Field Report

To:	Mark Nelson, Nelson Distributing, Inc.
Copies:	Dianne Conway, Gordon Thomas Honeywell LLP
From:	Kristin Anderson, Floyd Snider
Date:	September 20, 2023
Project No:	Nelson-Granite Falls
Re:	Field Report for MW-04 Area Additional Soil Excavation

Floyd | Snider oversaw excavation work at the former Nelson Distributing bulk-fuel facility (Nelson Petroleum Property) in Granite Falls, Washington on September 8, 2023. Excavation work was performed by Glacier Environmental Services. The purpose of the work was to remove remaining residual petroleum-contaminated soil from the vicinity of well MW-04, abutting excavation performed in 2021.

Prior excavation was completed on the Nelson Petroleum Property to remove petroleumcontaminated soil associated with the former bulk fuel facility in 2016. During this excavation, a buffer of native soil was left in place surrounding MW-04 to protect the well casing. Additional excavation to remove remaining petroleum-contaminated soil on the west-adjacent One Ballard Property was completed in 2021. This excavation was extended to the property line of the Nelson Petroleum Property and also did not damage or remove MW-04. The extents of the prior excavations and location of MW-04 were presented in a Remedial Excavation Summary to Ecology; a figure from that summary is provided as an attachment to report.

In response to a report documenting completion of the 2021 excavation, Ecology indicated that a No Further Action determination for the Nelson Petroleum Property would require a restrictive covenant to be placed on the property for the soil left in place surrounding MW-04 due to detected gasoline-range organics exceeding the cleanup level in a sample collected at 3 feet below ground surface (bgs) during well installation. Floyd|Snider proposed extending the property line excavation to remove this contaminated soil in lieu of a covenant, and Ecology provided email concurrence of this approach on May 24, 2023. Excavation was scheduled for September 2023 to occur during seasonal low water table conditions.

Site monitoring wells, including MW-04, were decommissioned by a licensed driller on September 5, 2023, prior to excavation. A safety meeting to discuss contaminated soil handling



was conducted prior to beginning ground-disturbing activities. Key photographs of site construction activities are provided as an attachment to this report.

Excavation was performed by removing the 1 to 2 feet of surface gravel beginning at the western property line of the Nelson Petroleum Property (approximately 2 feet west of MW-04), extending to the south, east and north of MW-04 until the 2016 excavation backfill was encountered on all sides of the well.

Quarry spalls comprising the 2016 backfill were encountered at the following distances from MW-04:

- 2 feet south of the well location
- 4 feet east of the well location
- 4 feet north of the well location

The dimensions of the native soil buffer on the Nelson Petroleum Property were generally consistent with, though slightly smaller than, the area assumed from previous excavation maps. The extents of excavated native soil and existing quarry spalls surrounding MW-04 are annotated on the attached map. Once the extents of the remaining native soil were delineated, the excavation was advanced to the target depth consistent with the approved excavation plan.

Native soil surrounding MW-04 exhibited petroleum odor and staining beginning at a depth of approximately 3 feet bgs. Petroleum odor was observed to a depth of approximately 6.5 feet bgs. Below 6.5 feet bgs, soils encountered were fine sand without odor or staining. Screening for volatiles was performed on excavated soil using a photoionization detector (PID). A maximum PID reading of 20 parts per million vapor (ppmv) was measured in soil with petroleum odor. Soil below 6.5 feet bgs had PID readings of 0.0 ppmv. Groundwater intrusion was encountered at approximately 5 feet bgs.

The excavation was advanced to a depth of 7.5 feet bgs, consistent with the base of the adjacent 2021 One Ballard Property excavation and approximately 1 foot below the deepest field indications of petroleum contamination observed. The depth of excavation was verified both by measuring from the ground surface with a tape measure and comparing against a pre-measured mark on the arm of the excavator. Excavated soils were stockpiled temporarily on-property in the order that they were removed, such that dry surface soils created a pad to receive deeper saturated soil. Saturated soils were additionally drained over the excavation to remove free water prior to stockpiling.

All contaminated soils and the surface soil immediately underlying the temporary stockpile were loaded to a truck operated by JDS trucking for off-site disposal. A total of 14.21 tons of soil were disposed as Class 3 petroleum-contaminated soil for thermal desorption at Iron Mountain Quarry (IMQ) landfill, a permitted disposal facility. Disposal records from IMQ are provided as an attachment to report. Imported gravel backfill from Iron Mountain Quarry matching the specifications of the 2021 backfill was placed in the excavation and compacted. Documentation of gravel backfill importation is also provided as an attachment to this report.

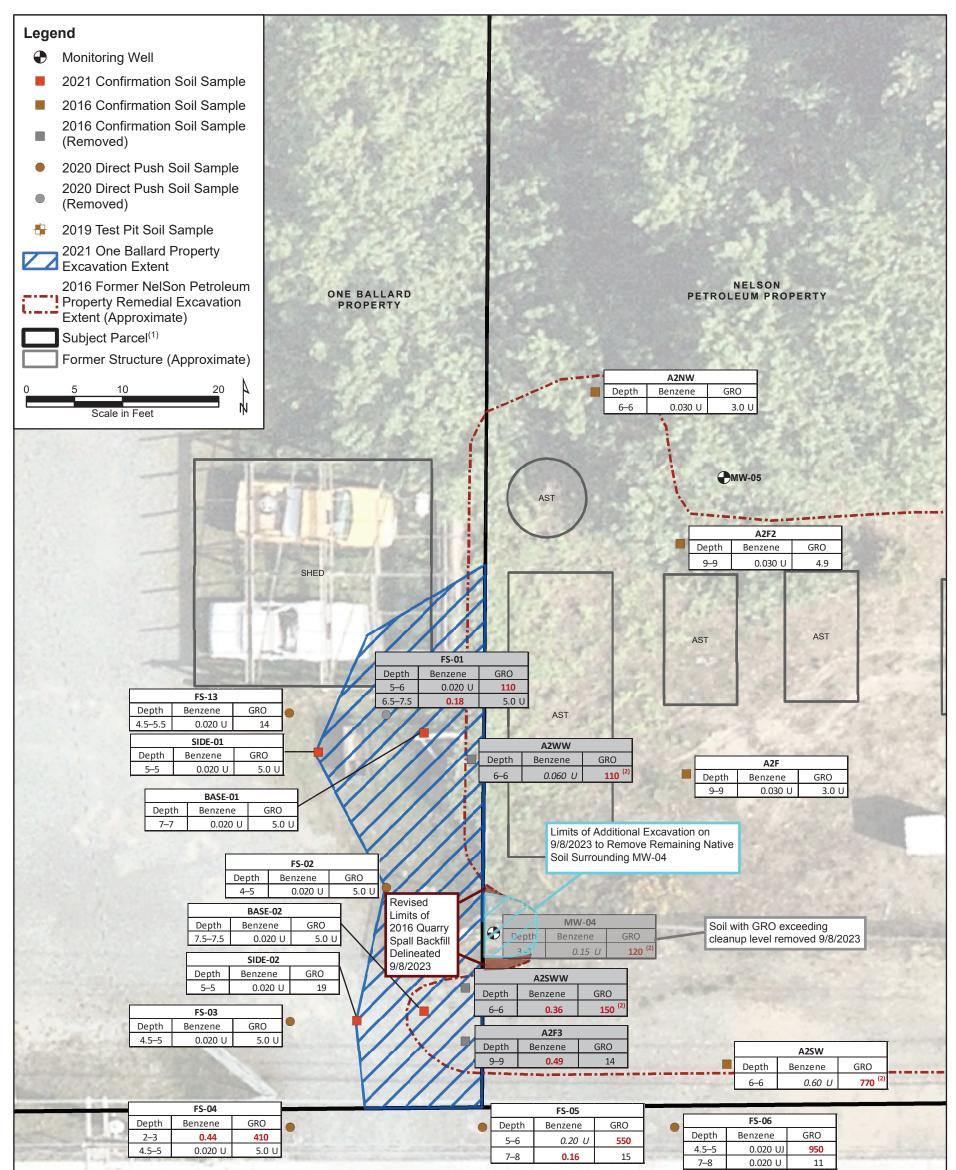
This Field Report documents removal of all remaining petroleum-contaminated soil on the Nelson Petroleum Property. The Ecology Environmental Information database has been updated to reflect removal of the previous soil sample at MW-04. No contaminated soil that would be subject to a restrictive covenant remains on-property.

LIST OF ATTACHMENTS

Attachment 1 MW-04 Excavation Map Markup

- Attachment 2 Key Photographs
- Attachment 3 Soil Disposal Documentation
- Attachment 4 Imported Backfill Documentation

Attachment 1 MW-04 Excavation Map Markup



17		FSTP-05 Depth Benzene GRO 4-4 0.020 U 170
 in the east and west and on parcel data from Snohomish County in the north and south. Sample contains highly weathered gasoline. Results shown in RED BOLD indicate a result that exceeds the MTCA Method A cleanup level for benzene (0.030 mg/kg) or GRO (30 mg/kg) <i>Italics</i> indicate a reporting limit that exceeds the applicable cleanup level. bgs = Below gr GRO = Gasoline. MTCA = Model mg/kg = Milligra Qualifiers: U = Analyte wa UJ = Analyte wa 	e-range organics Toxics Control Act ams per kilogram s not detected at the given reporting limit. as not detected at the given reporting ting limit is considered an estimate.	W STANLEY ST annotated with 2023 additional excavation details
FLOYD SNIDER strategy • science • engineering	One Ballard Property Remedial Excavation Summ NelSon Petroleum Propert Granite Falls, WA	Sample Summary

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Attachment 2 Key Photographs

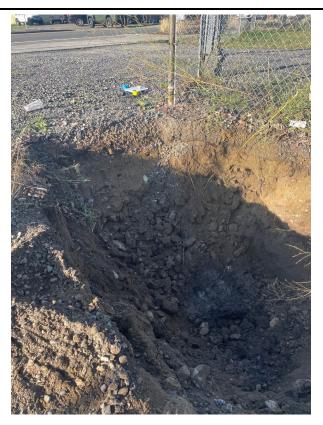


Photograph 1. MW-04 vicinity and property line fence (facing N)



Photograph 2. Surface soil removal from fence line to north, east and south (facing N)

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Photograph 3. 2016 excavation quarry spall backfill ~2 feet south of MW-04 (facing SW)



Photograph 4. 2016 excavation quarry spall backfill ~4 feet north and east of MW-04 (facing NE)

FLOYD | SNIDER strategy - science - engineering MW-04 Additional Excavation Nelson Petroleum Property Granite Falls, WA



Photograph 5. Excavation to 7.5 foot depth marker on excavator (facing W)



Photograph 6. Completed native soil excavation extent surrounding MW-04 (facing N)



MW-04 Additional Excavation Nelson Petroleum Property Granite Falls, WA



Photograph 7. Temporary contaminated soil stockpile and imported backfill (facing NE)



Photograph 8. Contaminated soil loaded for off-site disposal

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Photograph 9. Full removal of residual contaminated soil stockpile



Photograph 10. Excavation backfilled with gravel borrow

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Attachment 3 Soil Disposal Documentation

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Attachment 4 Imported Backfill Documentation

22121 17th Ave SE STE 117 Bothell, WA 98021 425-481-0999

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