

November 10, 2023

Beth Kercher Department of Ecology, Eastern Regional Office 4601 N Monroe Street, Spokane, WA 99205

Re: Work Plan for Additional Subject Property Investigation - DRAFT Wine Country Store, 7 East Rose Street, Walla Walla, WA Project No. 220442-A

Dear Beth:

Aspect Consulting (Aspect) has prepared this Work Plan on behalf of Stillwater Holdings, LLC to present the scope of work for completing additional investigation of their property located at 7 East Rose Street in Walla Walla, Washington (Subject Property), which operates as a Chevron-branded fuel station. A subsurface release of gasoline was identified in the vicinity of the Subject Property in September 2023. The Washington State Department of Ecology (Ecology) provided spill response actions to mitigate immediate hazards and evaluate the source of the gasoline, which was initially discovered in basement sumps of two nearby buildings. Based on the results of their evaluations, Ecology issued a letter to Stillwater Holdings, LLC, dated October 3, 2023, asking for immediate action to address the gasoline release. Initial investigation of the Subject Property included drilling for the evaluation of subsurface conditions, collection of soil samples for laboratory analysis, installation of groundwater monitoring wells, and gauging the monitoring wells for the presence of gasoline as light nonaqueous phase liquid (LNAPL). Additional investigation will be conducted on the Subject Property to further evaluate the suspected release from the underground storage tank (UST) system on the Subject Property

The objective of the additional investigation on the Subject Property described herein is to 1) identify if a release occurred from the UST system; and 2) collect data to further characterize the nature and extent of hazardous substances in soil and groundwater at concentrations exceeding applicable cleanup levels on the Subject Property. The work will be conducted in general accordance with the Model Toxics Control Act (MTCA) cleanup regulation, Chapter 173-340 of the Washington Administrative Code (WAC) and the UST Regulations, Chapter 173-360A WAC.

Project History

The Subject Property comprises 0.23 acres of commercial land located in downtown Walla Walla in Walla County, Washington that is developed and operated as a fuel station with a convenience store. The fuel station has three 10,000-gallon capacity, fiberglass USTs that were installed on November 15, 1981, and two fuel dispenser islands (ALLWEST, 2022¹). The USTs consist of two used for storage and distribution of gasoline and one for diesel. Historical records available from Ecology document a previous soil and groundwater cleanup at the Subject Property,

¹ ALLWEST, 2022, Phase I Environmental Site Assessment, Bill Singer's Chevron, 7 East Rose Street, Walla Walla, Washington, 99362, October 7, 2022.

identified at the time as Bill Singer's Chevron or Singer's Chevron, conducted between 2010 and 2013. In May 2013, Ecology issued a No Further Action determination for gasoline-range petroleum hydrocarbons in soil and groundwater with an Environmental Covenant that required maintenance of a surface cap over contaminated soil (Ecology, 2013²).

On September 14, 2023, petroleum-like odors were observed in the basement of the Marcus Whitman Hotel, located at 6 West Rose Street, across North 2nd Avenue from the Subject Property. Testing of air quality within the basement of the hotel identified elevated concentrations of volatile organic compounds (VOCs) and combustible gas concentrations at 93% of the Lower Explosive Limit (LEL) (Ecology, 2023³). Further investigation identified gasoline in two sumps and a vault in the hotel and in a sump in a vacant building located at 106 North 2nd Avenue, adjoining the Subject Property (106 Building). Elevated concentrations of VOCs and combustible gases were also measured in the 106 Building and in the U.S. Post Office building located on the north side of the 106 Building at 128 North 2nd Avenue (Ecology, 2023). Emergency response actions were implemented and included building ventilation and gasoline product recovery from building sumps.

Ecology investigated the source of the release through the collection and forensic analysis of product samples and advancement of exploratory soil borings (Ecology, 2023). The results of Ecology's investigation resulted in the October 3, 2023 letter, *Technical assistance regarding gasoline release from 7 E. Rose Street, Walla Walla*, to Wine Country Store, LLC c/o Ben Kleban from Sam Hunn, Regional Supervisor, Ecology Eastern Regional Office Spill Prevention, Preparedness, and Response Program, alleging that the source of the gasoline is the Subject Property and requesting that further investigation be completed to assess the full extent of contamination.

Previous Investigations

Aspect completed an initial subsurface investigation on the Subject Property in October and November 2023. The initial investigation consisted of installation and development of four groundwater monitoring wells (AMW-01 through AMW-04) and gauging of the wells for the presence of LNAPL and the depth to groundwater. The monitoring wells were gauged for the presence and thickness of LNAPL and the depth to groundwater following installation in late October and again in early November. The location of the wells is shown on Figure 1. The boring/well construction logs are provided as Appendix A.

One soil sample collected from each boring at the apparent top of the water table, as observed at the time of drilling, was submitted for laboratory analysis of gasoline-range petroleum hydrocarbons, benzene, toluene, ethylbenzene, and xylenes (BTEX). The laboratory analytical results are provided in Table 1 and the analytical report is provided in Appendix B. Gasoline-range petroleum hydrocarbons and two or more of the BTEX compounds were detected above MTCA Method A cleanup levels for unrestricted land use in soil samples collected at boring AMW-01 (located north of the dispensers beneath the western fuel island canopy), boring AMW-02 (located directly west of the existing tanks), and boring AMW-04 (located north of the tanks). Benzene was the only

² Environmental Covenant for Tax Parcel 360720574707 executed on May 13, 2013 between Bill D. & Loretta R. Singer and State of Washington, Department of Ecology.

³ Washington State Department of Ecology, 2023, Incident Briefing ICS 201-CG, Marcus Whitman Hotel Hazmat Response 091423, October 2, 2023.

analyzed contaminant detected above the MTCA Method A cleanup level in the soil sample collected from boring AMW-03, located at the southwest corner of the Subject Property.

Monitoring on the Subject Property (AMW-01 through AMW-04) and accessible off-Property wells (MW-5 through MW-9) were gauged for LNAPL and the depth to groundwater on October 18 and 19, 2023, and November 8, 2023. No measurable product was identified in the wells on the Subject Property (AMW-01 through AMW-04) or in off-property wells MW-7 through MW-9 (Table 2). LNAPL was measured in well MW-6 at thicknesses of 0.19 and 0.18 feet (Table 2). Groundwater levels measured at each well indicate localized groundwater flows to the southwest on the Subject Property and to the northwest in the Subject Property vicinity.

Groundwater sampling of monitoring wells AMW-01 through AMW-04 and MW-7 through MW-9 was conducted on November 8 and 9, 2023. MW-1 through MW-4 were not accessible without a right-of-way (ROW) permit, and MW-5 had a hard blockage at approximately 15 feet below top of casing. MW-1 was also noted to have a blockage at approximately 7 feet below top of casing, reportedly due to an incident with a vehicle during groundwater extraction activities conducted as part of initial spill response actions. Once a ROW permit is secured, the remaining undamaged wells will be sampled. Further investigation into the blockages at MW-1 and MW-5 will be conducted in the future.

Scope of Work

The scope of work described in this Work Plan for the Subject Property includes the following:

- Advancement of eight soil borings
- Installation and development of one groundwater monitoring well
- Collection and laboratory analysis of soil samples from the soil borings
- Collection and laboratory analysis of groundwater samples from the new Subject Property well⁴

The work is described in detail in the subsections below.

Locations

Eight borings (AB-01 through AB-07 and AMW-05) will be advanced on the Subject Property at the approximate locations shown on Figure 2. The final locations may be modified in the field at the time of drilling based on access limitations, including the presence of underground or overhead utilities. The boring locations were selected as follows:

- Borings AB-01 through AB-03 will be advanced on two sides of the existing UST pit.
- Borings AB-04 will be advanced along the fuel piping that connects the two fuel dispenser islands.

⁴ As described below, groundwater samples will be collected only if 0.1-foot or less of LNAPL is measured on groundwater in a well.

- Borings AB-05 and AMW-05 will be advanced near the fuel dispensers located beneath the eastern fuel island canopy. Boring AMW-05 will be completed as a groundwater monitoring well to evaluate groundwater quality downgradient of the UST pit.
- Borings AB-06 and AB-07 will be advanced near the fuel dispensers located beneath the western fuel island canopy.

The borings will be advanced to a depth of 5 feet below the top of the water table, as observed at the time of drilling, except for well AMW-05, which will be advanced to a depth of 20 feet below ground surface (bgs) for installation of a monitoring well. Groundwater has been measured in existing monitoring wells on the Subject Property at approximate depths of 11 to 15 feet bgs. Based on this information and the depth of contamination encountered during the initial investigation, the maximum total depth of the soil borings will be 20 feet. The monitoring well will be installed with a diameter and screen length appropriate for use as a recovery or extraction well, if determined through analysis to be appropriate as part of a cleanup action.

Drilling Methods, Soil Classification and Field Screening

Prior to drilling, each boring will be vacuum cleared of utilities to a depth of approximately 5 feet bgs. In addition, a public utility locate request will be submitted through the One-Call Utility Notification Center and a private locator will be contracted to clear the boring locations of any subsurface conductible utilities.

Each boring will be drilled using sonic drilling methods. Soil samples will be collected continuously in 5-foot intervals to the total depth of the exploration using a 3- to 4-inch diameter sampling core barrel inside an outer sonic drill casing. A field geologist will visually classify the soils in accordance with the ASTM International (ASTM) *Standard Practice for Description and Identification of Soils* (Visual-Manual Procedure), ASTM Method D2488 (ASTM, 2009⁵). In addition, the field geologist will screen each soil sample using a photoionization detector (PID) to monitor for the presence of VOCs.

A portion of the soil sample will be placed into a resealable plastic bag for headspace vapor screening. Ambient air will be captured in the bag; the bag will be sealed and then shaken gently to expose the soil to the air trapped in the bag. Vapors present within the sample bag's headspace will be measured by inserting the probe of a PID through a small opening in the bag, ensuring that the probe doesn't contact the soil. PID readings will be recorded on the boring logs. The soil descriptions, field screening results, PID readings, and other relevant details (e.g., staining, debris, odors, sheen, etc.) will be recorded on a boring log form.

Soil Sample Collection and Analysis

Soil samples will be collected from 2.5-foot intervals beginning at a depth of 5 feet bgs to the apparent top of the water table, as observed at the time of drilling, and at the bottom of the boring (5 feet below the water table) for potential chemical analytical testing. Up to two soil samples from above the water table in each boring will be submitted for laboratory analysis of gasoline-range petroleum hydrocarbons by NWTPH-Gx and benzene, toluene, ethylbenzene, and xylenes by EPA Method 8021. Soil samples will be selected for chemical analysis from intervals where field

⁵ ASTM, 2009, ASTM D2488-09a, Standard Practice for Description and Identification of Soils, ASTM International, West Conshohocken, PA, 2009.

screening results identify odors, staining, sheen, or volatile vapor concentrations above background levels. If field screening results do not suggest the presence of contamination in soil, the sample intervals will be selected based on sample recovery, classified soil type, and the depth at which contamination is most likely to be present (for example, at a depth of 10 feet bgs when evaluating for a potential release from the USTs or a depth of 5 feet bgs when evaluating for a potential release from product piping or fuel dispensers).

Well Construction

Monitoring well AMW-05 will be installed similarly to existing monitoring wells on the Subject Property, to a total depth of 20 feet bgs with 15 feet of screen. The monitoring well will be installed by a state-licensed, resource-protection well driller and in accordance with Chapter 173-160 WAC. An Aspect field geologist will oversee and document installation of each monitoring well, including completion of an As-Built Well Completion Diagram.

Well AMW-05 will be constructed as a 4-inch-diameter, threaded Schedule 40 PVC with 0.020inch slotted screen and blank casing above. An artificial filter pack consisting of 10/20 silica sand will be placed around the well screen, and a minimum 1.5-foot-thick annular bentonite seal will be placed above the filter pack. A concrete surface seal will be set at grade for each new monitoring well with a flush-mount steel monument. The well casing and monuments will be surveyed by a licensed surveyor into the existing well network to allow for the evaluation of groundwater flow direction and gradient.

Well Development

The monitoring well will be developed to remove fine-grained material from inside the well casing and filter pack, and to improve hydraulic communication between the well screen and the surrounding water-bearing formation. Well development will include a combination of surging across the well screen, pumping, and monitoring of turbidity. Surging will be completed by repeatedly raising and dropping a surge block across the length of the submerged screen to dislodge fine-grained material in the well screen and filter pack. A downhole submersible well-development pump will be used to purge groundwater until turbidity is reduced to minimal levels (below 10 nephelometric turbidity units [NTU] if practicable), or until a minimum of 10 casing volumes of water have been removed from the well.

Groundwater Monitoring and Sampling

No sooner than 48 hours following well development completion of AMW-05, a groundwater sample will be collected for laboratory analysis. Prior to groundwater purging and sampling at well AMW-05, all accessible wells located both on the Subject Property and in the surrounding city ROW will be gauged for the presence of LNAPL and the depth to groundwater. Prior to taking water level measurements, a downhole camera will be used to investigate the blockages in wells MW-1 and MW-5 to determine whether the monitoring wells are suitable for future groundwater monitoring and sampling, or if they need to be decommissioned. A ROW permit will be obtained from the City of Walla Walla to safely access the wells installed by others in the city ROW. The ROW permit will include traffic control plans to access each well. Existing monitoring wells that were not accessible for sampling without the ROW permit will be sampled at the same time as new well AMW-05.

Each accessible and suitable well will be opened and allowed to equilibrate to atmospheric pressure for at least 30 minutes prior to monitoring. The presence and thickness of LNAPL in each well will be gauged using a downhole product probe and the depth to water will be measured to the nearest 0.01-foot using a water level meter. Groundwater purging and sampling will be completed at wells where 0.1-foot or less of LNAPL is measured on groundwater.

Groundwater samples will be collected from the monitoring wells in accordance with the industry standard procedures for low-flow purging and sampling that are outlined in EPAs Low-Flow (Minimal Drawdown) Ground-water Sampling Procedures⁶, using a peristaltic pump with dedicated tubing with the tubing intake placed at the midpoint of the screened interval. Field parameters (temperature, pH, specific electrical conductance [conductivity], dissolved oxygen, oxidation-reduction potential [ORP], and turbidity) will be monitored using a YSI meter and flow-through cell, or equivalent, and field turbidimeter and recorded until they stabilize. Stabilization will be determined by three successive readings, taken 3 to 5 minutes apart, with \pm 0.1 for pH, \pm 3% for conductivity, \pm 10% for dissolved oxygen, \pm 10 millivolts for ORP, and \pm 10% for turbidity. At least five successive readings of field parameters will be taken during low-flow purging and recorded at each monitoring well. Once purging is complete, the groundwater samples will be collected using the same low-flow rate directly into laboratory-supplied sample containers.

Groundwater samples collected from the wells will be submitted for laboratory analysis of gasoline-range petroleum hydrocarbons by method NWTPH-Gx and BTEX by EPA Method 8021.

Data Compilation and Evaluation

The results of the additional Subject Property investigation will be summarized in data tables, figures depicting exploration locations and groundwater flow direction, and boring/well construction logs.

Limitations

Work for this project was performed for Stillwater Holdings, LLC (Client), and this letter was prepared in accordance with generally accepted professional practices for the nature and conditions of work completed in the same or similar localities, at the time the work was performed. This letter does not represent a legal opinion. No other warranty, expressed or implied, is made.

All reports prepared by Aspect Consulting for the Client apply only to the services described in the Agreement(s) with the Client. Any use or reuse by any party other than the Client is at the sole risk of that party, and without liability to Aspect Consulting. Aspect Consulting's original files/reports shall govern in the event of any dispute regarding the content of electronic documents furnished to others.

⁶ Puls, Robert W., and Barcelona, Michael J., Low-Flow (Minimal Drawdown) Ground-water Sampling Procedures, USEPA Office of Research and Development Ground Water Issue EPA/540/S-95/504, April 1996.

Project No. 230442-A

Sincerely,

Aspect consulting

DRAFT

Delia Massey, PE Project Engineer dmassey@aspectconsulting.com

DRAFT

Carla Brock, LHG Principal Geologist cbrock@aspectconsulting.com

Attachments:Table 1 – Soil Results
Table 2 – Groundwater Elevations and Product Measurements
Figure 1 – Site Map Showing Investigation Locations
Figure 2 – Proposed Investigation Locations on Chevron Property
Appendix A – Monitoring Well Logs
Appendix B – Analytical Laboratory Results

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TABLES

Table 1. Soil Results

Project No. 230442, Singer's Chevron, Walla Walla, Washington

	Sample Location Sample Date	AMW-1 10/19/2023	AMW-2 10/19/2023	AMW-3 10/19/2023	AMW-4 10/20/2023
	Depth ¹	15	10.5	14.5	10
	MTCA Method A Soil				
Analyte	Cleanup Level ²				
Total Petroleum Hydrocarbor	ns (TPH)				
Gasoline Range Organics	30	510	750	< 3.0 U	140
Volatile Organic Compounds	(VOC)				
Benzene	0.03	3.4	4.8	0.045	0.63
Ethylbenzene	6	7.7	11	0.021	1.5
m,p-Xylenes		32	46	0.079	7.5
o-Xylene		12	17	0.031	3.5
Total Xylenes	9	44	63	0.11	11
Toluene	7	35	46	0.075	6.3

Notes:

All results in milligrams per kilogram

Results in **bold** indicate the analyte was detected above the laboratory reporting limit

Results highlighted blue indicate an analyte was detected above the MTCA Method A cleanup level. "--" = not analyzed

¹All sample depths in feet below ground surface (bgs).

²Model Toxics Control Act (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Use.

U - Analyte not detected at or above Reporting Limit (RL) shown.

Table 2. Groundwater Elevations and Product Measurements

Project No. 230442, Singer's Chevron, Walla Walla, Washington

		Top of		Ton		Bottom		Depth to					
		Casing	Top of	Screen	Bottom of	Screen		Product	Depth to		GW		
Woll		Elevation	Screen (feet	Elevation	Scroon	Elovation		(feet below	Groundwater	Thickness of	Elevation		
Identification	Data Collected by		has) ²	(NAVD88)	(feet bas)		Data	TOC) ³	(feet hTOC)	Product (feet)			
City Right-of-Way	Wells	(1141000)	593)	(11,41,200)	(1001 093)	(11,11,000)	Date	100)	(1000)	r rouuer (reer)	(1141 000)		
ony regne-or-way	Ecology						9/21/23	nm	11.82	nm	939.95		
MW-1*	Ecology	951.77	7.50	944.27	22.50	929.27	10/9/23	nm	11.54	nm	940.23		
	Aspect			• • • • • • •	22.00		Monitoring w	ell blocked at ap	proximately 7 feet	bTOC			
	Ecology						9/21/23	nm	14.70	nm	937.81		
M/M/ 2*	Ecology	052 51	7.50	045.01	24.02	027 59	10/9/23	nm	14.43	nm	938.08		
10100-2	Aspect	952.51	7.50	945.01	24.95	927.50	10/17/23	NP	13.42	0.00	939.09		
	Aspect						10/18/23	NP	14.26	0.00	938.25		
	Ecology						9/21/23	nm	9.38	nm	942.39		
M\\/_3*	Ecology	951 77	7 50	944 27	24.83	926 94	10/9/23	nm	10.78	nm	940.99		
10100-0	Aspect	551.77	7.50	544.27	24.00	520.54	10/17/23	NP	10.53	0.00	941.24		
	Aspect						10/18/23	NP	10.62	0.00	941.15		
M\\/_4*	Ecology	950.50	7 50	943.00	22.50	928 00	9/21/23	nm	NA	nm	NA		
10100-4	Ecology	550.50	1.00	340.00	22.50	520.00	10/9/23	nm	11.54	nm	938.96		
	Ecology			945 50	24 77		9/24/23	nm	12.46	nm	940.54		
	Ecology						10/9/23	12.43	12.45	0.02	940.55		
MM/-5	Aspect	953.00	7 50			028.23	10/17/23	NP	12.20	0.00	940.80		
	Aspect	333.00	7.50	343.30	24.11	320.25	10/18/23	NP	12.16	0.00	940.84		
	Aspect						11/8/23	NP	11.40	0.00	941.60		
	Aspect						Monitoring w	ell blocked at ap	proximately 15 fee	et bTOC			
	Ecology								9/24/23	nm	14.50	nm	939.56
	Ecology		7.50	946.56	24.13	929.93	10/9/23	11.33	12.88	1.55	941.18		
MW-6*	Aspect	954.06					10/17/23	10.85	11.07	0.22	943.15		
	Aspect						10/18/23	10.83	11.02	0.19	943.18		
	Aspect						11/8/23	9.55	9.73	0.18	944.46		
M/M/_7	Aspect	051.82	10.00	0/1 82	25.00	026.82	10/18/23	NP	15.37	0.00	936.45		
10100-7	Aspect	551.02	10.00	341.02	20.00	520.02	11/8/23	NP	14.22	0.00	937.60		
M\\\/_8	Aspect	954 95	10.00	944 95	25.00	929 95	10/18/23	NP	16.3	0.00	938.65		
10100-0	Aspect	334.33	10.00	344.33	23.00	323.33	11/8/23	NP	12.97	0.00	941.98		
M/M/-Q	Aspect	054 87	10.00	044.87	25.00	020.87	10/17/23	NP	13.12	0.00	941.75		
10100-5	Aspect	334.07	10.00	344.07	23.00	323.07	11/8/23	NP	11.06	0.00	943.81		
Chevron Property	Wells						-	-	-				
AMW-1	Aspect	953 65	5.00	948 65	20.00	933 65	10/19/23	NP	12.91	0.00	940.74		
7.0000 1	Aspect	000.00	0.00	010.00	20.00	000.00	11/8/23	NP	11.81	0.00	941.84		
AMW-2	Aspect	954 51	5.00	949 51	20.00	934 51	10/19/23	NP	13.91	0.00	940.60		
,	Aspect	001.01	0.00	5-10.01	20.00	001.01	11/8/23	NP	12.29	0.00	942.22		
AMW-3	Aspect	953 74	5.00	948 74	20.00	933 74	10/19/23	NP	14.85	0.00	938.89		
/\\\\\-0	Aspect	555.14	0.00	948.74	20.00	555.14	11/8/23	NP	14.12	0.00	939.62		
AM\\/-4	Aspect	955 18	5.00	950 18	20.00	935 18	10/20/23	NP	12.03	0.00	943.15		
7	Aspect	000.10	0.00	500.10	20.00	000.10	11/8/23	NP	11.40	0.00	943.78		

Notes:

Ecology data as reported to Aspect on 10/9/2023 by Clean Harbors

* = well located in active traffic lane

nm = indicates measurement not taken

NP = No Product measured in well

Bold - indicates groundwater elevation corrected for product depression using a specific gravity for gasoline of 0.745

¹Elevations in feet relative to the North American Vertical Datum of 1988 (NAVD88)

²Depth in feet below ground surface (bgs)

³Depth to product and groundwater measured in feet below the top of casing (bTOC)

FIGURES





PROJECT NO

230442

REVISED BY: CEB / RAP

1





A snect	NOV-2023	DIM / NLK	FIGURE NO.
	PROJECT NO.	REVISED BY:	2
CONSULTING	230442	CEB / RAP	

APPENDIX A

Monitoring Well Logs

No. 200 Sieve	an 50% ¹ of Coarse Fraction d on No. 4 Sieve	≤5% Fines		GW	Well-graded GRAVEL Well-graded GRAVEL WITH SAND Poorly-graded GRAVEL Poorly-graded GRAVEL WITH SAND	MC=Natural Moisture Content PSGEOTECHNICAL LAB TESTSPS=Particle Size Distribution FCEFC=Fines Content (% < 0.075 mm) GHHydrometer TestAL=Hydrometer Test Limits C=C=Consolidation Test StrStrength TestOC=Organic Content (% Loss by Ignition) Comp=Proctor Test K=Hydraulic Conductivity TestSG=Specific Gravity Test
ined on	Aore tha Retainec	Fines		GM	SILTY GRAVEL SILTY GRAVEL WITH SAND	Organic Chemicals CHEMICAL LAB TESTS
50%1 Retai	Gravels - N	≧15%		GC	CLAYEY GRAVEL CLAYEY GRAVEL WITH SAND	TPH-Dx = Diesel and Oil-Range Petroleum Hydrocarbons TPH-G = Gasoline-Range Petroleum Hydrocarbons VOCs = Volatile Organic Compounds SVOCs = Semi-Volatile Organic Compounds
- More than	e Fraction	Fines		SW	Well-graded SAND Well-graded SAND WITH GRAVEL	PAHs = Polycyclic Aromatic Hydrocarbon Compounds PCBs = Polychlorinated Biphenyls <u>Metals</u> RCRA8 = As, Ba, Cd, Cr, Pb, Hg, Se, Ag, (d = dissolved, t = total)
ed Soils	of Coars 4 Sieve	≦5%		SP	Poorly-graded SAND Poorly-graded SAND WITH GRAVEL	MTCA5 = As, Cd, Cr, Hg, Pb (d = dissolved, t = total) PP-13 = Ag, As, Be, Cd, Cr, Cu, Hg, Ni, Pb, Sb, Se, Tl, Zn (d=dissolved, t=total)
Coarse-Grain	50% ¹ or More Passes No.	Fines		SM	SILTY SAND SILTY SAND WITH GRAVEL	PID = Photoionization Detector FIELD TESTS Sheen = Oil Sheen Test SPT ² SPT ² = Standard Penetration Test NSPT = Non-Standard Penetration Test DCPT = Dynamic Cone Penetration Test
	Sands -	≧15%		sc	CLAYEY SAND CLAYEY SAND WITH GRAVEL	Descriptive Term BouldersSize Range and Sieve Number Larger than 12 inchesCOMPONENT DEFINITIONSCobbles=3 inches to 12 inchesDEFINITIONS
) Sieve	lys Par F0%			ML	SILT SANDY or GRAVELLY SILT SILT WITH SAND SILT WITH GRAVEL	Coarse Gravel = 3 incres to 3/4 incres Fine Gravel = 3/4 incres to No. 4 (4.75 mm) Coarse Sand = No. 4 (4.75 mm) to No. 10 (2.00 mm) Medium Sand = No. 10 (2.00 mm) to No. 40 (0.425 mm) Fine Sand = No. 40 (0.425 mm) to No. 200 (0.075 mm)
s No. 200	s and Cla			CL	LEAN CLAY SANDY or GRAVELLY LEAN CLAY LEAN CLAY WITH SAND LEAN CLAY WITH GRAVEL	Silt and Clay = Smaller than No. 200 (0.075 mm) % by Weight Modifier % by Weight Modifier ESTIMATED ¹ (1) - <
lore Passe	Silt			OL	ORGANIC SILT SANDY or GRAVELLY ORGANIC SILT ORGANIC SILT WITH SAND	<1 = Subtrace 15 to 25 = Little PERCENTAGE 1 to <5 = Trace 30 to 45 = Some 5 to 10 = Few >50 = Mostly Dry = Absence of maisture ducty doubt to the touch MOISTURE
ils - 50%1 or M	ys More			мн	ELASTIC SILT WITH GRAVEL ELASTIC SILT SANDY OF GRAVELLY ELASTIC SILT ELASTIC SILT WITH SAND ELASTIC SILT WITH GRAVEL	Slightly Moist = Perceptible moisture, disty, diry to the tottor CONTENT Moist = Damp but no visible water CONTENT Very Moist = Water visible but not free draining Very below water table
Grained Soi	lits and Cla			СН	FAT CLAY SANDY or GRAVELLY FAT CLAY FAT CLAY WITH SAND FAT CLAY WITH GRAVEL	Non-Cohesive or Coarse-Grained SoilsRELATIVE DENSITYDensity³SPT² Blows/FootPenetration with $1/2"$ Diameter RodVery Loose= 0 to 4 $\geq 2'$ Very Loose= 0 to 4 $\geq 1000000000000000000000000000000000000$
Fine-(S Listing	Liquid		он	ORGANIC CLAY SANDY or GRAVELLY ORGANIC CLAY ORGANIC CLAY WITH SAND ORGANIC CLAY WITH GRAVEL	Loose = 5 to 10 1' to 2' Medium Dense = 11 to 30 3" to 1' Dense = 31 to 50 1" to 3" Very Dense = > 50 < 1"
Highly	Organic Soils			PT	PEAT and other mostly organic soils	Cohesive or Fine-Grained Soils CONSISTENCY Consistency³ SPT² Blows/Foot Manual Test Very Soft = 0 to 1 Penetrated >1" easily by thumb. Extrudes between thumb & fingers. Soft = 2 to 4 Penetrated 1/4" to 1" easily by thumb. Easily molded. Medium Stiff = 5 to 8 Penetrated 21/4" with effort by thumb. Molded with strong pressure
"WITH SILT name; e.g. GRAVEL" r gravel. • "	T" or "WITF , SP-SM ● neans 15 1 Well-grade	I CLA "SILT to 30 d" m	NY" means IY" or "CL % sand a leans app	5 to 15% AYEY" me nd gravel roximatel	6 silt and clay, denoted by a "." in the group srans >15% silt and clay • "WITH SAND" or "WITH • "SANDY" or "GRAVELLY" means >30% sand and y equal amounts of fine to coarse grain sizes • "Poorly	Stiff=9 to 0Foldaded $\sim 1/4$ with effort by thumb.Very Stiff=16 to 30Indented $\sim 1/4$ " with effort by thumb.Hard=> 30Indented with difficulty by thumbnail.
graded" m contains la Soils were ASTM D24 laboratory	eans unec ayers of the described 88. Where tests as a	and and indi	amounts o soil types identified cated in t priate. Ref	of grain si s; e.g., SM I in the fie he log, so fer to the	zes • Group names separated by "/" means soil //ML. id in general accordance with the methods described in ils were classified using ASTM D2487 or other report accompanying these exploration logs for details.	Observed and Distinct Observed and Gradual Inferred
,					-	

Aspect

10.0.0

Estimated or measured percentage by dry weight
 (SPT) Standard Penetration Test (ASTM D1586)
 Determined by SPT, DCPT (ASTM STP399) or other field methods. See report text for details.

Exploration Log Key











	Λ	~ ~		~1			Singe	ers Chev	ron - 23044	2		Monitoring V	Vell Log	
		Þ	ビ	U			Projec	ct Address & Site	e Specific Location			Coordinates (Lat,Lon WGS84)	Exploration Num	ber
		ONS Contra		ING	Fau	inme	Walla V	Valla, Washir	ngton, 27 N 2nd St Sampling Metho	i nd		46.0674, -118.3400 Ground Surface Elev. (NAVD88)	- MW-8	}
	Wee	otorn	State		Equi	robo	051010		Crob	<i>i</i> u			Ecology Well Tag	g No.
	vves	Opera	ator	:5	Exploration	n Me	thod(s)	' 	Grad Work Start/Completion	n Dates		Top of Casing Elev (NAVD88)	BPQ 389 Depth to Water (Belo	ow GS)
	۵۱۵	x Mr	 Cann	'n	S	nic	alou(o)		10/18/2023	. 2 4.00		954 95'	16 3' (Static))
Depth	Elev.		Expl	oration N	lotes and	San	nple Sam	Analytical	Field Tests	Materia		Description	10.0 (Otatio)	Dept
(feet)	(feet) 955) N -		8" Flus		Тур	e/ID L	Lab Test(s)		Туре	Brick s	idewalk		(ft)
	955 955 957 950 950 950 950 950 950 950 950			8" Flus traffic-ra in conc 4" sche 3/8" ber #12 (10 sand	dule 40 PVC in ated monument ete -20) silica -20) silica -20) silica (2023 (10-slot) 4" e 40 PVC in sand (2023 (2023) (2023) (2023) (2023)				PID=2.2 ppm Sheen=NS PID=3.5 ppm Sheen=NS PID=3.8 ppm Sheen=NS PID=1.3 ppm Sheen=NS PID=5.3 ppm Sheen=NS PID=2.8 ppm Sheen=NS PID=2.9 ppm Sheen=NS PID=2.3 ppm Sheen=NS PID=1.4 ppm Sheen=NS PID=3.3 ppm Sheen=NS PID=3.5 ppm Sheen=NS PID=3.0 ppm Sheen=NS	$\begin{array}{c c c c c c c c c c c c c c c c c c c $	Brick s GRAVI brown; f vounded SILT V plasticity pieces of GRAVI moist, b fine to c becom SILTY gravel; f coarse s bgs SILTY coarse r	idewalk EL WITH SILT AND SAND (GW ine to coarse subrounded to rou cobbles; fine to coarse sand. VITH GRAVEL (ML); slightly mo ; fine to coarse subrounded gra bserved. EL WITH SILT AND SAND (GW rown; fine to coarse subangular oarse sand. es gray at 7.5 ft bgs GRAVEL (GM); very moist, darl ine to coarse subrounded to rou sand. es wet and dark brown with yelk GRAVEL (GM); very moist, darl ounded gravel; fine to coarse sa of exploration at 25 ft. bgs. o sheen or hydrocarbon-like odo out.	/-GM); moist, dark nded gravel; ist, brown; low vel; broken PVC /-GM); slightly to rounded gravel; to rounded gravel; to rounded gravel; fine to pw cobbles at 17 ft c brown; fine to and.	- 5 - 10 - 15 - 20 - 25
	+													+
Sample		geno	tt				Water Level	¥ Static W ∑ Water Le	ater Level		See Explo of symbo Logged b Approved	oration Log Key for explanation ls by: DRB d by: Carla Brock	Exploration Log MW-8 Sheet 1 of 1	on



APPENDIX B

Analytical Laboratory Results



November 2, 2023

Ms. Carla Brock Aspect Consulting, LLC 710 - 2nd Ave, Suite 550 Seattle, WA 98104

Dear Ms. Brock,

On October 24th, 10 samples were received by our laboratory and assigned our laboratory project number EV23100126. The project was identified as your 230442. The sample identification and requested analyses are outlined on the attached chain of custody record.

No abnormalities or nonconformances were observed during the analyses of the project samples.

Please do not hesitate to call me if you have any questions or if I can be of further assistance.

Sincerely,

ALS Laboratory Group

Rob Greer Laboratory Director

Page 1
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CERTIFICATE OF ANALYSIS

CLIENT:	Aspect Consulting 710 - 2nd Ave, Sui Seattle, WA 98104	, LLC te 550 I	DATE: 11/2/2023 ALS JOB#: EV23100126 ALS SAMPLE#: EV23100126-04				
	Carla Brock			I ECTION DATE	10/24/20	723 0:40:00	ΔΝΛ
CLIENT SAMPLE ID	AMW-1-15.0		WDOE AG	CCREDITATION:	C601	525 9.40.00	
		SAMPLE	DATA RESULTS				
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS / DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	510	30	10	MG/KG	10/30/2023	DLC
Benzene	EPA-8260	3400	20	1	UG/KG	10/30/2023	DLC
Toluene	EPA-8260	35000	120	10	UG/KG	10/30/2023	DLC
Ethylbenzene	EPA-8260	7700	170	10	UG/KG	10/30/2023	DLC
m,p-Xylene	EPA-8260	32000	340	10	UG/KG	10/30/2023	DLC
o-Xylene	EPA-8260	12000	210	10	UG/KG	10/30/2023	DLC
SUPPOCATE	METHOD	%PEC				ANALYSIS DATE	ANALYSIS BY
		/81CEC				40/00/0000	
TET 10X DIJUTION	NWTPH-GX	180 GS2				10/30/2023	DLC
Toluene-d8	EPA-8260	86.0				10/30/2023	DLC
Toluene-d8 10X Dilution	EPA-8260	99.9				10/30/2023	DLC

GS2 - Surrogate outside of control limits due to dilution.

Chromatogram indicates that it is likely that sample contains lightly weathered gasoline.

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		CERTIFIC	ATE OF ANALYSIS						
CLIENT:	Aspect Consulting 710 - 2nd Ave, Sui Seattle, WA 98104	LLC te 550		DATE: ALS JOB#: ALS SAMPLE#:					
CLIENT CONTACT: CLIENT PROJECT: CLIENT SAMPLE ID	Carla Brock 230442 AMW-2-10.5		D, COLI WDOE AC	DATE RECEIVED: COLLECTION DATE: WDOF ACCREDITATION			10/24/2023 10/19/2023 12:45:00 PM C601		
		SAMPLE	DATA RESULTS						
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS / DATE	ANALYSIS BY		
TPH-Volatile Range	NWTPH-GX	750	30	10	MG/KG	10/30/2023	DLC		
Benzene	EPA-8260	4800	180	10	UG/KG	10/30/2023	DLC		
Toluene	EPA-8260	46000	220	20	UG/KG	10/31/2023	DLC		
Ethylbenzene	EPA-8260	11000	150	10	UG/KG	10/30/2023	DLC		
m,p-Xylene	EPA-8260	46000	300	10	UG/KG	10/30/2023	DLC		
o-Xylene	EPA-8260	17000	190	10	UG/KG	10/30/2023	DLC		
						ANALYSIS	ANALYSIS		
SURROGATE	METHOD	%REC				DATE	BY		
TFT 10X Dilution	NWTPH-GX	290 GS2				10/30/2023	DLC		
Toluene-d8 10X Dilution	EPA-8260	90.9				10/30/2023	DLC		
Toluene-d8 20X Dilution	EPA-8260	99.7				10/31/2023	DLC		

GS2 - Surrogate outside of control limits due to dilution. Chromatogram indicates that it is likely that sample contains lightly weathered gasoline.

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		CERTIFIC	ATE OF ANALYSIS						
CLIENT:	Aspect Consulting 710 - 2nd Ave, Sui Seattle, WA 98104	, LLC te 550 I		DATE: ALS JOB#: ALS SAMPLE#:			11/2/2023 EV23100126 EV23100126-07		
CLIENT CONTACT: CLIENT PROJECT: CLIENT SAMPLE ID	Carla Brock 230442 AMW-3-14 5		DA COLI WDOF AC	DATE RECEIVED: COLLECTION DATE:			10/24/2023 10/19/2023 6:05:00 PM C601		
		SAMPLE	DATA RESULTS		0001				
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY		
TPH-Volatile Range	NWTPH-GX	U	3.0	1	MG/KG	10/30/2023	DLC		
Benzene Toluene	EPA-8260 EPA-8260	45 75	17 10	1 1	UG/KG UG/KG	10/30/2023 10/30/2023	DLC DLC		
Ethylbenzene m,p-Xylene	EPA-8260 EPA-8260 EPA-8260	21 79 31	14 27 17	1 1	UG/KG UG/KG	10/30/2023 10/30/2023			
SURROGATE	METHOD	%REC		I	00/10	ANALYSIS J	ANALYSIS BY		
TFT	NWTPH-GX	82.7				10/30/2023	DLC		
Toluene-d8	EPA-8260	96.2				10/30/2023	DLC		

U - Analyte analyzed for but not detected at level above reporting limit.

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		CERTIFIC	ATE OF ANALYSIS						
CLIENT:	Aspect Consulting 710 - 2nd Ave, Sui Seattle, WA 98104	, LLC te 550		DATE: ALS JOB#: ALS SAMPLE#:					
CLIENT CONTACT: CLIENT PROJECT: CLIENT SAMPLE ID	Carla Brock 230442 AMW-4-10.0		D, COLI WDOE AC	DATE RECEIVED: COLLECTION DATE: WDOE ACCREDITATION:			10/24/2023 10/20/2023 8:20:00 AM C601		
		SAMPLE	DATA RESULTS						
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY		
TPH-Volatile Range	NWTPH-GX	140	30	10	MG/KG	10/30/2023	DLC		
Benzene Toluene	EPA-8260 EPA-8260	630 6300	8.8 100	1 10	UG/KG UG/KG	10/30/2023 10/30/2023	DLC DLC		
Ethylbenzene m,p-Xylene	EPA-8260 EPA-8260	1500 7500	10 200	1 10	UG/KG UG/KG	10/30/2023 10/30/2023	DLC		
o-Xylene	EPA-8260	3500	100	10	UG/KG	10/30/2023	DLC		
SURROGATE	METHOD	%REC				ANALYSIS DATE	ANALYSIS BY		
TFT 10X Dilution	NWTPH-GX	84.9				10/30/2023	DLC		
Toluene-d8 10X Dilution Toluene-d8	EPA-8260 EPA-8260	97.3 93.1				10/30/2023 10/30/2023	DLC DLC		

Chromatogram indicates that it is likely that sample contains lightly weathered gasoline.

Page 5 ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 98208 PHONE 425-356-2600 FAX 425-356-2626 ALS Group USA, Corp dba ALS Environmental

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CERTIFICATE OF ANALYSIS

CLIENT:	Aspect Consulting, LLC	DATE:	11/2/2023
	710 - 2nd Ave, Suite 550	ALS SDG#:	EV23100126
	Seattle, WA 98104	WDOE ACCREDITATION:	C601
CLIENT CONTACT:	Carla Brock		
CLIENT PROJECT:	230442		

LABORATORY BLANK RESULTS

MBG-103023S - Batch 202748 - Soil by NWTPH-GX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	MG/KG	3.0	10/30/2023	DLC
U - Analyte analyzed for but	not detected at level above rep	porting limit.				
MB-103023S - Batch 20	02842 - Soil by EPA-	8260				
				REPORTING	ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS	UNITS	LIMITS	DATE	BY
Benzene	EPA-8260	U	UG/KG	5.0	10/30/2023	DLC
Toluene	EPA-8260	U	UG/KG	10	10/30/2023	DLC
Ethylbenzene	EPA-8260	U	UG/KG	10	10/30/2023	DLC
m,p-Xylene	EPA-8260	U	UG/KG	20	10/30/2023	DLC
o-Xylene	EPA-8260	U	UG/KG	10	10/30/2023	DLC

U - Analyte analyzed for but not detected at level above reporting limit.

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CERTIFICATE OF ANALYSIS

CLIENT:	Aspect Consulting, LLC 710 - 2nd Ave, Suite 550
	Seattle, WA 98104
CLIENT CONTACT:	Carla Brock
CLIENT PROJECT:	230442

ALS SDG#: WDOE ACCREDITATION:

DATE:

11/2/2023 EV23100126 C601

LABORATORY CONTROL SAMPLE RESULTS

ALS Test Batch ID: 202748 - Soil by NWTPH-GX

					LIM	ITS	ANALYSIS	ANALYSIS BY
SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	MIN	MAX	DATE	
TPH-Volatile Range - BS	NWTPH-GX	101			66.5	122.7	10/30/2023	DLC
TPH-Volatile Range - BSD	NWTPH-GX	102	1		66.5	122.7	10/30/2023	DLC

ALS Test Batch ID: 202842 - Soil by EPA-8260

	····, -···			LIM	ITS	ANALYSIS	ANALYSIS BY	
SPIKED COMPOUND	METHOD	%REC	RPD QUAL	MIN	MAX	DATE		
Benzene - BS	EPA-8260	115		75	138	10/30/2023	DLC	
Benzene - BSD	EPA-8260	110	4	75	138	10/30/2023	DLC	
Toluene - BS	EPA-8260	115		71.6	122.1	10/30/2023	DLC	
Toluene - BSD	EPA-8260	110	5	71.6	122.1	10/30/2023	DLC	
Ethylbenzene - BS	EPA-8260	110		50	150	10/30/2023	DLC	
Ethylbenzene - BSD	EPA-8260	104	5	50	150	10/30/2023	DLC	
m,p-Xylene - BS	EPA-8260	111		50	150	10/30/2023	DLC	
m,p-Xylene - BSD	EPA-8260	105	6	50	150	10/30/2023	DLC	
o-Xylene - BS	EPA-8260	117		50	150	10/30/2023	DLC	
o-Xylene - BSD	EPA-8260	112	5	50	150	10/30/2023	DLC	

APPROVED BY

Rob Greer Laboratory Director

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FAX 425-356-2626

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*Turnaround request less than standard mav incur Rush Charges

ALS ENVIRONMENTAL Sample Receiving Checklist

Client: ASPECT CONSULTING ALS	S Job #: _	EV23	100120	0
Project: 230 442				
Received Date: 10-24-23 Received Time: 1345		Ву: _	AHF	
Type of shipping container: Cooler \times Box O	Other			
Shipped via: FedEx Ground UPS Mail FedEx Express	Courier _	ALS X	Hand Deliv	vered
Were custody seals on outside of shipping container? If yes, how many? Where? Custody seal date: Seal name:		Yes	<u>No</u>	<u>N/A</u>
Was Chain of Custody properly filled out (ink, signed, dated, etc.)	?	×		
Did all bottles have labels?		\times		
Did all bottle labels and tags agree with Chain of Custody?		<u> </u>		
Were samples received within hold time?		_X_		
Did all bottles arrive in good condition (unbroken, etc.)?		<u> </u>		
Was sufficient amount of sample sent for the tests indicated?		×*		. <u> </u>
Was correct preservation added to samples?		<u>×*</u>		
If no, Sample Control added preservative to the following: Sample Number Reagent Analyte		9	HÌ-K	its
Were VOA vials checked for absence of air bubbles? Bubbles present in sample #:NのNモ	-7	_X_		
Temperature of cooler upon receipt: $1.9°C$	Cool	Amb	oient N/2	Ą
Explain any discrepancies: * SAMPLES ON HOLD. NO CLÍENT WILL CONTACT.	TEST	PRES	ENTLY I	NDI CATED.
Was client contacted? Who was called? By Outcome of call:	whom?		Date	•