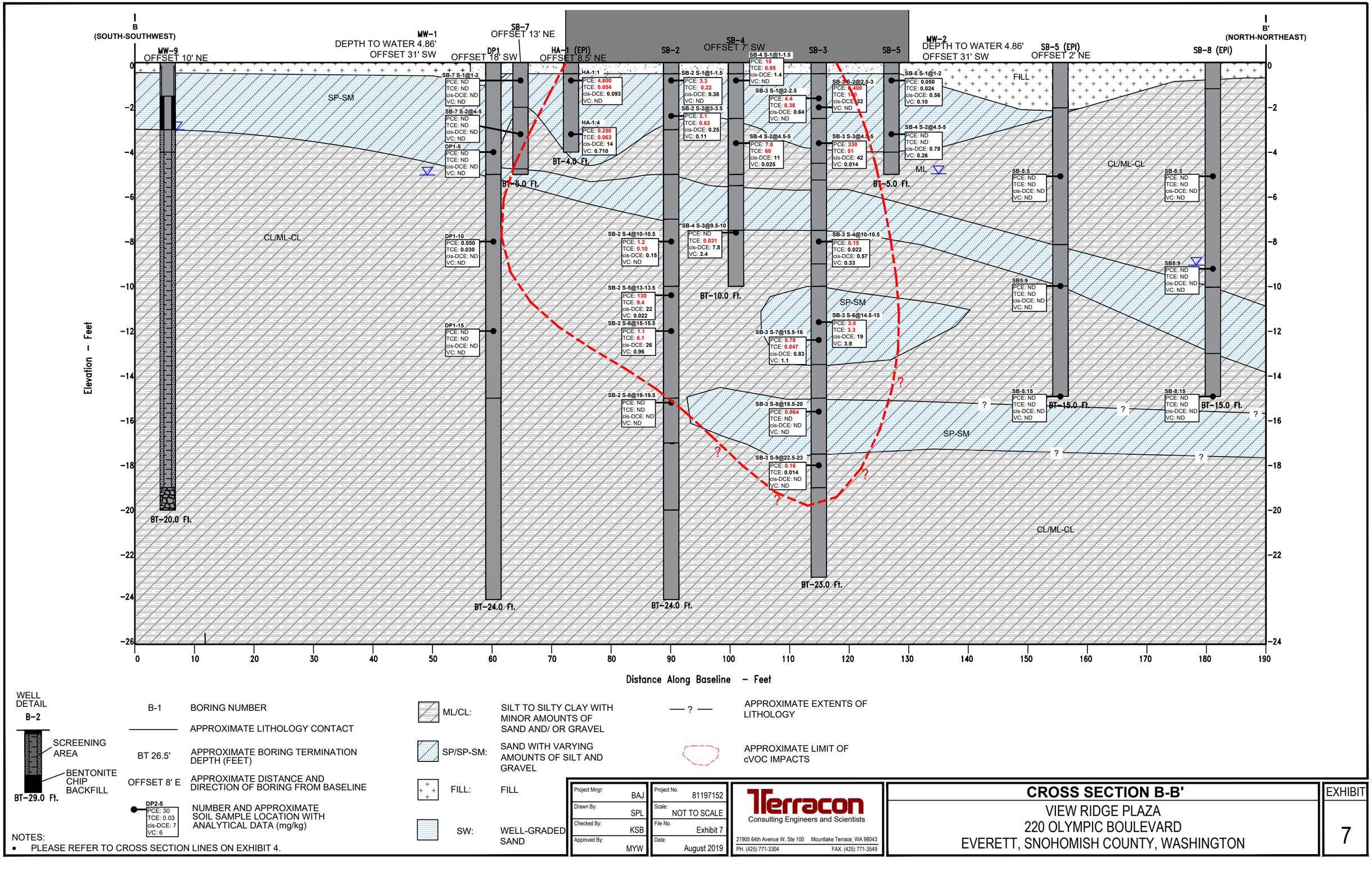
Terracon
Consulting Engineers and Scientists
21905 64th Avenue W, Ste 100 Mountlake Terrace, WA 98043
PH. (425) 771-3304 FAX. (425) 771-3549

CROSS SECTION A-A'

VIEW RIDGE PLAZA
220 OLYMPIC BOULEVARD
EVERETT, SNOHOMISH COUNTY, WASHINGTON

EXHIBIT 6

Figure 15



WELL DETAIL
B-2
SCREENING AREA
BENTONITE CHIP BACKFILL
BT-29.0 Ft.

B-1 BORING NUMBER

APPROXIMATE LITHOLOGY CONTACT

BT 26.5' APPROXIMATE BORING TERMINATION DEPTH (FEET)

OFFSET 8' E APPROXIMATE DISTANCE AND DIRECTION OF BORING FROM BASELINE

DP2-5
PCE: 30
TCE: 0.03
cis-DCE: 7
VC: 6
NUMBER AND APPROXIMATE SOIL SAMPLE LOCATION WITH ANALYTICAL DATA (mg/kg)

ML/CL: SILT TO SILTY CLAY WITH MINOR AMOUNTS OF SAND AND/ OR GRAVEL

SP/SP-SM: SAND WITH VARYING AMOUNTS OF SILT AND GRAVEL

FILL: FILL

SW: WELL-GRADED SAND

— ? — APPROXIMATE EXTENTS OF LITHOLOGY

APPROXIMATE LIMIT OF cVOC IMPACTS

NOTES:
- PLEASE REFER TO CROSS SECTION LINES ON EXHIBIT 4.

Project Mngr:	BAJ
Drawn By:	SPL
Checked By:	KSB
Approved By:	MYW
Project No.	81197152
Scale:	NOT TO SCALE
File No.	Exhibit 7
Date:	August 2019

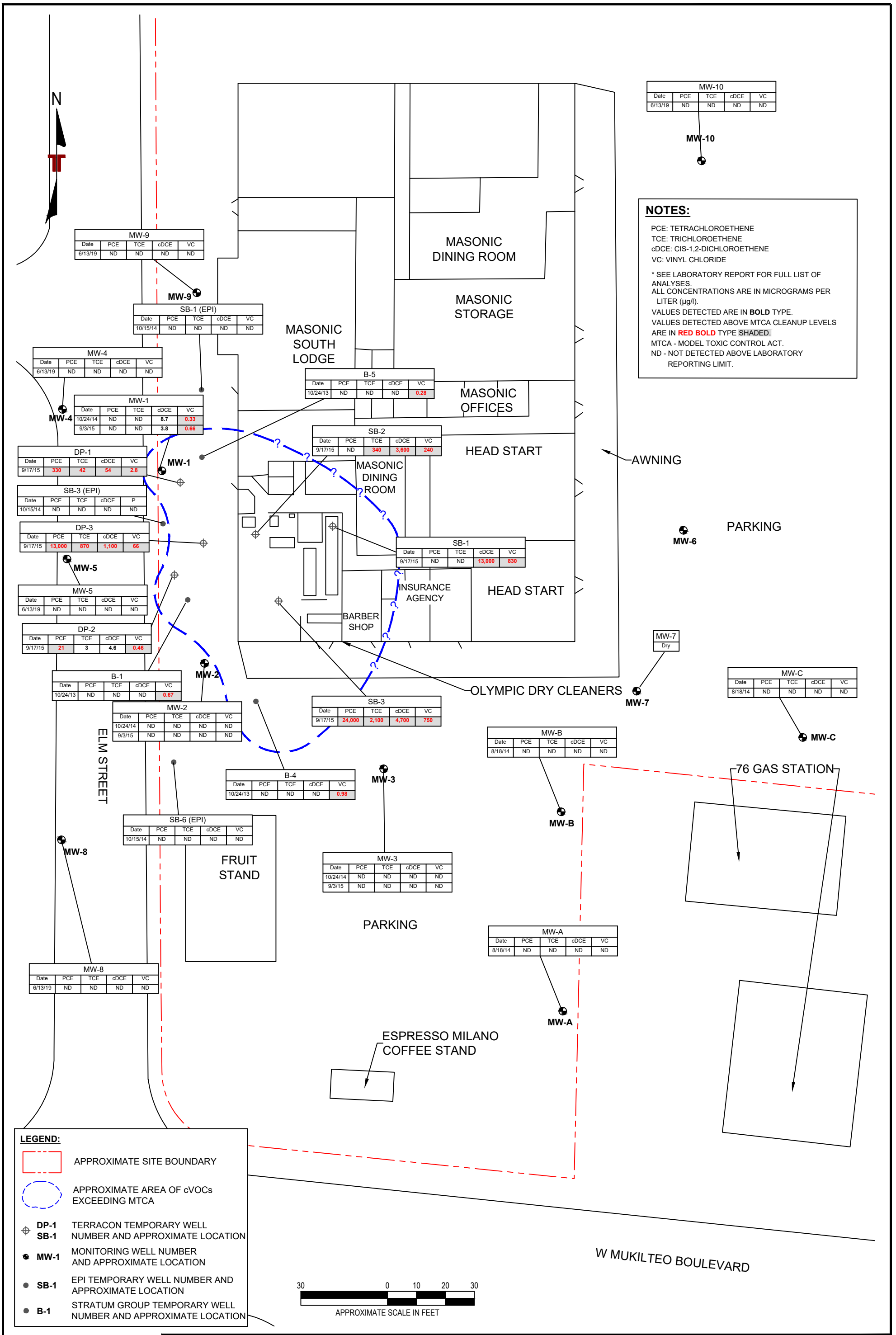
Terracon
Consulting Engineers and Scientists
21905 64th Avenue W, Ste 100 Mountlake Terrace, WA 98043
PH. (425) 771-3304 FAX. (425) 771-3549

CROSS SECTION B-B'

VIEW RIDGE PLAZA
220 OLYMPIC BOULEVARD
EVERETT, SNOHOMISH COUNTY, WASHINGTON

EXHIBIT 7

Figure 16



NOTES:

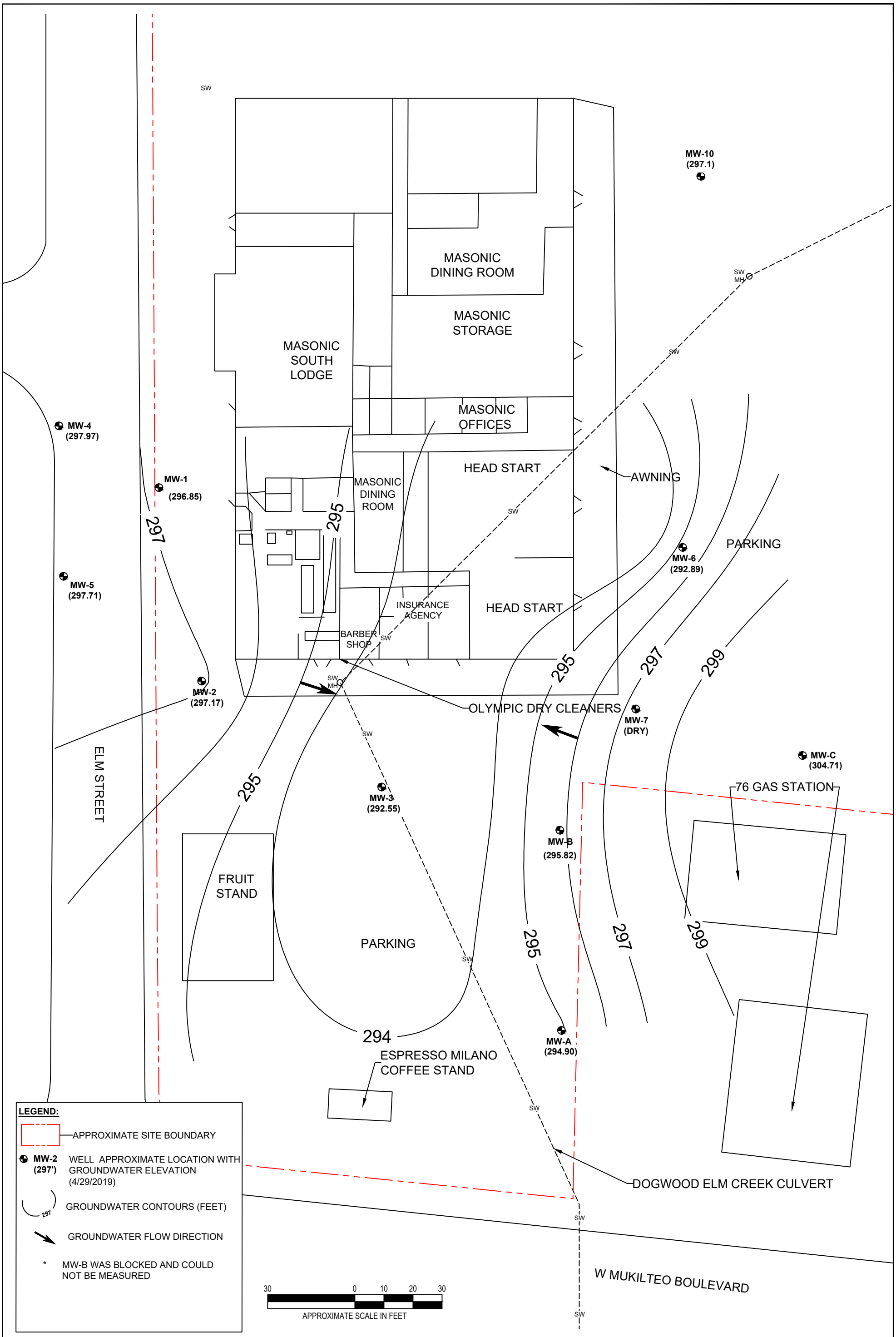
PCE: TETRACHLOROETHENE
TCE: TRICHLOROETHENE
cDCE: CIS-1,2-DICHLOROETHENE
VC: VINYL CHLORIDE

* SEE LABORATORY REPORT FOR FULL LIST OF ANALYSES.
ALL CONCENTRATIONS ARE IN MICROGRAMS PER LITER (µg/l).
VALUES DETECTED ARE IN **BOLD** TYPE.
VALUES DETECTED ABOVE MTCA CLEANUP LEVELS ARE IN **RED BOLD** TYPE SHADED.
MTCA - MODEL TOXIC CONTROL ACT.
ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMIT.

Project Mngr: BAJ	Project No. 81197152	Terracon Consulting Engineers and Scientists	**GROUNDWATER ANALYTICAL CONCENTRATIONS MAP**
Drawn By: AMP	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	VIEW RIDGE PLAZA
Checked By: BAJ	File No. EXHIBIT 8	PH. (425) 771-3304 FAX. (425) 771-3549	220 OLYMPIC BOULEVARD
Approved By: MYW	Date: JUNE 2019		EVERETT, SNOHOMISH COUNTY, WASHINGTON

EXHIBIT 8

Figure 17

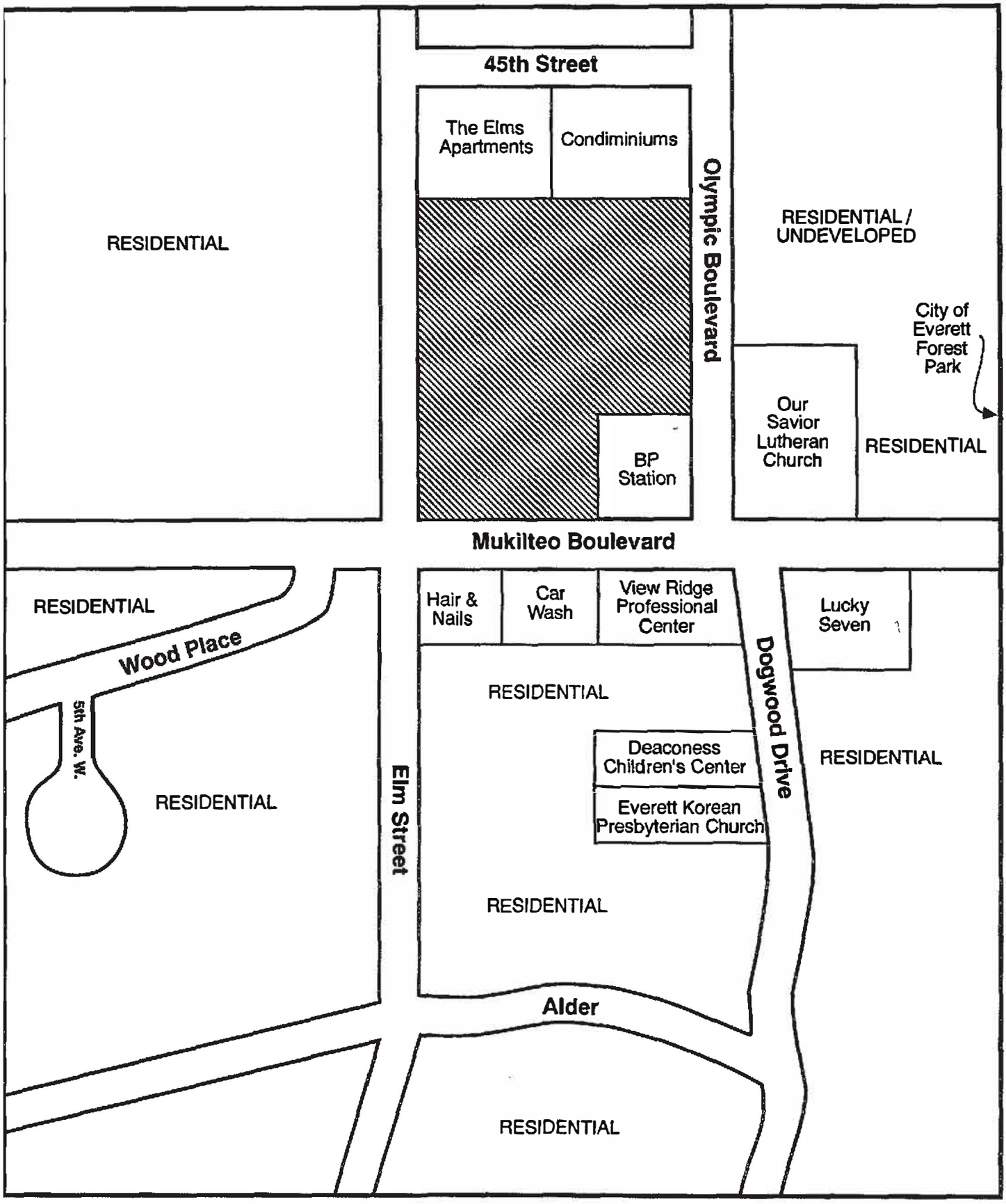


Project Mngr: BAJ	Project No. 81197152	Terracon Consulting Engineers and Scientists	**GROUNDWATER FLOW AND GRADIENT MAP - APRIL 2019**
Drawn By: JWD	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	VIEW RIDGE PLAZA
Checked By: BAJ	File No. EXHIBIT 9	PH. (425) 771-3304 FAX. (425) 771-3549	220 OLYMPIC BOULEVARD
Approved By: MYW	Date: AUG 2019		EVERETT, SNOHOMISH COUNTY, WASHINGTON

EXHIBIT 9

Figure 18

Site Representation
View Ridge Plaza, 220 Olympic Boulevard
Everett, Washington



Subject Property

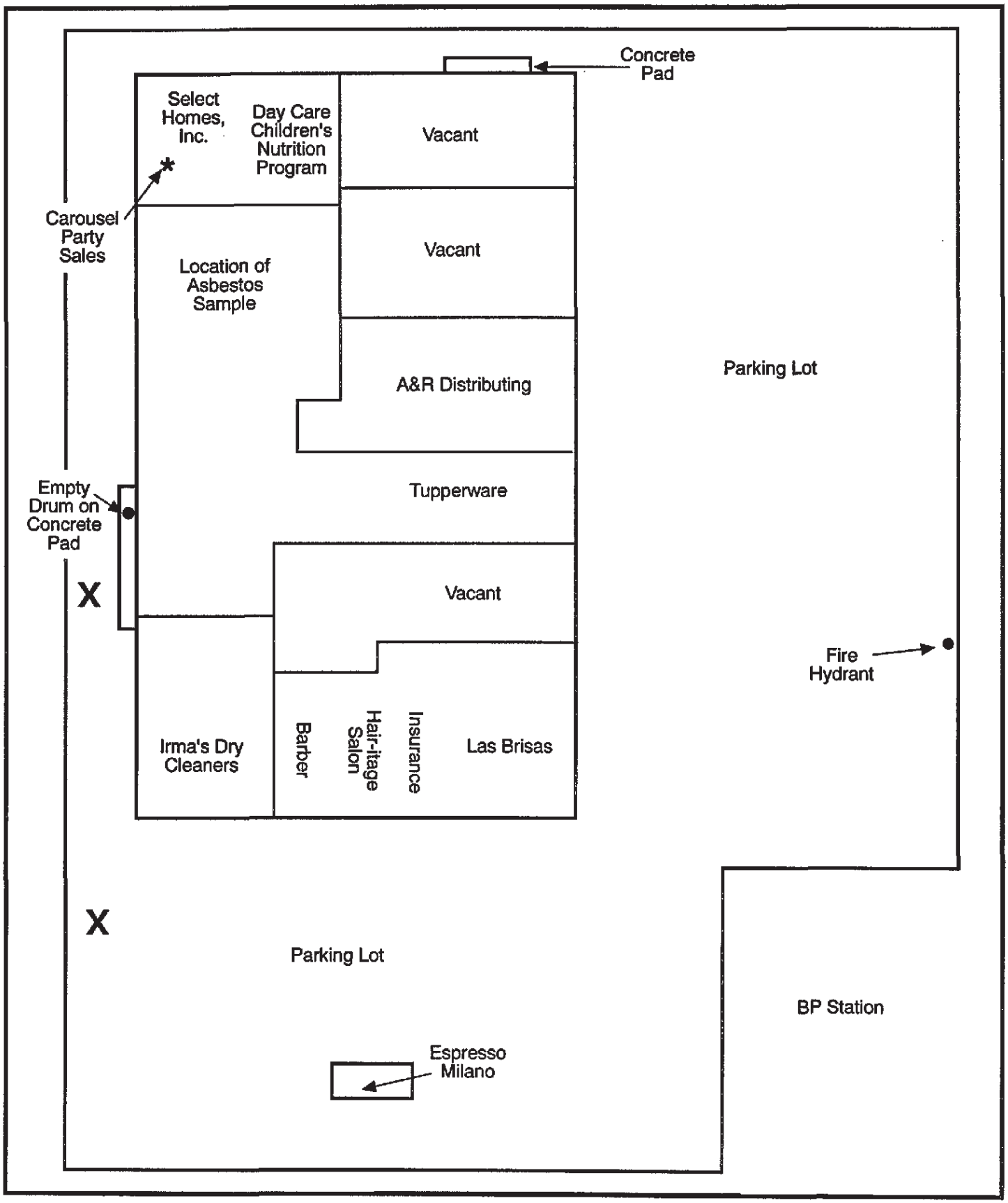
Please Note: Not Drawn to Scale

ENVIRONMENTAL PARTNERS INC

N

Figure 19

Site Plan
View Ridge Plaza, 220 Olympic Boulevard
Everett, Washington



X Transformers

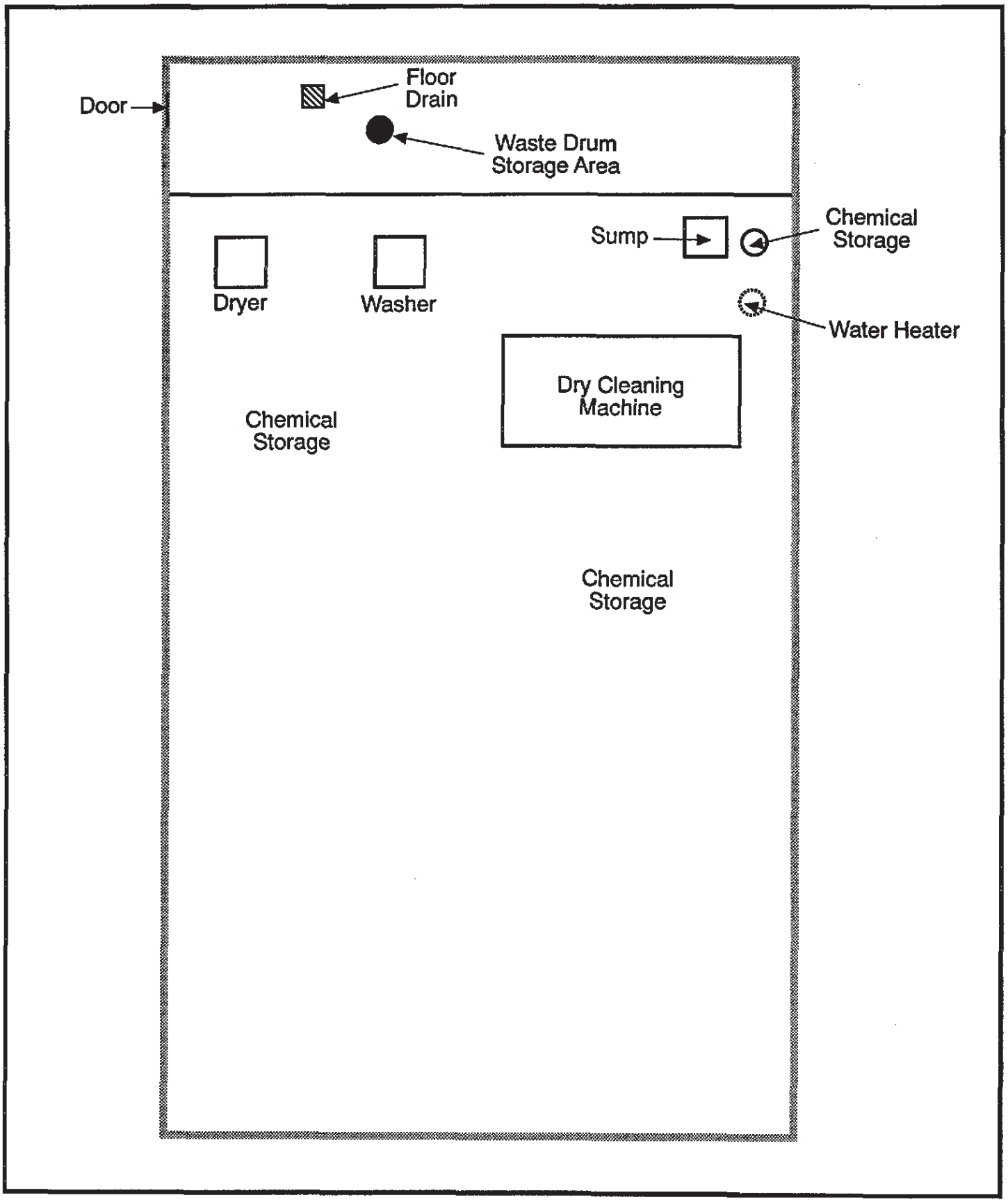
Please Note: Not Drawn to Scale

ENVIRONMENTAL PARTNERS INC

N

Figure 20

Irma's Dry Cleaners
View Ridge Plaza, 220 Olympic Boulevard
Everett, Washington



Please Note: Not Drawn to Scale

ENVIRONMENTAL PARTNERS INC

Figure 21

NOTES:

- PROPERTY BOUNDARY
- SUB-SLAB VAPOR SAMPLE LOCATIONS
- INDOOR AIR SAMPLE LOCATIONS
- BACKGROUND AIR SAMPLE LOCATIONS

KEY:

SAMPLE IDENITIFICATION	IA-4
TETRACHLOROETHENE	PCE 95.7
TRICHLOROETHENE	TCE 1.32
CIS-1,2-DICHLOROETHENE	cDCE 1.57
TRANS-1,2-DICHLOROETHENE	tDCE ND
VINYL CHLORIDE	VC ND
BENZENE	BZ 3.99
CHLOROFORM	CL 4.75

RED INDICATES CONCENTRATION IS GREATER THAN THE APPLICABLE COMMERCIAL RME CLEANUP LEVEL

"E" INDICATES VALUE IS GREATER THAN QUANTITATION RANGE

"ND" INDICATES COMPOUND NOT DETECTED ABOVE THE QUANTITATION LIMIT

BG-2	
PCE	1.75
TCE	ND
cDCE	ND
tDCE	ND
VC	ND

IA-8	
PCE	22.1
TCE	0.265
cDCE	0.291
tDCE	ND
VC	ND

BG-1	
PCE	1.66
TCE	ND
cDCE	ND
tDCE	ND
VC	ND

IA-6	
PCE	64.4
TCE	0.762
cDCE	0.964
tDCE	ND
VC	ND

SSV-1	
PCE	37,600
TCE	9,810
cDCE	14,500
tDCE	663
VC	190

IA-7	
PCE	71.2
TCE	0.742
cDCE	1.03
tDCE	ND
VC	ND

SSV-2	
PCE	12,600
TCE	6,010
cDCE	9,820
tDCE	385
VC	50.7

SSV-3	
PCE	22,800
TCE	14,700
cDCE	35,400
tDCE	15,800 E
VC	7,100

IA-4	
PCE	95.7
TCE	1.32
cDCE	1.57
tDCE	ND
VC	ND
BZ	3.99
CL	4.75

IA-1	
PCE	893
TCE	22.3
cDCE	26.2
tDCE	0.849
VC	0.451
CL	2.80

IA-2	
PCE	70.0
TCE	3.83
cDCE	8.64
tDCE	ND
VC	ND

IA-3	
PCE	6.49
TCE	ND
cDCE	ND
tDCE	ND
VC	ND

IA-5	
PCE	94.5
TCE	1.13
cDCE	1.56
tDCE	ND
VC	ND

AWNING
MASONIC DINING ROOM
MASONIC SOUTH LODGE
MASONIC STORAGE
PARKING LOT
MASONIC OFFICES
MASONIC DINING ROOM
HEAD START
AWNING
ELM STREET
OLYMPIC DRY CLEANERS
BARBER SHOP
INSURANCE AGENCY
HEAD START
MARKET

N

0 5 10 20

SCALE: 1" = 20'

FIGURE 4
CONCENTRATIONS OF CVOCs IN SUB-SLAB VAPOR AND INDOOR AIR (µg/m^3)

PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	ADDITIONAL SITE CHARACTERIZATION REPORT WITH INDOOR AIR DATA		
LOCATION	220 OLYMPIC BOULEVARD, EVERETT, WASHINGTON		
PREPARED FOR	PIVOTAL SOLUTIONS		
DATE 01/22/15	DRAWN BY CLM/MWB	REVIEWED BY DCK	PROJECT NUMBER 67002.1

Figure 22

MASONIC DINING ROOM

MASONIC SOUTH

MASONIC STORAGE

MASONIC OFFICES

HEAD START

MASONIC DINING ROOM

HEAD START

OLYMPIC DRY CLEANERS

BARBER SHOP

INSURANCE AGENCY

FRUIT STAND

PARKING

ESPRESSO MILANO COFFEE STAND

AWNING

ELM STREET

N

NOTES:

SAMPLE NUMBER

TETRACHLOROETHENE

TRICHLOROETHENE

VINYL CHLORIDE

VP-8	
PCE	43,000
TCE	1,900
VC	ND

ALL CONCENTRATIONS ARE IN MICROGRAMS PER CUBIC METER (µg/m³).

VALUES DETECTED ARE IN **BOLD** TYPE.

VALUES DETECTED ABOVE MTCA CLEANUP LEVELS ARE IN **BOLD** TYPE AND SHADED.

MTCA - MODEL TOXIC CONTROL ACT.

ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMIT.

VP-6	
PCE	36,000
TCE	1,500
VC	ND

VP-5	
PCE	28,000
TCE	2,000
VC	ND

DP-7	
PCE	250
TCE	ND
VC	170

VP-8	
PCE	43,000
TCE	1,900
VC	ND

SSV-1	
PCE	440,000
TCE	10,000
VC	360

VP-7	
PCE	47,000
TCE	1,800
VC	ND

DP-6	
PCE	550
TCE	ND
VC	1,900

VP-4	
PCE	110,000
TCE	7,300
VC	93

VP-2	
PCE	120,000
TCE	15,000
VC	530

DP4-V	
PCE	ND
TCE	ND
VC	ND

VP-1	
PCE	340,000
TCE	47,000
VC	1,100

VP-3	
PCE	660,000
TCE	50,000
VC	1,600

DP5-V	
PCE	ND
TCE	ND
VC	ND

VP-1 VP-2 VP-3 VP-4 VP-5 VP-6 VP-7 VP-8 DP-4 DP-5 DP-6 DP-7 SSV-1

INFERRED LIMITS OF SOIL VAPOR CONCENTRATIONS EXCEEDING MTCA

LEGEND:

APPROXIMATE SITE BOUNDARY

VP-1 / **DP-1** TERRACON VAPOR WELL NUMBER AND APPROXIMATE LOCATION

SSV-1 EPI VAPOR WELL NUMBER AND APPROXIMATE LOCATION

20 0 5 10 20

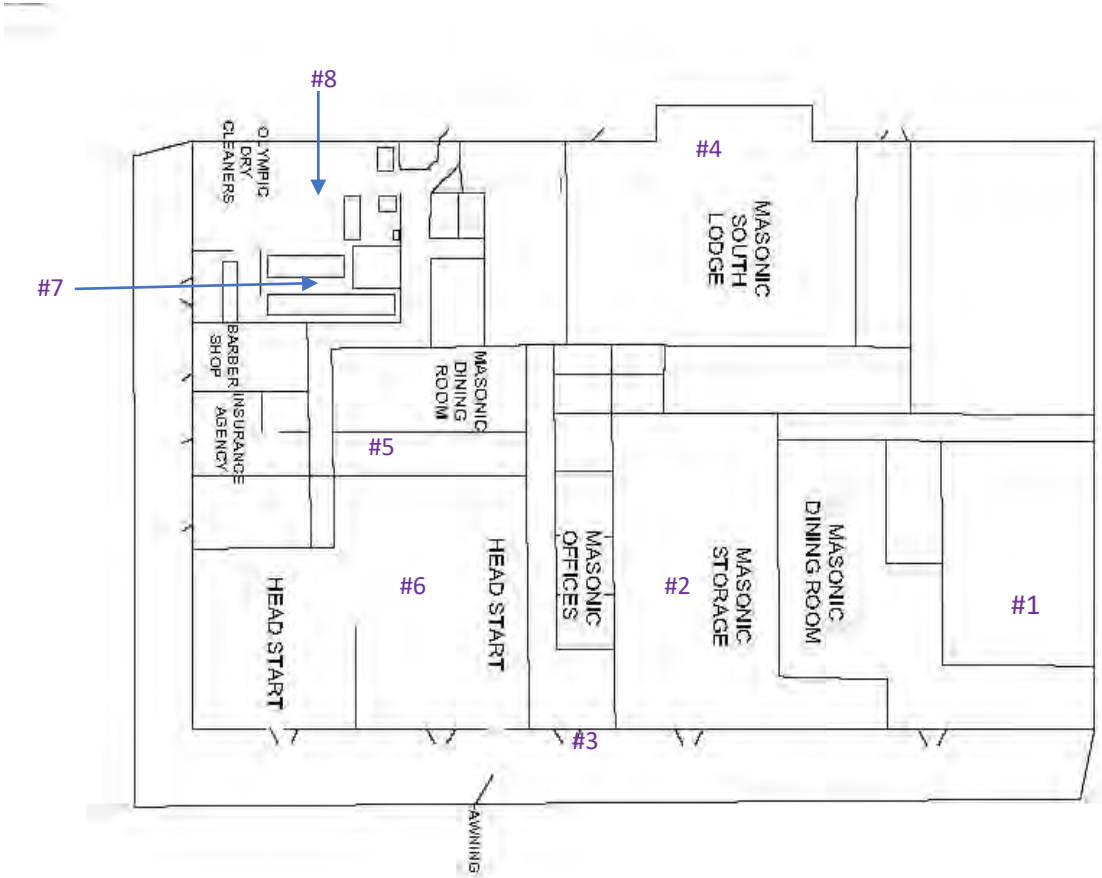
SCALE IN FEET

Project Mngr: MDN	Project No. 81157132	Terracon Consulting Engineers and Scientists	**VAPOR WELL LOCATIONS WITH SOIL VAPOR CONCENTRATIONS**
Drawn By: AWS	Scale: AS SHOWN	21905 64th Avenue W., Ste 100 Mountlake Terrace, WA 98043	VIEW RIDGE PLAZA
Checked By: MDN	File No. EXHIBITS	PH. (425) 771-3304 FAX. (425) 771-3549	220 OLYMPIC BOULEVARD
Approved By: MYW	Date: SEPT 2015		EVERETT, SNOHOMISH COUNTY, WASHINGTON

EXHIBIT 4

Figure 23

Exhibit 1



Market Plaza Indoor Air Sampling Locations

Enclosure B

Basis for the Opinion: Documents List

Documents List

1. Environmental Partners, Inc. (EPI), *Phase I Environmental Assessment*. May 28, 1993*
2. Stratum Group, *Environmental Sampling Summary*, November 14, 2013 (initial report)*
3. Stratum Group, *Environmental Site Assessment: Phase II Soil and Groundwater Investigation,* February 28, 2014 (final report)*
4. EPI, *Additional Site Characterization*, December 2, 2014 (initial report)
5. EPI, *Additional Site Characterization with Indoor Air Data,* March 4, 2015 (final report)*
6. Terracon Consultants Inc. (Terracon), *Limited Site Investigation*, November 19, 2015 (initial report)
7. Terracon, *Revised Limited Site Investigation*, January 7, 2016 (final report)*
8. Terracon, *Limited Indoor Air Quality Assessment*, June 12, 2018 *
9. Terracon, *Revised Remedial Investigation/Feasibility Study Report*, October 31, 2019 (Note: all the earlier starred reports are included in this report)
10. Terracon Consultants, Inc., *Cleanup Action Report*, December 20, 2022

*Document is included in the Revised Remedial Investigation/Feasibility Study

Enclosure C

Previous Site Characterization

Previous Site Characterization

In May of 1993, a Phase I site assessment was performed. It concluded that the on-Site drycleaners and the off-Site gasoline station posed risks to the property and that the on-Site building contained asbestos-containing material.

In October of 2013, three groundwater monitoring wells were installed near the property line adjacent to the off-Site gasoline station. A groundwater sample was collected from each well and analyzed for gasoline, benzene, ethylbenzene, toluene, xylene, and methyl tertiary butyl ether. All three groundwater samples had non-detectable concentrations of all analytes. It was concluded that contamination on the gasoline station property was not affecting the View Ridge Plaza property.

Six soil samples were collected from five soil borings near the on-Site drycleaners and analyzed for volatile organic compounds (VOCs). All soil samples had not-detectable concentrations of VOCs except for two soil samples from one boring. The shallow sample had detections of tetrachloroethene (PCE), trichloroethene (TCE), and cis 1,2-dichloroethene (cDCE), with the concentration of PCE exceeding the then MTCA Method A cleanup level. The deeper soil sample had a detection of PCE only, with the concentration below the then MTCA Method A cleanup level.

In October of 2014, twenty-nine soil samples were collected from eight soil borings and three hand augers and analyzed for PCE, TCE, cDCE, trans 1,2-dichloroethene (tDCE), vinyl chloride (VC), and 1,1-dichloroethene (1,1-DCE). All the samples from soil borings and the one auger sample that were outside the building had non-detectable concentrations of all analytes.

The two hand auger samples from inside the dry cleaners had detections of PCE in all four samples, with all four concentrations exceeding the MTCA Method A cleanup level. The same four samples had detections of TCE in three of four samples, with all three concentrations exceeding the MTCA Method A cleanup level. The same four samples had detections of cDCE in all four samples, with all four concentrations below the MTCA Method A Site cleanup level. tDCE was detected in two of four samples, with both concentrations below their MTCA Method B cleanup level. VC was detected in two of four samples, with one of two concentrations exceeding the MTCA Method A cleanup level. 1,1-DCE was detected in two of four soil samples, with both concentrations below their MTCA Method B cleanup level.

Three groundwater monitoring wells were installed, samples collected from them, and grab samples from three soil borings. All six samples were analyzed for PCE, TCE, cDCE, tDCE, VC, and 1,1-DCE. All three grab groundwater samples and two of three groundwater well samples had non-detectable concentrations of all analytes. One groundwater well sample had detections of cDCE and VC, with the concentration of VC exceeding the MTCA Method A cleanup level.

Three sub-slab soil vapor samples were collected from inside the building and analyzed for PCE, TCE, cDCE, tDCE, VC, 1,1-DCE, benzene, carbon tetrachloride, chloroethane, and chloroform. PCE, TCE, cDCE, tDCE, VC, benzene, and chloroform were detected in all three vapor samples, with all concentrations exceeding their MTCA Method B Site screening levels. 1,1-DCE was detected in all three vapor samples, with one of three concentrations exceeding the MTCA Method B screening level. Chloroethane was detected in two samples and carbon tetrachloride in one sample, with all three concentrations below their MTCA Method B screening level.

In December of 2014 and January of 2015, two rounds of indoor air monitoring were conducted. In December, the drycleaners and the two adjoining spaces were sampled and analyzed for PCE, TCE, cDCE, tDCE, VC, 1,2-dichloroethene (1,2-DCE), 1,1,1-trichloroethane (1,1,1-TCE), benzene, carbon tetrachloride, and chloroform. All analytes were detected in the drycleaner sample, with PCE, TCE, and chloroform exceeding the MTCA Method B screening level. In one adjoining space, PCE, TCE, cDCE, 1,1,1-TCE, benzene, carbon tetrachloride, and chloroform were detected, with the concentrations of PCE and TCE exceeding the MTCA Method B screening level while in the other adjoining space, PCE, benzene, carbon tetrachloride, and chloroform were detected, with all concentrations below the MTCA Method B screening level.

In January, five rooms farther from the drycleaners were sampled and analyzed for the same analytes. PCE, TCE, cDCE, benzene, carbon tetrachloride, and chloroform were detected in all five indoor air samples, with four of five PCE, one of five benzene, and one of five chloroform concentrations exceeding their respective MTCA Method B screening levels. 1,1,1-TCE was detected in one of five vapor samples, with a concentration below the MTCA Method B screening level.

In September of 2015, four soil borings were installed outside the building and an additional eight soil borings were installed inside the building. Soil vapor samples were collected from the four exterior soil borings and sub-slab soil vapor samples were collected from the eight interior soil borings plus one existing sub-slab soil vapor sampling point.

The vapor samples were analyzed for PCE, TCE, cDCE, tDCE, VC, 1,2-DCE, 1,1,1-TCE, benzene, carbon tetrachloride, and chloroform. Two of the exterior soil vapor samples had no detections of any analyte while one exterior sample had detections of PCE, cDCE, and VC, with only PCE and VC exceeding their respective MTCA Method B screening levels. The fourth exterior sample had detections only of PCD and VC, with only VC exceeding its MTCA Method B screening level.

Four of the interior sub-slab vapor samples had no detections of any analyte except for PCE, TCE, and cDCE, with only PCE and TCE exceeding their respective MTCA Method B screening levels. Two of the remaining four sub-slab vapor samples had detections of PCE, TCE, cDCE, tDCE, VC, and 1,1-DCE, with only PCE, TCE, and VC exceeding their respective MTCA Method B screening levels.

The one of the remaining two sub-slab vapor samples had a detection of 1,1,1-TCE as well as detections of the above six analytes, with the concentration below the MTCA Method B screening level while the other sub-slab vapor sample had a detection of chloroform as well as the above six analytes, with the concentration exceeding the MTCA Method B screening level.

The existing sub-slab sampling point, located in the dry cleaners and sampled, had detections of PCE, TCE, cDCE, tDCE, VC, 1,1,1-TCE, and chloroform, with PCE, TCE, VC, and chloroform exceeding their respective screening levels. Forty-five soil samples were collected from twelve soil borings and analyzed for PCE, TCE, cDCE, tDCE, VC, 1,1-DCE, para-isopropyltoluene, toluene, benzene, and 1,2-dibromoethane. Tetrachloroethene was detected at concentrations exceeding the MTCA Method A cleanup level in twenty-four soil samples. TCE was detected at concentrations exceeding the MTCA Method A cleanup level in twenty-two soil samples. Benzene was detected at a concentration exceeding the MTCA Method A cleanup level in one soil sample. All other soil analyses had non-detectable concentrations or had concentrations below their relative MTCA Method A or B cleanup levels for any analyte.

Three groundwater monitoring wells were sampled as well as six groundwater grab samples were collected from six soil borings and analyzed for the same ten analytes. PCE was detected in four of nine soil samples with all four concentrations exceeding the MTCA Method A cleanup level. The other five soil samples all had non-detectable concentrations. TCE was detected in five of nine soil samples with four of five concentrations exceeding the MTCA Method A cleanup level. cDCE was detected is seven of nine soil samples, with five of seven concentrations exceeding the MTCA Method B cleanup level. VC was detected in seven of nine groundwater samples, with all seven concentrations exceeding the MTCA Method A cleanup level. All other volatile organic compounds (VOCs) were non-detectable or had concentrations below their respective cleanup levels. All concentrations of para-isopropyltoluene, toluene, and 1,2-dibromomethane were non-detectable.

In April of 2019, seven additional groundwater monitoring wells were installed on-Site. Eleven soil samples were collected from the seven wells and analyzed for PCE, TCE, cDCE, tDCE, VC, 1,1-DCE, and 1,2-dibromomethane. None of the analytes were detected in any of the soil samples. Groundwater samples were collected from five of the seven wells and analyzed for the same analytes plus para-isopropyltoluene, toluene, and chloroethane. None of the analytes were detected in any of the groundwater samples. A sample was collected from each end of the culvert containing Dogwood Elm Creek and analyzed for PCE, TCE, cDCE, tDCE, VC, and 1,1-DCE. None of the analytes were detected in any of the surface water samples.

In June of 2018, eight interior air samples and three exterior air samples (one ground level and two roof top) were collected and analyzed for PCE, TCE, cDCE, tDCE, VC, 1,1-DCE, 1,1,1-TCE, benzene, carbon tetrachloride, and chloroform.

The two roof top samples had no detections of any analyte except that PCE was detected in one sample and chloroform in both samples, with all three concentrations below the MTCA Method B screening levels.

The ground level exterior sample had no detections of any analyte except for chloroform with a concentration equal to the two roof top air samples. tDCE, 1,1-DCE, 1,1,1-TCE, and carbon tetrachloride were not detected in any of the indoor air samples. Benzene was detected in all eight indoor air samples, with all eight concentrations exceeding the MTCA Method B screening level. Chloroform was detected in all eight indoor air samples, with six of eight concentrations exceeding the MTCA Method B screening level.

The five indoor air monitoring points farthest from the drycleaners had four detections of PCE, one detection of TCE, and two detections of cDCE, with all seven concentrations below their respective MTCA Method B screening levels. The sampling location closest to the drycleaners had detections of PCE, TCE, and cDCE, with the concentrations of PCE and TCE exceeding their respective MTCA Method B screening level. The two indoor sampling points located in the drycleaners had detections of PCE, TCE, and cDCE, with all six concentrations exceeding the MTCA Method B screening level, and one detection of VC, also exceeding the MTCA Method B screening level.

Enclosure D

Environmental Covenant for Institutional Controls

202307210291
COVENANTS Rec: $217.50
7/21/2023 2:54 PM 15 PG
SNOHOMISH COUNTY, WA

After Recording Return
Original Signed Covenant to:

Christopher Maurer
Toxics Cleanup Program
Department of Ecology
300 Desmond Drive
Olympia, WA 98504

Environmental Covenant

Grantor: GOV Everett, LLC, a Delaware limited liability company (hereafter "GOV Everett")

Grantee: State of Washington, Department of Ecology (hereafter "Ecology")

Legal Description: VIEW RIDGE ADD DIV 2 BLK 000 D-02 - TR 41, AS PER PLAT REC IN VOL 12 OF PLATS, PG 19, RECORDS OF SNO CO; TGW TH PTN VAC ELM ST ADJ THRTO PER CITY OF EV ORD NO 3502 REC AF# 1137481 LY W OF AND ADJ TOSD PREMISES AND ELY OF THE E LN OF THE NEW ELM ST; EXC FR THE FOREGOING THE FDT: BEG SE COR OF TR 41; TH W ON S LN OF SD LT 155 FT TH N PLW E LN OF SD LT 125 FT TH E PLW S LN SD LT 155 FT TO E LNTHOF TH S 125 FT POB - PLUS AN EQUAL & UNDIV INT IN LOT A

Tax Parcel Nos.: Snohomish County Parcel No. 00606200004102

Cross Reference: VCP Project No. NW3244
Cleanup Site ID No. 12644
Facility Site ID No. 20079
Subordination Agreement Dated: 03.20.2023
No Further Action (NFA) Dated: _____

RECITALS

a. This document is an environmental (restrictive) covenant (hereafter "Covenant") executed pursuant to the Model Toxics Control Act ("MTCA"), chapter 70.105D RCW, and Uniform Environmental Covenants Act ("UECA"), chapter 64.70 RCW.

b. The Property that is the subject of this Covenant is part or all of a site commonly known as the former View Ridge Plaza in Everett, Washington, and Ecology's Cleanup Site ID No. 12644 and Facility Site ID No. 20079. The Property is currently occupied by the Everett Veteran Affairs Clinic. The Property is legally described in Exhibit A, and illustrated in Exhibit B, both of which are attached (hereafter "Property"). If there are differences between these two Exhibits, the legal description in Exhibit A shall prevail.

c. The Property is the subject of remedial action conducted under MTCA. This Covenant is required because residual contamination remain on the Property after completion of remedial actions. Specifically, the following principal contaminants remain on the Property:

Medium	Principal Contaminants Present
Soil	Tetrachloroethene (PCE), Trichloroethene (TCE), and Vinyl chloride (VC)
Groundwater	VC and Cis-1,2-Dichloroethene (cis-DCE)
Vapor / Air	Not Applicable

d. It is the purpose of this Covenant to restrict certain activities and uses of the Property to protect human health and the environment and the integrity of remedial actions conducted at the site. Records describing the extent of residual contamination and remedial actions conducted are available through Ecology, including the following documents:

- Terracon Consultants, Inc., *Compliance Monitoring and Contingency Plan, View Ridge Plaza – Everett VA*, dated May 22, 2023.
- Terracon Consultants, Inc., *Cleanup Action Report, View Ridge Plaza*, December 20, 2022.

e. This Covenant grants Ecology certain rights under UECA and as specified in this Covenant. As a Holder of this Covenant under UECA, Ecology has an interest in real property, however, this is not an ownership interest which equates to liability under MTCA or the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601 *et seq.* The rights of Ecology as an "agency" under UECA, other than its' right as a holder, are not an interest in real property.

COVENANT

GOV Everett, as the Grantor and fee simple owner of the Property, hereby grants to the Washington State Department of Ecology, and its successors and assignees, the following covenants. Furthermore, it is the intent of the Grantor that such covenants shall supersede any prior interests the Grantor has in the Property and run with the land and be binding on all current and future owners of any portion of, or interest in, the Property.

Section 1. General Restrictions and Requirements.

The following general restrictions and requirements shall apply to the Property:

a. Interference with Remedial Action. The Grantor shall not engage in any activity on the Property that may impact or interfere with the remedial action and any operation, maintenance, inspection or monitoring of that remedial action without prior written approval from Ecology.

b. Protection of Human Health and the Environment. The Grantor shall not engage in any activity on the Property that may threaten continued protection of human health or the environment without prior written approval from Ecology. This includes, but is not limited to, any activity that results in the release of residual contamination that was contained as a part of the remedial action or that exacerbates or creates a new exposure to residual contamination remaining on the Property.

c. Continued Compliance Required. Grantor shall not convey any interest in any portion of the Property without providing for the continued adequate and complete operation, maintenance and monitoring of remedial actions and continued compliance with this Covenant.

d. Leases. Grantor shall restrict any lease for any portion of the Property to uses and activities consistent with this Covenant and notify all lessees of the restrictions on the use of the Property.

e. Preservation of Reference Monuments. Grantor shall make a good faith effort to preserve any reference monuments and boundary markers used to define the areal extent of coverage of this Covenant. Should a monument or marker be damaged or destroyed, Grantor shall have it replaced by a licensed professional surveyor within thirty (30) days of discovery of the damage or destruction.

Section 2. Specific Prohibitions and Requirements.

In addition to the general restrictions in Section 1 of this Covenant, the following additional specific restrictions and requirements shall apply to the Property.

a. Containment of Soil. The remedial action for the Property is based on containing contaminated soil and groundwater under a cap consisting of the concrete floor of the existing on-Property building and impervious surfaces located as illustrated in Exhibit B. The Grantor shall not alter or remove the existing structures on or the concrete cap over the Property in any manner that would expose contaminated soil, result in a release to the environment of contaminants, or create a new exposure pathway, without prior written approval of Ecology. Should the Grantor propose to remove all or a portion of the existing structures or the cap on the Property so that access to the underlying contamination is feasible, Ecology may require treatment or removal of the underlying contaminated soil. Any intrusive subsurface soil work within or beneath the Property must be implemented by Hazardous Waste Operations and Emergency Response (HAZWOPER) trained workers in accordance with a health and safety plan.

b. Groundwater Use. The groundwater beneath the Property has been identified to be contaminated. Therefore, groundwater beneath the Property shall not be extracted for any purpose other than temporary construction dewatering, investigation, monitoring, or remediation. Drilling of a well for any water supply purpose is strictly prohibited. Groundwater extracted from the Property for any purpose shall be considered potentially contaminated and any discharge of this water shall be done in accordance with state and federal law. Groundwater monitoring wells MW-3 through MW-6, MW-8, and MW-10 through MW-14 shall be preserved and any activity on the Property that will compromise the integrity of the groundwater monitoring wells is prohibited without prior written approval by Ecology

c. Vapor/Gas Controls. The vapor beneath the Property has not been identified to be contaminated; however, the residual soil and groundwater contamination on the Property presents a potential risk to vapor accumulation and intrusion. Therefore, the existing building includes a EPRO Services, Inc., Geo-Seal 100 Vapor Intrusion Mitigation System (VIMS), which 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. This VIMS, combined with the concrete floor of the structure are adequately preventing the migration of vapors into the building. No alterations of the existing VIMS, concrete floor of the structure, or new construction that has the potential to affect the vapor intrusion pathway shall be performed unless approved by Ecology. Any activity on the Property that will compromise the integrity of the cap or VIMS including: drilling; digging; piercing the cap with sampling device, post, stake or similar device; grading; excavation; installation of underground utilities; removal of the cap; or application of loads in excess of the cap load bearing capacity, is prohibited without prior written approval by Ecology.

d. Compliance Monitoring and Contingency Plan. The Grantor shall comply with and implement the requirements of the *Compliance Monitoring and Contingency Plan,* prepared by Terracon Consultants Inc., dated May 22, 2023, until such time that Ecology confirms in writing

that the obligations of the Compliance Monitoring and Contingency Plan are no longer necessary. A copy of the *Compliance Monitoring and Contingency Plan,* dated May 22, 2023, is filed with Ecology and available upon request.

Section 3. Access.

a. The Grantor shall maintain clear access to all remedial action components necessary to construct, operate, inspect, monitor, and maintain the remedial action.

b. The Grantor freely and voluntarily grants Ecology and its authorized representatives, upon reasonable notice, the right to enter the Property at reasonable times to evaluate the effectiveness of this Covenant and associated remedial actions, and enforce compliance with this Covenant and those actions, including the right to take samples, inspect any remedial actions conducted on the Property, and to inspect related records.

c. No right of access or use by a third party to any portion of the Property is conveyed by this instrument.

Section 4. Notice Requirements.

a. Conveyance of Any Interest. The Grantor, when conveying any interest within the area of the Property described and illustrated in Exhibit B, including but not limited to title, easement, leases, and security or other interests, must:

i. Provide written notice to Ecology of the intended conveyance at least thirty (30) days in advance of the conveyance.

ii. Include in the conveying document a notice in substantially the following form, as well as a complete copy of this Covenant:

NOTICE: THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL COVENANT GRANTED TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY ON July 21**, 2023 AND RECORDED WITH THE SNOHOMISH COUNTY AUDITOR UNDER RECORDING NUMBER** 202307210291**. USES AND ACTIVITIES ON THIS PROPERTY MUST COMPLY WITH THAT COVENANT, A COMPLETE COPY OF WHICH IS ATTACHED TO THIS DOCUMENT.**

iii. Unless otherwise agreed to in writing by Ecology, provide Ecology with a complete copy of the executed document within thirty (30) days of the date of execution of such document.

b. Reporting Violations. Should the Grantor become aware of any violation of this Covenant, Grantor shall promptly report such violation in writing to Ecology.

c. Emergencies. For any emergency or significant change in site conditions due to Acts of Nature (for example, flood or fire) resulting in a violation of this Covenant, the Grantor is authorized to respond to such an event in accordance with state and federal law. The Grantor must notify Ecology in writing of the event and response actions planned or taken as soon as practical but no later than within twenty-four (24) hours of the discovery of the event.

d. Notification Procedure. Any required written notice, approval, reporting or other communication shall be personally delivered or sent by first class mail to the following persons. Any change in this contact information shall be submitted in writing to all parties to this Covenant. Upon mutual agreement of the parties to this Covenant, an alternative to personal delivery or first class mail, such as e-mail or other electronic means, may be used for these communications.

GOV Everett, LLC c/o HC Government Realty Holdings, L.P. 390 S. Liberty Street, Suite 100 Winston-Salem, NC 27101 Attn: John W. Braswell Telephone: (770) 686-9673 Email:jbraswell@hcgovtrust.com	Washington State Department of Ecology Attn: Environmental Covenants Coordinator Toxics Cleanup Program P.O. Box 47600 Olympia, WA 98504 – 7600 (360) 407-6000 ToxicsCleanupProgramHQ@ecy.wa.gov

Section 5. Modification or Termination.

a. The Grantor must provide written notice and obtain approval from Ecology at least sixty (60) days in advance of any proposed activity or use of the Property in a manner that is inconsistent with this Covenant. For any proposal that is inconsistent with this Covenant and permanently modifies an activity or use restriction at the Property:

i. Ecology must issue a public notice and provide an opportunity for the public to comment on the proposal; and

ii. If Ecology approves the proposal, the Covenant must be amended to reflect the change before the activity or use can proceed.

b. If the conditions at the Property requiring a Covenant have changed or no longer exist, then the Grantor may submit a request to Ecology that this Covenant be amended or terminated. Any amendment or termination of this Covenant must follow the procedures in MTCA and UECA and any rules promulgated under these chapters.

Section 6. Enforcement and Construction.

a. This Covenant is being freely and voluntarily granted by the Grantor.

b. Within ten (10) days of execution of this Covenant, Grantor shall provide Ecology with an original signed Covenant and proof of recording and a copy of the Covenant and proof of recording to others required by RCW 64.70.070.

c. Ecology shall be entitled to enforce the terms of this Covenant by resort to specific performance or legal process. All remedies available in this Covenant shall be in addition to any and all remedies at law or in equity, including MTCA and UECA. Enforcement of the terms of this Covenant shall be at the discretion of Ecology, and any forbearance, delay or omission to exercise its rights under this Covenant in the event of a breach of any term of this Covenant is not a waiver by Ecology of that term or of any subsequent breach of that term, or any other term in this Covenant, or of any rights of Ecology under this Covenant.

d. The Grantor shall be responsible for all costs associated with implementation of this Covenant. Furthermore, the Grantor, upon request by Ecology, shall be obligated to pay for Ecology's costs to process a request for any modification or termination of this Covenant and any approval required by this Covenant.

e. This Covenant shall be liberally construed to meet the intent of MTCA and UECA.

f. The provisions of this Covenant shall be severable. If any provision in this Covenant or its application to any person or circumstance is held invalid, the remainder of this Covenant or its

application to any person or circumstance is not affected and shall continue in full force and effect as though such void provision had not been contained herein.

g. A heading used at the beginning of any section or paragraph or exhibit of this Covenant may be used to aid in the interpretation of that section or paragraph or exhibit but does not override the specific requirements in that section or paragraph.

The undersigned Grantor warrants he/she holds the title to the Property and has authority to execute this Covenant.

EXECUTED this 26 day of May, 2023.

GOV EVERETT, LLC, a Delaware limited liability company

Jacqlyn Piscetelli
(Signature)

By: Jacqlyn Piscetelli
(Printed Name)

Title: Authorized Signatory

REPRESENTATIVE ACKNOWLEDGEMENT

STATE OF North Carolina

COUNTY OF Forsyth

On this 26 day of May, 2023, I certify that Jacqlyn Piscetelli personally appeared before me, acknowledged that he/she signed this instrument, on oath stated that he/she was authorized to execute this instrument, and acknowledged it as the Authorized Signatory of GOV EVERETT LLC, to be the free and voluntary act and deed of such party for the uses and purposes mentioned in the instrument.

Jill A Choplin
Notary Public
Yadkin County, NC
My Commission Expires
8-01-2026

Jill A Choplin
Notary Public in and for the State of North Carolina

Residing at Yadkin County, NC

My appointment expires 8-01-2026

The Department of Ecology, hereby accepts the status as GRANTEE and HOLDER of the above Environmental Covenant.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

(Signature)

By: Erik Snyder

Title: Section Manager
Toxics Cleanup Program

Dated: 6/20/2023

STATE ACKNOWLEDGMENT

STATE OF WASHINGTON

COUNTY OF THURSTON

On this 20TH day of JUNE, 2023, I certify that ERIK SNYDER personally appeared before me, acknowledged that he/she is the SECTION MANAGER of the state agency that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed, for the uses and purposes therein mentioned, and on oath stated that he/she was authorized to execute said instrument for said state agency.

AMANDA E SEIDER

Notary Public in and for the State of Washington

AMANDA E SEIDER
Commission Expires
11-22-2026
NOTARY PUBLIC
License Number 199001
STATE OF WASHINGTON

Residing at THURSTON COUNTY, WA

My appointment expires 11/22/2026

Exhibit A

LEGAL DESCRIPTION

LEGAL DESCRIPTION

Tract 41, View Ridge Addition to Everett Division No. 2, according to the plat thereof recorded in Volume 12 of Plats, Page 19, records of Snohomish County, Washington;

Together with that portion of vacated Elm Street lying west of and adjacent to said premises, and easterly of the east line of the new Elm Street;

Except from the foregoing, the following described Tract:

Beginning at the southeast corner of Tract 41;
Thence west on the south line of said lot for 155 feet;
Thence north parallel with the east line of said lot for 125 feet;
Thence east parallel with the south line of said lot for 155 feet to the east line thereof;
Thence south 125 feet to the point of beginning.

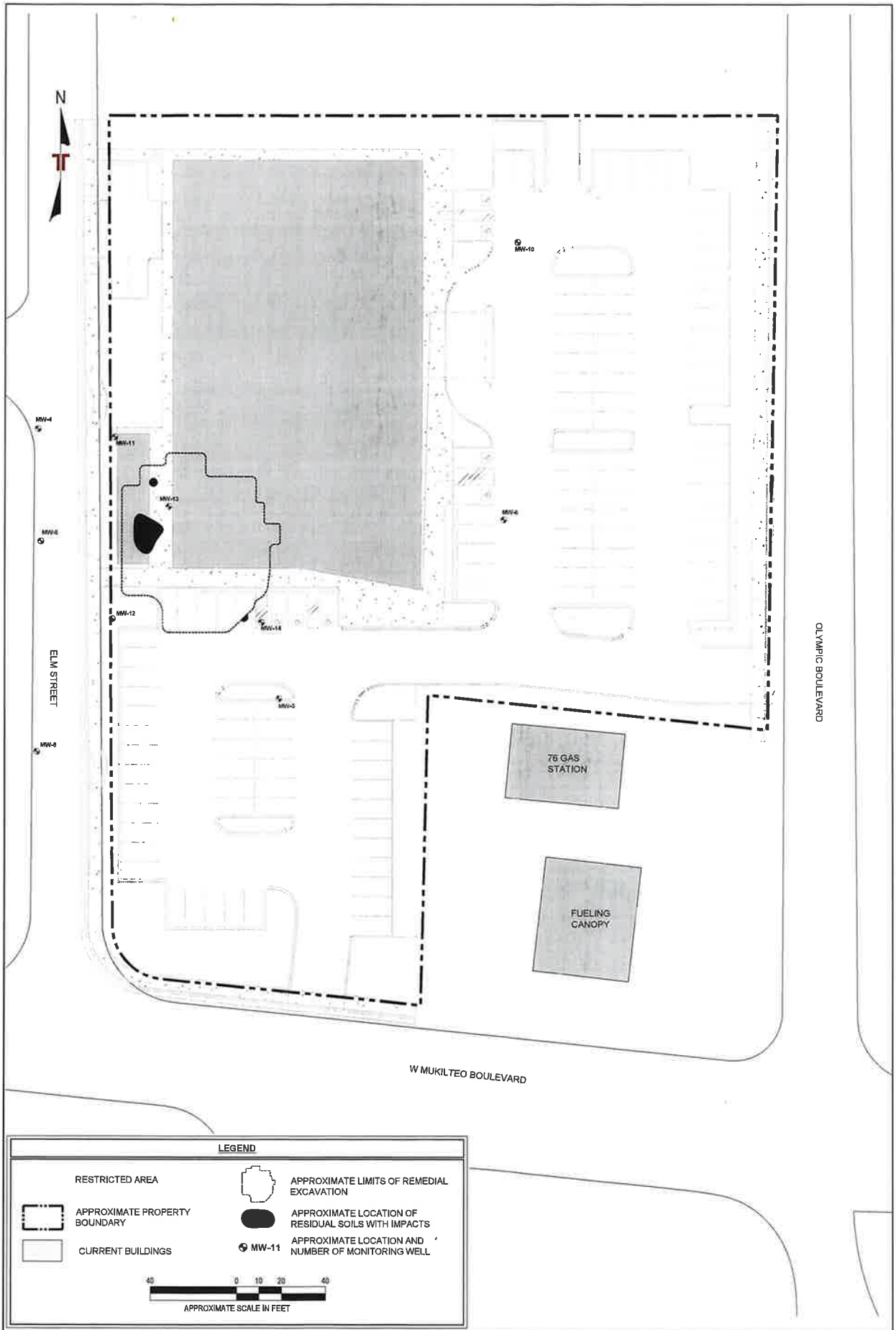
Situate in the County of Snohomish, State of Washington.

ABBREVIATED LEGAL DESCRIPTION

VIEW RIDGE ADD DIV 2 BLK 000 D-02 - TR 41, AS PER PLAT REC IN VOL 12 OF PLATS, PG 19, RECORDS OF SNO CO; TGW TH PTN VAC ELM ST ADJ THRTO PER CITY OF EV ORD NO 3502 REC AF# 1137481 LY W OF AND ADJ TOSD PREMISES AND ELY OF THE E LN OF THE NEW ELM ST; EXC FR THE FOREGOING THE FDT: BEG SE COR OF TR 41; TH W ON S LN OF SD LT 155 FT TH N PLW E LN OF SD LT 125 FT TH E PLW S LN SD LT 155 FT TO E LNTHOF TH S 125 FT POB - PLUS AN EQUAL & UNDIV INT IN LOT A

Exhibit B

PROPERTY MAP



LEGEND

- RESTRICTED AREA
- APPROXIMATE PROPERTY BOUNDARY
- CURRENT BUILDINGS
- APPROXIMATE LIMITS OF REMEDIAL EXCAVATION
- APPROXIMATE LOCATION OF RESIDUAL SOILS WITH IMPACTS
- MW-11 APPROXIMATE LOCATION AND NUMBER OF MONITORING WELL

40 0 10 20 40

APPROXIMATE SCALE IN FEET

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

Exhibit C

SUBORDINATION AGREEMENT

Recording Requested by & After
Recording Return to:

SUBORDINATION AGREEMENT

KNOW ALL PERSONS, That Global Signal Acquisitions IV LLC, a Delaware limited liability company, the owner and holder of that certain Grant of Easement and Assignment of Lease bearing the date the 12th day of September, 2018, executed by Market Plaza LLC, a Washington limited liability company, the Landowner, and recorded in the office of the County Auditor of Snohomish County, State of Washington, on February 22, 2019, under Auditor's File Number 201902220210, does hereby agree that said Instrument shall be subordinate to the interest of the State of Washington, Department of Ecology, under the environmental (restrictive) covenant dated 07/21/2023 executed by Erik Snyder, and recorded in Snohomish County, Washington under Auditor's File Number 202307210291.

By: Tara Groda

Title: Sr. Mgr. Nat'l RE Ops.

Dated: March 20, 2023

CORPORATE ACKNOWLEDGMENT

STATE OF TEXAS
COUNTY OF HARRIS

On this 20 day of March, 2023, I certify That Tara Groda personally appeared before me, acknowledged that **he/she** is the Sr. Mgr. Nat'l RE Ops. of Global Signal Acquisitions IV LLC, a Delaware limited liability company, that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said company, for the uses and purposes therein mentioned, and on oath stated that **he/she** was authorized to execute said instrument for said company.

MICHAEL POWERS
My Notary ID # 128965477
Expires June 24, 2024

Notary Public

My appointment expires _____

Enclosure E

Inspection and Monitoring Plan

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

TABLE OF CONTENTS

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

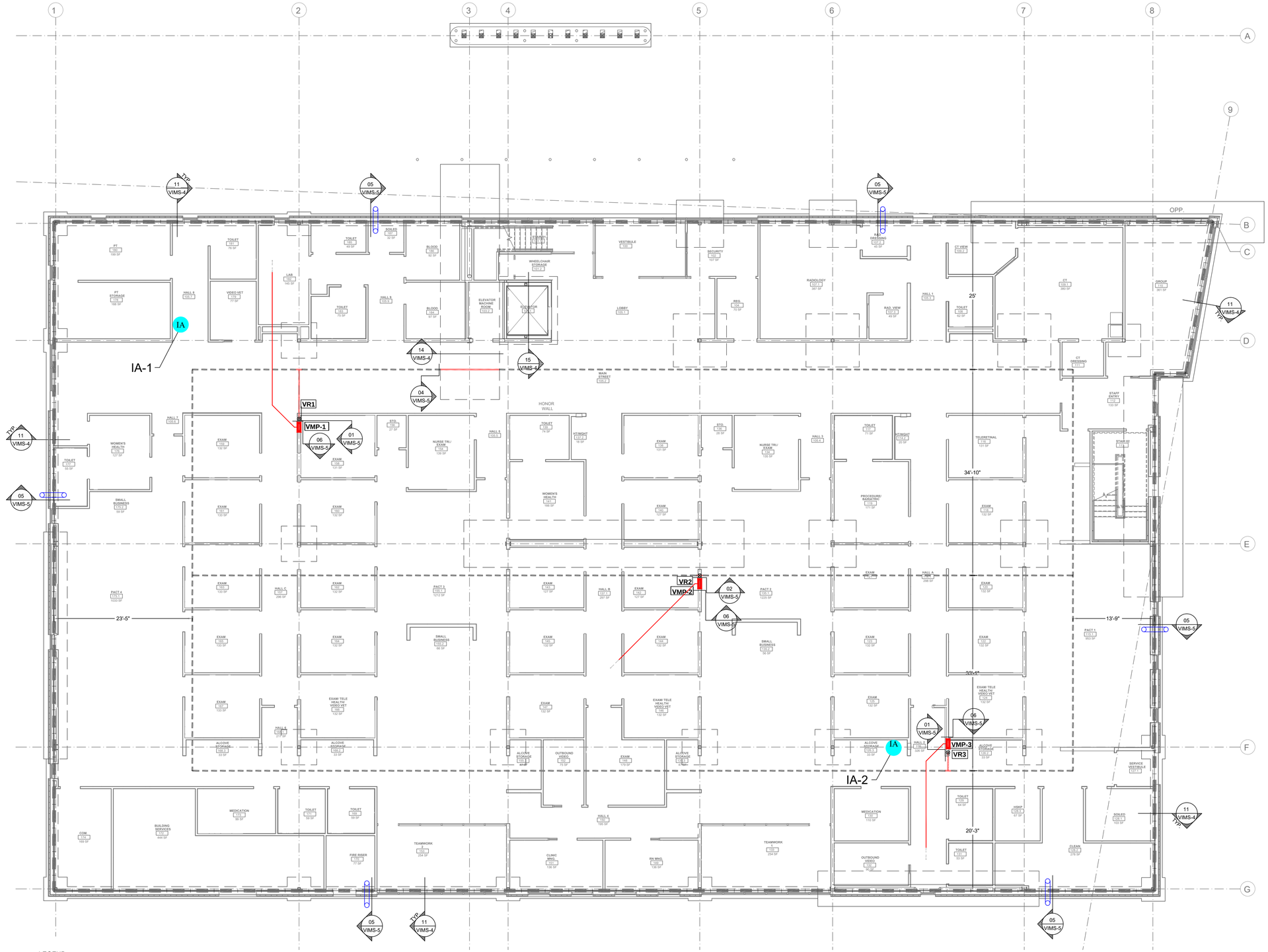
CURRENT BUILDINGS

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



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

N

8 0 2 4 8

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

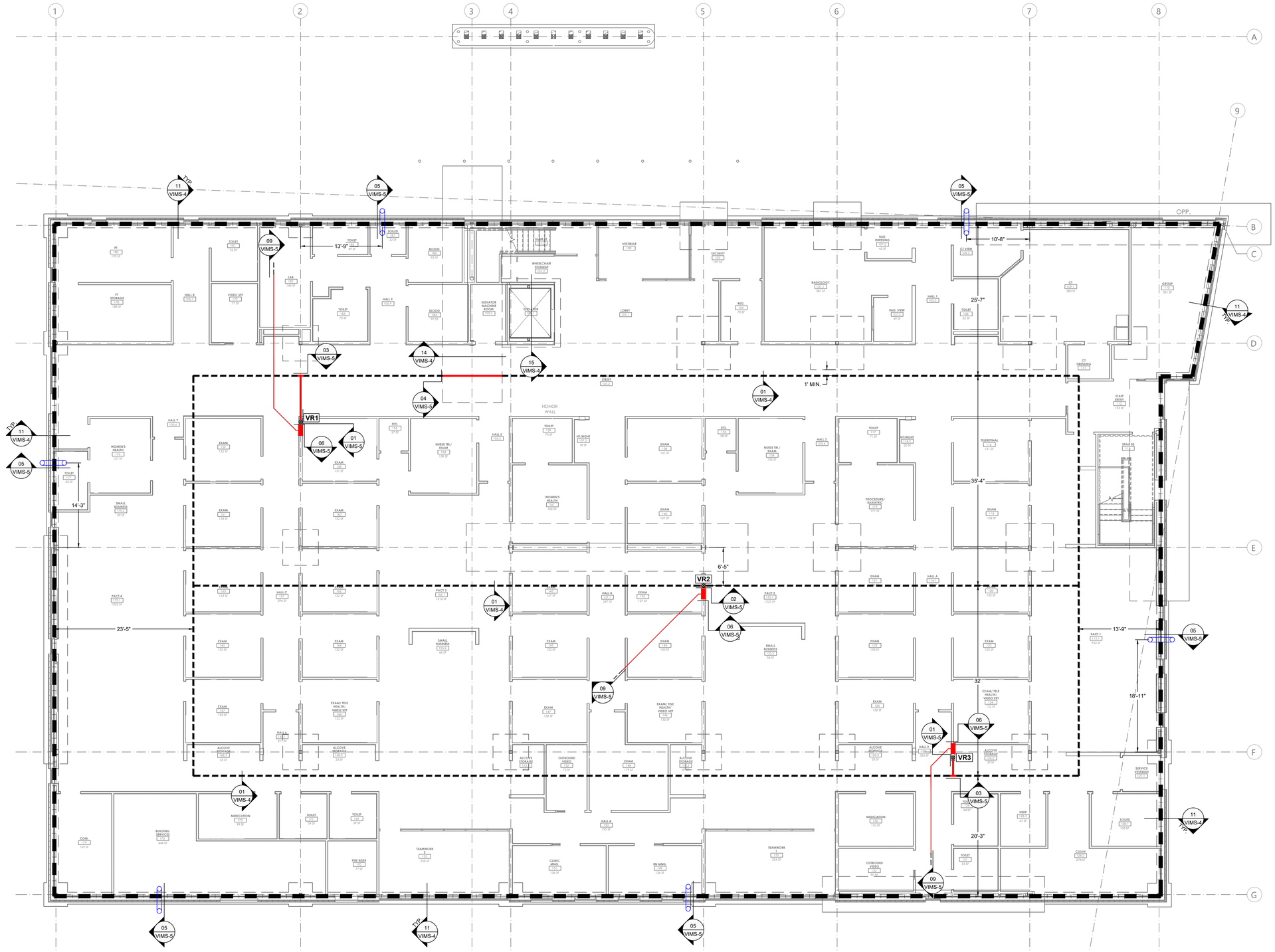
PH. (425) 771-3304 FAX. (425) 771-3549

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: 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

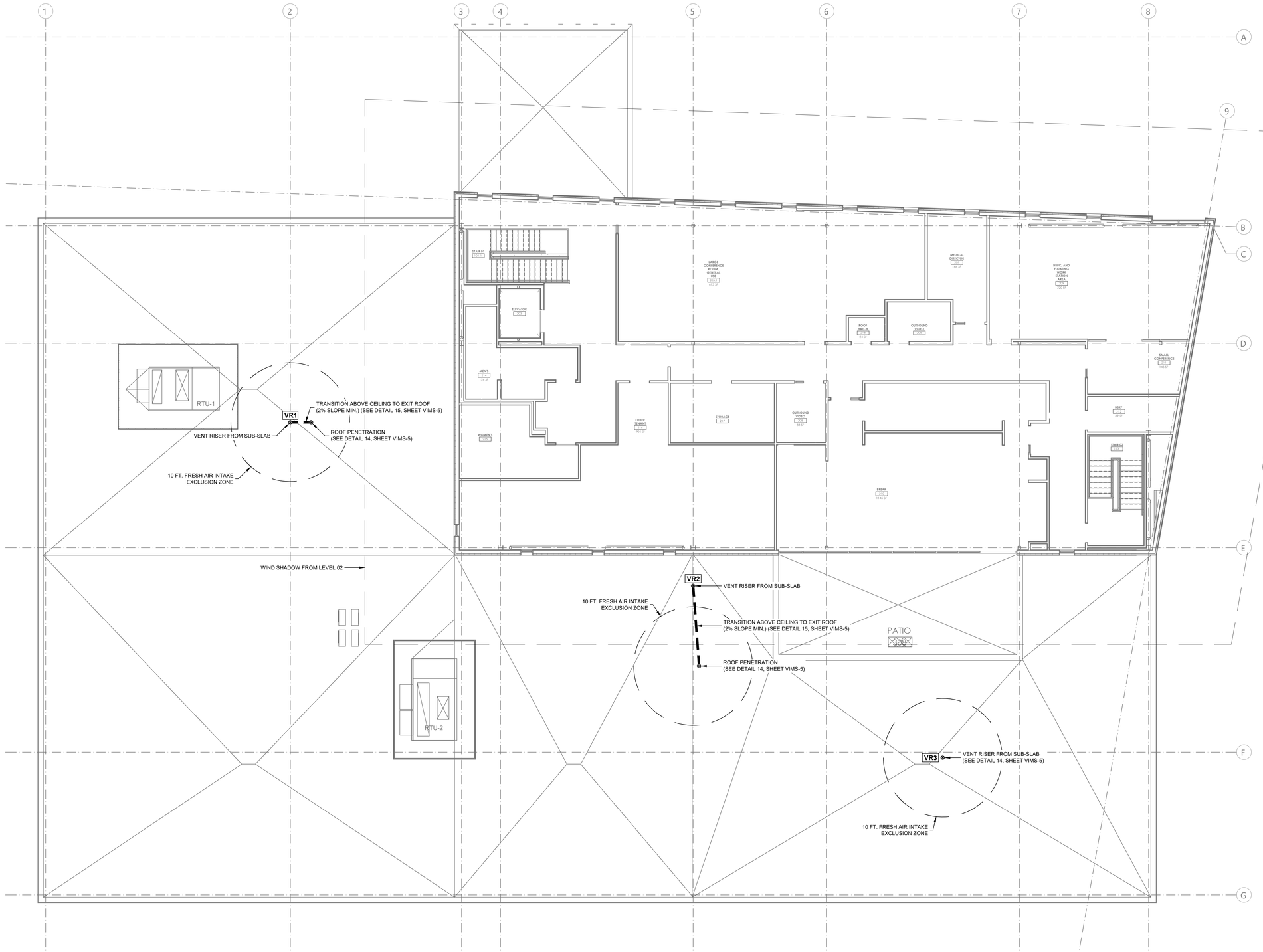
PROJECT: 2014

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:

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 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