PACIFIC CREST ENVIRONMENTAL
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September 22, 2023

Mr. Christopher Maurer
Toxics Cleanup Program
Washington State Department of Ecology
Northwest Regional Office
PO Box 330316,
Shoreline, WA 98133-9716

RE: FORMER PRIME CLEANERS SITE
18001 BOTHELL EVERETT HIGHWAY
BOTHELL, WASHINGTON
FACILITY SITE ID NO. 19816
VCP NO. NW2751
CLEANUP SITE ID NO. 11775
PACIFIC CREST NO. 223-002

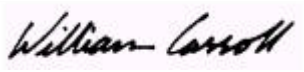
Dear Mr. Maurer:

Pacific Crest Environmental, LLC (Pacific Crest) has prepared the enclosed Amended Draft Cleanup Action Plan (Amended dCAP) on behalf of Mill Creek Crossing (MCC), LLC for review by the Washington State Department of Ecology (Ecology). This dCAP has been prepared to meet the requirements of the Model Toxics Control Cleanup Act (MTCA) administered by Ecology under Chapter 173-340 of the Washington Administrative Code (WAC). .

Please do not hesitate to contact the undersigned at (425) 363-2394 should you have questions or require additional information.

Sincerely,

PACIFIC CREST ENVIRONMENTAL, LLC



William Carroll, L.H.G, L.G.
Principal Hydrogeologist

cc: Mr. Nicholas Echelbarger (MCC)
Mr. Andy Lakha (Lakha Properties – Mill Creek, LLC)
Ms. Chrystene Milner (Fortress Management)
Mr. Matt Stock (Hillis Clark Martin & Peterson P.S.)
Mr. Matt Adamson (Jameson Pepple Cantu PLLC)

Voluntary Cleanup Program

Washington State Department of Ecology
Toxics Cleanup Program

REQUEST FOR OPINION FORM

Use this form to request a written opinion on your planned or completed independent remedial action under the Voluntary Cleanup Program (VCP). Attach to this form the plans or reports documenting the remedial action. Please submit only one form for each request.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are requesting a written opinion under the VCP. This information may be found on the VCP Agreement.

Facility/Site Name: Former Prime Cleaners Site	
Facility/Site Address: 18001 Bothell Everett Highway	
Facility/Site No: 19816	VCP Project No.: NW2751

Step 2: REQUEST WRITTEN OPINION ON PLAN OR REPORT

What type of independent remedial action plan or report are you submitting to Ecology for review under the VCP? Please check all that apply.

- ☐ Remedial investigation plan
- ☐ Remedial investigation report
- ☐ Feasibility study report
- ☐ Property cleanup* plan (* cleanup of one or more parcels located within the Site)
- ☐ Property cleanup* report
- ☒ Site cleanup plan
- ☐ Site cleanup report
- ☐ Other – please specify:

Do you want Ecology to provide you with a written opinion on the planned or completed independent remedial action?

☒ Yes ☐ No

Please note that Ecology's opinion will be limited to:

- Whether the planned or completed remedial action at the site meets the substantive requirements of the Model Toxics Control Act (MTCA), and/or
- Whether further remedial action is necessary at the site under MTCA.

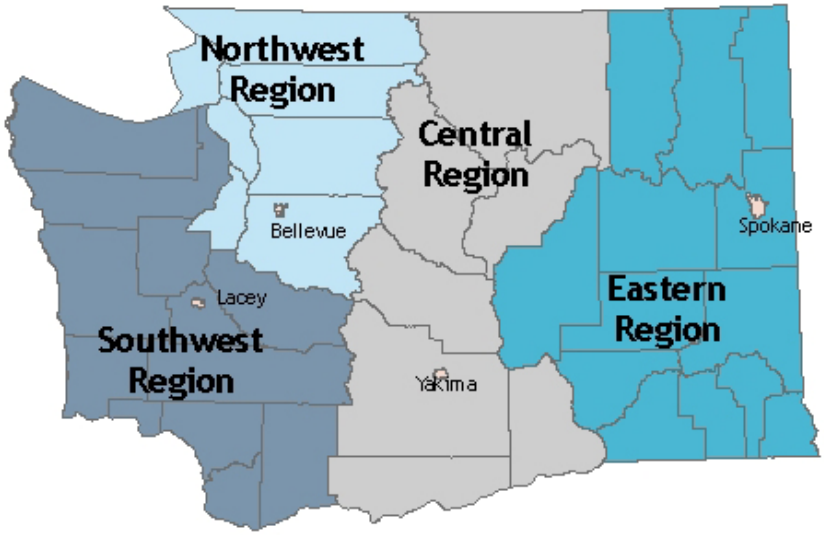
Step 3: REPRESENTATIONS AND SIGNATURE

The undersigned representative of the Customer hereby certifies that he or she is fully authorized to request services from Ecology under the Agreement for this VCP Project.

Name: William Carroll		Title: Principal Hydrogeologist
Signature: *William Carroll*		Date: 09-22-23
Organization: Pacific Crest Environmental, LLC		
Mailing address: PO Box 952		
City: North Bend	State: WA	Zip code: 98045
Phone: 425-888-4990	Fax: 425-888-4994	E-mail: wcarroll@arrowenv.com

Step 4: SUBMITTAL

Please mail your completed form and the independent remedial action plan or report that you are requesting Ecology review to the site manager Ecology assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



Northwest Region: Attn: VCP Coordinator 3190 160th Ave. SE Bellevue, WA 98008-5452	**Central Region:** Attn: VCP Coordinator 15 W. Yakima Ave., Suite 200 Yakima, WA 98902
Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775	**Eastern Region:** Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295

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AMENDED CLEANUP ACTION PLAN

FORMER PRIME CLEANERS SITE
18001 BOTHELL EVERETT HIGHWAY
BOTHELL, WASHINGTON
FACILITY SITE ID NO. 19816
VCP NO. NW2751
CLEANUP SITE ID NO. 11775

Submitted by:

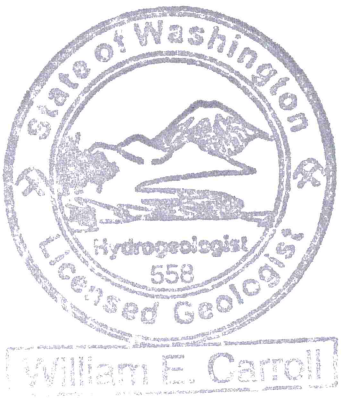
Pacific Crest Environmental, LLC
1531 Bendigo Boulevard North
North Bend, Washington 98045
Pacific Crest PN: 223-002

Prepared by:

William Carroll, LG, LHG
Principal Hydrogeologist

Reviewed by:

Joel Harrington
Project Geologist



September 22, 2023

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EXECUTIVE SUMMARY

This document presents for review by the Washington State Department of Ecology (Ecology) the Amended Draft Cleanup Action Plan (dCAP) for the Former Prime Cleaners Site (the Site) near Bothell, Washington. This dCAP was prepared by Pacific Crest Environmental, LLC (Pacific Crest) on behalf of Mill Creek Crossing (MCC), LLC. This dCAP has been prepared to meet the requirements of the Model Toxics Control Cleanup Act (MTCA) administered by Ecology under Chapter 173-340 of the Washington Administrative Code (WAC). This dCAP describes the proposed cleanup action for this Site and sets forth the requirements that the cleanup must meet.

- Background - The Site consists of properties affected by contamination associated with a release of tetrachloroethene (PCE) that occurred at the MCC Center at 18001 Bothell Everett Highway in Bothell Washington (MCC Property). The Site location is illustrated on Figure 1. The contaminants of potential concern (COPCs) for the Site consist of the following chlorinated volatile organic compounds (CVOCs) associated with a release of PCE-based dry-cleaning solvent that occurred at the former Prime Cleaners Dry-Cleaner (Prime Cleaners) tenant suite on the MCC Property: PCE, trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE) and vinyl chloride (VC). The contaminants of concern (COCs) are the following COPCs in the media of concern that exceed their MTCA cleanup levels presented in this dCAP: PCE and TCE. The Site has been assigned Facility/Site No. 19816 and Voluntary Cleanup Program (VCP) Project No. NW2751 by Ecology.

- Cleanup Action Overview - The Remedial Investigation/Feasibility Study (RI/FS) and CAP, dated June 24, 2014, selected dual phase extraction (DPE) as the preferred cleanup alternative to remediate soil and groundwater. DPE operates by inducing a vacuum on wells to simultaneously extract CVOCs in soil vapor and groundwater from the subsurface. Between 2017 and 2021, MCC's consultant operated the DPE system and conducted groundwater monitoring.

- An investigation conducted in 2023 determined that operation of the DPE system significantly reduced concentrations of PCE and TCE in media of concern at and around the former Prime Cleaners. Samples of indoor air within the former Prime Cleaners tenant space and soil vapor beneath the former Prime Cleaners indicated that concentrations of PCE and TCE were below their respective cleanup and screening levels applicable to commercial workers. Concentrations of PCE and TCE in groundwater also decreased but remained above MTCA Method A cleanup levels.

- In order to achieve the cleanup action objectives within the remaining portions of the Site, the amended cleanup action approach presented in this dCAP consists of implementation of a restrictive covenant on a portion of the MCC Property that prohibits the use of groundwater as a potable water supply and monitored natural attenuation (MNA) of PCE in groundwater beyond the MCC Property boundaries. The reliance on MNA beyond the MCC Property boundaries is appropriate because of the contaminant mass reduction achieved by the DPE system and the decreasing concentrations of PCE in well MW-8, the only affected well located beyond the MCC Property boundaries.

1.0 INTRODUCTION

1.1 PURPOSE

Pacific Crest Environmental, LLC (Pacific Crest) has prepared for review by the Washington State Department of Ecology (Ecology) this Amended Draft Cleanup Action Plan (dCAP) for the Former Prime Cleaners Site (the Site[1]) located at the Mill Creek Crossing (MCC) Center at 18001 Bothell Everett Highway in Bothell Washington (MCC Property). The general location of the Site is shown in Figure 1.

A CAP is required as part of the site cleanup process under Model Toxics Control Act (MTCA) Cleanup Regulations (Chapter 173-340 of the Washington Administrative Code [WAC 173-340]). The purpose of the dCAP is to identify the proposed cleanup action for the Site and to provide an explanatory document for public review. More specifically, this plan:

- Describes the Site;
- Summarizes current site conditions;
- Summarizes the cleanup action alternatives considered in the remedy selection process;
- Describes the selected cleanup action for the Site and the rational for selecting this alternative;
- Identifies site-specific cleanup levels and points of compliance for each hazardous substance and medium of concern for the proposed cleanup action;
- Identifies applicable state and federal laws for the proposed cleanup action;
- Identifies residual contamination remaining on the Site after cleanup and restrictions on future uses and activities at the Site to ensure continued protection of human health and the environment;
- Discusses compliance monitoring requirements; and
- Presents the schedule for implementing the dCAP.

1.2 REMEDIAL ACTION RESPONSIBILITIES

Cleanup actions at the Site are being conducted under the direction of the former property owner and potentially liable person (PLP):

Mill Creek Crossing (MCC), LLC
Attn: Mr. Nicholas Echelbarge
31 NW Cherry Loop
Shoreline, Washington 98177

[1] A “Site” is defined as the areal and vertical extent of the contaminants of concern (COCs) in the media of concern at concentrations that exceed the applicable cleanup levels.

The environmental consultant for the cleanup action is:

Pacific Crest Environmental, LLC
c/o Mr. William Carroll, L.G., L.H.G.
P.O. Box 952
1531 Bendigo Boulevard North
North Bend, Washington 98045

The current property owner is:

Lakha Properties – Mill Creek, LLC
500 108th Ave NE, Suite 2050
Bellevue, WA 98004

2.0 SITE DESCRIPTION

The following subsections provide a description of the MCC Property, relevant Site characterization information, and remedial investigation, feasibility study, and interim action activities completed at the Site by Pacific Crest and others, and cleanup levels.

2.1 BACKGROUND

2.1.1 MCC Property Description

The MCC Property (Snohomish County Tax Parcel #27051800106300) is approximately 3.15 acres in size and located on the southeast corner of the intersection of 180th Street SE and Bothell Everett Highway in Bothell, Washington. In 1983, the MCC Property was developed as a retail shopping center. Between 1984 and 2000, Prime Cleaners conducted retail dry-cleaning operations in a tenant suite on the southern portion of the MCC Property. In 2015, the former owner, MCC, sold the property to Lakha Properties – Mill Creek LLC (Lakha Properties).

2.1.2 Physiographic Setting

The Site is located at an elevation of approximately 290 feet above mean sea level in an area with a topographic slope to the west. The two closest surface water bodies are Silver Creek and North Creek, located approximately 1,800 feet east and 2,800 feet west, respectively. Silver Creek and North Creek discharge into the Sammamish River, located approximately 5 miles south of the Site.

2.1.3 Terrestrial Habitat Setting

Land use within the vicinity of the Site consists of a combination of urban commercial and residential property and does not contain undisturbed terrestrial habitat for wildlife. Contiguous undeveloped land with an area greater than 1.5 acres is not present either on the Site or within 500 feet of the Site. Due to the size of the undeveloped contiguous land located on or within a 500-foot radius of the Site (less than 1.5 acres) and the COCs present, the Site qualifies for an exemption under WAC 173-340-7491(1)(c).

2.1.4 Geologic Setting

The Puget Sound region is underlain by Quaternary sediments deposited by several glacial episodes (Galster and Laprade 1991). The regional subsurface conditions were generated by deposition occurring through a series of glacial advances and retreats. The regional sediments consist primarily of interbedded and/or sequential deposits of alluvial clays, silts, and sands, typically situated over deposits of glacial till consisting of silty sand to sandy silt with gravel. Outwash sediments consisting of stratified sands, silts, clays, and gravels were deposited by rivers, streams, and post-glacial lakes during the glacial retreats. With the exception of the most recent recessional deposits, sediments have been compacted by the historical overriding ice sheets.

Surficial geology in the immediate vicinity of the Site is identified in the United States Geologic Survey (USGS) Geologic Map of Bothell (Minard 1985) as Quaternary age advance outwash deposits (Qva) of the Vashon Stade during the Frasier Glaciation. The Vashon Stade of the Fraser Glaciation occurred approximately 15,000 to 13,000 years ago and consisted of a portion of the Cordilleran Ice Sheet occupying the Puget lowland area of western Washington. Glacial melt-

water drained southwest to the Pacific Ocean due to the dam created by the glacial toe. Qva is sand, silty sand and gravel deposited by streams from the advancing ice sheet and can be as much as 180 feet thick in the area.

2.1.5 Hydrogeology

Groundwater aquifers in the Puget Sound region generally occur in recent alluvial deposits of sands and gravel, which are stratigraphically delimited by aquitards (low permeability units) consisting of glacial till deposits. Discontinuous perched shallow groundwater zones may be seasonally or locally present above the glacial till deposits (Galster and Laprade 1991).

Shallow unconfined groundwater is first encountered at the Site in sandy layers at depths ranging from between approximately 15 feet below ground surface (bgs) and 25 feet bgs. Saturated conditions continue to the maximum depth explored, 70 feet bgs. The direction of groundwater flow based on potentiometric surface elevations measured in existing wells has been to the south and southwest during groundwater measurement events conducted between 2014 and 2023. Pacific Crest calculated hydraulic gradients of between 0.001 feet per foot (ft/ft) during the November 2017 sampling event and 0.002 ft/ft during the June 2022 sampling event.

2.2 SITE INVESTIGATION, FEASIBILITY STUDY, AND INTERIM MEASURE ACTIVITIES

The Site investigation area (Investigation Area) includes: a portion of the MCC Property in the vicinity of the former Prime Cleaners tenant suite; the public rights-of-way adjacent to the MCC Property; and the topographically down-gradient area in the immediate vicinity of the MCC Property.

In 1999, PCE was detected in soil and groundwater below the former Prime Cleaners tenant suite. Between 1999 and 2014, environmental consultants working on behalf of MCC conducted subsurface investigation activities to assess the nature and extent of PCE-contaminated soil and groundwater. In 2014, Zipper Geo Associates (ZGA) submitted a Remedial Investigation Feasibility Study (RI/FS) Report and dCAP to Ecology for review (ZGA 2014a and ZGA 2014b). The RI/FS results are summarized below:

- **Soil -** Laboratory analysis of soil samples detected PCE at concentrations ranging from 1.1 micrograms per kilogram (µg/kg) to 560 µg/kg and TCE concentrations ranging from 9.2 µg/kg to 38 µg/kg. Laboratory analysis of soil samples detected cis-1,2-DCE in two samples at concentrations of 28 µg/kg and 330 µg/kg. Laboratory analysis of soil samples did not detect trans-1,2-DCE or VC at concentrations above their respective practical quantitation limits (PQLs). PCE and TCE are the only COPCs in soil that exceed their respective MTCA Method A cleanup levels. The elevated concentrations of PCE and TCE in soil were located in the vicinity of the former Prime Cleaners dry-cleaning equipment. The extent of PCE and TCE concentrations in soil that exceed their respective MTCA Method A cleanup levels for unrestricted properties is defined within the boundaries of the MCC Property.
- **Groundwater -** Laboratory analysis of groundwater samples detected PCE at concentrations ranging from 0.55 micrograms per liter (µg/L) to 170 µg/L. Laboratory analysis of groundwater samples detected TCE in one sample at a concentration of 3.22 µg/L and detected cis-1,2-DCE in two samples at concentrations of 1.4 µg/L and 4.8 µg/L,

respectively. Laboratory analysis of groundwater samples did not detect trans-1,2-DCE or VC at concentrations above their respective PQLs. PCE is the only COPC in groundwater that exceeds its MTCA Method A cleanup level. The extent of PCE concentrations in groundwater that exceed the MTCA Method A cleanup level extends beyond the southern boundary of the MCC Property but is delineated by monitoring wells located to the north, south, east, and west.

- **Soil Vapor –** Laboratory analysis of soil samples detected PCE at concentrations ranging from 500 micrograms per cubic meter (µg/m^3) to 24,000 µg/m^3 and detected TCE at concentrations ranging from 68 µg/m^3 to 470 µg/m^3. Laboratory analysis of soil vapor samples detected cis-1,2-DCE in one sample at a concentration of 22 µg/m^3. Laboratory analysis of soil vapor samples did not detect trans-1,2-DCE or VC at concentrations above their respective PQLs. The elevated concentrations of PCE and TCE in soil vapor were located in the vicinity of the former Prime Cleaners dry-cleaning equipment.
- **Indoor Air -** Laboratory analysis of indoor air samples detected PCE at concentrations ranging from 1.1 µg/m^3 to 3.6 µg/m^3 and laboratory analysis of representative indoor air samples[2] detected TCE at concentrations ranging from 1.3 µg/m^3 to 2.1 µg/m^3. Laboratory analysis of indoor air samples did not detect cis-1,2-DCE, trans-1,2-DCE or VC at concentrations above their respective PQLs.
- **Exposure Pathways –** The RI concluded that direct contact and inhalation pathways were not complete and that the leaching to groundwater and groundwater ingestion pathways were potentially complete, but no water supply wells or ecological receptors were identified within the Site.

The RI/FS and CAP selected dual phase extraction (DPE) as the preferred cleanup alternative to remediate soil and groundwater. DPE operates by inducing a vacuum on wells to simultaneously extract CVOCs in soil vapor and groundwater from the subsurface. DPE is effective for remediation of shallow permeable material (e.g., sand and silty sand). During operation of a typical DPE system, the concentrations of CVOCs in soil gas and groundwater decrease as the mass of contaminants present in the subsurface is reduced. Over time, the CVOC recovery rate tends to become a function of the rate of desorption of contaminants from soil and recovery rates reach asymptotic levels. The RI/FS Report estimated a restoration timeframe of 1-year to achieve cleanup standards for both soil and groundwater. Ecology approved the CAP for Property Specific Cleanup in an Opinion Letter dated September 8, 2014 (Ecology 2014).

In 2017, ZGA installed a DPE system at the Site that consisted of one 25-horsepower (HP) Dekker Oil-Sealed Liquid Ring Pump, a liquid knock-out drum, and a liquid transfer pump. The DPE system was connected to four 4-inch diameter dedicated vacuum extraction wells (DPE-1 through DPE-4) completed to 40-feet bgs. Groundwater recovered by the system was discharged to the sanitary sewer under an Industrial Waste Discharge Authorization (Authorization No. 1010-02) from the King County Wastewater Treatment Division. Between 2017 and 2021, ZGA operated the DPE system and conducted groundwater monitoring. The results of the system operation and

[2] Laboratory analysis of indoor air samples collected on November 21, 2013 detected elevated TCE concentrations that were attributed to TCE-containing “spot cleaner”. The concentrations of TCE detected at that time do not appear representative of vapor intrusion by soil vapor.

monitoring are presented in reports prepared by ZGA (ZGA 2020, ZGA 2021, ZGA 2022a) and are summarized below:

- The DPE system operated for approximately five years between February 2017 and September 2021. During operations, the DPE system extracted and discharged to the sanitary sewer 1,164,940 gallons of groundwater.
- After DPE system operations, laboratory analysis of groundwater samples collected in June 2022 detected PCE in samples from resource protection wells MW-3, MW-4, and MW-8 at concentrations of 6.0 µg/L, 23 µg/L, and 22 µg/L, respectively.
- Laboratory analysis of indoor air samples collected between January 2019 and January 2020 did not detect PCE, TCE, cis-1,2-DCE, trans-1,2-DCE, or VC at concentrations above their respective cleanup levels.

In correspondence dated March 6, 2020, ZGA, on behalf of MCC, requested a No Further Action (NFA) determination for the Site. In an Opinion Letter dated September 29, 2021 (Ecology 2021), Ecology stated that cleanup of the Site was insufficient and required either implementation of further cleanup action to remediate off-property contaminated groundwater or implementation of engineering and/or institutional controls as cleanup measures to meet the substantive requirements of the MTCA regulations.

2.1 RECENT MONITORING AND INVESTIGATION ACTIVITIES

Between April 19, 2023 and April 22, 2023, Pacific Crest, on behalf of MCC, conducted monitoring activities at the Site. The purpose of the scope of work was to assess current groundwater, soil vapor, and indoor air conditions. The DPE system was not operational during the sampling activities. The investigation activities included:

- Collecting groundwater samples from select existing wells and submitting the samples to an independent laboratory for analysis of CVOCs;
- Collecting sub-slab soil vapor samples from existing Vapor Pin™ sample points for laboratory analysis of CVOCs; and,
- Collecting indoor air samples inside the former Prime Cleaners tenant suite, now the Fusion India and Osaka Grill restaurants, and collecting an ambient air sample outside the former Prime Cleaners tenant space.

The investigation methods and results are presented in the Data Gap Investigation Report, dated August 17, 2023, provided in Appendix A. The recent investigation activities are summarized below:

- On April 19, 2023, the depth to groundwater measured in the monitoring wells ranged from 17.62 feet below top of casing (btoc) (MW-5) to 26.86 feet btoc (MW-9). The groundwater elevations ranged from 272.23 feet (MW-1 and MW-5) to 271.73 feet (MW-8). Groundwater elevation data are presented in Table 1.
- A Site Plan illustrating the groundwater potentiometric surface contours is provided as Figure 3. The groundwater flow direction is generally toward the south at a gradient of 0.003 ft/ft, which is consistent with the potentiometric surface calculations for previous events.

- The groundwater geochemical parameter data that were collected during well purging are presented in Table 2.
- Groundwater analytical data for the COPCs for the Site are summarized in Table 3. Laboratory analysis of the groundwater samples detected PCE at concentrations ranging from 0.34 µg/L to 21 µg/L. Laboratory analysis of the groundwater samples collected from well MW-4, MW-8, and DPE-3 detected PCE at concentrations that exceeded the MTCA Method A cleanup level of 5 µg/L. Laboratory analysis did not detect TCE, cis-1,2-DCE, trans-1,2-DCE or VC at concentrations above their respective practical quantitation limits (PQLs). A Site Plan illustrating the concentrations of COCs in groundwater from the April 2023 groundwater monitoring event is provided on Figure 3.
- On April 19, 2023, Pacific Crest collected on soil vapor sample from Vapor Pin™ SPG-5. The tracer and shut-in tests confirmed the integrity of the Vapor Pin installation. Laboratory analysis of soil vapor sample SPG-5 detected PCE, TCE, and trans-1,2-DCE at concentrations of 458 µg/m^3, 28.5 µg/m^3, and 0.403 µg/m^3, respectively. Laboratory analysis did not detect the remaining COCs at concentrations above their respective laboratory PQLs. The detected concentrations of PCE and TCE exceed their respective default sub-slab soil vapor screening levels for residential land use, but not the screening levels for commercial workers. The soil vapor results are summarized in Table 4 and illustrated on Figure 4.
- On April 19, 2023, Pacific Crest deployed three Summa® canisters to collect indoor and ambient air samples. Laboratory analysis of the ambient air sample (AA-042023) did not detect any of the COCs at concentrations above their respective laboratory PQLs. Laboratory analysis of the indoor air samples IA1-042023 and IA2-042023 detected PCE concentrations of 0.284 µg/m^3 and 0.234 µg/m^3, respectively. The detected concentrations of PCE were below the default MTCA Method B cleanup level that is protective of residential exposure scenarios and the MTCA Method B screening level for commercial workers. The remaining COC were not detected at concentrations above their respective PQLs. The air results are summarized in Table 5 and illustrated on Figure 5.

2.2 REGULATORY FRAMEWORK

In 2012, the Site was entered into Ecology's Voluntary Cleanup Program (VCP) for the purpose of obtaining Opinion Letters from Ecology during the cleanup process. Ecology assigned Facility/Site No. 19816 and VCP Project No. NW2751 to the Site.

In correspondence dated March 6, 2020, ZGA, on behalf of MCC, requested an NFA determination for the Site. In an Opinion Letter dated September 29, 2021 (Ecology 2021), Ecology stated that cleanup of the Site was insufficient and required either implementation of further cleanup action to remediate off-property contaminated groundwater or implementation of engineering and/or institutional controls as cleanup measures to meet the substantive requirements of the MTCA regulations.

2.3 UPDATED CONCEPTUAL SITE MODEL

An updated conceptual site model (CSM) has been developed for the Site that is based upon data collected during the investigation and cleanup activities conducted at the Site by Pacific Crest and others. The updated CSM identifies plausible exposure pathways for human receptors. The updated CSM elements are presented below:

- A release of PCE based dry cleaning solvent occurred on the MCC Property in the former Prime Cleaners tenant space. On the basis of the dry-cleaning operation dates, the release of PCE appears to have occurred between 1984 and 2000. The current tenant in the former Prime Cleaners tenant space is a restaurant (Fusion India).
- The Site COPCs consist of PCE and its reductive dechlorination degradation products TCE, cis-1,2-DCE, trans-1,2-DCE, and VC. The media of concern where concentrations of COPCs have been detected include soil, groundwater, soil vapor, and indoor air. Laboratory analysis of soil, soil vapor, indoor air, and groundwater samples detected PCE at concentrations above its MTCA Method A cleanup level or applicable screening level. Laboratory analysis of soil, soil vapor, and indoor air samples has also detected TCE, a breakdown product of PCE, at concentrations above its MTCA Method A cleanup level or applicable screening levels. Laboratory analysis of soil and soil vapor samples has detected cis-1,2-DCE at concentrations below its applicable screening levels. Laboratory analysis of soil, soil vapor, indoor air, and groundwater samples has not detected trans-1,2-DCE or VC at concentrations above their respective PQLs. The analytical results for the COPCs in the media of concern are summarized in Tables 3, 4, 5, and 6. The applicable preliminary screening levels (PSLs) for the COPCs in soil, groundwater, soil vapor, and air are the applicable MTCA Method A or Method B cleanup levels or screening levels which are presented in Tables 7, 8, and 9. The COCs are those COPCs that have exceeded the applicable cleanup level: PCE and TCE
- The horizontal and vertical extent of concentrations of PCE and TCE in soil and groundwater is defined by samples collected to date and the plan view extent, as delineated in the RI/FS Report, is illustrated on Figure 6.
- The applicable transport mechanisms for the migration of COCs include direct release to soil; migration to subsurface soil; migration/leaching to groundwater; volatilization from soil and groundwater to air; and transport by groundwater flow (advection).
- Between 2017 and 2021, ZGA operated the DPE system. The system was initially scheduled to operate for one year, but operations continued for four years. During operations, the DPE system extracted and discharged to the sanitary sewer 1,164,940 gallons of groundwater. The effectiveness of the DPE system can be assessed on the basis of the reduced concentrations of the COCs in the media of concern. Implementation of DPE resulted in decreases in concentrations of PCE, TCE, and cis-1,2-DCE in all media where they were detected. A comparison of the maximum concentrations of PCE and TCE in the media of concern before and after DPE[3] system operations is provided below:

[3] The most recent investigation activities in 2023 are representative of post-DPE Site conditions.

Media of Concern	Maximum Concentrations			
	Before DPE Operation		After DPE Operation	
	PCE	TCE	PCE	TCE
Soil	560 µg/kg	38 µg/kg	Confirmation soil samples were not collected during the 2023 investigation activities, but the soil vapor results provide empirical evidence the indicates that concentrations of PCE and TCE in soil are below their respective cleanup levels.[4]	
Soil Vapor	24,000 µg/m^3	840 µg/m^3	458 µg/m^3	28.5 µg/m^3
Indoor Air	3.6 µg/m^3	2.1 µg/m^3	0.284 µg/m^3	<0.00672 µg/m^3
Groundwater	170 µg/L	3.22 µg/L	23 µg/L	<0.20 µg/L

The change in aerial extent of PCE concentrations in groundwater since operation of the DPE system is illustrated on Figure 6.

- Prior to implementation of DPE, inhalation was identified as the only current potentially complete exposure pathway. Based on the zoning classification for the MCC Property (General Commercial) and current commercial land use, the current receptors are commercial workers. Implementation of DPE reduced the concentrations of the COCs in indoor air to below their respective cleanup levels and reduced concentrations of the COCs in soil vapor and groundwater to below their respective screening levels that are protective of indoor air for commercial workers. Future receptors potentially exposed to contaminants in air at the Site will likely still be commercial workers.
- Laboratory analysis of groundwater samples has detected PCE at concentrations that exceed the MTCA Method A cleanup level that is protective of potable groundwater. However, groundwater in the vicinity of the Site is not currently used as a drinking water source. Exposure to PCE in potable water is a complete pathway only if an extraction well was installed and used as a source for potable water.
- MTCA requires an evaluation of the potential impact for the constituents of concern on terrestrial ecological receptors in accordance with the procedures outlined in WAC 173-340-7490. However, due to the size of the undeveloped contiguous land located on or within a 500-foot radius of the Site (less than 1.5 acres) and the COCs present, the Site qualifies for an exemption under WAC 173-340-7491 (b) and (c)(i); therefore, no further ecological evaluation was conducted.

[4] PCE and TCE are present in soil vapor due to their chemical properties. In the absence of active vapor recovery, concentrations of PCE and TCE in soil gas should reach equilibrium with concentrations of PCE and TCE in soil. DPE resulted in a 94% decrease in concentrations of PCE in soil vapor. A reduction of this magnitude in soil concentrations results in predicted concentrations below the respective cleanup levels for PCE and TCE.

2.4 CLEANUP STANDARDS

2.4.1 Contaminants of Concern

The Site COPCs consist of PCE and its reductive dechlorination degradation products TCE, cis-1,2-DCE, trans-1,2-DCE, and VC. The COCs are those COPCs that have exceeded the applicable cleanup level: PCE and TCE.

2.4.1 Cleanup Levels

The applicable PSLs for the COPCs in soil, groundwater, soil vapor, and air are the applicable MTCA Method A or Method B cleanup levels or screening levels which are presented in Tables 7, 8, and 9. Proposed cleanup levels were developed in accordance with WAC 173-340-700 through WAC 173-340-760. The resulting cleanup levels for soil, groundwater, and indoor air/soil vapor are presented in Tables 7 through 9, respectively.

2.4.1 Point of Compliance

The point of compliance is defined in WAC 173-340-200 as the point where cleanup levels shall be attained. Once the cleanup levels are attained at the point of compliance, the concentrations of COCs have achieved the regulatory requirements established under MTCA. The media specific points of compliance are summarized below:

- The point of compliance for soil is defined as Site soil from ground surface to the uppermost level of the saturated zone, not to exceed 15 feet bgs. Empirical evidence in the form of sub-slab soil vapor sample results indicate that concentrations of PCE and TCE in soil do not exceed their applicable cleanup levels.
- The point of compliance for groundwater is defined as groundwater throughout the Site, from the uppermost level of the saturated zone extending vertically to the lowest depth that is affected by COCs. Performance monitoring of groundwater will be conducted during the cleanup action to monitor the attenuation of concentrations of COCs in groundwater.
- The point of compliance for indoor air is defined as indoor air throughout the Site where analytical results of soil and groundwater samples have detected concentrations of COCs that, when used to predict indoor air concentrations, exceed cleanup levels. Based on protection of commercial workers, concentrations of the COCs in indoor air do not exceed their respective cleanup levels and concentrations of the COCs in soil vapor do not exceed their respective screening levels.

2.5 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

Cleanup activities at the Site will be conducted under Ecology's VCP. Although Ecology will be the lead agency, the cleanup action effort will be conducted in accordance with all applicable local regulations and permitting requirements. The remedial alternatives will comply with the ARARs, including state and federal laws, in accordance with WAC 173-340-350 and WAC 173-340-710. ARARs are often identified as constituent-specific, location-specific, or remedial action-specific. A number of regulations include requirements in more than one of these three categories.

The primary ARARs include:

- MTCA (WAC 173-340);

- Water Quality Standards for Groundwater (WAC 173-200); and
- Hazardous Waste Management Act (Chapter 70.105 of the Revised Code of Washington [RCW 70.105]).

These primary ARARs are anticipated to be the most applicable requirements, since they include the framework for the cleanup action, including applicable and relevant regulatory guidelines, cleanup standards, waste disposal criteria, references for additional ARARs, and standards for documentation.

Additional ARARs for the Site include:

- The Occupational Safety and Health Act (Part 1910 of Title 29 of the Code of Federal Regulations [29 CFR 1910]);
- The State Environmental Policy Act (RCW 43.21);
- General occupational health standards (WAC 296-62);
- Hazardous Waste Operations (WAC 296-843)
- Minimum Standards for Construction and Maintenance of Wells (WAC 173-160); and
- Accreditation of Environmental Laboratories (WAC 174-50).

3.0 AMENDED CLEANUP ACTION PLAN

This section presents a description of the proposed cleanup action and summarizes the restoration timeframe.

3.1 CLEANUP ACTION OBJECTIVE

The cleanup action objectives of the selected cleanup action activities are to:

- Protect human health and the environment;
- Provide a mechanism to minimize the potential for receptors to be exposed to COCs in potable water;
- Provide for compliance monitoring of the concentrations of the COPCs in groundwater beyond the MCC Property boundaries until the concentrations of the COCs are below their respective cleanup levels; and
- Comply with applicable state and federal laws.

3.2 CLEANUP ACTION DESCRIPTION

In order to achieve the cleanup action objectives, the cleanup action approach consists of implementation of institutional controls on the MCC Property and monitored natural attenuation (MNA) of PCE in groundwater beyond the MCC Property boundaries. The reliance on MNA beyond the MCC Property boundaries is appropriate because of the contaminant mass reduction achieved by the DPE system and the decreasing concentrations of PCE in well MW-8, the only affected well located beyond the MCC Property boundaries. The cleanup action components are discussed below:

- **Institutional Control** – A proposed Environmental Covenant on the MCC Property includes the following restrictions:
    - **Groundwater Use Restriction –** A Restrictive Covenant will restrict the extraction and use of groundwater from the MCC Property for any purpose other than temporary construction dewatering, investigation, monitoring, or remediation. Drilling of a well for any water supply purpose will be strictly prohibited within the area identified on Figure 7. Groundwater extracted from the MCC 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.
- **Compliance Monitoring** – Performance and confirmation monitoring will be conducted during the implementation of the cleanup action in the portions of the Site located beyond the MCC Property boundaries. The implementation procedures for performance and confirmation monitoring are described in Section 4 of this dCAP.

3.3 RESTORATION TIMEFRAME

Cleanups should be completed within a reasonable time frame in accordance with WAC 173-340-360(2)(b)(ii) as determined by site-specific criteria in WAC 173-340-360(4)(b). Based on current conditions, the estimated timeframe to achieve cleanup levels in off-property groundwater is between 5 and 10 years.

4.0 CLEANUP ACTION DESIGN AND IMPLEMENTATION

This section provides a detailed description and the specific implementation details of the cleanup action alternative for soil and groundwater.

4.1 SCHEDULE

The critical tasks for implementation of the cleanup action are:

- Restrictive Covenant preparation and approval;
- Compliance Monitoring; and,
- Closure Report

4.1.1 Implementation

4.1.1.1 Restrictive Covenant Implementation

Following the approval of the Amended CAP by Ecology, MCC will submit a copy of the draft Restrictive Covenant to the current property owner and local municipality for review. Upon receipt of written authorization from the local municipality, MCC will arrange to have the Restrictive Covenant recorded with Snohomish County. A copy of the recorded Restrictive Covenant will be submitted to Ecology after it has been recorded with Snohomish County.

4.1.1.2 DPE System Decommissioning

The DPE system components will be decommissioned and removed from the MCC Property after the Restrictive Covenant is recorded with Snohomish County.

4.2 COMPLIANCE MONITORING

Performance and confirmation monitoring will be conducted during the implementation of the cleanup action.

- **Performance Monitoring** - The purpose of performance monitoring is to monitor the progress of the cleanup action and demonstrate that the cleanup action has attained the cleanup standards. The media sampled during performance monitoring will include groundwater from off-property monitoring wells that are downgradient of the MCC Property and not included in the potable well restriction area.
    - **Groundwater** – Groundwater sampling will be conducted to monitor decreasing concentrations of COCs in the following monitoring wells: MW-2, MW-3, MW-4, MW-8, MW-7, and MW-6. Groundwater performance monitoring will include the evaluation of groundwater conditions to assess the rate of attenuation of the groundwater plume from natural processes such as biodegradation, dispersion, dilution, sorption, volatilization, or other geochemical reactions (e.g., hydrolysis). The groundwater sampling frequency and locations, procedures for sample collection and handling, analytical testing methods, are presented below.
        - Annual groundwater performance monitoring will be conducted until the data indicate that the applicable cleanup for the COCs have been attained at the points of compliance, for two consecutive events.

    - The groundwater samples will be submitted to an independent laboratory for analysis of the COPCs by SW-846 Method 8260.

- **Confirmation Monitoring** - Confirmation monitoring will be conducted to confirm the long-term effectiveness of the cleanup action after performance monitoring. Once performance monitoring results demonstrate that the concentration of CVOCs in performance samples are below the applicable cleanup levels for two consecutive sampling events, confirmation monitoring will begin. Four consecutive quarters of confirmation groundwater monitoring will then be conducted to confirm that concentrations of CVOCs in groundwater remain below the cleanup levels. The groundwater sampling locations, procedures for sample collection and handling, and analytical testing methods for groundwater confirmation monitoring are identical to those presented above for groundwater performance monitoring.

4.3 WASTE MANAGEMENT

Based on the historical operations on the Site and data collected during previous investigations, the only hazardous waste anticipated to be present in investigation derived waste is waste code F002, spent halogenated solvents, primarily PCE. Management of investigation derived waste (IDW) materials generated by the remedial action or as a result of surface or subsurface investigative activities, Generated wastes will include:

- Wastewater generated by decontamination of equipment during the cleanup action or generated by monitoring well purging activities. Groundwater, decontamination fluids, and soil cuttings generated during sampling activities will be placed into DOT-approved containers and transported off-site for disposal in accordance with the applicable regulatory requirements.
- Used personal protective equipment (PPE) and disposable equipment will be double bagged and placed in a municipal refuse dumpster. Any PPE and disposable equipment that is to be disposed of which can still be reused will be rendered inoperable before disposal in a refuse dumpster.

4.4 DOCUMENTATION REQUIREMENTS

Documentation of the cleanup action will meet MTCA requirements. Upon client review and approval, all applicable and relevant documentation generated for the cleanup action will be submitted to Ecology. Document copies will be retained in Pacific Crest files for a minimum of three years after completion of the project.

4.4.1 Data Management

An established document control system will be implemented during the cleanup action, which includes the following, as appropriate: field documentation which includes well purging and sampling documentation; chain-of-custody documentation; waste inventory documentation; and waste management labels. Disposal manifests and/or bills-of-lading for the wastes generated at and disposed from the Site will also be maintained and submitted with the project documentation.

4.4.2 Health and Safety

A HASP is required for all cleanup actions (WAC 173-340-810 and WAC 296-62). The HASP must comply with the requirements of the Occupational Safety and Health Act of 1970 and the Washington Industrial Safety and Health Act (RCW 49.17).

4.4.3 Progress Reports

4.4.3.1 Annual Progress Reports

Annual progress reports will be prepared following the annual groundwater monitoring events. The progress reports will document the cleanup action progress; groundwater conditions; and attenuation of PCE and other HVOC breakdown product concentrations at the Site. At a minimum, the annual progress report will include:

- A Site background;
- Geologic and hydrologic description of the Site;
- A narrative of the field activities;
- The performance groundwater monitoring results; and
- A discussion including deviations from the dCAP and recommendations for future work at the Site.

4.4.3.2 Closure Report

Once concentrations of CVOCs are demonstrated to be below the cleanup levels in groundwater, and following four quarters of confirmation groundwater monitoring demonstrating that contamination is below applicable cleanup levels, a closure report will be prepared documenting the cleanup action. At a minimum this report will include:

- A Site background;
- Geologic and hydrologic description of the Site;
- A narrative of the field activities describing the monitoring procedures;
- All compliance monitoring results; and
- A discussion including deviations from the dCAP.

A Property-Specific NFA determination will be requested from Ecology upon approval of the Restrictive Covenant and a Site-Specific NFA determination will be requested from Ecology upon completion of confirmation groundwater monitoring activities at the Site.

5.0 REFERENCES

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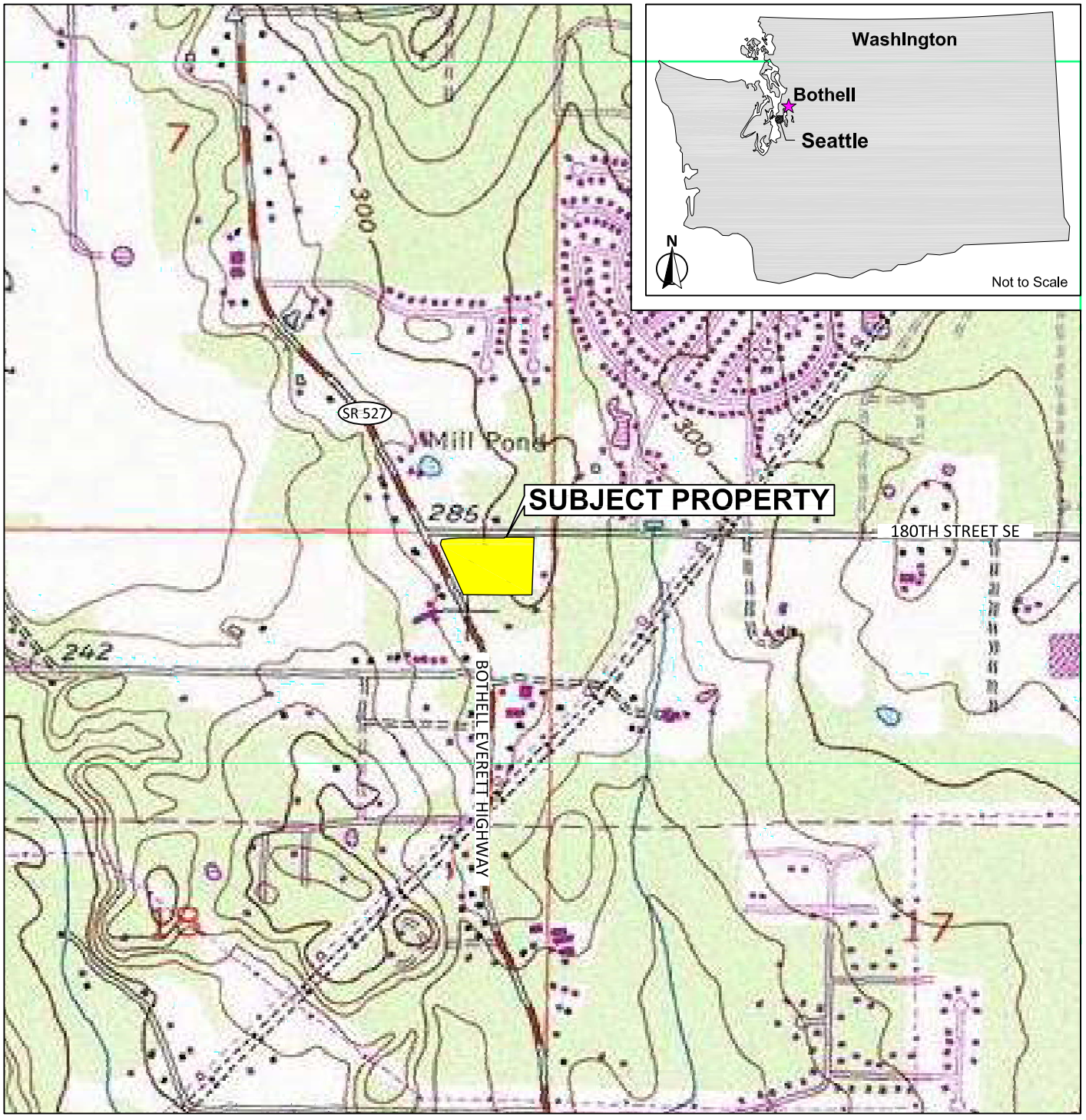
FIGURES

DRAFT FOR ECOLOGY REVIEW
AMENDED CLEANUP ACTION PLAN

FORMER PRIME CLEANERS SITE
18001 BOTHELL-EVERETT HIGHWAY
BOTHELL, WASHINGTON

PACIFIC CREST PN: 223-002



PACIFIC CREST ENVIRONMENTAL
WWW.PCENV.COM 425-888-4990

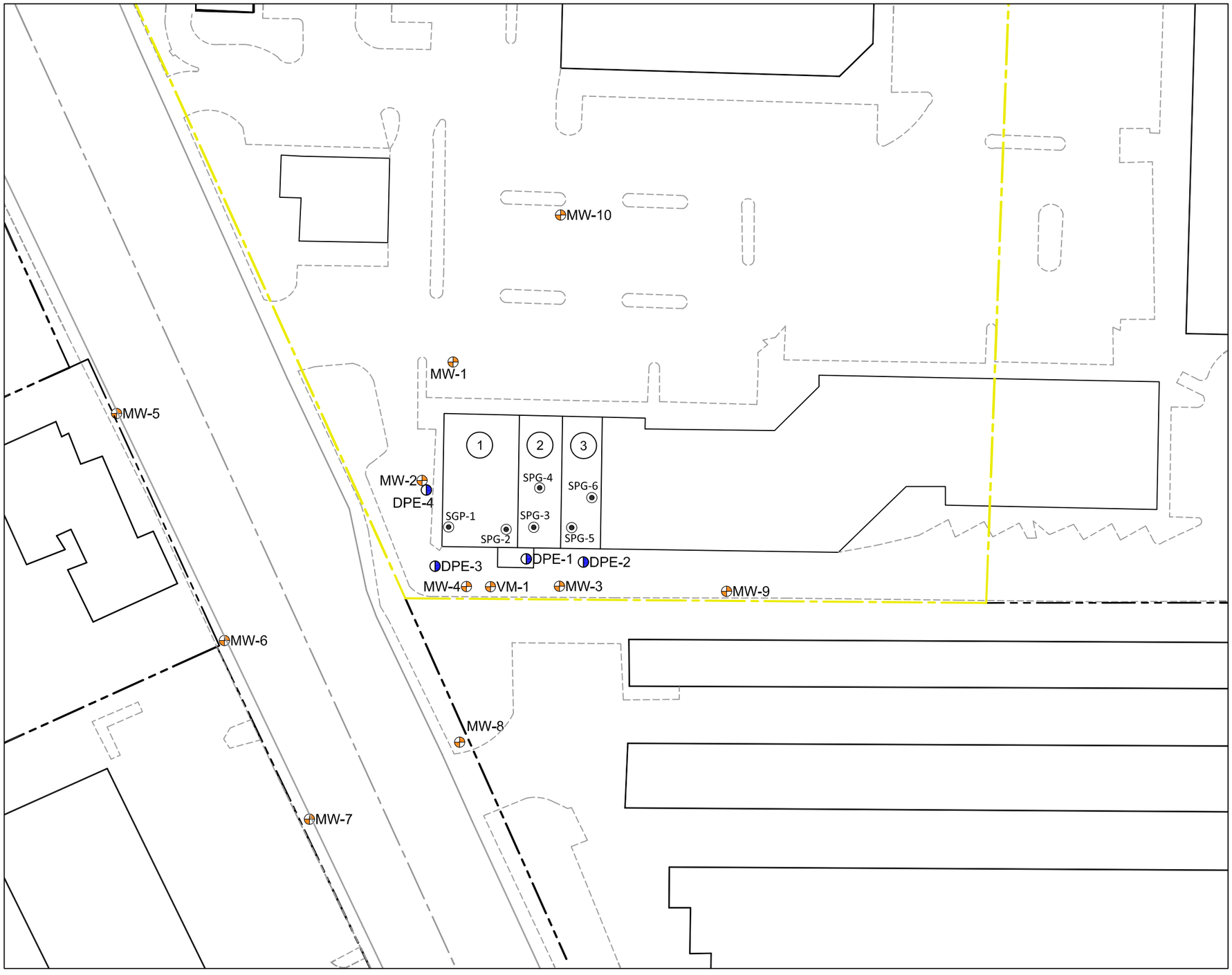
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 1

Site Location Map

9/14/2016 223-002-001.dwg FIG 1 Site Location



Legend

- SGP-1 — Soil Vapor Probe
- MW-1 — Monitoring Well
- DPE-1 — Dual Phase Extraction Well
- Subject Property
- Parcel Boundary
- Road Centerline
- Road
- Curb

1. Fushion India (Prime Cleaners 1984-2000)
2. Fushion India (Prime Cleaners 2000-2014)
3. Osaka Grill Teriyaki

Notes:

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

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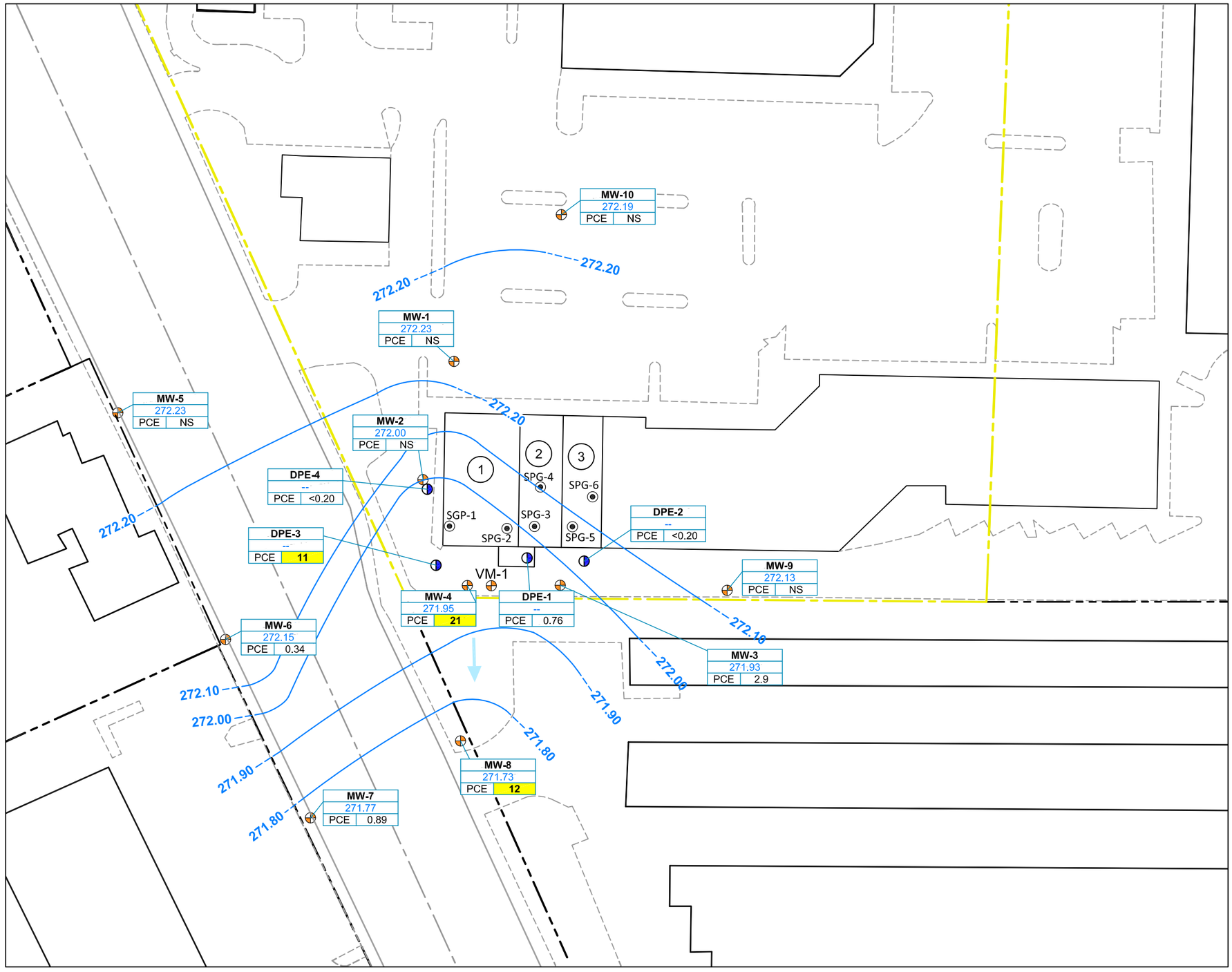
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 2

Site Plan

8/23/2023 223-002-002.dwg Fig 2 Site Plan



Legend

272.20 Potentiometric Contour in Feet (contour = 0.1 foot) (dashed where inferred)

Apparent Direction of Groundwater Flow

SGP-1 Soil Vapor Probe

MW-1 Monitoring Well

DPE-1 Dual Phase Extraction Well

Subject Property

Parcel Boundary

Road Centerline

Road

Curb

Well ID
Groundwater Elevation (feet)
PCE (µg/L)

PCE tetrachloroethene (MTCA CUL = 5)

µg/L micrograms per liter

BOLD concentration above applicable MTCA Method CUL

MTCA Model Toxics Control Act

CUL cleanup level

NS Not sampled

(1) Fusion India (Prime Cleaners 1984-2000)

(2) Fusion India (Prime Cleaners 2000-2014)

(3) Osaka Grill Teriyaki

Notes: Hydraulic Gradient = 0.003 ft/ft

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

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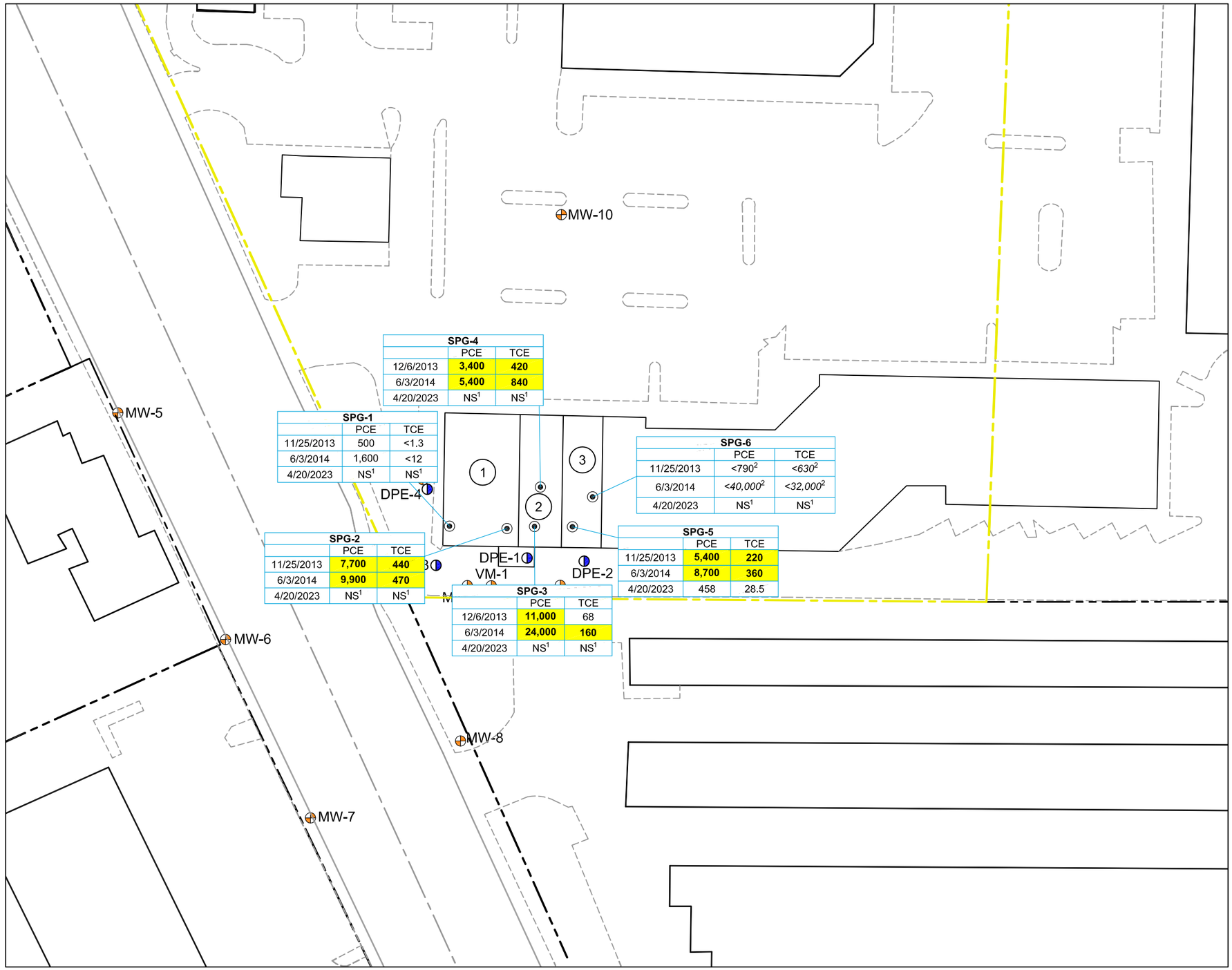
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 3

Site Plan with Potentiometric Surface Elevation Contours and Analytical Results
(4/19/2023 - 4/20/2023)

7/19/2023 223-002-006.dwg Fig 3 GW4-2023



Legend

- SGP-1 — Soil Vapor Probe
- MW-1 — Monitoring Well
- DPE-1 — Dual Phase Extraction Well
- Subject Property
- Parcel Boundary
- Road Centerline
- Road
- Curb

BOLD Concentration above applicable preliminary screening level

µg/m^3 micrograms per cubic meter

MTCA Model Toxics Control Act

PCE tetrachloroethene

TCE trichloroethene

NS not sampled

Location ID		
	PCE	TCE
Date	µg/m^3	µg/m^3

1 Fusion India (Prime Cleaners 1984-2000)

2 Fusion India (Prime Cleaners 2000-2014)

3 Osaka Grill Teriyaki

Notes:

1) Soil Vapor Probe not sampled due to inability to find probes. Probes possibly destroyed/covered during interior renovations

2) Failed leak test

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

PACIFIC CREST ENVIRONMENTAL
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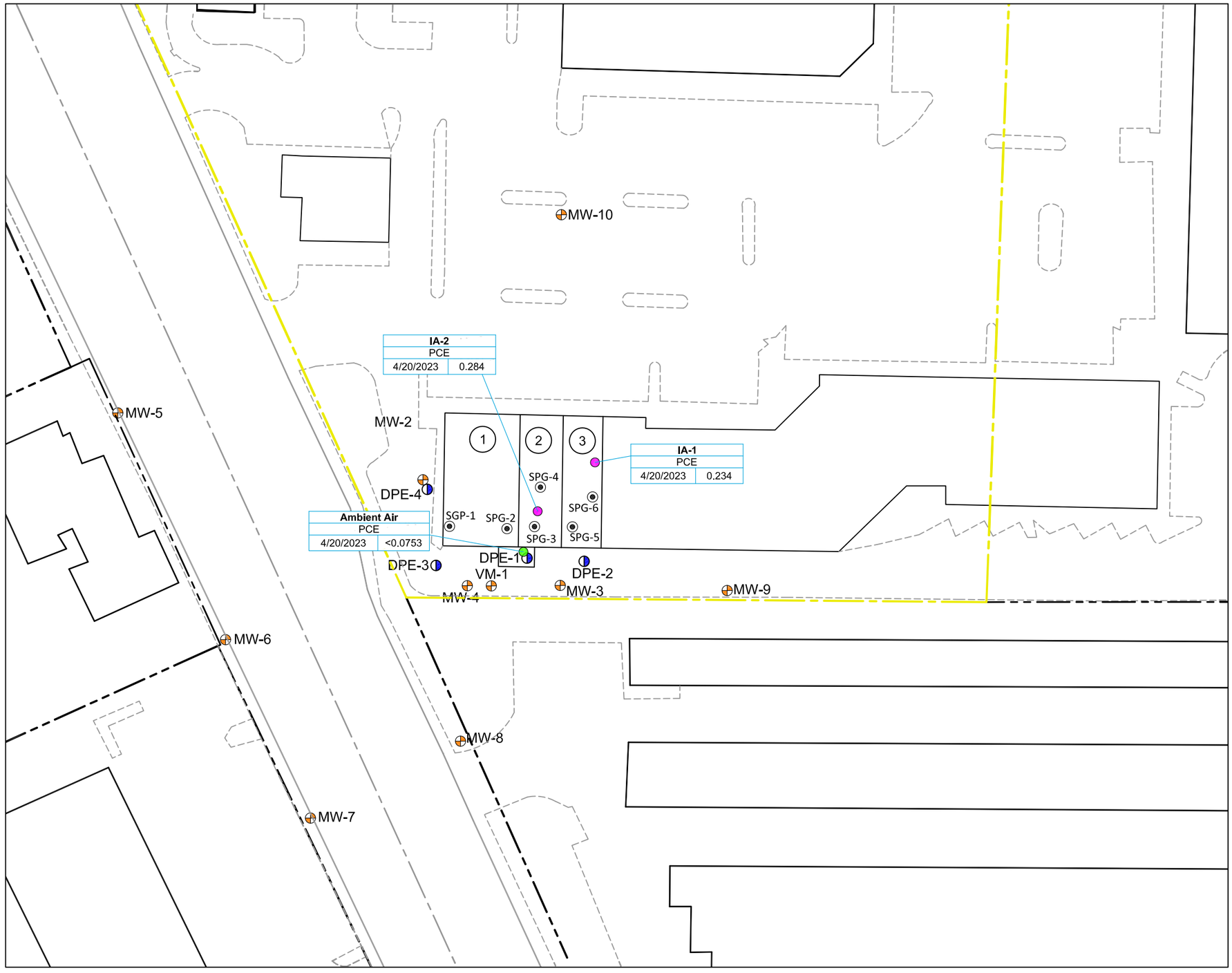
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 4

Site Plan with Analytical Results -- Soil Vapor

7/19/2023 223-002-007.dwg Fig 4 SVS



Legend

SGP-1	Soil Vapor Probe
MW-1	Monitoring Well
DPE-1	Dual Phase Extraction Well
IA-1	Indoor Air Sample
Ambient Air	Ambient Air Sample
	Subject Property
	Parcel Boundary
	Road Centerline
	Road
	Curb

$\mu g/m^3$ micrograms per cubic meter

PCE tetrachloroethene

Sample Location	
PCE	
Date	$\mu g/m^3$

1. Fusion India (Prime Cleaners 1984-2000)
2. Fusion India (Prime Cleaners 2000-2014)
3. Osaka Grill Teriyaki

Notes: 1) Vacant tenant space (Former Money Tree) not sampled due to ongoing renovations.

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

7/19/2023 223-002-008.dwg Fig 5 Air

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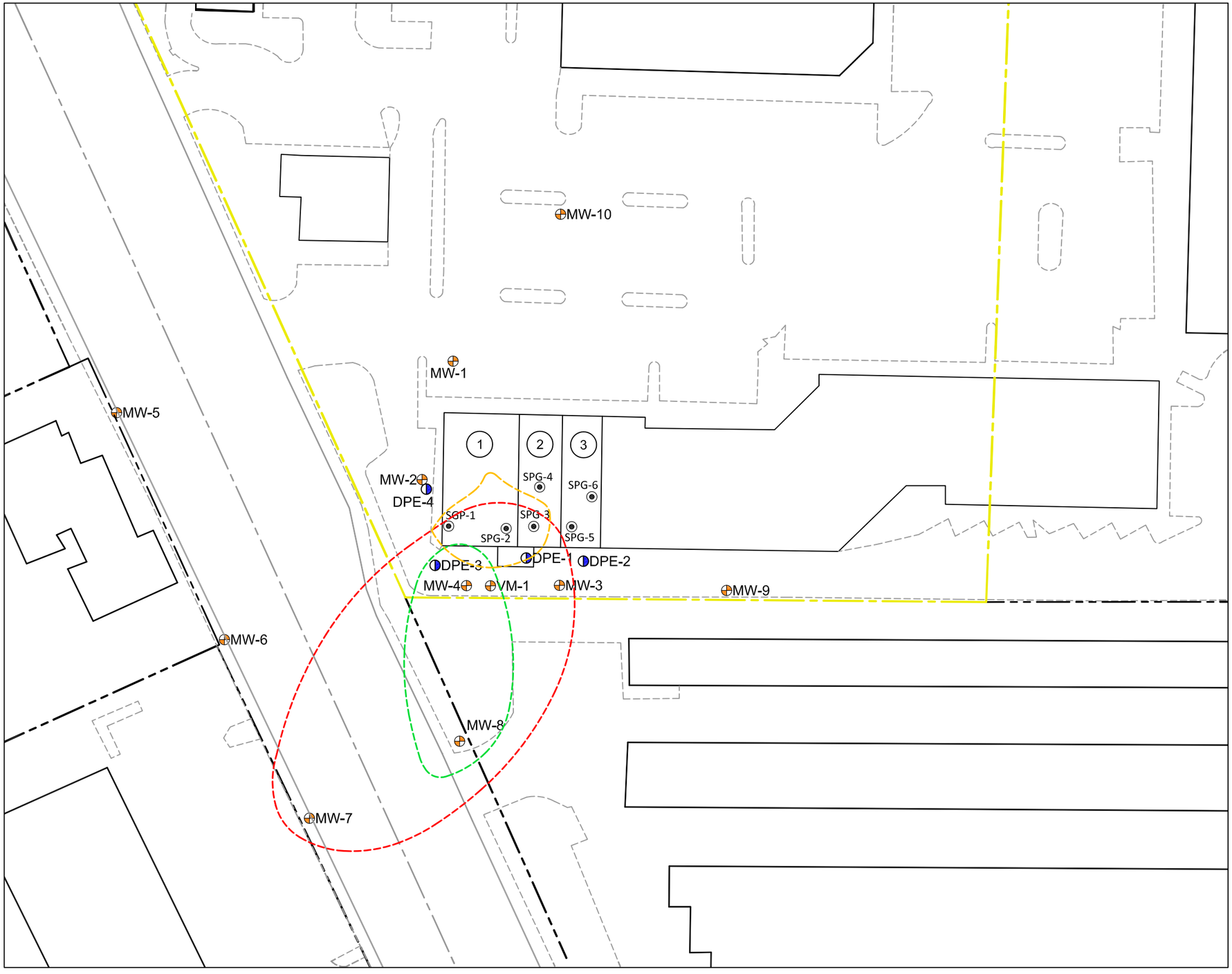
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 5

Site Plan with Analytical Results -- Air



Legend

SGP-1	Soil Vapor Probe
MW-1	Monitoring Well
DPE-1	Dual Phase Extraction Well
	Subject Property
	Parcel Boundary
	Road Centerline
	Road
	Curb
	Pre-DPE PCE Plume
	Post-DPE PCE Plume
	Pre-DPE Soil PCE Extent
DPE	Dual Phase Extraction
PCE	Tetrachloroethene

1. Fusion India (Prime Cleaners 1984-2000)
2. Fusion India (Prime Cleaners 2000-2014)
3. Osaka Grill Teriyaki

Notes:

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

7/19/2023 223-002-009.dwg Fig 6 COC Extent

PACIFIC CREST ENVIRONMENTAL
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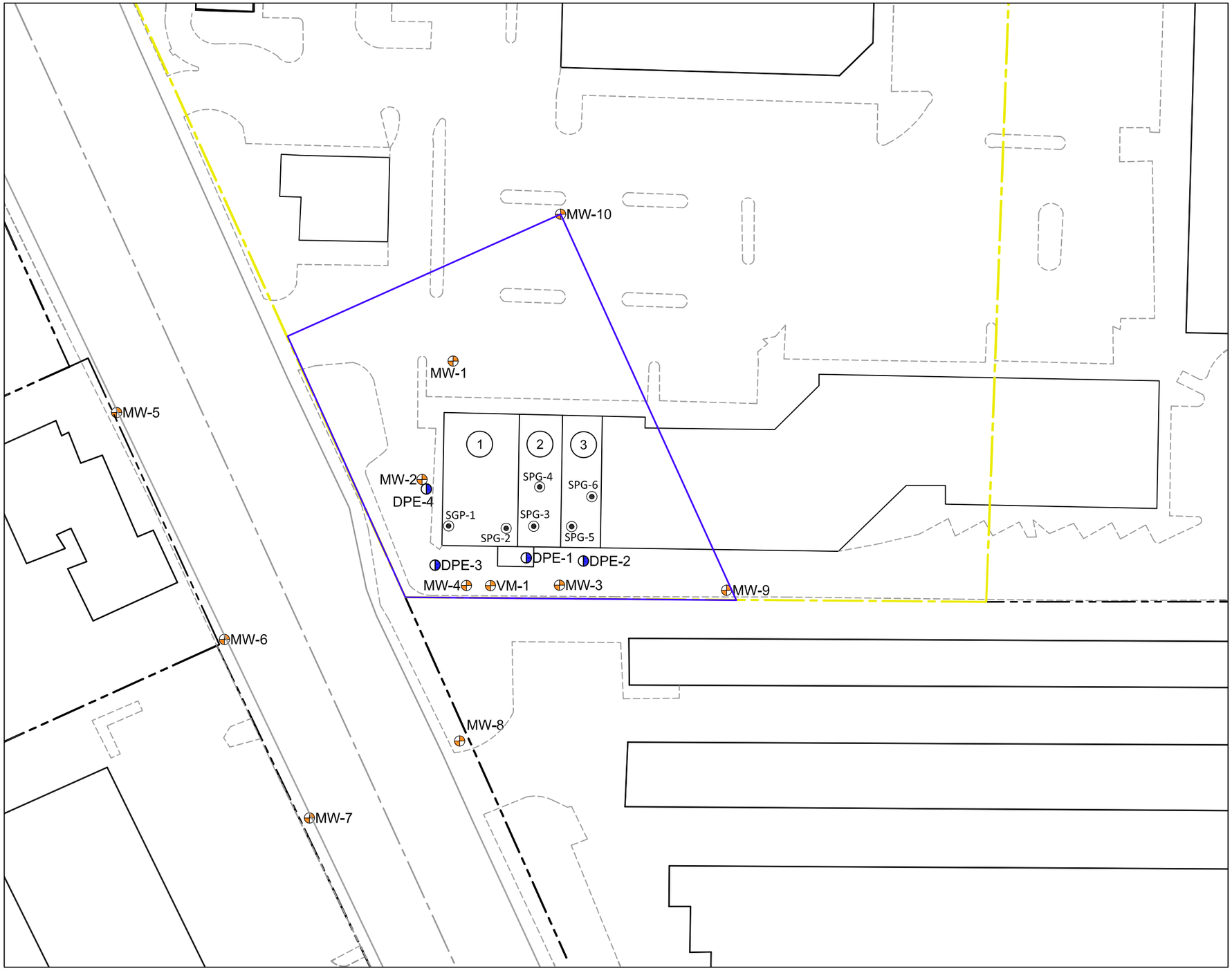
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 6

Site Plan with Extent of Contamination -- Soil and Groundwater



Legend

- SGP-1 — Soil Vapor Probe
- MW-1 — Monitoring Well
- DPE-1 — Dual Phase Extraction Well
- Subject Property
- Parcel Boundary
- Road Centerline
- Road
- Curb
- Potable Well Restriction Area

1. Fusion India (Prime Cleaners 1984-2000)
2. Fusion India (Prime Cleaners 2000-2014)
3. Osaka Grill Teriyaki

Notes:

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

PACIFIC CREST ENVIRONMENTAL
WWW.PCENV.COM 425-888-4990

Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 7

Site Plan with Restrictive Covenant Areas

7/19/2023 223-002-010.dwg Fig 7 Restrictive Covenant

TABLES

DRAFT FOR ECOLOGY REVIEW
AMENDED CLEANUP ACTION PLAN

FORMER PRIME CLEANERS SITE
18001 BOTHELL-EVERETT HIGHWAY
BOTHELL, WASHINGTON

PACIFIC CREST PN: 223-002

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-1	Terracon	8/25/2010	296.31	31-41	25.22	271.09
	Terracon	5/9/2011			21.18	275.13
	EES	6/22/2011			22.24	274.07
	EES	9/1/2011			24.76	271.55
	EES	12/6/2011			24.30	272.01
	EES	3/8/2012			22.98	273.33
	ZGA	5/23/2012			22.73	273.58
	EES	6/27/2012			22.79	273.52
	EES	10/18/2012			22.52	273.79
	EES	1/14/2013			20.54	275.77
	EES	4/24/2013			22.29	274.02
	EES	7/16/2013			24.72	271.59
	ZGA	1/9/2017			22.85	273.46
	ZGA	1/11/2017			22.90	273.41
	ZGA	3/20/2017			20.35	275.96
	ZGA	8/17/2017			24.87	271.44
	ZGA	11/14/2017			24.66	271.65
	ZGA	2/13/2018			21.65	274.66
	ZGA	1/14/2019			23.78	272.53
	ZGA	4/10/2019			24.04	272.27
	ZGA	12/3/2020			23.95	272.36
	ZGA	9/3/2021			26.18	270.13
	ZGA	6/30/2022			23.81	272.50
	Pacific Crest	4/19/2023			24.08	272.23
MW-2	Terracon	8/25/2010	296.47	34-44	25.58	270.89
	Terracon	5/9/2011			21.61	274.86
	EES	6/22/2011			22.72	273.75
	EES	9/1/2011			25.14	271.33
	EES	12/6/2011			24.59	271.88
	EES	3/8/2012			23.40	273.07
	ZGA	5/23/2012			22.97	273.50
	EES	6/27/2012			23.03	273.44
	EES	10/18/2012			25.81	270.66
	EES	1/14/2013			26.59	269.88
	ZGA	1/9/2017			23.14	273.33
	ZGA	1/11/2017			23.22	273.25
	ZGA	3/20/2017			20.81	275.66
	ZGA	8/17/2017			25.57	270.90
	ZGA	11/14/2017			25.15	271.32
	ZGA	2/13/2018			22.00	274.47
	ZGA	1/14/2019			24.05	272.42
	ZGA	4/10/2019			24.40	272.07
	ZGA	12/3/2020			24.30	272.17
	ZGA	9/3/2021			26.57	269.90
	ZGA	6/30/2022			24.18	272.29
	Pacific Crest	4/19/2023			24.47	272.00

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-3	Terracon	8/25/2010	296.96	29-39	26.17	270.79
	Terracon	5/9/2011			22.21	274.75
	EES	6/22/2011			23.39	273.57
	EES	9/1/2011			25.76	271.20
	EES	12/6/2011			25.28	271.68
	EES	3/8/2012			23.80	273.16
	ZGA	5/23/2012			23.49	273.47
	EES	6/27/2012			23.60	273.36
	EES	10/18/2012			26.36	270.60
	ZGA	1/9/2017			23.66	273.30
	ZGA	1/12/2017			23.80	273.16
	ZGA	3/20/2017			21.30	275.66
	ZGA	8/17/2017			26.10	270.86
	ZGA	11/14/2017			25.69	271.27
	ZGA	2/13/2018			22.45	274.51
	ZGA	1/14/2019			24.53	272.43
	ZGA	4/10/2019			24.92	272.04
	ZGA	12/3/2020			24.82	272.14
	ZGA	9/3/2021			27.15	269.81
	ZGA	6/30/2022			24.72	272.24
	Pacific Crest	4/19/2023			25.03	271.93
MW-4	Terracon	8/25/2010	296.56	25-35	25.76	270.80
	Terracon	5/9/2011			21.77	274.79
	EES	6/22/2011			22.96	273.60
	EES	9/1/2011			25.35	271.21
	EES	12/6/2011			24.89	271.67
	EES	3/8/2012			23.30	273.26
	ZGA	5/23/2012			23.10	273.46
	EES	6/27/2012			23.22	273.34
	EES	10/18/2012			25.98	270.58
	EES	1/14/2013			21.62	274.94
	ZGA	1/9/2017			23.21	273.35
	ZGA	1/13/2017			23.39	273.17
	ZGA	3/20/2017			20.91	275.65
	ZGA	8/17/2017			25.67	270.89
	ZGA	11/14/2017			25.32	271.24
	ZGA	2/13/2018			22.10	274.46
	ZGA	1/14/2019			24.16	272.40
	ZGA	4/10/2019			24.53	272.03
	ZGA	12/3/2020			26.12	270.44
	ZGA	9/3/2021			24.44	272.12
	ZGA	6/30/2022			24.33	272.23
	Pacific Crest	4/19/2023			24.61	271.95

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-5	Terracon	8/25/2010	289.85	13-33	18.71	271.14
	Terracon	5/9/2011			14.96	274.89
	EES	6/22/2011			16.00	273.85
	EES	9/1/2011			18.30	271.55
	EES	12/6/2011			18.00	271.85
	EES	3/8/2012			16.65	273.20
	ZGA	5/23/2012			16.18	273.67
	EES	6/27/2012			16.26	273.59
	EES	10/18/2012			18.95	270.90
	EES	1/14/2013			14.45	275.40
	EES	4/24/2013			15.86	273.99
	EES	7/16/2013			18.26	271.59
	ZGA	1/9/2017			17.36	272.49
	ZGA	1/12/2017			16.46	273.39
	ZGA	3/20/2017			14.36	275.49
	ZGA	8/17/2017			18.71	271.14
	ZGA	11/14/2017			18.51	271.34
	ZGA	2/13/2018			15.52	274.33
	ZGA	1/14/2019			17.59	272.26
	ZGA	4/10/2019			17.64	272.21
	ZGA	12/3/2020			17.85	272.00
	ZGA	9/3/2021			19.93	269.92
	ZGA	6/30/2022			17.28	272.57
	Pacific Crest	4/19/2023			17.62	272.23
MW-6	Terracon	8/25/2010	289.94	12.5-32.5	18.91	271.03
	Terracon	5/9/2011			15.06	274.88
	EES	6/22/2011			16.14	273.80
	EES	9/1/2011			18.48	271.46
	EES	12/6/2011			18.25	271.69
	EES	3/8/2012			16.70	273.24
	ZGA	5/23/2012			16.30	273.64
	EES	6/27/2012			16.50	273.44
	EES	10/18/2012			19.17	270.77
	EES	1/14/2013			14.46	275.48
	ZGA	1/9/2017			16.44	273.50
	ZGA	1/12/2017			16.60	273.34
	ZGA	3/20/2017			14.36	275.58
	ZGA	8/17/2017			18.81	271.13
	ZGA	11/14/2017			18.71	271.23
	ZGA	2/13/2018			15.53	274.41
	ZGA	1/14/2019			17.64	272.30
	ZGA	4/10/2019			17.66	272.28
	ZGA	12/3/2020			17.77	272.17
	ZGA	9/3/2021			19.92	270.02
	ZGA	6/30/2022			17.65	272.29
	Pacific Crest	4/19/2023			17.79	272.15

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-7	Terracon	8/25/2010	289.72	20-40	19.14	270.58
	Terracon	5/9/2011			15.22	274.50
	EES	6/22/2011			16.36	273.36
	EES	9/1/2011			18.73	270.99
	EES	12/5/2011			15.25	274.47
	EES	3/8/2012			16.62	273.10
	ZGA	5/23/2012			16.41	273.31
	EES	6/27/2012			16.46	273.26
	EES	10/18/2012			19.31	270.41
	ZGA	1/9/2017			16.61	273.11
	ZGA	1/12/2017			16.76	272.96
	ZGA	3/20/2017			14.40	275.32
	ZGA	8/17/2017			19.11	270.61
	ZGA	11/14/2017			18.68	271.04
	ZGA	2/13/2018			15.51	274.21
	ZGA	1/14/2019			17.52	272.20
	ZGA	4/10/2019			17.84	271.88
	ZGA	12/3/2020			17.84	271.88
	ZGA	9/3/2021			20.07	269.65
	ZGA	6/30/2022			17.71	272.01
	Pacific Crest	4/19/2023			17.95	271.77
MW-8	Terracon	5/9/2011	290.56	38-68	16.02	274.54
	EES	6/22/2011			17.22	273.34
	EES	9/1/2011			19.56	271.00
	EES	12/5/2011			19.06	271.50
	EES	3/8/2012			17.45	273.11
	Terracon	5/23/2012			17.21	273.35
	EES	6/27/2012			17.33	273.23
	EES	10/18/2012			20.19	270.37
	ZGA	1/9/2017			18.69	271.87
	ZGA	1/13/2017			17.65	272.91
	ZGA	3/20/2017			15.17	275.39
	ZGA	8/17/2017			19.91	270.65
	ZGA	11/14/2017			19.46	271.10
	ZGA	2/13/2018			16.30	274.26
	ZGA	1/14/2019			18.30	272.26
	ZGA	4/10/2019			18.61	271.95
	ZGA	12/9/2019			20.28	270.28
	ZGA	12/3/2020			18.81	271.75
	ZGA	9/3/2021			20.91	269.65
	ZGA	6/30/2022			18.58	271.98
	Pacific Crest	4/19/2023			18.83	271.73
MW-9	Terracon	1/9/2017	298.99	29-39	26.30	272.69
	Terracon	1/11/2017			25.10	273.89
	ZGA	3/20/2017			27.55	271.44
	ZGA	8/17/2017			27.55	271.44
	ZGA	11/14/2017			27.52	271.47
	ZGA	2/13/2018			24.35	274.64
	ZGA	1/14/2019			26.43	272.56
	ZGA	4/10/2019			26.73	272.26
	ZGA	12/3/2020			26.75	272.24
	ZGA	9/3/2021			29.09	269.90
	ZGA	6/30/2022			26.83	272.16
	Pacific Crest	4/19/2023			26.86	272.13

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-10	Terracon	1/9/2017	297.49	30-40	25.19	272.30
	Terracon	1/12/2017			24.17	273.32
	ZGA	3/20/2017			26.21	271.28
	ZGA	8/18/2017			26.21	271.28
	ZGA	11/14/2017			25.91	271.58
	ZGA	2/13/2018			22.85	274.64
	ZGA	1/14/2019			24.94	272.55
	ZGA	4/10/2019			25.25	272.24
	ZGA	12/3/2020			25.19	272.30
	ZGA	9/3/2021			27.42	270.07
	ZGA	6/30/2022			25.05	272.44
	Pacific Crest	4/19/2023			25.30	272.19
DPE-1	Pacific Crest	4/19/2023	NM	5-39	23.98	NM
DPE-2	Pacific Crest	4/19/2023	NM	--	24.78	NM
DPE-3	Pacific Crest	4/19/2023	NM	--	23.28	NM
DPE-4	Pacific Crest	4/19/2023	NM	--	23.47	NM
VM-1	Pacific Crest	4/19/2023	NM	10-20	DRY	NM

NOTES:
[1]Elevation of top of casing relative to an arbitrary datum in feet above mean sea level
[2]Depth below top of well casing in feet
NM = not measured
NS = not sampled
- = not reported
Terracon = Terracon Consultants Inc
ZGA = Zipper Geo Associates
Pacific Crest = Pacific Crest Environmental, LLC

Table 2
Groundwater Quality Parameters Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sample ID	Sampled By	Sample Date	Groundwater Quality Parameters[1]				
				Temperature (°C)	Specific Conductivity (mS/cm)	Dissolved Oxygen (mg/L)	pH	Oxidation Reduction Potential (mV)
MW-1	NA	Terracon	6/17/2009	NA	NA	1.3	5.24	212
	NA	Terracon	8/10/2010	NA	NA	2.25	5.34	-55
	NA	Terracon	5/10/2011	NA	NA	7.11	5.32	292
	NA	EES	6/22/2011	NA	0.194	3.19	5.7	129
	NA	EES	9/1/2011	NA	0.184	1.79	6.5	110
	NA	EES	12/5/2011	NA	0.218	2.20	6.4	65
	NA	EES	3/8/2012	NA	0.180	2.13	5.3	200
	NA	ZGA	5/23/2012	NA	NA	2.55	5.06	318
	NA	EES	6/27/2012	NA	0.280	2.57	5.3	221
	NA	EES	10/18/2012	NA	0.203	0.91	5.8	170
	NA	EES	1/14/2013	NA	0.190	3.29	5.3	190
	NA	EES	4/24/2013	NA	0.241	3.01	5.3	217
	NA	EES	7/16/2013	NA	0.384	1.13	6.0	151
	NA	ZGA	3/5/2014	NA	NA	4.82	6.57	136
	MW1-06292022	ZGA	6/29/2022	14.76	0.99	4.00	4.99	2.28
MW-2	NA	Terracon	6/16/2009	NA	NA	1.5	6.08	97
	NA	Terracon	8/12/2010	NA	NA	3.75	5.79	329
	NA	Terracon	5/10/2011	NA	NA	2.04	5.97	226
	NA	EES	6/22/2011	NA	0.346	0.36	6.4	78
	NA	EES	9/1/2011	NA	0.305	4.72	7.3	75
	NA	EES	12/5/2011	NA	0.270	2.40	6.2	274
	NA	EES	3/8/2012	NA	0.270	1.69	6.2	165
	NA	ZGA	5/24/2012	NA	NA	1.03	6.10	236
	NA	EES	6/27/2012	NA	0.290	0.6	6.2	156
	NA	EES	10/18/2012	NA	0.276	0.35	6.6	144
	NA	EES	1/14/2013	NA	0.280	0.90	6.1	113
	NA	ZGA	3/5/2014	NM	NM	NM	NM	NM
	MW2-06292022	ZGA	6/29/2022	15.38	1.37	3.82	5.31	2.20
MW-3	NA	Terracon	6/17/2009	NA	NA	2.3	5.86	186
	NA	Terracon	8/12/2010	NA	NA	4.64	5.89	326
	NA	Terracon	5/10/2011	NA	NA	5.34	5.97	275
	NA	ZGA	5/24/2012	NA	NA	5.01	5.93	247
	NA	ZGA	3/7/2014	NA	NA	7.02	6.90	236
	MW3-06302022	ZGA	6/30/2022	15.44	0.511	4.90	5.87	181
	MW3-042023	Pacific Crest	4/20/2023	14.0	0.539	5.93	6.31	135.8
MW-4	NA	Terracon	6/16/2009	NA	NA	2.6	5.63	211
	NA	Terracon	8/12/2010	NA	NA	6.48	5.75	400
	NA	Terracon	5/10/2011	NA	NA	6.10	5.83	291
	NA	EES	6/22/2011	NA	0.259	3.71	6.3	90
	NA	EES	9/1/2011	NA	0.24	4.11	7.1	68
	NA	EES	12/5/2011	NA	0.310	6.65	6.0	293
	NA	EES	3/8/2012	NA	0.230	5.87	6.0	182
	NA	ZGA	5/24/2012	NA	NA	5.86	5.88	244
	NA	EES	6/27/2012	NA	0.250	5.65	6.1	144
	NA	EES	10/18/2012	NA	0.239	6.44	6.4	163
	NA	EES	1/14/2013	NA	0.310	6.09	6.6	100
	NA	ZGA	3/7/2014	NA	NA	7.66	7.44	213
	MW4-06302022	ZGA	6/30/2022	15.08	0.184	7.67	6.21	176
	MW4-042023	Pacific Crest	4/20/2023	13.3	0.669	12.21	6.28	154.3

Table 2
Groundwater Quality Parameters Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sample ID	Sampled By	Sample Date	Groundwater Quality Parameters[1]				
				Temperature (°C)	Specific Conductivity (mS/cm)	Dissolved Oxygen (mg/L)	pH	Oxidation Reduction Potential (mV)
MW-5	NA	Terracon	8/10/2010	NA	NA	3.56	5.41	-49
	NA	Terracon	5/9/2011	NA	NA	1.87	5.27	204
	NA	EES	6/22/2011	NA	0.416	0.83	6.0	123
	NA	EES	9/1/2011	NA	0.356	0.27	6.3	132
	NA	EES	12/5/2011	NA	0.300	1.19	5.4	198
	NA	EES	3/8/2012	NA	0.330	0.72	5.4	175
	NA	EES	6/27/2012	NA	0.350	2.42	5.4	240
	NA	EES	10/18/2012	NA	0.245	0.30	6.0	119
	NA	EES	1/14/2013	NA	0.290	0.94	5.4	179
	NA	EES	4/24/2013	NA	0.454	2.50	5.5	213
	NA	EES	7/16/2013	NA	0.298	0.51	5.5	133
	NA	ZGA	3/6/2014	NA	NA	8.71	7.10	215
	MW5-06292022	ZGA	6/29/2022	15.26	1.269	4.31	6.19	1.11
MW-6	NA	Terracon	8/10/2010	NA	NA	3.85	5.86	-14
	NA	Terracon	5/9/2011	NA	NA	2.96	5.64	276
	NA	EES	6/22/2011	NA	0.362	2.39	6.1	104
	NA	EES	9/1/2011	NA	0.393	1.60	6.7	98
	NA	EES	12/5/2011	NA	0.280	0.66	5.8	217
	NA	EES	3/8/2012	NA	0.240	0.80	5.8	183
	NA	EES	6/27/2012	NA	0.350	3.08	5.8	216
	NA	EES	10/18/2012	NA	0.344	0.43	6.4	115
	NA	EES	1/14/2013	NA	0.290	0.98	5.8	168
	NA	ZGA	3/6/2014	NA	NA	7.16	7.15	216
	MW6-06292022	ZGA	6/29/2022	14.83	0.696	4.32	6.98	1.84
	MW6-041923	Pacific Crest	4/19/2023	14.0	0.3967	3.51	6.15	145.8
MW-7	NA	Terracon	8/10/2010	NA	NA	4.10	5.86	13
	NA	Terracon	5/9/2011	NA	NA	5.80	5.94	285
	NA	ZGA	3/6/2014	NA	NA	7.35	7.27	202
	MW7-06302022	ZGA	6/30/2022	14.62	0.107	0.0	6.97	147
	MW7-041923	Pacific Crest	4/19/2023	13.9	0.3093	7.20	6.14	146.3
MW-8	NA	Terracon	8/10/2010	NA	NA	3.39	6.21	180
	NA	ZGA	5/24/2012	NA	NA	5.24	5.79	244
	NA	ZGA	3/6/2014	NA	NA	7.90	7.17	228
	MW8-06302022	ZGA	6/30/2022	14.42	0.128	6.66	6.08	164
	MW8-041923	Pacific Crest	4/19/2023	13.3	0.2351	4.42	6.40	130.5
MW-9	NA	ZGA	3/5/2014	NA	NA	8.89	6.93	163
	MW9-06292022	ZGA	6/29/2022	14.52	0.122	5.59	6.22	148
MW-10	NA	ZGA	3/6/2014	NA	NA	6.82	6.75	227
	MW10-06292022	ZGA	6/29/2022	14.79	1.23	4.19	5.46	2.17
DPE-1	DPE1-041923	Pacific Crest	4/19/2023	15.0	0.3074	5.45	6.40	117.6
DPE-2	DPE2-042023	Pacific Crest	4/20/2023	14.5	0.2567	0.83	6.50	134.1
DPE-3	DPE3-042023	Pacific Crest	4/20/2023	12.9	0.3362	11.69	5.83	186.2
DPE-4	DPE4-042023	Pacific Crest	4/20/2023	13.5	0.2409	0.69	6.48	127.7

NOTES:
[1]Measured using YSI 556 Water Quality Meter
C = celsius
mS/cm = millisiemens per centimeter
mg/L = milligrams per liter
mV = millivolts
NM = not measured
NA = not available
Pacific Crest = Pacific Crest Environmental, LLC
R=Denotes results that exceed normal DO measurements and are likely the result of instrument error

Table 3
Laboratory Analytical Results Summary - Groundwater
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-1	MW-1	Terracon	6/17/2009	**12**	<1	4.8	<1	*<1.0*
MW-1	MW-1	Terracon	8/10/2010	<1	3.22	1.4	<1	*<1.0*
MW-1	MW-1	Terracon	5/10/2011	1.3	<1	<1	<1	*<1.0*
MW-1	TMW-1	EES	9/1/2011	<1	<1	<1	<1	<0.2
MW-1	TMW-1	EES	12/5/2011	1.1	<1	<1	<1	<0.2
MW-1	TMW-1	EES	3/8/2012	<1	<1	<1	<1	<0.2
MW-1	MW-1	ZGA	5/23/2012	<2	<2	<2	<2	<0.2
MW-1	TMW-1	EES	6/27/2012	<1	<1	<1	<1	<0.2
MW-1	TMW-1	EES	10/18/2012	1.1	<1	<1	<1	<0.2
MW-1	TMW-1	EES	1/14/2013	<1	<1	<1	<1	<0.2
MW-1	MW-1	ZGA	3/5/2014	<2	<2	<2	<2	<0.2
MW-1	MW-1	ZGA	1/11/2017	0.508	<1	<1	<1	*<1.00*
MW-1	MW-1	ZGA	8/18/2017	0.431	<1	<1	<1	*<0.5*
MW-1	MW-1	ZGA	11/15/2017	0.231	<0.5	<0.5	<0.5	*<0.5*
MW-1	MW-1	ZGA	2/13/2018	0.3	<0.5	<0.5	<0.5	*<0.5*
MW-1	MW-1	ZGA	1/14/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-1	MW-1	ZGA	4/10/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-1	MW1-06292022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-1	NS	Pacific Crest	4/19/2023	NS	NS	NS	NS	NS
MW-2	MW-2	Terracon	6/16/2009	<1	<1	<1	<1	<0.2
MW-2	MW-2	Terracon	8/12/2010	<1	<1	<1	<1	*<1.0*
MW-2	MW-2	Terracon	5/10/2011	<1	<1	<1	<1	*<1.0*
MW-2	TMW-2	EES	9/1/2011	<1	<1	<1	<1	<0.2
MW-2	TMW-2	EES	12/5/2011	<1	<1	<1	<1	<0.2
MW-2	TMW-2	EES	3/8/2012	<1	<1	<1	<1	<0.2
MW-2	MW-2	ZGA	5/24/2012	<2	<2	<2	<2	<0.2
MW-2	TMW-2	EES	6/27/2012	<1	<1	<1	<1	<0.2
MW-2	TMW-2	EES	10/18/2012	<1	<1	<1	<1	<0.2
MW-2	TMW-2	EES	1/14/2013	<1	<1	<1	<1	<0.2
MW-2	MW-2	ZGA	3/5/2014	<2	<2	<2	<2	<0.2
MW-2	MW-2	ZGA	1/11/2017	<1	<1	<1	<1	*<1.00*
MW-2	MW-2	ZGA	8/17/2017	<1	<1	<1	<1	*<0.5*
MW-2	MW-2	ZGA	11/14/2017	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-2	MW-2	ZGA	2/13/2018	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-2	MW-2	ZGA	1/14/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-2	MW-2	ZGA	4/10/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-2	MW2-06292022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-2	NS	Pacific Crest	4/19/2023	NS	NS	NS	NS	NS

Table 3
Laboratory Analytical Results Summary - Groundwater
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-3	MW-3	Terracon	6/17/2009	**6.6**	<1	<1	<1	<0.2
MW-3	MW-3	Terracon	8/12/2010	**6.4**	<1	<1	<1	*<1.0*
MW-3	MW-3	Terracon	5/10/2011	**9.3**	<1	<1	<1	*<1.0*
MW-3	MW-3	ZGA	5/24/2012	**15**	<2	<2	<2	<0.2
MW-3	MW-3	ZGA	3/7/2014	**5.6**	<2	<2	<2	<0.2
MW-3	MW-3	ZGA	1/12/2017	**9.28**	<1	<1	<1	*<1.0*
MW-3	MW-3	ZGA	8/21/2017	2.81	<1	<1	<1	*<0.5*
MW-3	MW-3	ZGA	11/16/2017	4.96	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	2/14/2018	**6.78**	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	1/15/2019	4.44	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	4/11/2019	2.51	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	12/9/2019	3.22	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	12/3/2020	**23.6**	<0.5	<0.5	<0.5	*<0.1*
MW-3	MW3-09032021	ZGA	9/3/2021	3.1	<0.5	<1	<1	<0.02
MW-3	MW3-06302022	ZGA	6/30/2022	**6.0**	<2.0	<2.0	<2.0	<0.2
MW-3	MW3-042023	Pacific Crest	4/20/2023	2.9	<0.20	<0.20	<0.20	<0.20
MW-4	MW-3	Adapt	10/31/2007	**45**	<1	<1	<1	<0.2
MW-4	MW-4	Terracon	6/16/2009	**170**	<1	<1	<1	<0.2
MW-4	MW-4	Terracon	8/12/2010	**140**	<1	<1	<1	*<1.0*
MW-4	MW-4	Terracon	5/10/2011	**110**	<1	<1	<1	*<1.0*
MW-4	TMW-4	EES	9/1/2011	**77**	<1	<1	<1	<0.2
MW-4	TMW-4	EES	12/5/2011	**68**	<1	<1	<1	<0.2
MW-4	TMW-4	EES	3/8/2012	**73**	<1	<1	<1	<0.2
MW-4	MW-4	ZGA	5/24/2012	**140**	<2	<2	<2	<0.2
MW-4	TMW-4	EES	6/27/2012	**80**	<1	<1	<1	<0.2
MW-4	TMW-4	EES	10/18/2012	**110**	<1	<1	<1	<0.2
MW-4	TMW-4	EES	1/14/2013	**84**	<1	<1	<1	<0.2
MW-4	MW-4	ZGA	3/7/2014	**44**	<2	<2	<2	<0.2
MW-4	MW-4	ZGA	1/13/2017	**96.1**	<1	<1	<1	*<1.0*
MW-4	MW-4	ZGA	8/21/2017	**76.5**	<1	<1	<1	*<0.5*
MW-4	MW-4	ZGA	11/16/2017	**50.8**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	2/14/2018	**28.5**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	1/15/2019	**10.7**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	4/11/2019	**22.5**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	12/9/2019	**42.9**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	12/4/2020	**18.6**	<0.5	<0.5	<0.5	<0.1
MW-4	MW4-09032021	ZGA	9/3/2021	**20**	<0.5	<1	<1	<0.02
MW-4	MW4-06302022	ZGA	6/30/2022	**23**	<2.0	<2.0	<2.0	<0.2
MW-4	MW4-042023	Pacific Crest	4/20/2023	**21**	<0.20	<0.20	<0.20	<0.20

Table 3
Laboratory Analytical Results Summary - Groundwater
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-5	MW-5	Terracon	8/10/2010	0.61	<1	<1	<1	*<1.0*
MW-5	MW-5	Terracon	5/9/2011	0.6	<1	<1	<1	*<1.0*
MW-5	TMW-5	EES	9/1/2011	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	12/5/2011	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	3/8/2012	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	6/27/2012	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	10/18/2012	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	1/14/2013	<1	<1	<1	<1	<0.2
MW-5	MW-5	ZGA	3/6/2014	<2	<2	<2	<2	<0.2
MW-5	MW-5	ZGA	1/12/2017	<1	<1	<1	<1	*<1.0*
MW-5	MW-5	ZGA	8/18/2017	0.281	<1	<1	<1	*<0.5*
MW-5	MW-5	ZGA	11/15/2017	0.259	<0.5	<0.5	<0.5	*<0.5*
MW-5	MW-5	ZGA	2/13/2018	0.22	<0.5	<0.5	<0.5	*<0.5*
MW-5	MW-5	ZGA	1/15/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-5	MW-5	ZGA	4/11/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-5	MW5-06292022	ZGA	6/29/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-5	NS	Pacific Crest	4/19/2023	NS	NS	NS	NS	NS
MW-6	MW-6	Terracon	8/10/2010	<1	<1	<1	<1	*<1.0*
MW-6	MW-6	Terracon	5/9/2011	2.2	<1	<1	<1	*<1.0*
MW-6	TMW-6	EES	9/1/2011	<1	<1	<1	<1	<0.2
MW-6	TMW-6	EES	12/5/2011	3.3	<1	<1	<1	<0.2
MW-6	TMW-6	EES	3/8/2012	4.1	<1	<1	<1	<0.2
MW-6	TMW-6	EES	6/27/2012	<1	<1	<1	<1	<0.2
MW-6	TMW-6	EES	10/18/2012	<1	<1	<1	<1	<0.2
MW-6	TMW-6	EES	1/14/2013	5.0	<1	<1	<1	<0.2
MW-6	MW-6	ZGA	3/6/2014	4.7	<2	<2	<2	<0.2
MW-6	MW-6	ZGA	1/12/2017	1.07	<1	<1	<1	*<1.0*
MW-6	MW-6	ZGA	8/21/2017	0.674	<1	<1	<1	*<0.5*
MW-6	MW-6	ZGA	11/15/2017	2.37	<0.5	<0.5	<0.5	*<0.5*
MW-6	MW-6	ZGA	2/14/2018	3.21	<0.5	<0.5	<0.5	*<0.5*
MW-6	MW-6	ZGA	1/15/2019	2.04	<0.5	<0.5	<0.5	*<0.5*
MW-6	MW-6	ZGA	4/11/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-6	MW6-06292022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.20
MW-6	MW6-041923	Pacific Crest	4/19/2023	0.34	<0.20	<0.20	<0.20	<0.20

Table 3
Laboratory Analytical Results Summary - Groundwater
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-7	MW-7	Terracon	8/10/2010	0.55	<1	<1	<1	*<1.0*
MW-7	MW-7	Terracon	5/9/2011	<1	<1	<1	<1	*<1.0*
MW-7	MW-7	ZGA	3/6/2014	8	<2	<2	<2	<0.2
MW-7	MW-7	ZGA	1/12/2017	0.948	<1	<1	<1	*<1.0*
MW-7	MW-7	ZGA	8/21/2017	1.49	<1	<1	<1	*<0.5*
MW-7	MW-7	ZGA	11/15/2017	3.8	<0.5	<0.5	<0.5	*<0.5*
MW-7	MW-7	ZGA	2/14/2018	1.93	<0.5	<0.5	<0.5	*<0.5*
MW-7	MW-7	ZGA	1/15/2019	3.88	<0.5	<0.5	<0.5	*<0.5*
MW-7	MW-7	ZGA	4/11/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-7	MW7-09032021	ZGA	9/3/2021	<1	<0.5	<1	<1	<0.02
MW-7	MW7-06302022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-7	MW7-041923	Pacific Crest	4/19/2023	0.89	<0.20	<0.20	<0.20	<0.20
MW-8	MW-8	Terracon	5/10/2011	**22**	<1	<1	<1	*<1.0*
MW-8	MW-8	ZGA	5/24/2012	**36**	<2	<2	<2	<0.2
MW-8	MW-8	ZGA	3/7/2014	**13**	<2	<2	<2	<0.2
MW-8	MW-8	ZGA	1/13/2017	**26.4**	<1	<1	<1	*<1.0*
MW-8	MW-8	ZGA	8/21/2017	**25.1**	<1	<1	0.25	*<0.5*
MW-8	MW-8	ZGA	11/16/2017	**19.2**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	2/14/2018	**16.1**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	1/15/2019	**12.1**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	4/11/2019	**14.3**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	12/9/2019	**17.5**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	12/4/2020	**6.45**	<0.5	<0.5	<0.5	<0.1
MW-8	MW8-09032021	ZGA	9/3/2021	**13**	<0.5	<1	<1	<0.02
MW-8	MW8-06302022	ZGA	6/30/2022	**22**	<2.0	<2.0	<2.0	<0.2
MW-8	MW8-041923	Pacific Crest	4/20/2023	**12**	<0.20	<0.20	<0.20	<0.20
MW-9	MW-9	Terracon	5/10/2011	<1.0	<1.0	<1.0	<1.0	<1.0
MW-9	MW-9	ZGA	3/5/2014	<2	<2	<2	<2	<0.2
MW-9	MW-9	ZGA	1/11/2017	<1	<1	<1	<1	<1.0
MW-9	MW-9	ZGA	8/18/2017	<1	<1	<1	<1	<0.5
MW-9	MW-9	ZGA	11/14/2017	<0.5	<0.5	<0.5	<0.5	<0.5
MW-9	MW-9	ZGA	2/13/2018	<0.5	<0.5	<0.5	<0.5	<0.5
MW-9	MW-9	ZGA	1/14/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MW-9	MW-9	ZGA	4/10/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MW-9	MW9-06302022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-9	NS	Pacific Crest	4/20/2023	NS	NS	NS	NS	NS

Table 3
Laboratory Analytical Results Summary - Groundwater
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-10	MW-10	ZGA	3/6/2014	<2	<2	<2	<2	<0.2
MW-10	MW-10	ZGA	1/12/2017	<1	<1	<1	<1	<1.0
MW-10	MW-10	ZGA	8/18/2017	<1	<1	<1	<1	<0.5
MW-10	MW-10	ZGA	11/14/2017	<0.5	<0.5	<0.5	<0.5	<0.5
MW-10	MW-10	ZGA	2/13/2018	<0.5	<0.5	<0.5	<0.5	<0.5
MW-10	MW-10	ZGA	1/14/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MW-10	MW-10	ZGA	4/10/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MW-10	MW10-06302022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-10	NS	Pacific Crest	4/20/2023	NS	NS	NS	NS	NS
DPE-1	DPE1-041923	Pacific Crest	4/19/2023	0.76	<0.20	<0.20	<0.20	<0.20
DPE-2	DPE2-042023	Pacific Crest	4/20/2023	<0.20	<0.20	<0.20	<0.20	<0.20
DPE-3	DPE3-042023	Pacific Crest	4/20/2023	**11**	<0.20	<0.20	<0.20	<0.20
DPE-4	DPE4-042023	Pacific Crest	4/20/2023	<0.20	<0.20	<0.20	<0.20	<0.20
DPE Effluent	Effluent	ZGA	3/8/2017	0.748	<1	<1	<1	<1.0
	Effluent	ZGA	11/12/2017	0.286	<0.5	<0.5	<0.5	<0.5
	Effluent	ZGA	1/11/2019	<0.5	<0.5	<0.5	<0.5	<0.5
	Effluent	ZGA	5/16/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MTCA Method A Cleanup Level				**5**	**5**	-	-	**0.2**
MTCA Method B	Noncancer	Potable Water		48	4	16	160	24
	Cancer			20.8	0.54	-	-	0.029
MTCA Method B	Noncancer	Vapor Intrusion - Residential		48	3.9	-	77	54
	Cancer			25	1.4	-	--	0.33
MTCA Method B	Noncancer	Vapor Intrusion - Commercial		410	32	-	650	460
	Cancer			120	12	-	--	1.6

NOTES:
BOLD = concentration exceeds MTCA Method A or B Cleanup Level
(<) = result is less than laboratory practical quantitation limit listed or analyte not detected at or above the reporting limit.
ITALICS = laboratory practical quantitation limit exceeds the applicable cleanup/screening level.
NA = not analyzed
NS = not sampled
[1] Analyzed by U.S. Environmental Protection Agency (EPA) Method 8260B/8260C
[2] Table 720-1, Method A Cleanup Levels for Groundwater, Model Toxics Control Act (MTCA) Cleanup Regulation Chapter 173-340 of the Washington Administrative
[3] Cleanup Levels and Risk Calculations (CLARC) under the Method B Model Toxics Control Act Cleanup Regulation
Adapt = Adapt Engineering, Inc.
Pacific Crest = Pacific Crest Environmental, LLC
Terracon = Terracon Conuslting Engineers & Scientists
ZGA = ZipperGeo Associates

Table 4
Laboratory Analytical Results Summary - Sub-Slab Soil Vapor
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Location ID	Location	Date	Sample ID	Sampled By	Soil Vapor Analytical Results (micrograms per cubic meter)[1]				
					Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
SPG-1	Former Money Tree/Prime Cleaners (Fusion India)	11/25/2013	SPG-1	ZGA	500	<1.3	<0.94	<0.94	<0.61
		6/3/2014	SPG-1	ZGA	**1,600**	<12	<8.9	<8.9	<5.7
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
SPG-2	Former Money Tree/Prime Cleaners (Fusion India)	11/25/2013	SPG-2	ZGA	**7,700**	**440**	22	<19	<12
		6/3/2014	SPG-2	ZGA	**9,900**	**470**	<190	<190	*<120*
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
SPG-3	Former Prime Cleaners (Fusion India)	12/6/2013	SPG-3	ZGA	**11,000**	68	<22	<22	<14
		6/3/2014	SPG-3	ZGA	**24,000**	**160**	<38	<38	<25
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
SPG-4	Former Prime Cleaners (Fusion India)	12/6/2013	SPG-4	ZGA	**3,400**	**420**	<5.5	6.8	<3.6
		6/3/2014	SPG-4	ZGA	**5,400**	**840**	<19	<19	<12
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
SPG-5	Osaka Grill	11/25/2013	SPG-5	ZGA	**5,400**	**220**	<13	<13	<8.2
		6/3/2014	SPG-5	ZGA	**8,700**	**360**	<19	<19	<12
		4/20/2023	SPG-5	Pacific Crest	458	28.5	<0.389	0.403	<0.791
SPG-6	Osaka Grill	11/25/2013	SPG-6[2]	ZGA	<790	*<630*	<460	<460	*<300*
		6/3/2014	SPG-6[2]	ZGA	*<40,000*	*<32,000*	<24,000	<24,000	*<15,000*
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
Sub-Slab Screening Level - Commercial Worker					**1,500**	**95**	**--**	**5200**	**44**
Sub-Slab Screening Level - Residential					**320**	**11**	**--**	**620**	**9.5**

NOTES:
BOLD denotes concentration above applicable commercial subslab screening level
< denotes result is less than laboratory practical quantitation limit listed or analyte not detected at or above the reporting limit
[1] Analyzed by U.S. Environmental Protection Agency (EPA) Method TO-15
[2] denotes probe failed leak test during sampling
[3] sample probe could not be located, possibly removed or destroyed during renovations
NS = not analyzed
MTCA = Model Toxics Control Act
Pacific Crest = Pacific Crest Environmental, LLC
ZGA = Zipper Geo Associates

Table 5
Laboratory Analytical Results Summary - Indoor and Ambient Air
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Location ID	Sample ID	Date	Sampled By	Air Analytical Results (µg/m^3)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl Chloride
Former Prime Cleaners (Fusion India)	Prime Cleaners	11/21/2013	ZGA	1.1	**280**	<0.39	<2.0	<0.13
	Prime Cleaners	6/3/2014	ZGA	3.5	**2.1**	<0.13	<0.65	<0.042
	Prime Cleaners	8/22/2018	ZGA	0.73	<0.27	<0.4	<0.4	<0.26
	Prime Cleaners	1/14/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Prime Cleaners	4/18/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Prime Cleaners	1/24/2020	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	IA2-042023	4/20/2023	Pacific Crest	0.284	<0.00672	<0.0972	<0.0977	<0.198
Former Money Tree/Prime Cleaners (Fusion India)	Money Tree	11/21/2013	ZGA	<0.20	**1.3**	<0.12	<0.59	<0.038
	Money Tree	6/3/2014	ZGA	<1.1	<0.88	<0.65	<3.2	<0.21
	Money Tree	8/22/2018	ZGA	<0.68	**1.1**	<0.4	<0.4	<0.26
				<0.68	**0.82**	<0.4	<0.4	<0.26
	Money Tree	1/14/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Money Tree	4/18/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Money Tree	1/24/2020	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	NS	4/20/2023	Pacific Crest	NS	NS	NS	NS	NS
Osaka Grill	Osaka Grill	11/21/2013	ZGA	3.6	**210**	<0.28	<1.4	<0.090
	Osaka Grill	6/3/2014	ZGA	3.2	0.37	<0.27	<1.4	<0.087
	Osaka Grill	8/22/2018	ZGA	<0.68	<0.27	<0.4	<0.4	<0.26
	Osaka Grill	1/14/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Osaka Grill	4/18/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Osaka Grill	1/24/2020	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	IA1-042023	4/20/2023	Pacific Crest	0.234	<0.00672	<0.0972	<0.0977	<0.198
Ambient	Ambient	11/21/2013	ZGA	<0.21	<0.17	<0.12	<0.62	<0.040
	Ambient	6/3/2014	ZGA	<0.23	<0.18	<0.14	<0.68	<0.044
	Ambient	8/22/2018	ZGA	<0.68	0.28	<0.4	<0.4	<0.26
	Ambient	1/14/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Ambient	4/18/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Ambient	1/24/2020	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	AA-042023	4/20/2023	Pacific Crest	<0.0753	<0.00672	<0.0972	<0.0977	<0.198
MTCA Method B Cleanup Level for Air[2]				**9.6**	**0.3**	**--**	**18.29**	**0.28**
MTCA Method B Screening Level - Commercial Worker				**44.9**	**2.8**	**--**	**155.7**	**1.3**

NOTES:

[1]Analyzed by EPA Method TO-15

[2]Cleanup Levels and Risk Calculations (CLARC) under the Method B MTCA Cleanup Regulation (January 2023 Update). For analytes with both Cancer and Noncancer values, the lower of the two values was used.

Bold = concentration exceeds applicable MTCA cleanup level

< = analyte was not above the practical quantitation limit

italicized denotes that laboratory practical quantitation limit is above the applicable MTCA cleanup level.

MTCA = Model Toxics Control Act

µg/m^3 = micrograms per cubic meter

ZGA=ZipperGeo

Table 6
Laboratory Analytical Results Summary - Soil
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Location ID	Sample ID	Sampled By	Sample Date	Sample Depth[2]	Soil Analytical Results (micrograms per kilogram)[1] Select Chlorinated Volatile Organic Compounds				
					Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
B-1	B-1	EA	3/9/1999	22.5	**200**	<57	330	ND	ND
B-2	B-2	EA	3/9/1999	20	<57	<57	<57	ND	ND
SP-1	SP-1	EA	3/9/1999	5	**240**	<54	<54	ND	ND
SP-2	SP-2	EA	3/9/1999	1	**560**	<53	<53	ND	ND
B-7	B-7	Adapt	10/24/2007	30	**63**	<30	<50	<50	<50
B1	B1	Terracon	5/17/2009	3	**160**	**38**	<1.5	<1.5	<1.5
B2	B2	Terracon	5/17/2009	3	1.1	18	<1.0	<1.0	<1.0
B3	B3	Terracon	5/17/2009	2.5	1.9	20	<1.0	<1.0	<1.0
B4	B4	Terracon	5/17/2009	2.5	17	29	<1.1	<1.1	<1.1
B5	B5	Terracon	5/17/2009	3	<1.1	24	<1.1	<1.1	<1.1
B6	B6	Terracon	5/17/2009	3	1.2	15	<1.0	<1.0	<1.0
B7	B7	Terracon	5/17/2009	3	15	22	<1.1	<1.1	<1.1
B8	B8	Terracon	5/17/2009	3	28	30	28	<1.1	<1.1
B9	B9	Terracon	5/17/2009	2.5	**110**	9.2	<1.1	<1.1	<1.1
	B9	Terracon	5/17/2009	5	4.1	27	<1.1	<1.1	<1.1
B10	B10	Terracon	5/17/2009	3	5.2	14	<1.1	<1.1	<1.1
	B10	Terracon	5/17/2009	5.5	**160**	10	<1.1	<1.1	<1.1
B11	B11	Terracon	5/17/2009	3	<1.0	<1.0	<1.0	<1.0	<1.0
B12	B12	Terracon	5/17/2009	3	3.8	**38**	<1.1	<1.1	<1.1
B13	B13	Terracon	5/17/2009	3.5	16	**33**	<1.0	<1.0	<1.0
MW1	MW1-1	Terracon	5/28/2009	7.5	<1.1	<1.1	<1.1	<1.1	<1.1
	MW1-2	Terracon	5/28/2009	17.5	<1.1	<1.1	<1.1	<1.1	<1.1
	MW1-3	Terracon	5/28/2009	25	2.1	<1.1	<1.1	<1.1	<1.1
	MW1-4	Terracon	5/28/2009	37	<1.3	<1.3	<1.3	<1.3	<1.3
	MW1-5	Terracon	5/28/2009	41	<1.2	<1.2	<1.2	<1.2	<1.2
MW2	MW2-6	Terracon	5/28/2009	7.5	<1.1	<1.1	<1.1	<1.1	<1.1
	MW2-7	Terracon	5/28/2009	18	<1.0	<1.0	<1.0	<1.0	<1.0
	MW2-8	Terracon	5/28/2009	23	<1.1	<1.1	<1.1	<1.1	<1.1
	MW2-9	Terracon	5/28/2009	44	<1.1	<1.1	<1.1	<1.1	<1.1
	MW2-10	Terracon	5/28/2009	33	<1.0	<1.0	<1.0	<1.0	<1.0
MW3	MW3-11	Terracon	5/29/2009	7.5	4.5	<1.2	<1.2	<1.2	<1.2
	MW3-12	Terracon	5/29/2009	13	3.9	<1.1	<1.1	<1.1	<1.1
	MW3-13	Terracon	5/29/2009	27.5	9.3	<1.1	<1.1	<1.1	<1.1
	MW3-14	Terracon	5/29/2009	31	2.3	<1.1	<1.1	<1.1	<1.1
	MW3-15	Terracon	5/29/2009	37	<1.1	<1.1	<1.1	<1.1	<1.1
MW5	MW5 S-1	Terracon	7/12/2010	12.5	<1.2	<1.2	<1.2	<1.2	<1.2
	MW5 S-2	Terracon	7/12/2010	20	<1.2	<1.2	<1.2	<1.2	<1.2
	MW5 S-3	Terracon	7/12/2010	25	<1.1	<1.1	<1.1	<1.1	<1.1
	MW5 S-4	Terracon	7/12/2010	30	<1.2	<1.2	<1.2	<1.2	<1.2
	MW5 S-5	Terracon	7/12/2010	35	<1.2	<1.2	<1.2	<1.2	<1.2
MW6	MW6 S-1	Terracon	7/13/2010	15	<1.2	<1.2	<1.2	<1.2	<1.2
	MW6 S-2	Terracon	7/13/2010	20	<1.0	<1.0	<1.0	<1.0	<1.0
	MW6 S-3	Terracon	7/13/2010	26	<1.1	<1.1	<1.1	<1.1	<1.1
	MW6 S-4	Terracon	7/13/2010	30	<1.1	<1.1	<1.1	<1.1	<1.1
	MW6 S-5	Terracon	7/13/2010	35	1.3	<1.1	<1.1	<1.1	<1.1
MW7	MW7 S-1	Terracon	7/13/2010	16	<1.2	<1.2	<1.2	<1.2	<1.2
	MW7 S-2	Terracon	7/13/2010	20	<1.1	<1.1	<1.1	<1.1	<1.1
	MW7 S-3	Terracon	7/13/2010	26	<1.1	<1.1	<1.1	<1.1	<1.1
	MW7 S-4	Terracon	7/13/2010	32.5	<1.1	<1.1	<1.1	<1.1	<1.1
	MW7 S-5	Terracon	7/13/2010	40	13	<1.2	<1.2	<1.2	<1.2

Table 6
Laboratory Analytical Results Summary - Soil
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Location ID	Sample ID	Sampled By	Sample Date	Sample Depth[2]	Soil Analytical Results (micrograms per kilogram)[1] Select Chlorinated Volatile Organic Compounds				
					Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
MW8	MW-8 S1	ZGA	4/26/2011	10	1.8	<1.2	<1.2	<1.2	<1.2
	MW-8 S2	ZGA	4/26/2011	15	<1.0	<1.0	<1.0	<1.0	<1.0
	MW-8 S3	ZGA	4/26/2011	20	8.9	<1.2	<1.2	<1.2	<1.2
	MW-8 S4	ZGA	4/26/2011	25	7.3	<1.1	<1.1	<1.1	<1.1
	MW-8 S5	ZGA	4/26/2011	30	45	<1.2	<1.2	<1.2	<1.2
	MW-8 S6	ZGA	4/26/2011	35	16	<1.2	<1.2	<1.2	<1.2
	MW-8 S7	ZGA	4/26/2011	40	25	<1.1	<1.1	<1.1	<1.1
	MW-8 S8	ZGA	4/26/2011	45	12	<1.1	<1.1	<1.1	<1.1
	MW-8 S9	ZGA	4/26/2011	50	16	<1.1	<1.1	<1.1	<1.1
	MW-8 S10	ZGA	4/26/2011	55	<1.0	<1.1	<1.1	<1.1	<1.1
	MW-8 S11	ZGA	4/26/2011	60	8.7	<1.1	<1.1	<1.1	<1.1
	MW-8 S12	ZGA	4/26/2011	70	7	<1.2	<1.2	<1.2	<1.2
MW9	MW 9-1	ZGA	9/30/2013	3	<10	<10	<10	<10	<10
	MW 9-2	ZGA	9/30/2013	8	<10	<10	<10	<10	<10
	MW 9-3	ZGA	9/30/2013	13	<10	<10	<10	<10	<10
	MW 9-4	ZGA	9/30/2013	18	<10	<10	<10	<10	<10
	MW 9-5	ZGA	9/30/2013	23	<10	<10	<10	<10	<10
	MW 9-6	ZGA	9/30/2013	28.5	<10	<10	<10	<10	<10
	MW 9-7	ZGA	9/30/2013	34	<10	<10	<10	<10	<10
	MW 9-8	ZGA	9/30/2013	38.5	<10	<10	<10	<10	<10
MW10	MW 10-1	ZGA	9/30/2013	3.5	<10	<10	<10	<10	<10
	MW 10-2	ZGA	9/30/2013	9	<10	<10	<10	<10	<10
	MW 10-3	ZGA	9/30/2013	13.5	<10	<10	<10	<10	<10
	MW 10-4	ZGA	9/30/2013	18	<10	<10	<10	<10	<10
	MW 10-5	ZGA	9/30/2013	23.5	<10	<10	<10	<10	<10
	MW 10-6	ZGA	9/30/2013	28	<10	<10	<10	<10	<10
	MW 10-7	ZGA	9/30/2013	33.5	<10	<10	<10	<10	<10
	MW 10-8	ZGA	9/30/2013	38.5	<10	<10	<10	<10	<10
MTCA Method A Cleanup Levels for Soil					**50**	**30**	**NE**	**NE**	**NE**

NOTES:
[1]Analyzed by SW846 method 8260
[2]Depth in feet below ground surface
NE = not established
ND = Reported as not detected. Detection limit not listed.
< = concentration not detected at or above the laboratory detection limit
Bold = concentration exceeds the applicable Cleanup Level
CVOCs = Chlorinated Volatile Organic Compounds
MTCA = Model Toxics Control Act
Pacific Crest = Pacific Crest Environmental, LLC
EA = Environmental Associates, Inc.
Adapt = Adapt Engineering, Inc.
Terracon = Terracon, Inc.
ZGA = Zipper Geo Associates, Inc.

Table 7
Preliminary Screening Levels and Proposed Cleanup Levels - Soil
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Screening Level Description	COPCs				
	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
MTCA Method A Cleanup Level	0.05	0.03	--	--	--
MTCA Method B, Carcinogen, Direct Contact (ingestion only) unrestricted	480	12	--	--	0.67
MTCA Method B, Non-Carcinogen, Direct Contact (ingestion only) unrestricted	480	40	160	1,600	240
MTCA Method B, Three-Phase Model, Soil Leaching to Groundwater	0.05	0.025	0.079	0.52	0.0017
Final Cleanup Level for COCs only	0.05	0.03	--	--	--

NOTE:
COPCs=Contaminants of Potential Concern
"--" = Not applicable or not calculated by Pacific Crest
COCs = Contaminants of concern
Screening Levels in milligrams per kilogram (mg/kg)

Table 8
Preliminary Screening Levels and Proposed Cleanup Levels - Groundwater
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Screening Level Description	COPCs				
	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
MTCA Method A Cleanup Levels for Groundwater - Ingestion	5	5	--	--	0.2
MTCA Method B Cleanup Levels for Groundwater - Ingestion	21	4	16	160	0.029
MTCA Method B Screening Levels for Groundwater - Vapor Intrusion - Residential	25	1.4	--	77	0.33
MTCA Method B Screening Levels for Groundwater - Vapor Intrusion - Commercial	120	12	--	650	1.6
Cleanup Level for COCs only	5	5	--	--	--

NOTE:
COCs=Contaminants of Concern
"--" = Not applicable or not calculated by Pacific Crest
COCs = Contaminants of concern
Screening Levels in micrograms per liter (ug/L)

Table 9
Preliminary Screening Levels and Proposed Cleanup Levels - Air and Soil Vapor
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Screening Level Description	COPCs				
	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroether	Vinyl Chloride
MTCA Method B Cleanup Level - Indoor Air - Residential	9.6	0.33	--	18.29	0.28
MTCA Method B Screening Level - Indoor Air - Commercial Worker	44.9	2.8	--	155.7	1.3
MTCA Method B Screening Level - Subslab Soil Vapor - Residential	320	11	--	610	9.5
MTCA Method B Screening Level - Subslab Soil Vapor - Commercial Worker	1500	95	--	5200	44
Cleanup Levels for COCs only	9.6	0.33	--	--	--

NOTE:
COPCs=Contaminants of Potential Concern
"--" = Not applicable or not calculated
COCs = Contaminants of concern
Screening Levels in micrograms per cubic meter (ug/m^3)

APPENDIX A
DATA GAP INVESTIGATION REPORT

DRAFT FOR ECOLOGY REVIEW
AMENDED CLEANUP ACTION PLAN

FORMER PRIME CLEANERS SITE
18001 BOTHELL-EVERETT HIGHWAY
BOTHELL, WASHINGTON

PACIFIC CREST PN: 223-00

PACIFIC CREST ENVIRONMENTAL
1531 BENDIGO BOULEVARD NORTH PO BOX 952 NORTH BEND, WA 98045
T 425.888.4990 F 425.888.4994

DATA GAP INVESTIGATION REPORT

FORMER PRIME CLEANERS SITE
18001 BOTHELL EVERETT HIGHWAY
BOTHELL, WASHINGTON
FACILITY SITE ID NO. 19816
VCP NO. NW2751
CLEANUP SITE ID NO. 11775

Submitted by:

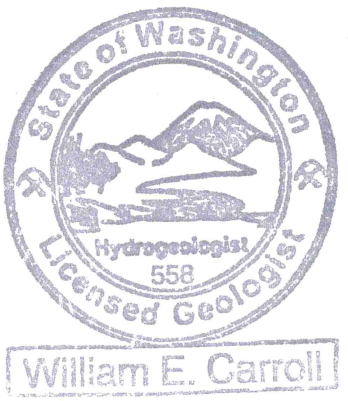
Pacific Crest Environmental, LLC
1531 Bendigo Boulevard North
North Bend, Washington 98045
Pacific Crest PN: 223-002

Prepared by:

William Carroll, LG, LHG
Principal Hydrogeologist

Reviewed by:

Joel Harrington
Project Geologist



August 17, 2023

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1.0 INTRODUCTION

Pacific Crest Environmental, LLC (Pacific Crest) has prepared this Data Gap Investigation Report (the Report) on behalf of Mill Creek Crossing (MCC), LLC for the Former Prime Cleaners Site (the Site[1]) located at the MCC Center at 18001 Bothell Everett Highway in Bothell Washington (MCC Property). The Site consists of properties affected by contamination associated with a release of tetrachloroethene (PCE) that occurred at the MCC Property. The Site location is illustrated on Figure 1.

The contaminants of potential concern (COPCs) for the Site consist of the following chlorinated volatile organic compounds (CVOCs) associated with a release of PCE-based dry-cleaning solvent that occurred at the former Prime Cleaners Dry-Cleaner tenant suite on the MCC Property: PCE, trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE) and vinyl chloride (VC). The contaminants of concern (COCs) are the following COPCs in the media of concern that exceed their Model Toxics Control Act (MTCA) Cleanup Regulation (Chapter 173-340 of the Washington Administrative Code [WAC 173-340]) cleanup levels presented in the draft Cleanup Action Plan (dCAP) (ZGA 2014b) and approved by Ecology in the Opinion Letter dated September 8, 2014 (Ecology 2014: PCE and TCE. The Site has been assigned Facility/Site No. 19816 and Voluntary Cleanup Program (VCP) Project No. NW2751 by Ecology.

1.1 PURPOSE

This Report describes the methodologies and results of recent site investigation activities that were conducted to assess the current Site conditions. The purpose of this Report is to provide sufficient information to document the activities conducted by Pacific Crest at the Site in 2023.

1.2 REMEDIAL ACTION RESPONSIBILITIES

Cleanup actions at the Site are being conducted under the direction of the former property owner and potentially liable person (PLP):

Mill Creek Crossing (MCC), LLC
Attn: Mr. Nicholas Echelbarge
31 NW Cherry Loop
Shoreline, Washington 98177

The environmental consultant for the cleanup action is:

Pacific Crest Environmental, LLC
c/o Mr. William Carroll, L.G., L.H.G.
P.O. Box 952
1531 Bendigo Boulevard North
North Bend, Washington 98045

[1] A “Site” is defined as the areal and vertical extent of the contaminants of concern (COCs) in the media of concern at concentrations that exceed the applicable cleanup levels.

The current property owner is:

Lakah Properties – Mill Creek, LLC
500 108th Ave NE, Suite 2050
Bellevue, WA 98004

1.3 ORGANIZATION

The Report has been organized into the following sections:

- **Section 2 – Background:** Section 2 provides background information, including location, description, and history of the MCC Property; the geologic and hydrogeologic setting; and a summary of previous remedial investigation (RI), feasibility study (FS); and interim cleanup action activities.
- **Section 3 – Recent Investigation Activities and Results:** Section 3 provides a summary of investigation and monitoring activities conducted in 2023 and an updated Conceptual Site Model (CSM).
- **Section 4 – References:** The documents cited in this Report are presented in Section 4.

2.0 BACKGROUND

The following subsections provide a description of the MCC Property, relevant Site characterization information, and remedial investigation, feasibility study, and interim action activities completed at the Site by Pacific Crest and others.

2.1 MCC PROPERTY DESCRIPTION

The MCC Property (Snohomish County Tax Parcel #27051800106300) is approximately 3.15 acres in size and located on the southeast corner of the intersection of 180th Street SE and Bothell Everett Highway in Bothell, Washington. In 1983, the MCC Property was developed as a retail shopping center. Between 1984 and 2014, Prime Cleaners conducted retail dry-cleaning operations in a tenant suite on the southern portion of the MCC Property. In 2015, the former owner, MCC, sold the property to Lakha Properties – Mill Creek LLC (Lakha Properties).

2.2 NATURAL CONDITIONS

2.2.1 Physiographic Setting

The Site is located at an elevation of approximately 290 feet above mean sea level in an area with a topographic slope to the west. The two closest surface water bodies are Silver Creek and North Creek, located approximately 1,800 feet east and 2,800 feet west, respectively. Silver Creek and North Creek discharge into the Sammamish River, located approximately 5 miles south of the Site.

2.2.2 Terrestrial Habitat Setting

Land use within the vicinity of the Site consists of a combination of urban commercial and residential property and does not contain undisturbed terrestrial habitat for wildlife. Contiguous undeveloped land with an area greater than 1.5 acres is not present either on the Site or within 500 feet of the Site. Due to the size of the undeveloped contiguous land located on or within a 500-foot radius of the Site (less than 1.5 acres) and the COCs present, the Site qualifies for an exemption under WAC 173-340-7491(1)(c).

2.2.3 Geologic Setting

The Puget Sound region is underlain by Quaternary sediments deposited by several glacial episodes (Galster and Laprade 1991). The regional subsurface conditions were generated by deposition occurring through a series of glacial advances and retreats. The regional sediments consist primarily of interbedded and/or sequential deposits of alluvial clays, silts, and sands, typically situated over deposits of glacial till consisting of silty sand to sandy silt with gravel. Outwash sediments consisting of stratified sands, silts, clays, and gravels were deposited by rivers, streams, and post-glacial lakes during the glacial retreats. With the exception of the most recent recessional deposits, sediments have been compacted by the historical overriding ice sheets.

Surficial geology in the immediate vicinity of the Site is identified in the United States Geologic Survey (USGS) Geologic Map of Bothell (Minard 1985) as Quaternary age advance outwash deposits (Qva) of the Vashon Stade during the Frasier Glaciation. The Vashon Stade of the Fraser Glaciation occurred approximately 15,000 to 13,000 years ago and consisted of a portion of the

Cordilleran Ice Sheet occupying the Puget lowland area of western Washington. Glacial melt-water drained southwest to the Pacific Ocean due to the dam created by the glacial toe. Qva is sand, silty sand and gravel deposited by streams from the advancing ice sheet and can be as much as 180 feet thick in the area.

2.2.4 Hydrogeology

Groundwater aquifers in the Puget Sound region generally occur in recent alluvial deposits of sands and gravel, which are stratigraphically delimited by aquitards (low permeability units) consisting of glacial till deposits. Discontinuous perched shallow groundwater zones may be seasonally or locally present above the glacial till deposits (Galster and Laprade 1991).

Shallow unconfined groundwater is first encountered at the Site in sandy layers at depths ranging from between approximately 15 feet below ground surface (bgs) and 25 feet bgs. Saturated conditions continue to the maximum depth explored, 70 feet bgs. The direction of groundwater flow based on potentiometric surface elevations measured in existing wells has been to the south and southwest during groundwater measurement events conducted between 2014 and 2023. Pacific Crest calculated hydraulic gradients of between 0.001 feet per foot (ft/ft) during the November 2017 sampling event and 0.002 ft/ft during the June 2022 sampling event.

2.3 PREVIOUS RI/FS AND INTERIM CLEANUP ACTION ACTIVITIES

The Site investigation area (Investigation Area) includes: a portion of the MCC Property in the vicinity of the former Prime Cleaners tenant suite; the public rights-of-way adjacent to the MCC Property; and the topographically down-gradient area in the immediate vicinity of the MCC Property.

In 1999, PCE was detected in soil and groundwater below the former Prime Cleaners tenant suite. Between 1999 and 2014, environmental consultants working on behalf of MCC conducted subsurface investigation activities to assess the nature and extent of PCE-contaminated soil and groundwater. In 2012, the Site was entered into Ecology's VCP. In 2014, Zipper Geo Associates (ZGA) submitted an RI/FS Report and dCAP to Ecology for review (ZGA 2014a and ZGA 2014b). The RI/FS results are summarized below:

- **Soil -** Laboratory analysis of soil samples detected PCE at concentrations ranging from 1.1 micrograms per kilogram (µg/kg) to 560 µg/kg and TCE concentrations ranging from 9.2 µg/kg to 38 µg/kg. Laboratory analysis of soil samples detected cis-1,2-DCE in two samples at concentrations of 28 µg/kg and 330 µg/kg. Laboratory analysis of soil samples did not detect trans-1,2-DCE or VC at concentrations above their respective practical quantitation limits (PQLs). PCE and TCE are the only COPCs in soil that exceed their respective MTCA Method A cleanup levels. The elevated concentrations of PCE and TCE in soil were located in the vicinity of the former Prime Cleaners dry-cleaning equipment. The extent of PCE and TCE concentrations in soil that exceed their respective MTCA Method A cleanup levels for unrestricted properties is defined within the boundaries of the MCC Property.
- **Groundwater -** Laboratory analysis of groundwater samples detected PCE at concentrations ranging from 0.55 micrograms per liter (µg/L) to 170 µg/L. Laboratory analysis of groundwater samples detected TCE in one sample at a concentration of 3.22 µg/L and detected cis-1,2-DCE in two samples at concentrations of 1.4 µg/L and 4.8 µg/L,

respectively. Laboratory analysis of groundwater samples did not detect trans-1,2-DCE or VC at concentrations above their respective PQLs. PCE is the only COPC in groundwater that exceeds it MTCA Method A cleanup level. The extent of PCE concentrations in groundwater that exceed the MTCA Method A cleanup level extends beyond the southern boundary of the MCC Property but is delineated by monitoring wells located to the north, south, east, and west.

- **Soil Vapor –** Laboratory analysis of soil samples detected PCE at concentrations ranging from 500 micrograms per cubic meter (µg/m^3) to 24,000 µg/m^3 and detected TCE at concentrations ranging from 68 µg/m^3 to 470 µg/m^3. Laboratory analysis of soil vapor samples detected cis-1,2-DCE in one sample at a concentration of 22 µg/m^3. Laboratory analysis of soil vapor samples did not detect trans-1,2-DCE or VC at concentrations above their respective PQLs. The elevated concentrations of PCE and TCE in soil vapor were located in the vicinity of the former Prime Cleaners dry-cleaning equipment.
- **Indoor Air -** Laboratory analysis of indoor air samples detected PCE at concentrations ranging from 1.1 µg/m^3 to 3.6 µg/m^3 and laboratory analysis of representative indoor air samples[2] detected TCE at concentrations ranging from 1.3 µg/m^3 to 2.1 µg/m^3. Laboratory analysis of indoor air samples did not detect cis-1,2-DCE, trans-1,2-DCE or VC at concentrations above their respective PQLs.
- **Exposure Pathways –** The RI concluded that direct contact and inhalation pathways were not complete and that the leaching to groundwater and groundwater ingestion pathways were potentially complete, but no water supply wells or ecological receptors were identified within the Site.

The RI/FS and CAP selected dual phase extraction (DPE) as the preferred cleanup alternative to remediate soil and groundwater. DPE operates by inducing a vacuum on wells to simultaneously extract CVOCs in soil vapor and groundwater from the subsurface. DPE is effective for remediation of shallow permeable material (e.g., sand and silty sand). During operation of a typical DPE system, the concentrations of CVOCs in soil gas and groundwater decrease as the mass of contaminants present in the subsurface is reduced. Over time, the CVOC recovery rate tends to become a function of the rate of desorption of contaminants from soil and recovery rates reach asymptotic levels. The RI/FS Report estimated a restoration timeframe of 1-year to achieve cleanup standards for both soil and groundwater. Ecology approved the CAP for Property Specific Cleanup in an Opinion Letter dated September 8, 2014 (Ecology 2014).

In 2017, ZGA installed a DPE system at the Site that consisted of one 25-horsepower (HP) Dekker Oil-Sealed Liquid Ring Pump, a liquid knock-out drum, and a liquid transfer pump. The DPE system was connected to four 4-inch diameter dedicated vacuum extraction wells (DPE-1 through DPE-4) completed to 40-feet bgs. Groundwater recovered by the system was discharged to the sanitary sewer under an Industrial Waste Discharge Authorization (Authorization No. 1010-02) from the King County Wastewater Treatment Division. Copies of the Site Plan illustrating the DPE system location, a process flow diagram of the DPE system, and the Industrial Wastewater Discharge Authorization are provided in Appendix A. Between 2017 and 2021, ZGA operated the

[2] Laboratory analysis of indoor air samples collected on November 21, 2013 detected elevated TCE concentrations that were attributed to TCE-containing “spot cleaner”. The concentrations of TCE detected at that time do not appear representative of vapor intrusion by soil vapor.

DPE system and conducted groundwater monitoring. The results of the system operation and monitoring are presented in reports prepared by ZGA (ZGA 2020, ZGA 2021, ZGA 2022a) and are summarized below:

- The DPE system operated for approximately five years between February 2017 and September 2021. During operations, the DPE system extracted and discharged to the sanitary sewer 1,164,940 gallons of groundwater.
- After DPE system operations, laboratory analysis of groundwater samples collected in June 2022 detected PCE in samples from resource protection wells MW-3, MW-4, and MW-8 at concentrations of 6.0 µg/L, 23 µg/L, and 22 µg/L, respectively.
- Laboratory analysis of indoor air samples collected between January 2019 and January 2020 did not detect PCE, TCE, cis-1,2-DCE, trans-1,2-DCE, or VC at concentrations above their respective cleanup levels.

In correspondence dated March 6, 2020, ZGA, on behalf of MCC, requested a No Further Action (NFA) determination for the Site. In an Opinion Letter dated September 29, 2021 (Ecology 2021), Ecology stated that cleanup of the Site was insufficient and required either implementation of further cleanup action to remediate off-property contaminated groundwater or implementation of engineering and/or institutional controls as cleanup measures to meet the substantive requirements of the MTCA regulations.

3.0 RECENT INVESTIGATION ACTIVITIES AND RESULTS

3.1 SCOPE OF WORK

Between April 19, 2023 and April 22, 2023, Pacific Crest, on behalf of MCC, conducted monitoring activities at the Site. The purpose of the scope of work was to assess current groundwater, soil vapor, and indoor air conditions. The DPE system was not operational during the sampling activities. The investigation activities included:

- Collecting groundwater samples from select existing wells and submitting the samples to an independent laboratory for analysis of CVOCs;
- Collecting sub-slab soil vapor samples from existing Vapor Pin™ sample points for laboratory analysis of CVOCs; and,
- Collecting indoor air samples inside the former Prime Cleaners tenant suite, now the Fusian India and Osaka Grill restaurants, and collecting an ambient air sample outside the former Prime Cleaners tenant space.

A narrative summary of the recent investigation field activities is provided in the following sections.

3.2 GROUNDWATER MONITORING EVENT

On April 19, 2023 and April 20, 2023, Pacific Crest conducted a groundwater monitoring and sampling event. The purpose of the monitoring was to assess groundwater conditions during cleanup action implementation. The monitoring procedures are described below:

- Prior to collecting groundwater samples, Pacific Crest collected water elevation measurements from wells MW-1 through MW-10 and DPE-1 through DPE-4. Groundwater elevation monitoring was conducted by opening the monument and removing the well caps from each of the existing wells and permitting the water level in each well to equilibrate with atmospheric pressure for a minimum of 15 minutes prior to collecting groundwater level data.
- Groundwater levels were measured relative to the north side of each well casing to an accuracy of 0.01-foot using an electronic water level indicator. The water level indicator was raised and lowered a minimum of 3 times to confirm the reading prior to recording the depth to water on the field form.

Groundwater sampling was conducted using U.S. Environmental Protection Agency's (EPA's) *Low-Flow (Minimal Drawdown) Groundwater Sampling Procedures* (Puls and Barcelona 1996) and Pacific Crest's standard operating procedures (SOPs). The groundwater sampling procedure are summarized as follows:

- Pacific Crest collected groundwater samples from wells MW-3, MW-4, MW-6, MW-7, MW-8, DPE-1, DPE-2, DPE-3, and DPE-4. Samples were not collected from wells MW-1, MW-2, MW-5, MW-9, and MW-10 because laboratory analysis of samples from those wells had not detected a COPC at a concentration above its respective cleanup level for at least 4 sampling events. Prior to groundwater sample collection, each well was purged using a

peristaltic pump and dedicated polyethylene tubing at a flow rate of approximately 200 milliliters per minute (0.053 gallons per minute).

- During purging, groundwater geochemical parameters, including temperature, specific conductivity, dissolved oxygen (DO), and oxidation/reduction potential (ORP), were recorded approximately every three minutes using a YSI ProQuatro multi-parameter water quality meter equipped with a flow-through cell.
- Upon stabilization of geochemical parameters, groundwater samples were collected from upstream of the flow-through cell. Groundwater samples were transferred directly from the dedicated tubing into laboratory-prepared 40-milliliter sample vials preserved with hydrochloric acid. The vials were completely filled with water to eliminate potential loss of volatiles to headspace. Each vial was checked to ensure that there were no air bubbles present in the sample, labeled, placed on ice in a cooler, and transported to OnSite Environmental (OnSite) of Redmond Washington under standard chain-of-custody protocols for analysis on a standard turnaround time.
- OnSite analyzed the samples for CVOCs by SW-846 Method 8260D. A copy of the laboratory analytical report is provided in Appendix B.

3.3 SOIL VAPOR MONITORING EVENT

On April 20, 2023, Pacific Crest collected one sub-slab soil vapor sample from the pre-existing Vapor Pin™ (SPG-5) in the Osaka Grill tenant space in accordance with manufacturer instructions and Ecology's Guidance for Evaluating Vapor Intrusion in Washington State. Pacific Crest was unable to locate Vapor Pins™ SPG-1, SPG-2, SPG-3, SPG-4, or SPG-6, which appear to have been destroyed or covered during modifications to the leased spaces by the MCC Property tenants.

Prior to collecting the soil vapor sample, the Vapor Pin™ was checked for leakage by conducting a shut-in test and a helium tracer test. The Vapor Pin™ was purged of three volumes of air at a rate of approximately 200 milliliters per minute prior to sample collection. The Vapor Pin™ location is illustrated on Figure 2.

One vapor sample was collected into a one-liter evacuated laboratory-prepared stainless-steel SUMMA® canister. The sample was submitted to Fremont Analytical, Inc. (Fremont) of Seattle, Washington for analysis of CVOCs by EPA Method TO-15. A copy of the laboratory analytical report is provided in Appendix C.

3.4 INDOOR AND AMBIENT AIR MONITORING EVENT

On April 19, 2023, concurrent with sub-slab soil vapor sampling, Pacific Crest deployed three SUMMA® canisters equipped with 8-hour flow regulators to collect the following samples: one indoor air sample (IA2-042023) from former Prime Cleaners tenant suite, now the Fusian Indian restaurant; one indoor air sample in the Osaka Grill tenant suite (IA1-042023); and one ambient air sample from outside the former Prime Cleaners tenant suite (AA-042023).[3] The indoor and

[3] A portion of the former Prime Cleaners space (former Money Tree) was not sampled due to ongoing renovations.

ambient air samples were collected using six-liter evacuated laboratory-prepared stainless-steel SUMMA® canisters with flow regulators set to collect over an 8-hour period. The SUMMA® canisters were deployed during regular business hours to collect representative samples under working exposure conditions. The ambient air sample was collected up-wind of the former Prime Cleaners tenant space. The SUMMA® canisters were collected on April 20, 2023 and transported to Fremont, under standard chain of-custody procedures. Fremont analyzed the samples for CVOCs by EPA Method TO-15 and prepared reports documenting the results. A copy of the laboratory analytical report is provided in Appendix c.

3.5 RESULTS

The results of the recent progress monitoring activities are presented below.

- On April 19, 2023, the depth to groundwater measured in the monitoring wells ranged from 17.62 feet below top of casing (btoc) (MW-5) to 26.86 feet btoc (MW-9). The groundwater elevations ranged from 272.23 feet (MW-1 and MW-5) to 271.73 feet (MW-8). Groundwater elevation data are presented in Table 1.
- A Site Plan illustrating the groundwater potentiometric surface contours is provided as Figure 3. The groundwater flow direction is generally toward the south at a gradient of 0.003 ft/ft, which is consistent with the potentiometric surface calculations for previous events.
- The groundwater geochemical parameter data that were collected during well purging are presented in Table 2.
- Groundwater analytical data for the COPCs for the Site are summarized in Table 3. Laboratory analysis of the groundwater samples detected PCE at concentrations ranging from 0.34 µg/L to 21 µg/L. Laboratory analysis of the groundwater samples collected from well MW-4, MW-8, and DPE-3 detected PCE at concentrations that exceeded the MTCA Method A cleanup level of 5 µg/L. Laboratory analysis did not detect TCE, cis-1,2-DCE, trans-1,2-DCE or VC at concentrations above their respective PQLs. A Site Plan illustrating the concentrations of COCs in groundwater from the April 2023 groundwater monitoring event is provided on Figure 3.
- On April 19, 2023, Pacific Crest collected on soil vapor sample from Vapor Pin™ SPG-5. The tracer and shut-in tests confirmed the integrity of the Vapor Pin installation. Laboratory analysis of soil vapor sample SPG-5 detected PCE, TCE, and trans-1,2-DCE at concentrations of 458 µg/m^3, 28.5 µg/m^3, and 0.403 µg/m^3, respectively. Laboratory analysis did not detect the remaining COCs at concentrations above their respective laboratory PQLs. The detected concentrations of PCE and TCE exceed their respective default sub-slab soil vapor screening levels for residential land use, but not the screening levels for commercial workers. The soil vapor results are summarized in Table 4 and illustrated on Figure 4.
- On April 19, 2023, Pacific Crest deployed three Summa® canisters to collect indoor and ambient air samples. Laboratory analysis of the ambient air sample (AA-042023) did not detect any of the COCs at concentrations above their respective laboratory PQLs. Laboratory analysis of the indoor air samples IA1-042023 and IA2-042023 detected PCE concentrations of 0.284 µg/m^3 and 0.234 µg/m^3, respectively. The detected concentrations of PCE were below the default MTCA Method B cleanup level that is protective of residential exposure scenarios and the MTCA Method B screening level for commercial

workers. The remaining COC were not detected at concentrations above their respective PQLs. The air results are summarized in Table 5 and illustrated on Figure 5.

3.6 UPDATED CONCEPTUAL SITE MODEL

An updated CSM has been developed for the Site that is based upon data collected during the investigation and cleanup activities conducted at the Site by Pacific Crest and others. The updated CSM identifies plausible exposure pathways for human receptors. The updated CSM elements are presented below:

- A release of PCE based dry cleaning solvent occurred on the MCC Property in the former Prime Cleaners tenant space. On the basis of the dry-cleaning operation dates, the release of PCE appears to have occurred between 1984 and 2000. The current tenant in the former Prime Cleaners tenant space is a restaurant (India Fusian).
- The Site COPCs consist of PCE and its reductive dechlorination degradation products TCE, cis-1,2-DCE, trans-1,2-DCE, and VC. The media of concern where concentrations of COPCs have been detected include soil, groundwater, soil vapor, and indoor air. Laboratory analysis of soil, soil vapor, indoor air, and groundwater samples detected PCE at concentrations above its MTCA Method A cleanup level or applicable screening level. Laboratory analysis of soil, soil vapor, and indoor air samples has also detected TCE, a breakdown product of PCE, at concentrations above its MTCA Method A cleanup level or applicable screening levels. Laboratory analysis of soil and soil vapor samples has detected cis-1,2-DCE at concentrations below its applicable screening levels. Laboratory analysis of soil, soil vapor, indoor air, and groundwater samples has not detected trans-1,2-DCE or VC at concentrations above their respective PQLs. The analytical results for the COPCs in the media of concern are summarized in Tables 3, 4, 5, and 6. The applicable preliminary screening levels (PSLs) for the COPCs in soil, groundwater, soil vapor, and air are the applicable MTCA Method A or Method B cleanup levels or screening levels which are presented in Tables 7, 8, and 9. The COCs are those COPCs that have exceeded the applicable cleanup level: PCE and TCE
- The horizontal and vertical extent of concentrations of PCE and TCE in soil and groundwater is defined by samples collected to date and the plan view extent, as delineated in the RI/FS Report, is illustrated on Figure 6.
- The applicable transport mechanisms for the migration of COCs include direct release to soil; migration to subsurface soil; migration/leaching to groundwater; volatilization from soil and groundwater to air; and transport by groundwater flow (advection).
- Between 2017 and 2021, ZGA operated the DPE system. The system was initially scheduled to operate for one year, but operations continued for four years. During operations, the DPE system extracted and discharged to the sanitary sewer 1,164,940 gallons of groundwater. The effectiveness of the DPE system can be assessed on the basis of the reduced concentrations of the COCs in the media of concern. Implementation of DPE resulted in decreases in concentrations of PCE, TCE, and cis-1,2-DCE in all media

where they were detected. A comparison of the maximum concentrations of PCE and TCE in the media of concern before and after DPE[4] system operations is provided below:

Media of Concern	Maximum Concentrations			
	Before DPE Operation		After DPE Operation	
	PCE	TCE	PCE	TCE
Soil	560 µg/kg	38 µg/kg	Confirmation soil samples were not collected during the 2023 investigation activities, but the soil vapor results provide empirical evidence the indicates that concentrations of PCE and TCE in soil are below their respective cleanup levels.[5]	
Soil Vapor	24,000 µg/m^3	840 µg/m^3	458 µg/m^3	28.5 µg/m^3
Indoor Air	3.6 µg/m^3	2.1 µg/m^3	0.284 µg/m^3	<0.00672 µg/m^3
Groundwater	170 µg/L	3.22 µg/L	23 µg/L	<0.20 µg/L

The change in aerial extent of PCE concentrations in groundwater since operation of the DPE system is illustrated on Figure 6.

- Prior to implementation of DPE, inhalation was identified as the only current potentially complete exposure pathway. Based on the zoning classification for the MCC Property (General Commercial) and current commercial land use, the current receptors are commercial workers. Implementation of DPE reduced the concentrations of the COCs in indoor air to below their respective cleanup levels and reduced concentrations of the COCs in soil vapor and groundwater to below their respective screening levels that are protective of indoor air for commercial workers. Unless zoning changes, future receptors potentially exposed to contaminants in air at the Site will still be commercial workers.
- Laboratory analysis of groundwater samples has detected PCE at concentrations that exceed the MTCA Method A cleanup level that is protective of potable groundwater. However, groundwater in the vicinity of the Site is not currently used as a drinking water source. Exposure to PCE in potable water is a complete pathway only if an extraction well was installed and used as a source for potable water.
- MTCA requires an evaluation of the potential impact for the constituents of concern on terrestrial ecological receptors in accordance with the procedures outlined in WAC 173-340-7490. However, due to the size of the undeveloped contiguous land located on or

[4] The most recent investigation activities in 2023 are representative of post-DPE Site conditions.

[5] PCE and TCE are present in soil vapor due to their chemical properties. In the absence of active vapor recovery, concentrations of PCE and TCE in soil gas should reach equilibrium with concentrations of PCE and TCE in soil. DPE resulted in a 94% decrease in concentrations of PCE in soil vapor. A reduction of this magnitude in soil concentrations results in predicted concentrations below the respective cleanup levels for PCE and TCE.

within a 500-foot radius of the Site (less than 1.5 acres) and the COCs present, the Site qualifies for an exemption under WAC 173-340-7491 (b) and (c)(i); therefore, no further ecological evaluation was conducted.

3.7 CONCLUSIONS

Conclusions that are based on the results of recent monitoring activities and the updated CSM are presented below.

- The 2023 investigation results demonstrate that operation of the DPE system significantly reduced concentrations of the COCs (i.e., PCE and TCE) and their breakdown products in the media of concern at and around the former Prime Cleaners tenant space. Laboratory analysis of recent indoor air samples collected from the current tenant spaces did not detect the COCs at concentrations above their respective MTCA Method B cleanup levels applicable to commercial workers. Laboratory analysis of recent soil vapor samples collected from below the slab of the building also did not detect the COCs at concentrations above their applicable screening levels used to assess vapor intrusion into indoor air that is protective of commercial workers. Based on the soil vapor results, the concentrations of the COCs in soil in the vicinity of former dry-cleaning equipment are presumed to be below their respective MTCA Method A cleanup levels. PCE concentrations in groundwater samples from three closely placed wells exceed the MTCA Method A cleanup level for PCE that is protective of drinking water use. However, a prohibition on extraction of groundwater for use as drinking water would meet the substantive requirements of MTCA to prevent exposure to PCE in groundwater on the MCC Property.

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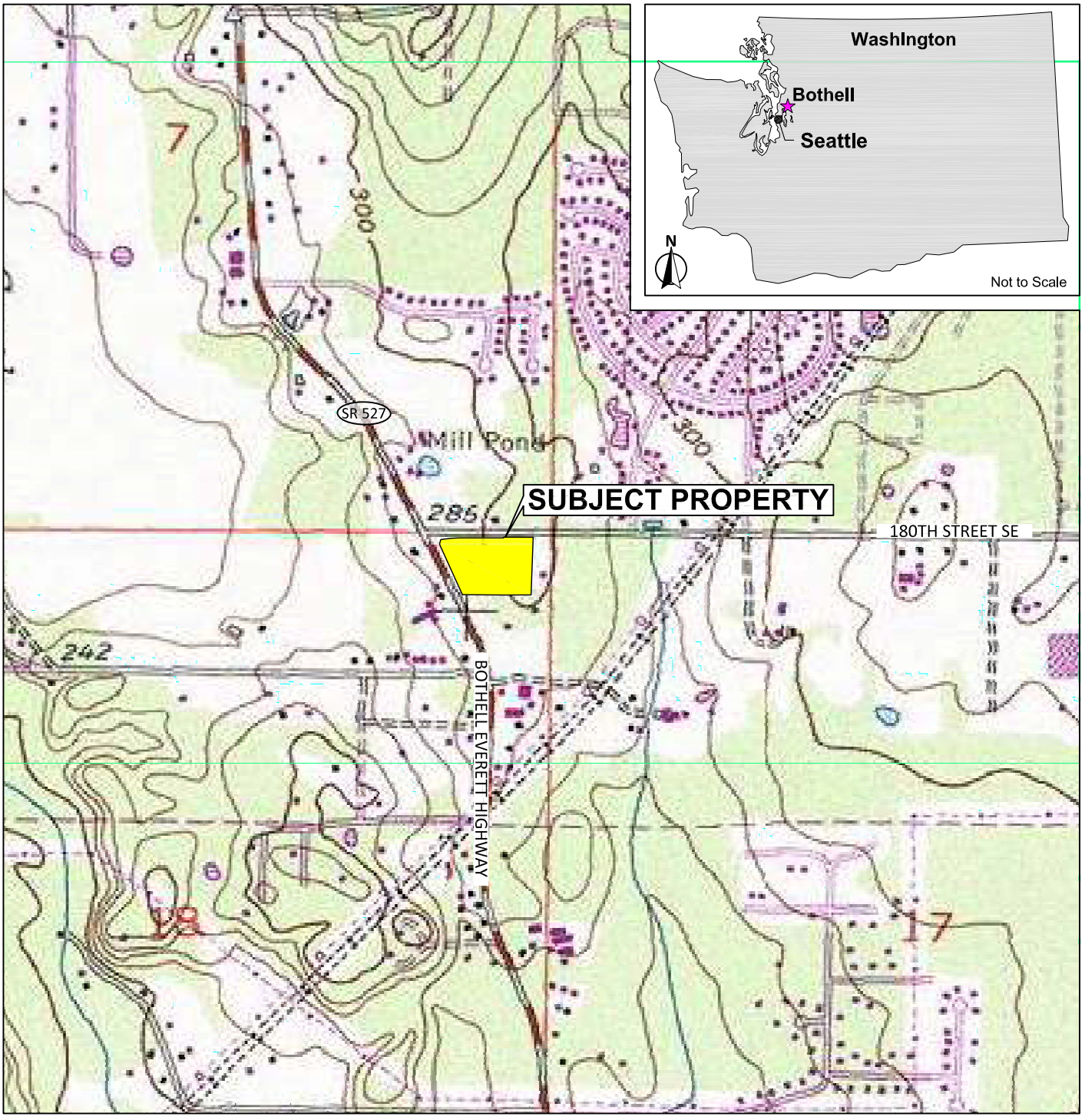
FIGURES

DATA GAP INVESTIGATION REPORT

FORMER PRIME CLEANERS SITE
18001 BOTHELL-EVERETT HIGHWAY
BOTHELL, WASHINGTON

PACIFIC CREST PN: 223-002



PACIFIC CREST ENVIRONMENTAL
WWW.PCENV.COM 425-888-4990

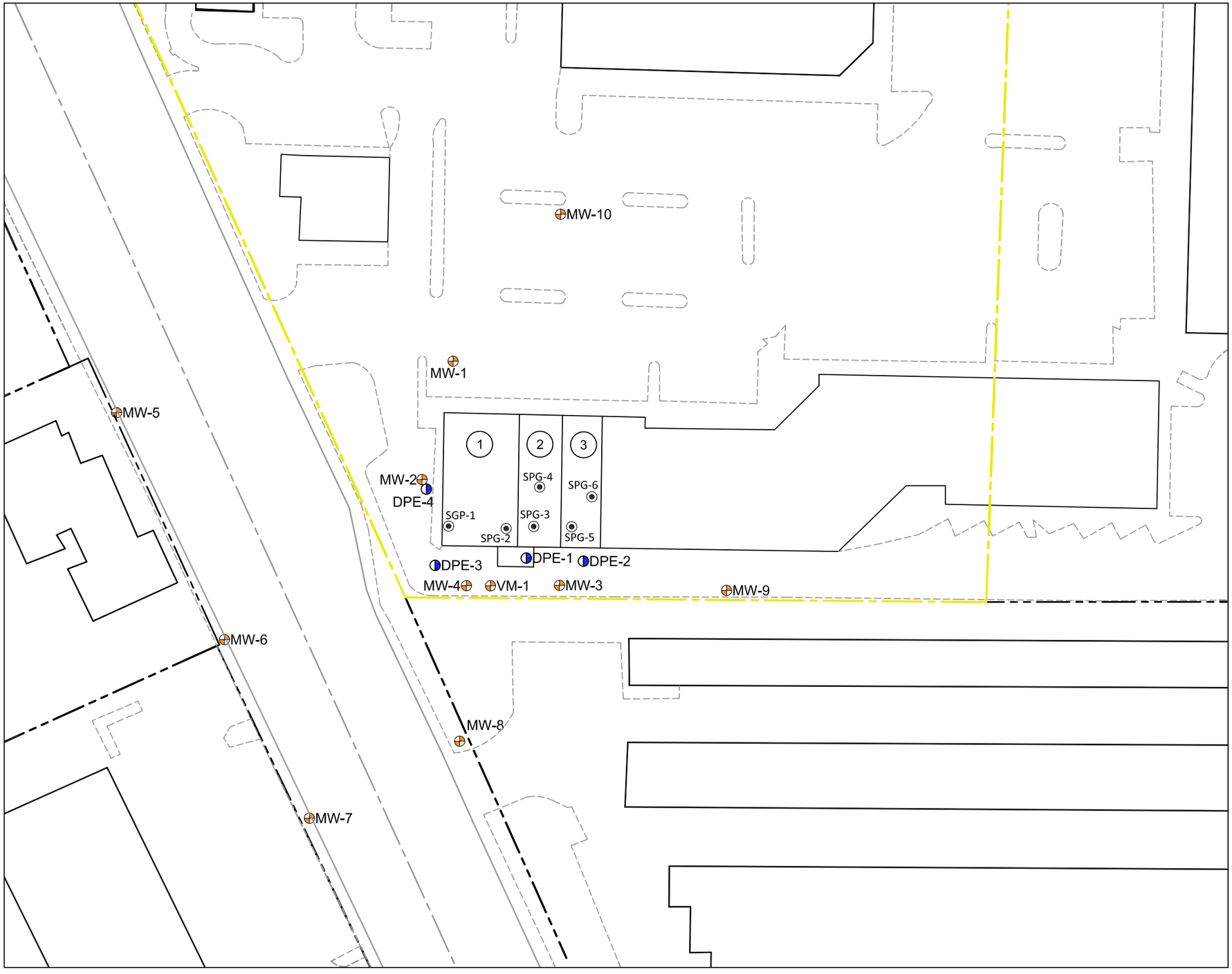
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 1

Site Location Map

9/14/2016 223-002-001.dwg FIG 1 Site Location



Legend

- SGP-1 — Soil Vapor Probe
- MW-1 — Monitoring Well
- DPE-1 — Dual Phase Extraction Well
- Subject Property
- Parcel Boundary
- Road Centerline
- Road
- Curb

1. Fushion India (Prime Cleaners 1984-2000)
2. Fushion India (Prime Cleaners 2000-2014)
3. Osaka Grill Teriyaki

Notes:

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

DRAFT

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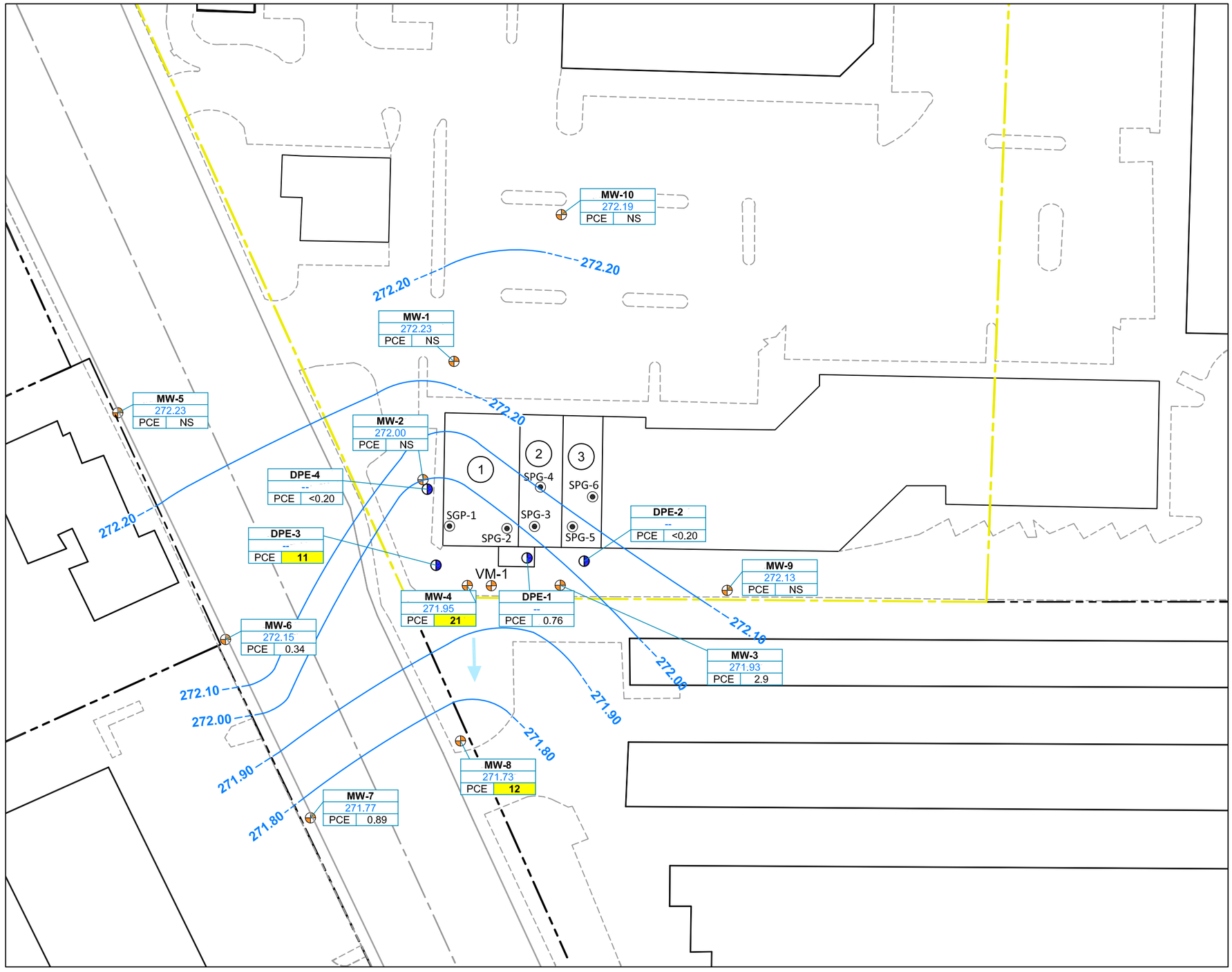
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 2

Site Plan

7/19/2023 223-002-002.dwg Fig 2 Site Plan



Legend

272.20 ---- Potentiometric Contour in Feet (contour = 0.1 foot) (dashed where inferred)

Apparent Direction of Groundwater Flow

SGP-1 Soil Vapor Probe

MW-1 Monitoring Well

DPE-1 Dual Phase Extraction Well

Subject Property

Parcel Boundary

Road Centerline

Road

Curb

Well ID
Groundwater Elevation (feet)
PCE (µg/L)

PCE tetrachloroethene (MTCA CUL = 5)

µg/L micrograms per liter

BOLD concentration above applicable MTCA Method CUL

MTCA Model Toxics Control Act

CUL cleanup level

NS Not sampled

(1) Fusion India (Prime Cleaners 1984-2000)

(2) Fusion India (Prime Cleaners 2000-2014)

(3) Osaka Grill Teriyaki

Notes: Hydraulic Gradient = 0.003 ft/ft

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

DRAFT

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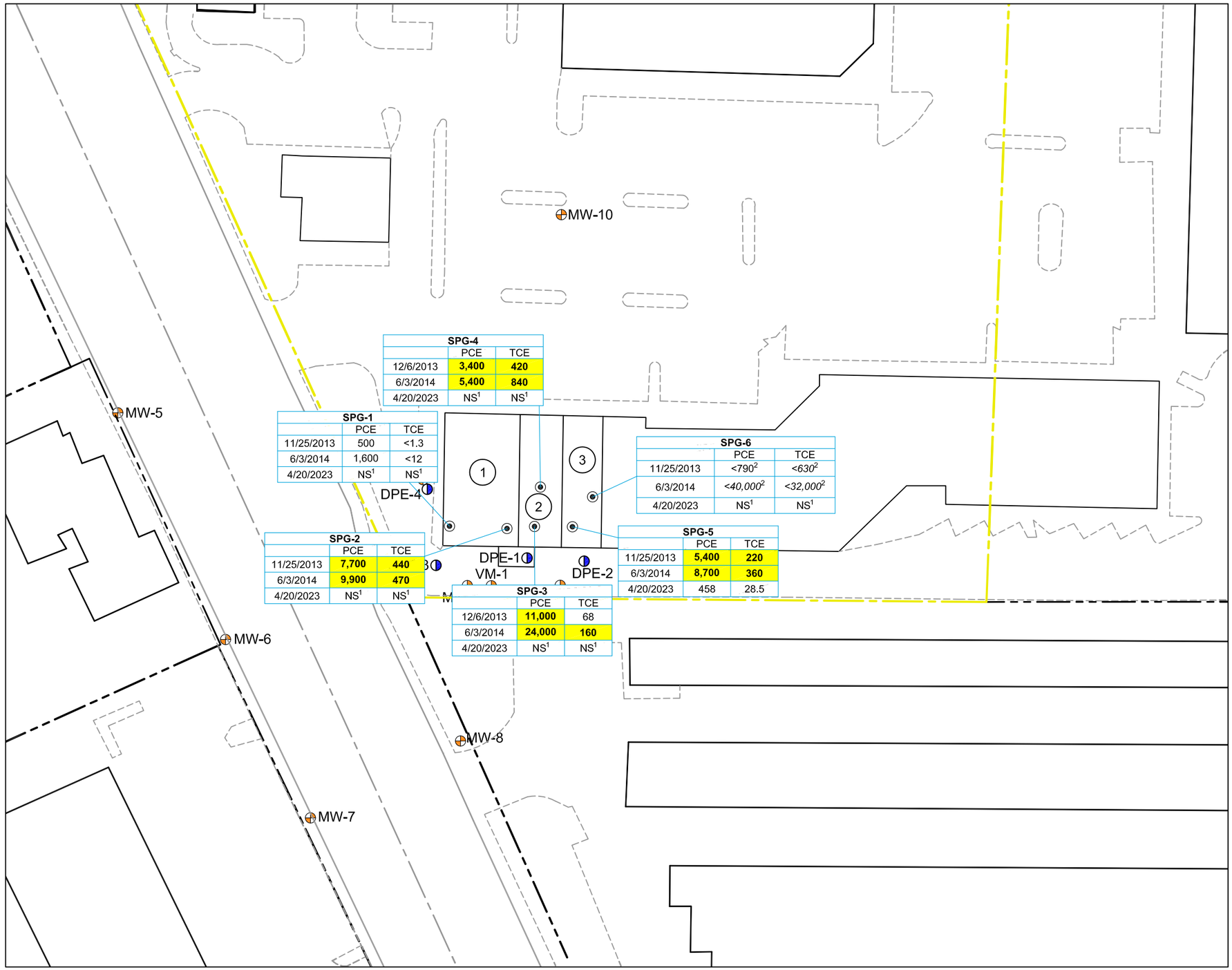
Bothell, Washington

PN: 223-002

Figure 3

Site Plan with Potentiometric Surface Elevation Contours and Analytical Results
(4/19/2023 - 4/20/2023)

7/19/2023 223-002-006.dwg Fig 3 GW4-2023



Legend

- SGP-1 — Soil Vapor Probe
- MW-1 — Monitoring Well
- DPE-1 — Dual Phase Extraction Well
- Subject Property
- Parcel Boundary
- Road Centerline
- Road
- Curb

BOLD Concentration above applicable preliminary screening level

$\mu g/m^3$ micrograms per cubic meter

MTCA Model Toxics Control Act

PCE tetrachloroethene

TCE trichloroethene

NS not sampled

Location ID		
	PCE	TCE
Date	$\mu g/m^3$	$\mu g/m^3$

1. Fusion India (Prime Cleaners 1984-2000)
2. Fusion India (Prime Cleaners 2000-2014)
3. Osaka Grill Teriyaki

Notes:

1) Soil Vapor Probe not sampled due to inability to find probes. Probes possibly destroyed/covered during interior renovations

2) Failed leak test

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

DRAFT

7/19/2023 223-002-007.dwg Fig 4 SVS

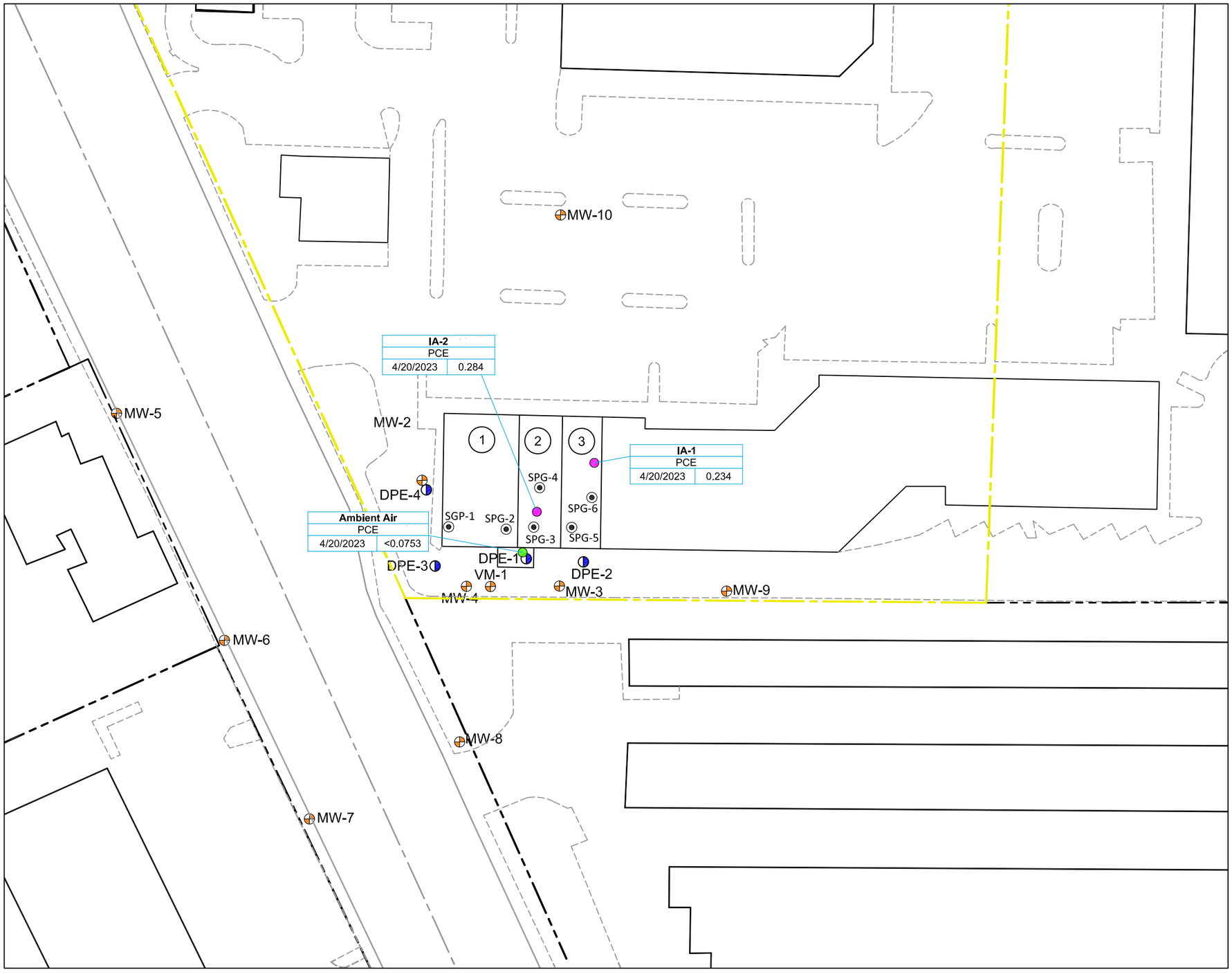
PACIFIC CREST ENVIRONMENTAL
WWW.PCENV.COM 425-888-4990

Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 4

Site Plan with Analytical Results -- Soil Vapor



Legend

SGP-1	Soil Vapor Probe
MW-1	Monitoring Well
DPE-1	Dual Phase Extraction Well
IA-1	Indoor Air Sample
Ambient Air	Ambient Air Sample
	Subject Property
	Parcel Boundary
	Road Centerline
	Road
	Curb

$\mu g/m^3$ micrograms per cubic meter

PCE tetrachloroethene

Sample Location	
PCE	
Date	$\mu g/m^3$

1. Fusion India (Prime Cleaners 1984-2000)
2. Fusion India (Prime Cleaners 2000-2014)
3. Osaka Grill Teriyaki

Notes: 1) Vacant tenant space (Former Money Tree) not sampled due to ongoing renovations.

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

DRAFT

7/19/2023 223-002-008.dwg Fig 5 Air

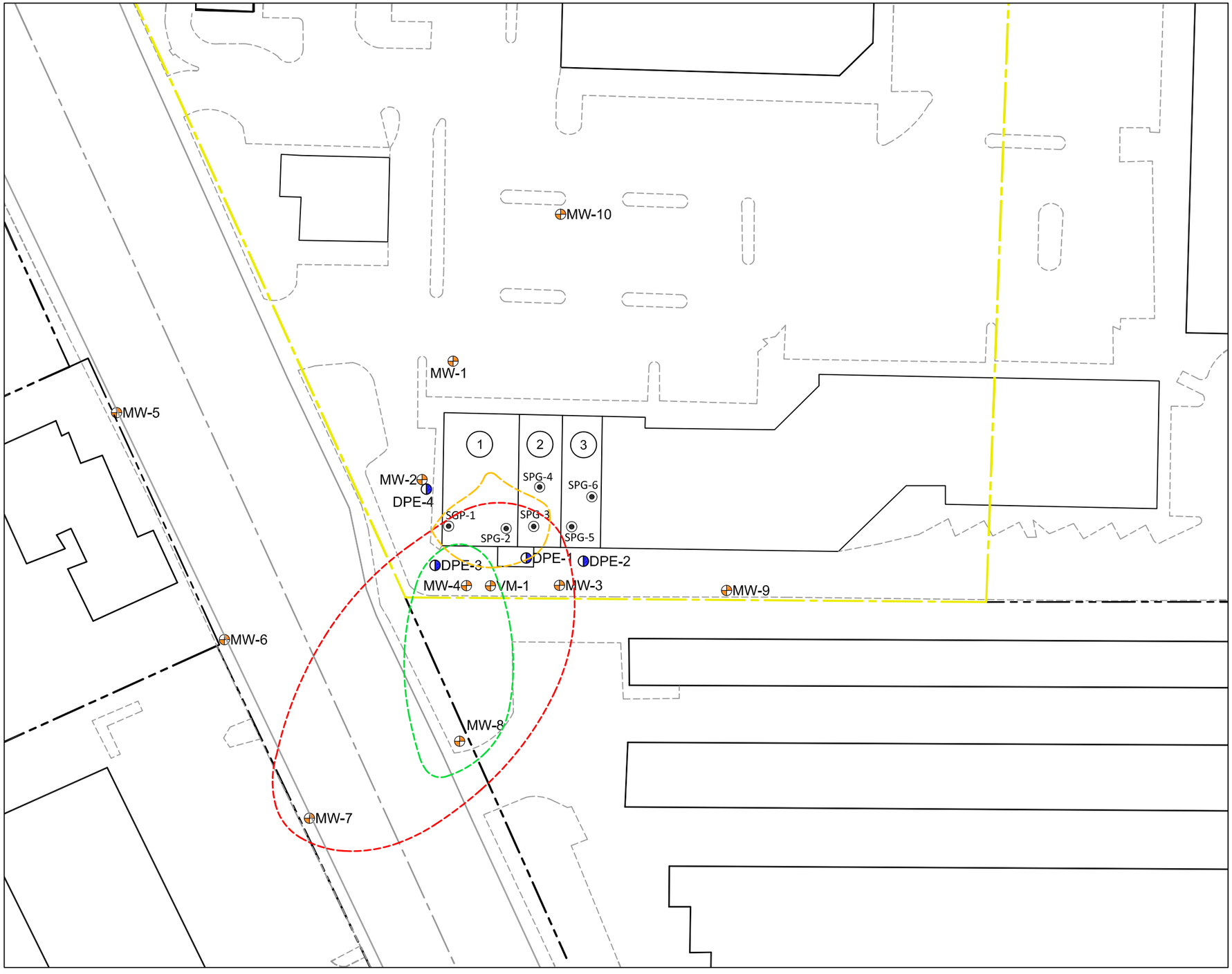
PACIFIC CREST ENVIRONMENTAL
WWW.PCENV.COM 425-888-4990

Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 5

Site Plan with Analytical Results -- Air



Legend

SGP-1	Soil Vapor Probe
MW-1	Monitoring Well
DPE-1	Dual Phase Extraction Well
	Subject Property
	Parcel Boundary
	Road Centerline
	Road
	Curb
	Pre-DPE PCE Plume
	Post-DPE PCE Plume
	Pre-DPE Soil PCE Extent
DPE	Dual Phase Extraction
PCE	Tetrachloroethene

1. Fusion India (Prime Cleaners 1984-2000)
2. Fusion India (Prime Cleaners 2000-2014)
3. Osaka Grill Teriyaki

Notes:

Source: Snohomish County Assessor

N

0 50

Approximate Scale in Feet

DRAFT

PACIFIC CREST ENVIRONMENTAL
WWW.PCENV.COM 425-888-4990

Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington

PN: 223-002

Figure 6

Site Plan with Extent of Contamination -- Soil and Groundwater

7/19/2023 223-002-009.dwg Fig 6 COC Extent

TABLES

DATA GAP INVESTIGATION REPORT

FORMER PRIME CLEANERS SITE
18001 BOTHELL-EVERETT HIGHWAY
BOTHELL, WASHINGTON

PACIFIC CREST PN: 223-002

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-1	Terracon	8/25/2010	296.31	31-41	25.22	271.09
	Terracon	5/9/2011			21.18	275.13
	EES	6/22/2011			22.24	274.07
	EES	9/1/2011			24.76	271.55
	EES	12/6/2011			24.30	272.01
	EES	3/8/2012			22.98	273.33
	ZGA	5/23/2012			22.73	273.58
	EES	6/27/2012			22.79	273.52
	EES	10/18/2012			22.52	273.79
	EES	1/14/2013			20.54	275.77
	EES	4/24/2013			22.29	274.02
	EES	7/16/2013			24.72	271.59
	ZGA	1/9/2017			22.85	273.46
	ZGA	1/11/2017			22.90	273.41
	ZGA	3/20/2017			20.35	275.96
	ZGA	8/17/2017			24.87	271.44
	ZGA	11/14/2017			24.66	271.65
	ZGA	2/13/2018			21.65	274.66
	ZGA	1/14/2019			23.78	272.53
	ZGA	4/10/2019			24.04	272.27
	ZGA	12/3/2020			23.95	272.36
	ZGA	9/3/2021			26.18	270.13
	ZGA	6/30/2022			23.81	272.50
	Pacific Crest	4/19/2023			24.08	272.23
MW-2	Terracon	8/25/2010	296.47	34-44	25.58	270.89
	Terracon	5/9/2011			21.61	274.86
	EES	6/22/2011			22.72	273.75
	EES	9/1/2011			25.14	271.33
	EES	12/6/2011			24.59	271.88
	EES	3/8/2012			23.40	273.07
	ZGA	5/23/2012			22.97	273.50
	EES	6/27/2012			23.03	273.44
	EES	10/18/2012			25.81	270.66
	EES	1/14/2013			26.59	269.88
	ZGA	1/9/2017			23.14	273.33
	ZGA	1/11/2017			23.22	273.25
	ZGA	3/20/2017			20.81	275.66
	ZGA	8/17/2017			25.57	270.90
	ZGA	11/14/2017			25.15	271.32
	ZGA	2/13/2018			22.00	274.47
	ZGA	1/14/2019			24.05	272.42
	ZGA	4/10/2019			24.40	272.07
	ZGA	12/3/2020			24.30	272.17
	ZGA	9/3/2021			26.57	269.90
	ZGA	6/30/2022			24.18	272.29
	Pacific Crest	4/19/2023			24.47	272.00

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-3	Terracon	8/25/2010	296.96	29-39	26.17	270.79
	Terracon	5/9/2011			22.21	274.75
	EES	6/22/2011			23.39	273.57
	EES	9/1/2011			25.76	271.20
	EES	12/6/2011			25.28	271.68
	EES	3/8/2012			23.80	273.16
	ZGA	5/23/2012			23.49	273.47
	EES	6/27/2012			23.60	273.36
	EES	10/18/2012			26.36	270.60
	ZGA	1/9/2017			23.66	273.30
	ZGA	1/12/2017			23.80	273.16
	ZGA	3/20/2017			21.30	275.66
	ZGA	8/17/2017			26.10	270.86
	ZGA	11/14/2017			25.69	271.27
	ZGA	2/13/2018			22.45	274.51
	ZGA	1/14/2019			24.53	272.43
	ZGA	4/10/2019			24.92	272.04
	ZGA	12/3/2020			24.82	272.14
	ZGA	9/3/2021			27.15	269.81
	ZGA	6/30/2022			24.72	272.24
	Pacific Crest	4/19/2023			25.03	271.93
MW-4	Terracon	8/25/2010	296.56	25-35	25.76	270.80
	Terracon	5/9/2011			21.77	274.79
	EES	6/22/2011			22.96	273.60
	EES	9/1/2011			25.35	271.21
	EES	12/6/2011			24.89	271.67
	EES	3/8/2012			23.30	273.26
	ZGA	5/23/2012			23.10	273.46
	EES	6/27/2012			23.22	273.34
	EES	10/18/2012			25.98	270.58
	EES	1/14/2013			21.62	274.94
	ZGA	1/9/2017			23.21	273.35
	ZGA	1/13/2017			23.39	273.17
	ZGA	3/20/2017			20.91	275.65
	ZGA	8/17/2017			25.67	270.89
	ZGA	11/14/2017			25.32	271.24
	ZGA	2/13/2018			22.10	274.46
	ZGA	1/14/2019			24.16	272.40
	ZGA	4/10/2019			24.53	272.03
	ZGA	12/3/2020			26.12	270.44
	ZGA	9/3/2021			24.44	272.12
	ZGA	6/30/2022			24.33	272.23
	Pacific Crest	4/19/2023			24.61	271.95

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-5	Terracon	8/25/2010	289.85	13-33	18.71	271.14
	Terracon	5/9/2011			14.96	274.89
	EES	6/22/2011			16.00	273.85
	EES	9/1/2011			18.30	271.55
	EES	12/6/2011			18.00	271.85
	EES	3/8/2012			16.65	273.20
	ZGA	5/23/2012			16.18	273.67
	EES	6/27/2012			16.26	273.59
	EES	10/18/2012			18.95	270.90
	EES	1/14/2013			14.45	275.40
	EES	4/24/2013			15.86	273.99
	EES	7/16/2013			18.26	271.59
	ZGA	1/9/2017			17.36	272.49
	ZGA	1/12/2017			16.46	273.39
	ZGA	3/20/2017			14.36	275.49
	ZGA	8/17/2017			18.71	271.14
	ZGA	11/14/2017			18.51	271.34
	ZGA	2/13/2018			15.52	274.33
	ZGA	1/14/2019			17.59	272.26
	ZGA	4/10/2019			17.64	272.21
	ZGA	12/3/2020			17.85	272.00
	ZGA	9/3/2021			19.93	269.92
	ZGA	6/30/2022			17.28	272.57
	Pacific Crest	4/19/2023			17.62	272.23
MW-6	Terracon	8/25/2010	289.94	12.5-32.5	18.91	271.03
	Terracon	5/9/2011			15.06	274.88
	EES	6/22/2011			16.14	273.80
	EES	9/1/2011			18.48	271.46
	EES	12/6/2011			18.25	271.69
	EES	3/8/2012			16.70	273.24
	ZGA	5/23/2012			16.30	273.64
	EES	6/27/2012			16.50	273.44
	EES	10/18/2012			19.17	270.77
	EES	1/14/2013			14.46	275.48
	ZGA	1/9/2017			16.44	273.50
	ZGA	1/12/2017			16.60	273.34
	ZGA	3/20/2017			14.36	275.58
	ZGA	8/17/2017			18.81	271.13
	ZGA	11/14/2017			18.71	271.23
	ZGA	2/13/2018			15.53	274.41
	ZGA	1/14/2019			17.64	272.30
	ZGA	4/10/2019			17.66	272.28
	ZGA	12/3/2020			17.77	272.17
	ZGA	9/3/2021			19.92	270.02
	ZGA	6/30/2022			17.65	272.29
	Pacific Crest	4/19/2023			17.79	272.15

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-7	Terracon	8/25/2010	289.72	20-40	19.14	270.58
	Terracon	5/9/2011			15.22	274.50
	EES	6/22/2011			16.36	273.36
	EES	9/1/2011			18.73	270.99
	EES	12/5/2011			15.25	274.47
	EES	3/8/2012			16.62	273.10
	ZGA	5/23/2012			16.41	273.31
	EES	6/27/2012			16.46	273.26
	EES	10/18/2012			19.31	270.41
	ZGA	1/9/2017			16.61	273.11
	ZGA	1/12/2017			16.76	272.96
	ZGA	3/20/2017			14.40	275.32
	ZGA	8/17/2017			19.11	270.61
	ZGA	11/14/2017			18.68	271.04
	ZGA	2/13/2018			15.51	274.21
	ZGA	1/14/2019			17.52	272.20
	ZGA	4/10/2019			17.84	271.88
	ZGA	12/3/2020			17.84	271.88
	ZGA	9/3/2021			20.07	269.65
	ZGA	6/30/2022			17.71	272.01
	Pacific Crest	4/19/2023			17.95	271.77
MW-8	Terracon	5/9/2011	290.56	38-68	16.02	274.54
	EES	6/22/2011			17.22	273.34
	EES	9/1/2011			19.56	271.00
	EES	12/5/2011			19.06	271.50
	EES	3/8/2012			17.45	273.11
	Terracon	5/23/2012			17.21	273.35
	EES	6/27/2012			17.33	273.23
	EES	10/18/2012			20.19	270.37
	ZGA	1/9/2017			18.69	271.87
	ZGA	1/13/2017			17.65	272.91
	ZGA	3/20/2017			15.17	275.39
	ZGA	8/17/2017			19.91	270.65
	ZGA	11/14/2017			19.46	271.10
	ZGA	2/13/2018			16.30	274.26
	ZGA	1/14/2019			18.30	272.26
	ZGA	4/10/2019			18.61	271.95
	ZGA	12/9/2019			20.28	270.28
	ZGA	12/3/2020			18.81	271.75
	ZGA	9/3/2021			20.91	269.65
	ZGA	6/30/2022			18.58	271.98
	Pacific Crest	4/19/2023			18.83	271.73
MW-9	Terracon	1/9/2017	298.99	29-39	26.30	272.69
	Terracon	1/11/2017			25.10	273.89
	ZGA	3/20/2017			27.55	271.44
	ZGA	8/17/2017			27.55	271.44
	ZGA	11/14/2017			27.52	271.47
	ZGA	2/13/2018			24.35	274.64
	ZGA	1/14/2019			26.43	272.56
	ZGA	4/10/2019			26.73	272.26
	ZGA	12/3/2020			26.75	272.24
	ZGA	9/3/2021			29.09	269.90
	ZGA	6/30/2022			26.83	272.16
	Pacific Crest	4/19/2023			26.86	272.13

Table 1
Groundwater Elevation Data Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sampled By	Sample Date	Relative Casing Elevation[1]	Screen Interval[2]	Depth to Groundwater[2]	Relative Potentiometric Surface (feet)
MW-10	Terracon	1/9/2017	297.49	30-40	25.19	272.30
	Terracon	1/12/2017			24.17	273.32
	ZGA	3/20/2017			26.21	271.28
	ZGA	8/18/2017			26.21	271.28
	ZGA	11/14/2017			25.91	271.58
	ZGA	2/13/2018			22.85	274.64
	ZGA	1/14/2019			24.94	272.55
	ZGA	4/10/2019			25.25	272.24
	ZGA	12/3/2020			25.19	272.30
	ZGA	9/3/2021			27.42	270.07
	ZGA	6/30/2022			25.05	272.44
	Pacific Crest	4/19/2023			25.30	272.19
DPE-1	Pacific Crest	4/19/2023	NM	5-39	23.98	NM
DPE-2	Pacific Crest	4/19/2023	NM	--	24.78	NM
DPE-3	Pacific Crest	4/19/2023	NM	--	23.28	NM
DPE-4	Pacific Crest	4/19/2023	NM	--	23.47	NM
VM-1	Pacific Crest	4/19/2023	NM	10-20	DRY	NM

NOTES:
[1]Elevation of top of casing relative to an arbitrary datum in feet above mean sea level
[2]Depth below top of well casing in feet
NM = not measured
NS = not sampled
- = not reported
Terracon = Terracon Consultants Inc
ZGA = Zipper Geo Associates
Pacific Crest = Pacific Crest Environmental, LLC

Table 2
Groundwater Quality Parameters Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sample ID	Sampled By	Sample Date	Groundwater Quality Parameters[1]				
				Temperature (°C)	Specific Conductivity (mS/cm)	Dissolved Oxygen (mg/L)	pH	Oxidation Reduction Potential (mV)
MW-1	NA	Terracon	6/17/2009	NA	NA	1.3	5.24	212
	NA	Terracon	8/10/2010	NA	NA	2.25	5.34	-55
	NA	Terracon	5/10/2011	NA	NA	7.11	5.32	292
	NA	EES	6/22/2011	NA	0.194	3.19	5.7	129
	NA	EES	9/1/2011	NA	0.184	1.79	6.5	110
	NA	EES	12/5/2011	NA	0.218	2.20	6.4	65
	NA	EES	3/8/2012	NA	0.180	2.13	5.3	200
	NA	ZGA	5/23/2012	NA	NA	2.55	5.06	318
	NA	EES	6/27/2012	NA	0.280	2.57	5.3	221
	NA	EES	10/18/2012	NA	0.203	0.91	5.8	170
	NA	EES	1/14/2013	NA	0.190	3.29	5.3	190
	NA	EES	4/24/2013	NA	0.241	3.01	5.3	217
	NA	EES	7/16/2013	NA	0.384	1.13	6.0	151
	NA	ZGA	3/5/2014	NA	NA	4.82	6.57	136
	MW1-06292022	ZGA	6/29/2022	14.76	0.99	4.00	4.99	2.28
MW-2	NA	Terracon	6/16/2009	NA	NA	1.5	6.08	97
	NA	Terracon	8/12/2010	NA	NA	3.75	5.79	329
	NA	Terracon	5/10/2011	NA	NA	2.04	5.97	226
	NA	EES	6/22/2011	NA	0.346	0.36	6.4	78
	NA	EES	9/1/2011	NA	0.305	4.72	7.3	75
	NA	EES	12/5/2011	NA	0.270	2.40	6.2	274
	NA	EES	3/8/2012	NA	0.270	1.69	6.2	165
	NA	ZGA	5/24/2012	NA	NA	1.03	6.10	236
	NA	EES	6/27/2012	NA	0.290	0.6	6.2	156
	NA	EES	10/18/2012	NA	0.276	0.35	6.6	144
	NA	EES	1/14/2013	NA	0.280	0.90	6.1	113
	NA	ZGA	3/5/2014	NM	NM	NM	NM	NM
	MW2-06292022	ZGA	6/29/2022	15.38	1.37	3.82	5.31	2.20
MW-3	NA	Terracon	6/17/2009	NA	NA	2.3	5.86	186
	NA	Terracon	8/12/2010	NA	NA	4.64	5.89	326
	NA	Terracon	5/10/2011	NA	NA	5.34	5.97	275
	NA	ZGA	5/24/2012	NA	NA	5.01	5.93	247
	NA	ZGA	3/7/2014	NA	NA	7.02	6.90	236
	MW3-06302022	ZGA	6/30/2022	15.44	0.511	4.90	5.87	181
	MW3-042023	Pacific Crest	4/20/2023	14.0	0.539	5.93	6.31	135.8
MW-4	NA	Terracon	6/16/2009	NA	NA	2.6	5.63	211
	NA	Terracon	8/12/2010	NA	NA	6.48	5.75	400
	NA	Terracon	5/10/2011	NA	NA	6.10	5.83	291
	NA	EES	6/22/2011	NA	0.259	3.71	6.3	90
	NA	EES	9/1/2011	NA	0.24	4.11	7.1	68
	NA	EES	12/5/2011	NA	0.310	6.65	6.0	293
	NA	EES	3/8/2012	NA	0.230	5.87	6.0	182
	NA	ZGA	5/24/2012	NA	NA	5.86	5.88	244
	NA	EES	6/27/2012	NA	0.250	5.65	6.1	144
	NA	EES	10/18/2012	NA	0.239	6.44	6.4	163
	NA	EES	1/14/2013	NA	0.310	6.09	6.6	100
	NA	ZGA	3/7/2014	NA	NA	7.66	7.44	213
	MW4-06302022	ZGA	6/30/2022	15.08	0.184	7.67	6.21	176
	MW4-042023	Pacific Crest	4/20/2023	13.3	0.669	12.21	6.28	154.3

Table 2
Groundwater Quality Parameters Summary
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Location ID	Sample ID	Sampled By	Sample Date	Groundwater Quality Parameters[1]				
				Temperature (°C)	Specific Conductivity (mS/cm)	Dissolved Oxygen (mg/L)	pH	Oxidation Reduction Potential (mV)
MW-5	NA	Terracon	8/10/2010	NA	NA	3.56	5.41	-49
	NA	Terracon	5/9/2011	NA	NA	1.87	5.27	204
	NA	EES	6/22/2011	NA	0.416	0.83	6.0	123
	NA	EES	9/1/2011	NA	0.356	0.27	6.3	132
	NA	EES	12/5/2011	NA	0.300	1.19	5.4	198
	NA	EES	3/8/2012	NA	0.330	0.72	5.4	175
	NA	EES	6/27/2012	NA	0.350	2.42	5.4	240
	NA	EES	10/18/2012	NA	0.245	0.30	6.0	119
	NA	EES	1/14/2013	NA	0.290	0.94	5.4	179
	NA	EES	4/24/2013	NA	0.454	2.50	5.5	213
	NA	EES	7/16/2013	NA	0.298	0.51	5.5	133
	NA	ZGA	3/6/2014	NA	NA	8.71	7.10	215
	MW5-06292022	ZGA	6/29/2022	15.26	1.269	4.31	6.19	1.11
MW-6	NA	Terracon	8/10/2010	NA	NA	3.85	5.86	-14
	NA	Terracon	5/9/2011	NA	NA	2.96	5.64	276
	NA	EES	6/22/2011	NA	0.362	2.39	6.1	104
	NA	EES	9/1/2011	NA	0.393	1.60	6.7	98
	NA	EES	12/5/2011	NA	0.280	0.66	5.8	217
	NA	EES	3/8/2012	NA	0.240	0.80	5.8	183
	NA	EES	6/27/2012	NA	0.350	3.08	5.8	216
	NA	EES	10/18/2012	NA	0.344	0.43	6.4	115
	NA	EES	1/14/2013	NA	0.290	0.98	5.8	168
	NA	ZGA	3/6/2014	NA	NA	7.16	7.15	216
	MW6-06292022	ZGA	6/29/2022	14.83	0.696	4.32	6.98	1.84
	MW6-041923	Pacific Crest	4/19/2023	14.0	0.3967	3.51	6.15	145.8
MW-7	NA	Terracon	8/10/2010	NA	NA	4.10	5.86	13
	NA	Terracon	5/9/2011	NA	NA	5.80	5.94	285
	NA	ZGA	3/6/2014	NA	NA	7.35	7.27	202
	MW7-06302022	ZGA	6/30/2022	14.62	0.107	0.0	6.97	147
	MW7-041923	Pacific Crest	4/19/2023	13.9	0.3093	7.20	6.14	146.3
MW-8	NA	Terracon	8/10/2010	NA	NA	3.39	6.21	180
	NA	ZGA	5/24/2012	NA	NA	5.24	5.79	244
	NA	ZGA	3/6/2014	NA	NA	7.90	7.17	228
	MW8-06302022	ZGA	6/30/2022	14.42	0.128	6.66	6.08	164
	MW8-041923	Pacific Crest	4/19/2023	13.3	0.2351	4.42	6.40	130.5
MW-9	NA	ZGA	3/5/2014	NA	NA	8.89	6.93	163
	MW9-06292022	ZGA	6/29/2022	14.52	0.122	5.59	6.22	148
MW-10	NA	ZGA	3/6/2014	NA	NA	6.82	6.75	227
	MW10-06292022	ZGA	6/29/2022	14.79	1.23	4.19	5.46	2.17
DPE-1	DPE1-041923	Pacific Crest	4/19/2023	15.0	0.3074	5.45	6.40	117.6
DPE-2	DPE2-042023	Pacific Crest	4/20/2023	14.5	0.2567	0.83	6.50	134.1
DPE-3	DPE3-042023	Pacific Crest	4/20/2023	12.9	0.3362	11.69	5.83	186.2
DPE-4	DPE4-042023	Pacific Crest	4/20/2023	13.5	0.2409	0.69	6.48	127.7

NOTES:
[1]Measured using YSI 556 Water Quality Meter
C = celsius
mS/cm = millisiemens per centimeter
mg/L = milligrams per liter
mV = millivolts
NM = not measured
NA = not available
Pacific Crest = Pacific Crest Environmental, LLC
R=Denotes results that exceed normal DO measurements and are likely the result of instrument error

Table 3
Laboratory Analytical Results Summary - Groundwater
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-1	MW-1	Terracon	6/17/2009	**12**	<1	4.8	<1	*<1.0*
MW-1	MW-1	Terracon	8/10/2010	<1	3.22	1.4	<1	*<1.0*
MW-1	MW-1	Terracon	5/10/2011	1.3	<1	<1	<1	*<1.0*
MW-1	TMW-1	EES	9/1/2011	<1	<1	<1	<1	<0.2
MW-1	TMW-1	EES	12/5/2011	1.1	<1	<1	<1	<0.2
MW-1	TMW-1	EES	3/8/2012	<1	<1	<1	<1	<0.2
MW-1	MW-1	ZGA	5/23/2012	<2	<2	<2	<2	<0.2
MW-1	TMW-1	EES	6/27/2012	<1	<1	<1	<1	<0.2
MW-1	TMW-1	EES	10/18/2012	1.1	<1	<1	<1	<0.2
MW-1	TMW-1	EES	1/14/2013	<1	<1	<1	<1	<0.2
MW-1	MW-1	ZGA	3/5/2014	<2	<2	<2	<2	<0.2
MW-1	MW-1	ZGA	1/11/2017	0.508	<1	<1	<1	*<1.00*
MW-1	MW-1	ZGA	8/18/2017	0.431	<1	<1	<1	*<0.5*
MW-1	MW-1	ZGA	11/15/2017	0.231	<0.5	<0.5	<0.5	*<0.5*
MW-1	MW-1	ZGA	2/13/2018	0.3	<0.5	<0.5	<0.5	*<0.5*
MW-1	MW-1	ZGA	1/14/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-1	MW-1	ZGA	4/10/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-1	MW1-06292022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-1	NS	Pacific Crest	4/19/2023	NS	NS	NS	NS	NS
MW-2	MW-2	Terracon	6/16/2009	<1	<1	<1	<1	<0.2
MW-2	MW-2	Terracon	8/12/2010	<1	<1	<1	<1	*<1.0*
MW-2	MW-2	Terracon	5/10/2011	<1	<1	<1	<1	*<1.0*
MW-2	TMW-2	EES	9/1/2011	<1	<1	<1	<1	<0.2
MW-2	TMW-2	EES	12/5/2011	<1	<1	<1	<1	<0.2
MW-2	TMW-2	EES	3/8/2012	<1	<1	<1	<1	<0.2
MW-2	MW-2	ZGA	5/24/2012	<2	<2	<2	<2	<0.2
MW-2	TMW-2	EES	6/27/2012	<1	<1	<1	<1	<0.2
MW-2	TMW-2	EES	10/18/2012	<1	<1	<1	<1	<0.2
MW-2	TMW-2	EES	1/14/2013	<1	<1	<1	<1	<0.2
MW-2	MW-2	ZGA	3/5/2014	<2	<2	<2	<2	<0.2
MW-2	MW-2	ZGA	1/11/2017	<1	<1	<1	<1	*<1.00*
MW-2	MW-2	ZGA	8/17/2017	<1	<1	<1	<1	*<0.5*
MW-2	MW-2	ZGA	11/14/2017	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-2	MW-2	ZGA	2/13/2018	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-2	MW-2	ZGA	1/14/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-2	MW-2	ZGA	4/10/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-2	MW2-06292022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-2	NS	Pacific Crest	4/19/2023	NS	NS	NS	NS	NS

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Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-3	MW-3	Terracon	6/17/2009	**6.6**	<1	<1	<1	<0.2
MW-3	MW-3	Terracon	8/12/2010	**6.4**	<1	<1	<1	*<1.0*
MW-3	MW-3	Terracon	5/10/2011	**9.3**	<1	<1	<1	*<1.0*
MW-3	MW-3	ZGA	5/24/2012	**15**	<2	<2	<2	<0.2
MW-3	MW-3	ZGA	3/7/2014	**5.6**	<2	<2	<2	<0.2
MW-3	MW-3	ZGA	1/12/2017	**9.28**	<1	<1	<1	*<1.0*
MW-3	MW-3	ZGA	8/21/2017	2.81	<1	<1	<1	*<0.5*
MW-3	MW-3	ZGA	11/16/2017	4.96	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	2/14/2018	**6.78**	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	1/15/2019	4.44	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	4/11/2019	2.51	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	12/9/2019	3.22	<0.5	<0.5	<0.5	*<0.5*
MW-3	MW-3	ZGA	12/3/2020	**23.6**	<0.5	<0.5	<0.5	*<0.1*
MW-3	MW3-09032021	ZGA	9/3/2021	3.1	<0.5	<1	<1	<0.02
MW-3	MW3-06302022	ZGA	6/30/2022	**6.0**	<2.0	<2.0	<2.0	<0.2
MW-3	MW3-042023	Pacific Crest	4/20/2023	2.9	<0.20	<0.20	<0.20	<0.20
MW-4	MW-3	Adapt	10/31/2007	**45**	<1	<1	<1	<0.2
MW-4	MW-4	Terracon	6/16/2009	**170**	<1	<1	<1	<0.2
MW-4	MW-4	Terracon	8/12/2010	**140**	<1	<1	<1	*<1.0*
MW-4	MW-4	Terracon	5/10/2011	**110**	<1	<1	<1	*<1.0*
MW-4	TMW-4	EES	9/1/2011	**77**	<1	<1	<1	<0.2
MW-4	TMW-4	EES	12/5/2011	**68**	<1	<1	<1	<0.2
MW-4	TMW-4	EES	3/8/2012	**73**	<1	<1	<1	<0.2
MW-4	MW-4	ZGA	5/24/2012	**140**	<2	<2	<2	<0.2
MW-4	TMW-4	EES	6/27/2012	**80**	<1	<1	<1	<0.2
MW-4	TMW-4	EES	10/18/2012	**110**	<1	<1	<1	<0.2
MW-4	TMW-4	EES	1/14/2013	**84**	<1	<1	<1	<0.2
MW-4	MW-4	ZGA	3/7/2014	**44**	<2	<2	<2	<0.2
MW-4	MW-4	ZGA	1/13/2017	**96.1**	<1	<1	<1	*<1.0*
MW-4	MW-4	ZGA	8/21/2017	**76.5**	<1	<1	<1	*<0.5*
MW-4	MW-4	ZGA	11/16/2017	**50.8**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	2/14/2018	**28.5**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	1/15/2019	**10.7**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	4/11/2019	**22.5**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	12/9/2019	**42.9**	<0.5	<0.5	<0.5	*<0.5*
MW-4	MW-4	ZGA	12/4/2020	**18.6**	<0.5	<0.5	<0.5	<0.1
MW-4	MW4-09032021	ZGA	9/3/2021	**20**	<0.5	<1	<1	<0.02
MW-4	MW4-06302022	ZGA	6/30/2022	**23**	<2.0	<2.0	<2.0	<0.2
MW-4	MW4-042023	Pacific Crest	4/20/2023	**21**	<0.20	<0.20	<0.20	<0.20

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Former Prime Cleaners
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Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-5	MW-5	Terracon	8/10/2010	0.61	<1	<1	<1	*<1.0*
MW-5	MW-5	Terracon	5/9/2011	0.6	<1	<1	<1	*<1.0*
MW-5	TMW-5	EES	9/1/2011	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	12/5/2011	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	3/8/2012	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	6/27/2012	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	10/18/2012	<1	<1	<1	<1	<0.2
MW-5	TMW-5	EES	1/14/2013	<1	<1	<1	<1	<0.2
MW-5	MW-5	ZGA	3/6/2014	<2	<2	<2	<2	<0.2
MW-5	MW-5	ZGA	1/12/2017	<1	<1	<1	<1	*<1.0*
MW-5	MW-5	ZGA	8/18/2017	0.281	<1	<1	<1	*<0.5*
MW-5	MW-5	ZGA	11/15/2017	0.259	<0.5	<0.5	<0.5	*<0.5*
MW-5	MW-5	ZGA	2/13/2018	0.22	<0.5	<0.5	<0.5	*<0.5*
MW-5	MW-5	ZGA	1/15/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-5	MW-5	ZGA	4/11/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-5	MW5-06292022	ZGA	6/29/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-5	NS	Pacific Crest	4/19/2023	NS	NS	NS	NS	NS
MW-6	MW-6	Terracon	8/10/2010	<1	<1	<1	<1	*<1.0*
MW-6	MW-6	Terracon	5/9/2011	2.2	<1	<1	<1	*<1.0*
MW-6	TMW-6	EES	9/1/2011	<1	<1	<1	<1	<0.2
MW-6	TMW-6	EES	12/5/2011	3.3	<1	<1	<1	<0.2
MW-6	TMW-6	EES	3/8/2012	4.1	<1	<1	<1	<0.2
MW-6	TMW-6	EES	6/27/2012	<1	<1	<1	<1	<0.2
MW-6	TMW-6	EES	10/18/2012	<1	<1	<1	<1	<0.2
MW-6	TMW-6	EES	1/14/2013	5.0	<1	<1	<1	<0.2
MW-6	MW-6	ZGA	3/6/2014	4.7	<2	<2	<2	<0.2
MW-6	MW-6	ZGA	1/12/2017	1.07	<1	<1	<1	*<1.0*
MW-6	MW-6	ZGA	8/21/2017	0.674	<1	<1	<1	*<0.5*
MW-6	MW-6	ZGA	11/15/2017	2.37	<0.5	<0.5	<0.5	*<0.5*
MW-6	MW-6	ZGA	2/14/2018	3.21	<0.5	<0.5	<0.5	*<0.5*
MW-6	MW-6	ZGA	1/15/2019	2.04	<0.5	<0.5	<0.5	*<0.5*
MW-6	MW-6	ZGA	4/11/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-6	MW6-06292022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.20
MW-6	MW6-041923	Pacific Crest	4/19/2023	0.34	<0.20	<0.20	<0.20	<0.20

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Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-7	MW-7	Terracon	8/10/2010	0.55	<1	<1	<1	*<1.0*
MW-7	MW-7	Terracon	5/9/2011	<1	<1	<1	<1	*<1.0*
MW-7	MW-7	ZGA	3/6/2014	8	<2	<2	<2	<0.2
MW-7	MW-7	ZGA	1/12/2017	0.948	<1	<1	<1	*<1.0*
MW-7	MW-7	ZGA	8/21/2017	1.49	<1	<1	<1	*<0.5*
MW-7	MW-7	ZGA	11/15/2017	3.8	<0.5	<0.5	<0.5	*<0.5*
MW-7	MW-7	ZGA	2/14/2018	1.93	<0.5	<0.5	<0.5	*<0.5*
MW-7	MW-7	ZGA	1/15/2019	3.88	<0.5	<0.5	<0.5	*<0.5*
MW-7	MW-7	ZGA	4/11/2019	<0.5	<0.5	<0.5	<0.5	*<0.5*
MW-7	MW7-09032021	ZGA	9/3/2021	<1	<0.5	<1	<1	<0.02
MW-7	MW7-06302022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-7	MW7-041923	Pacific Crest	4/19/2023	0.89	<0.20	<0.20	<0.20	<0.20
MW-8	MW-8	Terracon	5/10/2011	**22**	<1	<1	<1	*<1.0*
MW-8	MW-8	ZGA	5/24/2012	**36**	<2	<2	<2	<0.2
MW-8	MW-8	ZGA	3/7/2014	**13**	<2	<2	<2	<0.2
MW-8	MW-8	ZGA	1/13/2017	**26.4**	<1	<1	<1	*<1.0*
MW-8	MW-8	ZGA	8/21/2017	**25.1**	<1	<1	0.25	*<0.5*
MW-8	MW-8	ZGA	11/16/2017	**19.2**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	2/14/2018	**16.1**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	1/15/2019	**12.1**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	4/11/2019	**14.3**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	12/9/2019	**17.5**	<0.5	<0.5	<0.5	*<0.5*
MW-8	MW-8	ZGA	12/4/2020	**6.45**	<0.5	<0.5	<0.5	<0.1
MW-8	MW8-09032021	ZGA	9/3/2021	**13**	<0.5	<1	<1	<0.02
MW-8	MW8-06302022	ZGA	6/30/2022	**22**	<2.0	<2.0	<2.0	<0.2
MW-8	MW8-041923	Pacific Crest	4/20/2023	**12**	<0.20	<0.20	<0.20	<0.20
MW-9	MW-9	Terracon	5/10/2011	<1.0	<1.0	<1.0	<1.0	<1.0
MW-9	MW-9	ZGA	3/5/2014	<2	<2	<2	<2	<0.2
MW-9	MW-9	ZGA	1/11/2017	<1	<1	<1	<1	<1.0
MW-9	MW-9	ZGA	8/18/2017	<1	<1	<1	<1	<0.5
MW-9	MW-9	ZGA	11/14/2017	<0.5	<0.5	<0.5	<0.5	<0.5
MW-9	MW-9	ZGA	2/13/2018	<0.5	<0.5	<0.5	<0.5	<0.5
MW-9	MW-9	ZGA	1/14/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MW-9	MW-9	ZGA	4/10/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MW-9	MW9-06302022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-9	NS	Pacific Crest	4/20/2023	NS	NS	NS	NS	NS

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18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No: 223-002

Well ID	Sample ID	Sampled By	Date	Groundwater Analytical Results (micrograms per liter)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
MW-10	MW-10	ZGA	3/6/2014	<2	<2	<2	<2	<0.2
MW-10	MW-10	ZGA	1/12/2017	<1	<1	<1	<1	<1.0
MW-10	MW-10	ZGA	8/18/2017	<1	<1	<1	<1	<0.5
MW-10	MW-10	ZGA	11/14/2017	<0.5	<0.5	<0.5	<0.5	<0.5
MW-10	MW-10	ZGA	2/13/2018	<0.5	<0.5	<0.5	<0.5	<0.5
MW-10	MW-10	ZGA	1/14/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MW-10	MW-10	ZGA	4/10/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MW-10	MW10-06302022	ZGA	6/30/2022	<2.0	<2.0	<2.0	<2.0	<0.2
MW-10	NS	Pacific Crest	4/20/2023	NS	NS	NS	NS	NS
DPE-1	DPE1-041923	Pacific Crest	4/19/2023	0.76	<0.20	<0.20	<0.20	<0.20
DPE-2	DPE2-042023	Pacific Crest	4/20/2023	<0.20	<0.20	<0.20	<0.20	<0.20
DPE-3	DPE3-042023	Pacific Crest	4/20/2023	**11**	<0.20	<0.20	<0.20	<0.20
DPE-4	DPE4-042023	Pacific Crest	4/20/2023	<0.20	<0.20	<0.20	<0.20	<0.20
DPE Effluent	Effluent	ZGA	3/8/2017	0.748	<1	<1	<1	<1.0
	Effluent	ZGA	11/12/2017	0.286	<0.5	<0.5	<0.5	<0.5
	Effluent	ZGA	1/11/2019	<0.5	<0.5	<0.5	<0.5	<0.5
	Effluent	ZGA	5/16/2019	<0.5	<0.5	<0.5	<0.5	<0.5
MTCA Method A Cleanup Level				**5**	**5**	-	-	**0.2**
MTCA Method B	Noncancer	Potable Water		48	4	16	160	24
	Cancer			20.8	0.54	-	-	0.029
MTCA Method B	Noncancer	Vapor Intrusion - Residential		48	3.9	-	77	54
	Cancer			25	1.4	-	--	0.33
MTCA Method B	Noncancer	Vapor Intrusion - Commercial		410	32	-	650	460
	Cancer			120	12	-	--	1.6

NOTES:
BOLD = concentration exceeds MTCA Method A or B Cleanup Level
(<) = result is less than laboratory practical quantitation limit listed or analyte not detected at or above the reporting limit.
ITALICS = laboratory practical quantitation limit exceeds the applicable cleanup/screening level.
NA = not analyzed
NS = not sampled
[1] Analyzed by U.S. Environmental Protection Agency (EPA) Method 8260B/8260C
[2] Table 720-1, Method A Cleanup Levels for Groundwater, Model Toxics Control Act (MTCA) Cleanup Regulation Chapter 173-340 of the Washington Administrative
[3] Cleanup Levels and Risk Calculations (CLARC) under the Method B Model Toxics Control Act Cleanup Regulation
Adapt = Adapt Engineering, Inc.
Pacific Crest = Pacific Crest Environmental, LLC
Terracon = Terracon Conuslting Engineers & Scientists
ZGA = ZipperGeo Associates

Table 4
Laboratory Analytical Results Summary - Sub-Slab Soil Vapor
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Location ID	Location	Date	Sample ID	Sampled By	Soil Vapor Analytical Results (micrograms per cubic meter)[1]				
					Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl chloride
SPG-1	Former Money Tree/Prime Cleaners (Fusion India)	11/25/2013	SPG-1	ZGA	500	<1.3	<0.94	<0.94	<0.61
		6/3/2014	SPG-1	ZGA	**1,600**	<12	<8.9	<8.9	<5.7
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
SPG-2	Former Money Tree/Prime Cleaners (Fusion India)	11/25/2013	SPG-2	ZGA	**7,700**	**440**	22	<19	<12
		6/3/2014	SPG-2	ZGA	**9,900**	**470**	<190	<190	*<120*
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
SPG-3	Former Prime Cleaners (Fusion India)	12/6/2013	SPG-3	ZGA	**11,000**	68	<22	<22	<14
		6/3/2014	SPG-3	ZGA	**24,000**	**160**	<38	<38	<25
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
SPG-4	Former Prime Cleaners (Fusion India)	12/6/2013	SPG-4	ZGA	**3,400**	**420**	<5.5	6.8	<3.6
		6/3/2014	SPG-4	ZGA	**5,400**	**840**	<19	<19	<12
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
SPG-5	Osaka Grill	11/25/2013	SPG-5	ZGA	**5,400**	**220**	<13	<13	<8.2
		6/3/2014	SPG-5	ZGA	**8,700**	**360**	<19	<19	<12
		4/20/2023	SPG-5	Pacific Crest	458	28.5	<0.389	0.403	<0.791
SPG-6	Osaka Grill	11/25/2013	SPG-6[2]	ZGA	<790	*<630*	<460	<460	*<300*
		6/3/2014	SPG-6[2]	ZGA	*<40,000*	*<32,000*	<24,000	<24,000	*<15,000*
		4/20/2023	NS[3]	Pacific Crest	NS	NS	NS	NS	NS
Sub-Slab Screening Level - Commercial Worker					**1,500**	**95**	**--**	**5200**	**44**
Sub-Slab Screening Level - Residential					**320**	**11**	**--**	**620**	**9.5**

NOTES:
BOLD denotes concentration above applicable commercial subslab screening level
< denotes result is less than laboratory practical quantitation limit listed or analyte not detected at or above the reporting limit
[1] Analyzed by U.S. Environmental Protection Agency (EPA) Method TO-15
[2] denotes probe failed leak test during sampling
[3] sample probe could not be located, possibly removed or destroyed during renovations
NS = not analyzed
MTCA = Model Toxics Control Act
Pacific Crest = Pacific Crest Environmental, LLC
ZGA = Zipper Geo Associates

Table 5
Laboratory Analytical Results Summary - Indoor and Ambient Air
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Location ID	Sample ID	Date	Sampled By	Air Analytical Results (µg/m^3)[1]				
				Tetrachloroethene	Trichloroethene	(cis) 1,2-Dichloroethene	(trans) 1,2-Dichloroethene	Vinyl Chloride
Former Prime Cleaners (Fusion India)	Prime Cleaners	11/21/2013	ZGA	1.1	**280**	<0.39	<2.0	<0.13
	Prime Cleaners	6/3/2014	ZGA	3.5	**2.1**	<0.13	<0.65	<0.042
	Prime Cleaners	8/22/2018	ZGA	0.73	<0.27	<0.4	<0.4	<0.26
	Prime Cleaners	1/14/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Prime Cleaners	4/18/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Prime Cleaners	1/24/2020	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	IA2-042023	4/20/2023	Pacific Crest	0.284	<0.00672	<0.0972	<0.0977	<0.198
Former Money Tree/Prime Cleaners (Fusion India)	Money Tree	11/21/2013	ZGA	<0.20	**1.3**	<0.12	<0.59	<0.038
	Money Tree	6/3/2014	ZGA	<1.1	<0.88	<0.65	<3.2	<0.21
	Money Tree	8/22/2018	ZGA	<0.68	**1.1**	<0.4	<0.4	<0.26
				<0.68	**0.82**	<0.4	<0.4	<0.26
	Money Tree	1/14/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Money Tree	4/18/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Money Tree	1/24/2020	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	NS	4/20/2023	Pacific Crest	NS	NS	NS	NS	NS
Osaka Grill	Osaka Grill	11/21/2013	ZGA	3.6	**210**	<0.28	<1.4	<0.090
	Osaka Grill	6/3/2014	ZGA	3.2	0.37	<0.27	<1.4	<0.087
	Osaka Grill	8/22/2018	ZGA	<0.68	<0.27	<0.4	<0.4	<0.26
	Osaka Grill	1/14/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Osaka Grill	4/18/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Osaka Grill	1/24/2020	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	IA1-042023	4/20/2023	Pacific Crest	0.234	<0.00672	<0.0972	<0.0977	<0.198
Ambient	Ambient	11/21/2013	ZGA	<0.21	<0.17	<0.12	<0.62	<0.040
	Ambient	6/3/2014	ZGA	<0.23	<0.18	<0.14	<0.68	<0.044
	Ambient	8/22/2018	ZGA	<0.68	0.28	<0.4	<0.4	<0.26
	Ambient	1/14/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Ambient	4/18/2019	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	Ambient	1/24/2020	ZGA	<6.8	<0.27	<0.4	<0.4	<0.26
	AA-042023	4/20/2023	Pacific Crest	<0.0753	<0.00672	<0.0972	<0.0977	<0.198
MTCA Method B Cleanup Level for Air[2]				**9.6**	**0.3**	**--**	**18.29**	**0.28**
MTCA Method B Screening Level - Commercial Worker				**44.9**	**2.8**	**--**	**155.7**	**1.3**

NOTES:

[1]Analyzed by EPA Method TO-15

[2]Cleanup Levels and Risk Calculations (CLARC) under the Method B MTCA Cleanup Regulation (January 2023 Update). For analytes with both Cancer and Noncancer values, the lower of the two values was used.

Bold = concentration exceeds applicable MTCA cleanup level

< = analyte was not above the practical quantitation limit

italicized denotes that laboratory practical quantitation limit is above the applicable MTCA cleanup level.

MTCA = Model Toxics Control Act

µg/m^3 = micrograms per cubic meter

ZGA=ZipperGeo

Table 6
Laboratory Analytical Results Summary - Soil
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Location ID	Sample ID	Sampled By	Sample Date	Sample Depth[2]	Soil Analytical Results (micrograms per kilogram)[1] Select Chlorinated Volatile Organic Compounds				
					Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
B-1	B-1	EA	3/9/1999	22.5	**200**	<57	330	ND	ND
B-2	B-2	EA	3/9/1999	20	<57	<57	<57	ND	ND
SP-1	SP-1	EA	3/9/1999	5	**240**	<54	<54	ND	ND
SP-2	SP-2	EA	3/9/1999	1	**560**	<53	<53	ND	ND
B-7	B-7	Adapt	10/24/2007	30	**63**	<30	<50	<50	<50
B1	B1	Terracon	5/17/2009	3	**160**	**38**	<1.5	<1.5	<1.5
B2	B2	Terracon	5/17/2009	3	1.1	18	<1.0	<1.0	<1.0
B3	B3	Terracon	5/17/2009	2.5	1.9	20	<1.0	<1.0	<1.0
B4	B4	Terracon	5/17/2009	2.5	17	29	<1.1	<1.1	<1.1
B5	B5	Terracon	5/17/2009	3	<1.1	24	<1.1	<1.1	<1.1
B6	B6	Terracon	5/17/2009	3	1.2	15	<1.0	<1.0	<1.0
B7	B7	Terracon	5/17/2009	3	15	22	<1.1	<1.1	<1.1
B8	B8	Terracon	5/17/2009	3	28	30	28	<1.1	<1.1
B9	B9	Terracon	5/17/2009	2.5	**110**	9.2	<1.1	<1.1	<1.1
	B9	Terracon	5/17/2009	5	4.1	27	<1.1	<1.1	<1.1
B10	B10	Terracon	5/17/2009	3	5.2	14	<1.1	<1.1	<1.1
	B10	Terracon	5/17/2009	5.5	**160**	10	<1.1	<1.1	<1.1
B11	B11	Terracon	5/17/2009	3	<1.0	<1.0	<1.0	<1.0	<1.0
B12	B12	Terracon	5/17/2009	3	3.8	**38**	<1.1	<1.1	<1.1
B13	B13	Terracon	5/17/2009	3.5	16	**33**	<1.0	<1.0	<1.0
MW1	MW1-1	Terracon	5/28/2009	7.5	<1.1	<1.1	<1.1	<1.1	<1.1
	MW1-2	Terracon	5/28/2009	17.5	<1.1	<1.1	<1.1	<1.1	<1.1
	MW1-3	Terracon	5/28/2009	25	2.1	<1.1	<1.1	<1.1	<1.1
	MW1-4	Terracon	5/28/2009	37	<1.3	<1.3	<1.3	<1.3	<1.3
	MW1-5	Terracon	5/28/2009	41	<1.2	<1.2	<1.2	<1.2	<1.2
MW2	MW2-6	Terracon	5/28/2009	7.5	<1.1	<1.1	<1.1	<1.1	<1.1
	MW2-7	Terracon	5/28/2009	18	<1.0	<1.0	<1.0	<1.0	<1.0
	MW2-8	Terracon	5/28/2009	23	<1.1	<1.1	<1.1	<1.1	<1.1
	MW2-9	Terracon	5/28/2009	44	<1.1	<1.1	<1.1	<1.1	<1.1
	MW2-10	Terracon	5/28/2009	33	<1.0	<1.0	<1.0	<1.0	<1.0
MW3	MW3-11	Terracon	5/29/2009	7.5	4.5	<1.2	<1.2	<1.2	<1.2
	MW3-12	Terracon	5/29/2009	13	3.9	<1.1	<1.1	<1.1	<1.1
	MW3-13	Terracon	5/29/2009	27.5	9.3	<1.1	<1.1	<1.1	<1.1
	MW3-14	Terracon	5/29/2009	31	2.3	<1.1	<1.1	<1.1	<1.1
	MW3-15	Terracon	5/29/2009	37	<1.1	<1.1	<1.1	<1.1	<1.1
MW5	MW5 S-1	Terracon	7/12/2010	12.5	<1.2	<1.2	<1.2	<1.2	<1.2
	MW5 S-2	Terracon	7/12/2010	20	<1.2	<1.2	<1.2	<1.2	<1.2
	MW5 S-3	Terracon	7/12/2010	25	<1.1	<1.1	<1.1	<1.1	<1.1
	MW5 S-4	Terracon	7/12/2010	30	<1.2	<1.2	<1.2	<1.2	<1.2
	MW5 S-5	Terracon	7/12/2010	35	<1.2	<1.2	<1.2	<1.2	<1.2
MW6	MW6 S-1	Terracon	7/13/2010	15	<1.2	<1.2	<1.2	<1.2	<1.2
	MW6 S-2	Terracon	7/13/2010	20	<1.0	<1.0	<1.0	<1.0	<1.0
	MW6 S-3	Terracon	7/13/2010	26	<1.1	<1.1	<1.1	<1.1	<1.1
	MW6 S-4	Terracon	7/13/2010	30	<1.1	<1.1	<1.1	<1.1	<1.1
	MW6 S-5	Terracon	7/13/2010	35	1.3	<1.1	<1.1	<1.1	<1.1
MW7	MW7 S-1	Terracon	7/13/2010	16	<1.2	<1.2	<1.2	<1.2	<1.2
	MW7 S-2	Terracon	7/13/2010	20	<1.1	<1.1	<1.1	<1.1	<1.1
	MW7 S-3	Terracon	7/13/2010	26	<1.1	<1.1	<1.1	<1.1	<1.1
	MW7 S-4	Terracon	7/13/2010	32.5	<1.1	<1.1	<1.1	<1.1	<1.1
	MW7 S-5	Terracon	7/13/2010	40	13	<1.2	<1.2	<1.2	<1.2

Table 6
Laboratory Analytical Results Summary - Soil
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Location ID	Sample ID	Sampled By	Sample Date	Sample Depth[2]	Soil Analytical Results (micrograms per kilogram)[1] Select Chlorinated Volatile Organic Compounds				
					Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
MW8	MW-8 S1	ZGA	4/26/2011	10	1.8	<1.2	<1.2	<1.2	<1.2
	MW-8 S2	ZGA	4/26/2011	15	<1.0	<1.0	<1.0	<1.0	<1.0
	MW-8 S3	ZGA	4/26/2011	20	8.9	<1.2	<1.2	<1.2	<1.2
	MW-8 S4	ZGA	4/26/2011	25	7.3	<1.1	<1.1	<1.1	<1.1
	MW-8 S5	ZGA	4/26/2011	30	45	<1.2	<1.2	<1.2	<1.2
	MW-8 S6	ZGA	4/26/2011	35	16	<1.2	<1.2	<1.2	<1.2
	MW-8 S7	ZGA	4/26/2011	40	25	<1.1	<1.1	<1.1	<1.1
	MW-8 S8	ZGA	4/26/2011	45	12	<1.1	<1.1	<1.1	<1.1
	MW-8 S9	ZGA	4/26/2011	50	16	<1.1	<1.1	<1.1	<1.1
	MW-8 S10	ZGA	4/26/2011	55	<1.0	<1.1	<1.1	<1.1	<1.1
	MW-8 S11	ZGA	4/26/2011	60	8.7	<1.1	<1.1	<1.1	<1.1
	MW-8 S12	ZGA	4/26/2011	70	7	<1.2	<1.2	<1.2	<1.2
MW9	MW 9-1	ZGA	9/30/2013	3	<10	<10	<10	<10	<10
	MW 9-2	ZGA	9/30/2013	8	<10	<10	<10	<10	<10
	MW 9-3	ZGA	9/30/2013	13	<10	<10	<10	<10	<10
	MW 9-4	ZGA	9/30/2013	18	<10	<10	<10	<10	<10
	MW 9-5	ZGA	9/30/2013	23	<10	<10	<10	<10	<10
	MW 9-6	ZGA	9/30/2013	28.5	<10	<10	<10	<10	<10
	MW 9-7	ZGA	9/30/2013	34	<10	<10	<10	<10	<10
	MW 9-8	ZGA	9/30/2013	38.5	<10	<10	<10	<10	<10
MW10	MW 10-1	ZGA	9/30/2013	3.5	<10	<10	<10	<10	<10
	MW 10-2	ZGA	9/30/2013	9	<10	<10	<10	<10	<10
	MW 10-3	ZGA	9/30/2013	13.5	<10	<10	<10	<10	<10
	MW 10-4	ZGA	9/30/2013	18	<10	<10	<10	<10	<10
	MW 10-5	ZGA	9/30/2013	23.5	<10	<10	<10	<10	<10
	MW 10-6	ZGA	9/30/2013	28	<10	<10	<10	<10	<10
	MW 10-7	ZGA	9/30/2013	33.5	<10	<10	<10	<10	<10
	MW 10-8	ZGA	9/30/2013	38.5	<10	<10	<10	<10	<10
MTCA Method A Cleanup Levels for Soil					**50**	**30**	**NE**	**NE**	**NE**

NOTES:
[1]Analyzed by SW846 method 8260
[2]Depth in feet below ground surface
NE = not established
ND = Reported as not detected. Detection limit not listed.
< = concentration not detected at or above the laboratory detection limit
Bold = concentration exceeds the applicable Cleanup Level
CVOCs = Chlorinated Volatile Organic Compounds
MTCA = Model Toxics Control Act
Pacific Crest = Pacific Crest Environmental, LLC
EA = Environmental Associates, Inc.
Adapt = Adapt Engineering, Inc.
Terracon = Terracon, Inc.
ZGA = Zipper Geo Associates, Inc.

Table 7
Preliminary Screening Levels and Proposed Cleanup Levels - Soil
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Screening Level Description	COPCs				
	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
MTCA Method A Cleanup Level	0.05	0.03	--	--	--
MTCA Method B, Carcinogen, Direct Contact (ingestion only) unrestricted	480	12	--	--	0.67
MTCA Method B, Non-Carcinogen, Direct Contact (ingestion only) unrestricted	480	40	160	1,600	240
MTCA Method B, Three-Phase Model, Soil Leaching to Groundwater	0.05	0.025	0.079	0.52	0.0017
Final Cleanup Level for COCs only	0.05	0.03	--	--	--

NOTE:
COPCs=Contaminants of Potential Concern
"--" = Not applicable or not calculated by Pacific Crest
COCs = Contaminants of concern
Screening Levels in milligrams per kilogram (mg/kg)

Table 8
Preliminary Screening Levels and Proposed Cleanup Levels - Groundwater
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Screening Level Description	COPCs				
	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
MTCA Method A Cleanup Levels for Groundwater - Ingestion	5	5	--	--	0.2
MTCA Method B Cleanup Levels for Groundwater - Ingestion	21	4	16	160	0.029
MTCA Method B Screening Levels for Groundwater - Vapor Intrusion - Residential	25	1.4	--	77	0.33
MTCA Method B Screening Levels for Groundwater - Vapor Intrusion - Commercial	120	12	--	650	1.6
Cleanup Level for COCs only	5	5	--	--	--

NOTE:
COCs=Contaminants of Concern
"--" = Not applicable or not calculated by Pacific Crest
COCs = Contaminants of concern
Screening Levels in micrograms per liter (ug/L)

Table 9
Preliminary Screening Levels and Proposed Cleanup Levels - Air and Soil Vapor
Former Prime Cleaners
18001 Bothell Everett Highway
Bothell, Washington
Pacific Crest No. 223-002

Screening Level Description	COPCs				
	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroether	Vinyl Chloride
MTCA Method B Cleanup Level - Indoor Air - Residential	9.6	0.33	--	18.29	0.28
MTCA Method B Screening Level - Indoor Air - Commercial Worker	44.9	2.8	--	155.7	1.3
MTCA Method B Screening Level - Subslab Soil Vapor - Residential	320	11	--	610	9.5
MTCA Method B Screening Level - Subslab Soil Vapor - Commercial Worker	1500	95	--	5200	44
Cleanup Levels for COCs only	9.6	0.33	--	--	--

NOTE:
COPCs=Contaminants of Potential Concern
"--" = Not applicable or not calculated
COCs = Contaminants of concern
Screening Levels in micrograms per cubic meter (ug/m^3)

APPENDIX A
DPE SYSTEM CONFIGURATION DOCUMENTS

DATA GAP INVESTIGATION REPORT

FORMER PRIME CLEANERS SITE
18001 BOTHELL-EVERETT HIGHWAY
BOTHELL, WASHINGTON

PACIFIC CREST PN: 223-002

LEGEND :

MW-1 GROUND WATER MONITORING WELL NUMBER AND APPROXIMATE LOCATION

DPE-1 DUAL PHASE EXTRACTION WELL NUMBER AND APPROXIMATE LOCATION

MW-2

DPE-4

35 feet

MONEY TREE

FORMER DRY CLEANER

GAS METER AND CONCRETE BARRIERS

EXISTING DRY CLEANER

TERIYAKI

APPROXIMATE LOCATION OF GAS LINE

CONEX BOX

DPE-1

25 feet

DPE-2

DPE-3

30 feet

APPROXIMATE LOCATION OF WATER

MW-4

VMW-1

MW-3

APPROXIMATE LOCATION OF FTR

APPROXIMATE LOCATION OF CCTV

N

10 0 5 10

SCALE IN FEET

REFERENCE: ZGA FIELD MEASUREMENTS. ALL MARKED UTILITY LOCATIONS ARE BASED ON PAINTED LOCATE MARKINGS AND FIELD OBSERVATIONS, AND ARE APPROXIMATE.

PRIME CLEANERS
18001 Bothell Everett Highway
Bothell, Washington

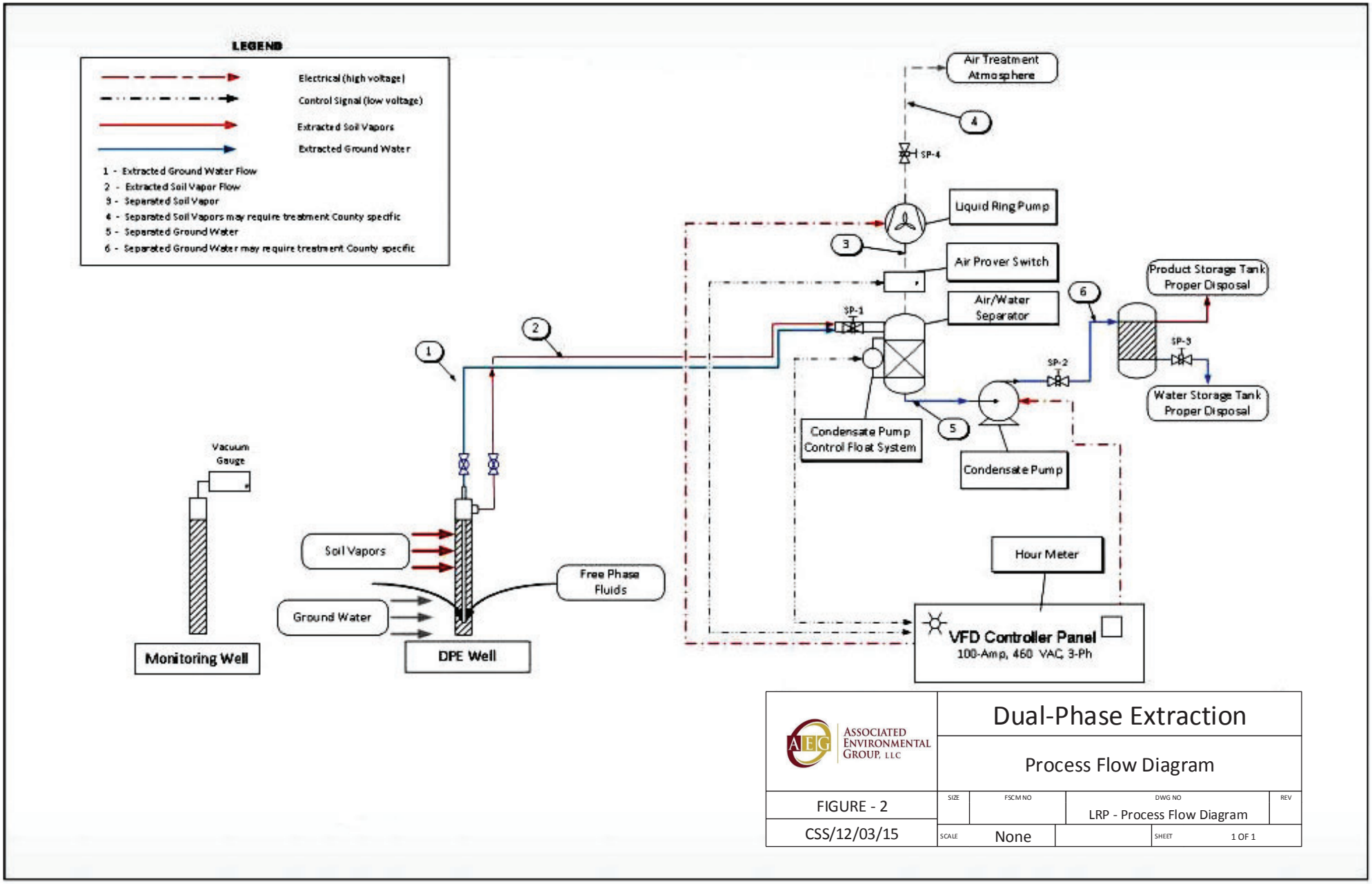
SITE PLAN

DATE: JUNE 2014 Job No. 1001.25

Zipper Geo Associates, LLC
19023 36th Ave. W.,Suite D
Lynnwood, WA

FIGURE 1

SHT.1 of 1



ASSOCIATED ENVIRONMENTAL GROUP, LLC

Dual-Phase Extraction

Process Flow Diagram

FIGURE - 2

CSS/12/03/15

SIZE	FSCM NO	DWG NO	REV
		LRP - Process Flow Diagram	

SCALE	SHEET
None	1 OF 1

King County
Wastewater Treatment Division
Industrial Waste Program
Department of Natural Resources and Parks
201 South Jackson Street, Suite 5513
Seattle, WA 98104-3855
206-477-5300 Fax 206-263-3001
TTY Relay: 711

May 24, 2021

SENT VIA EMAIL ONLY
ELECTRONIC READ RECEIPT REQUESTED

Dee Spector
Fortress Development
10400 NE 4th Street, Suite 2200
Bellevue, WA 98004
dee@fortressdevelopment.com

Issuance of renewed Wastewater Discharge Authorization No. 1010-02 to Lakha Properties - Mill Creek, LLC - Prime Cleaners Remediation

Dear Ms. Spector:

The King County Industrial Waste Program (KCIW) has reviewed your application to discharge industrial wastewater to the sewer system from the Lakha Properties - Mill Creek, LLC - Prime Cleaners Remediation facility located at 18001 Bothell Everett Highway, Bothell, Washington, and has issued the enclosed Minor Discharge Authorization.

This discharge authorization permits your facility to discharge limited amounts of industrial wastewater into King County's sewer system in accordance with the effluent limitations and other requirements and conditions set forth in the document and the regulations outlined in King County Code 28.84.060 (enclosed). As long as you maintain compliance with regulations and do not change the nature and volume of your discharge, KCIW will not require you to apply for an industrial wastewater discharge permit, a type of approval that would result in additional requirements, oversight, and increased fees.

If you propose to increase the volume of your discharge or change the type or quantities of substances discharged, you must contact KCIW at least 60 days before making these changes.

King County Code 28.84 authorizes a fee for each Minor Discharge Authorization issued by the King County Department of Natural Resources and Parks. The current fee for issuance of a renewed Minor Discharge Authorization is $1500. King County will send you an invoice for this amount.

If you have any questions about this discharge authorization or your wastewater discharge, please call me at 206-263-9765 or email me at michael.scullywest@kingcounty.gov. To learn more about King County's industrial wastewater regulations, visit our program's website at: www.kingcounty.gov/industrialwaste.

Thanks in advance for supporting our mission to protect workers, the local and regional sanitary sewer system, our treatment plant infrastructure, and the environment.

Sincerely,

Michael Scullywest
Industrial Waste Compliance Investigator

Enclosures

e-cc: Jon Einarsen, Zipper Geo Associates LLC, jeinarsen@zippergeo.com
Mike Oleson, Alderwood Water District, MOleson@awwd.com

King County

MINOR DISCHARGE AUTHORIZATION
King County Industrial Waste Program
201 S. Jackson Street, Suite 513
Seattle, WA 98104-3855

NUMBER 1010-02

for

Lakha Properties - Mill Creek, LLC - Prime Cleaners Remediation

Facility address: 18001 Bothell Everett Highway
Bothell, WA 98012

Mailing address: 10400 NE 4th Street, Suite 2200
Bellevue, WA 98004

Phone: (425) 462-2505

Emergency (24-hour) phone: 425-582-9928

Industry type: Groundwater Remediation - Organics

SIC code: 7216 **EPA Id. No.:** NA

Discharge to: Brightwater

*Note: This authorization is valid only for the specific discharges shown below:

Discharge process: Wastewater generated by Groundwater Remediation - Organics operation

Effective date: June 1, 2021
Expiration date: May 31, 2026

DESCRIPTION OF SAMPLE SITES AND DISCHARGE VOLUMES

Sample Site No.	Description	Maximum Volume (gallons per day)	
		Industrial	Total
IW1285A	Effluent pipe after treatment	8,000	8,000

Permission is hereby granted to discharge industrial wastewater from the above-identified facility into the King County sewer system in accordance with the effluent limitations and monitoring requirements set forth in this authorization.

If the industrial user wishes to continue to discharge after the expiration date, an application must be filed for re-issuance of this discharge authorization at least 90 days prior to the expiration date. For information concerning this King County Discharge Authorization, please call Industrial Waste Compliance Investigator Michael Scullywest at 206-263-9765.

24-HOUR EMERGENCY NOTIFICATION
Brightwater Treatment Plant: 206-263-9500
Washington State Department of Ecology: 425-649-7000

I. SPECIAL CONDITIONS

A. Lakha Properties - Mill Creek, LLC - Prime Cleaners Remediation shall notify KCIW prior to discharging wastewater to the sanitary sewer system so that a preoperative inspection may be completed.

B. If concentrations of organic compounds exceed 50 percent of screening levels the permittee shall notify KCIW within 24 hours of receiving analytical data. KCIW will review information submitted and may require installation of a granulated activated carbon filtration system (GAC) or other operational changes as deemed necessary.

C. Record Keeping and Retention:

1. The permittee shall maintain records relating to all permitted discharges to the King County sewerage system, including routine maintenance, waste disposal dates, manifests, self-monitoring reports, analytical lab results, pH monitoring records, and flow records.

2. All records required by this authorization shall be available for review at reasonable times by authorized representatives of KCIW.

3. Records of all such testing shall be retained for a period of three years unless litigation or the direction of KCIW requires an extension of that time.

D. For each measurement or sample taken to comply with this authorization, the permittee shall record the following information:

1. Date, exact place, and time of sampling

2. Dates the analyses were performed

3. Person who performed the analyses

4. Analytical techniques or methods used

5. Results of all analyses

REPORTING REQUIREMENTS

There are no required reports unless the permittee exceeds discharge limits, operating criteria, is unable to comply with the conditions of this discharge authorization, or if concentrations of organic compounds exceed 50% of KCIW screening level limits. See special condition B.

II. GENERAL DISCHARGE LIMITATIONS

A. Operating Criteria

There shall be no odor of solvent, gasoline, or hydrogen sulfide (rotten egg odor), oil sheen, unusual color, or visible turbidity. The discharge must remain translucent. If any of the discharge limits are exceeded, you must stop discharging and notify KCIW at 206-477-5300.

B. Corrosive Substances

Limits

Instantaneous minimum:	pH 5.0 (s.u.)
Daily minimum:	pH 5.5 (s.u.)
Maximum:	pH 12.0 (s.u.)

s.u. = standard units

The instantaneous minimum pH limit is violated whenever any single grab sample or any instantaneous recording is less than pH 5.0.

The daily minimum pH limit is violated whenever any continuous recording of 15 minutes or longer remains below pH 5.5 or when each pH value of four consecutive grab samples collected at 15-minute intervals or longer within a 24-hour period remains below pH 5.5.

Discharges of caustic solutions greater than pH 12.0 are prohibited unless King County provides prior written authorization. For these situations, the authorized caustic solution discharges above pH 12.0 must be less than pH 12.5 and must not contain an equivalent weight of sodium hydroxide (NaOH) that exceeds a daily loading rate of 21 pounds/day. The authorized discharge of caustic solutions greater than pH 12.0 shall be subject to special conditions to protect worker safety and the POTW.

C. Fats, Oils, and Grease

FOG Accumulations and Obstructions

Discharges of FOG shall not result in significant accumulations which, either alone or in combination with other wastes, are capable of obstructing flow or interfering with the operations or performance of the POTW.

Nonpolar FOG (mineral/petroleum origin)

Nonpolar FOG limit: 100 mg/L

The limit for nonpolar FOG is violated when either:

- the arithmetic mean of the concentration from the individual analyses of three grab samples, taken no more frequently than 5-minute intervals, exceeds the limitation, or

- the concentration of a single composite sample of three grab samples, taken no more frequently than 5-minute intervals, exceeds the limitation.

Industrial users that violate the nonpolar FOG limit may be required to complete, for King County review and approval, a FOG control plan.

Polar FOG (Animal and Vegetable Origin)

Industrial users that have the potential to discharge polar FOG shall minimize free-floating polar FOG. Industrial users must minimize the use of emulsifying agents, such as cleaners or detergents, to only the quantity needed to maintain industrial activities at their facility and to not impact the POTW.

Industrial users may not add emulsifying agents prior to or within FOG-removal devices, exclusively for the purposes of emulsifying free-floating FOG.

Industrial users that discharge free-floating polar FOG will be required to complete, for King County review and approval, a FOG control plan.

King County has the authority to include aqueous concentration-based discharge limits for polar FOG or total FOG (i.e., the sum of polar and nonpolar FOG) in permits and discharge authorizations issued to industrial users that primarily discharge FOG of animal or vegetable origin. The concentration-based limits shall be based on what can be achieved through implementation of a treatment technology that the Wastewater Treatment Division Director determines represents all known, available, and reasonable methods of prevention, control, and treatment.

D. Flammable or Explosive Materials

No person shall discharge any pollutant, as defined in 40 CFR 403.5, that creates a fire or explosion hazard in any sewer or treatment works, including, but not limited to, waste streams with a closed cup flashpoint of less than 140° Fahrenheit or 60° Centigrade using the test methods specified in 40 CFR 261.21.

At no time shall two successive readings on an explosion hazard meter, at the point of discharge into the system (or at any point in the system), be more than 5% nor any single reading be more than 10% of the lower explosive limit (LEL) of the meter.

Pollutants subject to this prohibition include, but are not limited to, gasoline, kerosene, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, and sulfides, and any other substances that King County, the fire department, Washington State, or the U.S. Environmental Protection Agency has notified the user are a fire hazard or a hazard to the system.

Petroleum Compounds	Maximum Concentration ppm (mg/L)
Benzene	0.07
Ethylbenzene	1.7
Toluene	1.4
Total xylenes	2.2

Heavy Metals/Cyanide

The industrial user shall not discharge wastes, which exceed the following limitations:

Heavy Metals & Cyanide	Instantaneous Maximum ppm (mg/L)[1]	Daily Average ppm (mg/L)[2]
Arsenic	4.0	1.0
Cadmium	0.6	0.5
Chromium	5.0	2.75
Copper	8.0	3.0
Lead	4.0	2.0
Mercury	0.2	0.1
Nickel	5.0	2.5
Silver	3.0	1.0
Zinc	10.0	5.0
Cyanide	3.0	2.0

[1] The instantaneous maximum is violated whenever the concentration of any sample, including a grab within a series used to calculate daily average concentrations, exceeds the limitation.

[2] The daily average limit is violated: a) for a continuous flow system when a composite sample consisting of four or more consecutive samples collected during a 24-hour period over intervals of 15 minutes or greater exceeds the limitation, or b) for a batch system when any sample exceeds the limitation. A composite sample is defined as at least four grab samples of equal volume taken throughout the processing day from a well-mixed final effluent chamber and analyzed as a single sample.

E. High Temperature

The industrial user shall not discharge material with a temperature in excess of 65° C or 150° F.

F. Hydrogen Sulfide

The following are atmospheric hydrogen sulfide limits as measured at a monitoring location designated by King County:

- Short-Term Limit: 15.0 parts per million volume (ppmv) as a 15-minute average
- 8-Hour Limit: 10.0 ppmv as an 8-hour average
- Weekly Limit: 3.0 ppmv as a 7-day average

More stringent weekly atmospheric hydrogen sulfide limits may be developed and imposed on a case-by-case basis depending on nuisance conditions or risks to workers and sewer infrastructure.

Aqueous soluble sulfide limits may be established on a case-by-case basis depending on the volume of discharge and conditions in the receiving sewer, including oxygen content, pH, and existing sulfide concentrations.

G. Organic Compounds

No person shall discharge any organic pollutants that result in the presence of toxic gases, vapors, or fumes within a public or private sewer or treatment works in a quantity that may cause acute worker health and safety problems. Organic pollutants subject to this restriction include, but are not limited to, the following:

- Any organic compound listed in the "Total Toxic Organics (TTO)" definition provided in 40 CFR Section 433.11(e) and 40 CFR Section 413.02(i)
- Acetone, 2-butanone (MEK), 4-methyl-2-pentanone (MIBK), xylenes

Industrial users are required to implement source control strategies and best management practices to minimize the concentration of any of the aforementioned organic pollutants.

Organic compound screening levels

Tetrachloroethylene (Perchloroethylene/PCE)	0.24 mg/L
Trichloroethylene (TCE)	0.5 mg/L
Vinyl chloride	0.012 mg/L
Chloroform (Trichloromethane)	0.060 mg/L

H. Settleable Solids

Settleable solids concentrations: 7.0 ml/L

III. GENERAL CONDITIONS

A. All requirements of King County Code pertaining to the discharge of wastes into the municipal sewer system are hereby made a condition of this discharge authorization.

B. All pretreatment systems used to bring the permittee's discharge into compliance with King County's discharge limitations and all compliance monitoring equipment shall be maintained continuously in satisfactory and effective operations by the permittee at the permittee's expense, and shall be subject to periodic inspections by authorized KCIW personnel. These systems shall be attended at all times during discharge to the King County sewerage system. In the event that such equipment fails, the permittee must notify KCIW immediately and take spill prevention precautions.

C. The industrial discharger shall implement measures to prevent accidental spills or discharges of prohibited substances to the municipal sewer system. Such measures include, but are not limited to, secondary containment of chemicals and wastes, elimination of connections to the municipal sewer system, and spill response equipment.

D. Any facility changes, which will result in a change in the character or volume of the pollutants discharged to the municipal sewer system, must be reported to your KCIW representative. Any facility changes that will cause the violation of the effluent limitations specified herein will not be allowed.

E. In the event the permittee is unable to comply with any of the conditions of this discharge authorization because of breakdown of equipment or facilities, an accident caused by human error, negligence, or any other cause, such as an act of nature the company shall:

1. Take immediate action to stop, contain, and clean up the unauthorized discharges and correct the problem.
2. Immediately notify KCIW and, if after 5 p.m. weekdays and on weekends, call the emergency King County treatment plant phone number on Page 1 so steps can be taken to prevent damage to the sewer system.
3. For discharge violations, collect a sample and submit new data to KCIW within 14 days of becoming aware of the violation.
4. Submit a written report within 14 days of the event (*14-Day Report*) describing the breakdown, the actual quantity and quality of resulting waste discharged, corrective action taken, and the steps taken to prevent recurrence.

F. Compliance with these requirements does not relieve the permittee from responsibility to maintain continuous compliance with the conditions of this discharge authorization or the resulting liability for failure to comply.

G. The permittee shall, at all reasonable times, allow authorized representatives of KCIW to enter that portion of the premises where an effluent source or disposal system is located or in which any records are required to be kept under the terms and conditions of this authorization.

H. Nothing in this discharge authorization shall be construed as excusing the permittee from compliance with any applicable federal, state, or local statutes, ordinances, or regulations including discharge into waters of the state. Any such discharge is subject to regulation and enforcement action by the Washington State Department of Ecology.

I. This discharge authorization does not authorize discharge after its expiration date. If the permittee wishes to continue to discharge after the expiration date, an application must be filed for reissuance of this discharge authorization at least 90 days prior to the expiration date. If the permittee submits its reapplication in the time specified herein, the permittee shall be deemed to have an effective wastewater discharge authorization until KCIW issues or denies the new wastewater discharge authorization. If the permittee fails to file its reapplication in the time period specified herein, the permittee will be deemed to be discharging without authorization.

Compliance Investigator:_____ Date:_____
Michael Scullywest

APPENDIX B
LABORATORY ANALYTICAL REPORT - GROUNDWATER

DATA GAP INVESTIGATION REPORT

FORMER PRIME CLEANERS SITE
18001 BOTHELL-EVERETT HIGHWAY
BOTHELL, WASHINGTON

PACIFIC CREST PN: 223-002

OnSite Environmental Inc.
14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

April 28, 2023

Bill Carroll
Pacific Crest Environmental, LLC
P.O. Box 952
North Bend, WA 98045

Re: Analytical Data for Project 223-002
Laboratory Reference No. 2304-228

Dear Bill:

Enclosed are the analytical results and associated quality control data for samples submitted on April 20, 2023.

The standard policy of OnSite Environmental, Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

David Baumeister
Project Manager

Enclosures

Date of Report: April 28, 2023
Samples Submitted: April 20, 2023
Laboratory Reference: 2304-228
Project: 223-002

Case Narrative

Samples were collected on April 20, 2023 and received by the laboratory on April 20, 2023. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Date of Report: April 28, 2023
Samples Submitted: April 20, 2023
Laboratory Reference: 2304-228
Project: 223-002

VOLATILE ORGANICS EPA 8260D

Matrix: Water
Units: ug/L

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**MW3-042023**					
Laboratory ID:	04-228-01					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	2.9	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*97*	*75-127*				
Toluene-d8	*98*	*80-127*				
4-Bromofluorobenzene	*81*	*78-125*				
Client ID:	**MW4-042023**					
Laboratory ID:	04-228-02					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	21	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*99*	*75-127*				
Toluene-d8	*100*	*80-127*				
4-Bromofluorobenzene	*84*	*78-125*				
Client ID:	**MW6-041923**					
Laboratory ID:	04-228-03					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	0.34	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*98*	*75-127*				
Toluene-d8	*99*	*80-127*				
4-Bromofluorobenzene	*84*	*78-125*				

Date of Report: April 28, 2023
Samples Submitted: April 20, 2023
Laboratory Reference: 2304-228
Project: 223-002

VOLATILE ORGANICS EPA 8260D

Matrix: Water
Units: ug/L

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**MW7-041923**					
Laboratory ID:	04-228-04					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	0.89	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*97*	*75-127*				
Toluene-d8	*98*	*80-127*				
4-Bromofluorobenzene	*83*	*78-125*				
Client ID:	**MW8-041923**					
Laboratory ID:	04-228-05					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	12	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*97*	*75-127*				
Toluene-d8	*98*	*80-127*				
4-Bromofluorobenzene	*82*	*78-125*				
Client ID:	**DPE1-041923**					
Laboratory ID:	04-228-06					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	0.76	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*97*	*75-127*				
Toluene-d8	*99*	*80-127*				
4-Bromofluorobenzene	*83*	*78-125*				

Date of Report: April 28, 2023
Samples Submitted: April 20, 2023
Laboratory Reference: 2304-228
Project: 223-002

VOLATILE ORGANICS EPA 8260D

Matrix: Water
Units: ug/L

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**DPE2-042023**					
Laboratory ID:	04-228-07					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*96*	*75-127*				
Toluene-d8	*98*	*80-127*				
4-Bromofluorobenzene	*83*	*78-125*				
Client ID:	**DPE3-042023**					
Laboratory ID:	04-228-08					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	11	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*95*	*75-127*				
Toluene-d8	*98*	*80-127*				
4-Bromofluorobenzene	*84*	*78-125*				
Client ID:	**DPE4-042023**					
Laboratory ID:	04-228-09					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*97*	*75-127*				
Toluene-d8	*98*	*80-127*				
4-Bromofluorobenzene	*82*	*78-125*				

Date of Report: April 28, 2023
Samples Submitted: April 20, 2023
Laboratory Reference: 2304-228
Project: 223-002

VOLATILE ORGANICS EPA 8260D
QUALITY CONTROL

Matrix: Water
Units: ug/L

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB0425W1					
Vinyl Chloride	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(trans) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
(cis) 1,2-Dichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Trichloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Tetrachloroethene	ND	0.20	EPA 8260D	4-25-23	4-25-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
Dibromofluoromethane	*96*	*75-127*				
Toluene-d8	*99*	*80-127*				
4-Bromofluorobenzene	*80*	*78-125*				

Analyte	Result		Spike Level		Percent Recovery		Recovery Limits	RPD	RPD Limit	Flags
SPIKE BLANKS										
Laboratory ID:	SB0425W1									
	SB	SBD	SB	SBD	SB	SBD				
Vinyl Chloride	**8.97**	**9.66**	10.0	10.0	90	97	71-135	7	20	
(trans) 1,2-Dichloroethene	**9.28**	**9.66**	10.0	10.0	93	97	80-125	4	17	
(cis) 1,2-Dichloroethene	**9.26**	**9.69**	10.0	10.0	93	97	80-129	5	17	
Trichloroethene	**10.6**	**11.3**	10.0	10.0	106	113	80-122	6	18	
Tetrachloroethene	**10.7**	**11.3**	10.0	10.0	107	113	80-124	5	18	
Surrogate:										
Dibromofluoromethane					*96*	*94*	*75-127*			
Toluene-d8					*101*	*100*	*80-127*			
4-Bromofluorobenzene					*89*	*86*	*78-125*			

OnSite Environmental Inc.

Data Qualifiers and Abbreviations

A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.

B - The analyte indicated was also found in the blank sample.

C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.

E - The value reported exceeds the quantitation range and is an estimate.

F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.

H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.

I - Compound recovery is outside of the control limits.

J - The value reported was below the practical quantitation limit. The value is an estimate.

K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.

L - The RPD is outside of the control limits.

M - Hydrocarbons in the gasoline range are impacting the diesel range result.

M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

N1 - Hydrocarbons in diesel range are impacting lube oil range results.

O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.

P - The RPD of the detected concentrations between the two columns is greater than 40.

Q - Surrogate recovery is outside of the control limits.

S - Surrogate recovery data is not available due to the necessary dilution of the sample.

T - The sample chromatogram is not similar to a typical _____.

U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

U1 - The practical quantitation limit is elevated due to interferences present in the sample.

V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.

W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.

X - Sample extract treated with a mercury cleanup procedure.

X1 - Sample extract treated with a sulfuric acid/silica gel cleanup procedure.

X2 - Sample extract treated with a silica gel cleanup procedure.

Y - The calibration verification for this analyte exceeded the 20% drift specified in methods 8260 & 8270, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.

Y1 - Negative effects of the matrix from this sample on the instrument caused values for this analyte in the bracketing continuing calibration verification standard (CCVs) to be outside of 20% acceptance criteria. Because of this, quantitation limits and sample concentrations should be considered estimates.

Z -

ND - Not Detected at PQL
PQL - Practical Quantitation Limit
RPD - Relative Percent Difference

Chain of Custody

OnSite Environmental Inc.
Analytical Laboratory Testing Services
14648 NE 95th Street • Redmond, WA 98052
Phone: (425) 883-3881 • www.onsite-env.com

Company: PACIFIC CREST
Project Number: ~~223-001~~ DS 4/21 223-002
Project Name: PRIME CLEANERS
Project Manager: W CARROLL
Sampled by: M BLACK

Turnaround Request (in working days)
(Check One)
☐ Same Day ☐ 1 Day
☐ 2 Days ☐ 3 Days
☒ Standard (7 Days)
☐ _____ (other)

Laboratory Number: 04-228

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	Number of Containers	NWTPH-HCID	NWTPH-Gx/BTEX (8021☐ 8260☐)	NWTPH-Gx	NWTPH-Dx (SG Clean-up☐)	Volatiles 8260	Halogenated Volatiles 8260 *SHORT LIST	EDB EPA 8011 (Waters Only)	Semivolatiles 8270/SIM (with low-level PAHs)	PAHs 8270/SIM (low-level)	PCBs 8082	Organochlorine Pesticides 8081	Organophosphorus Pesticides 8270/SIM	Chlorinated Acid Herbicides 8151	Total RCRA Metals	Total MTCA Metals	TCLP Metals	HEM (oil and grease) 1664					% Moisture
1	MW3 - 042023	4/20/23	1235	H_2O	3						X																
2	MW4 - 042023	4/20/23	1205		1						X																
3	MW6 - 041923	4/19/23	1330								X																
4	MW7 - 041923	4/19/23	1400								X																
5	MW8 - 041923	4/19/23	1235								X																
6	DPE1 - 041923	4/19/23	1510								X																
7	DPE2 - 042023	4/20/23	0858								X																
8	DPE3 - 042023	4/20/23	1115								X																
9	DPE4 - 042023	4/20/23	0940								X																

	Signature	Company	Date	Time
Relinquished		PACIFIC CREST	4/20/23	1428
Received	Nichelle Bolin	OSE	4/20/23	1428
Relinquished				
Received				
Relinquished				
Received				
Reviewed/Date		Reviewed/Date		

Comments/Special Instructions
* PCE, TCE, CIS 1,2, TRANS-DCE, VC

Data Package: Standard ☐ Level III ☐ Level IV ☐
Chromatograms with final report ☐ Electronic Data Deliverables (EDDs) ☐

APPENDIX C
LABORATORY ANALYTICAL REPORT – SOIL VAPOR AND AIR

DATA GAP INVESTIGATION REPORT

FORMER PRIME CLEANERS SITE
18001 BOTHELL-EVERETT HIGHWAY
BOTHELL, WASHINGTON

PACIFIC CREST PN: 223-002

3600 Fremont Ave. N.
Seattle, WA 98103
T: (206) 352-3790
F: (206) 352-7178
info@fremontanalytical.com

Pacific Crest
William Carroll
1531 Bendigo BLVD N
North Bend, WA 98045

RE: Prime Cleaners
Work Order Number: 2304481

April 27, 2023

Attention William Carroll:

Fremont Analytical, Inc. received 4 sample(s) on 4/20/2023 for the analyses presented in the following report.

Helium by GC/TCD
Volatile Organic Compounds by EPA Method TO-15

This report consists of the following:

- Case Narrative
- Analytical Results
- Applicable Quality Control Summary Reports
- Chain of Custody

All analyses were performed consistent with the Quality Assurance program of Fremont Analytical, Inc. Please contact the laboratory if you should have any questions about the results.

Thank you for using Fremont Analytical.

Sincerely,

Brianna Barnes
Project Manager

Date: *04/27/2023*

CLIENT: Pacific Crest
Project: Prime Cleaners
Work Order: 2304481

Work Order Sample Summary

Lab Sample ID	Client Sample ID	Date/Time Collected	Date/Time Received
2304481-001	AA-042023	04/20/2023 9:45 AM	04/20/2023 1:46 PM
2304481-002	IA1-042023	04/20/2023 9:50 AM	04/20/2023 1:46 PM
2304481-003	IA2-042023	04/20/2023 10:45 AM	04/20/2023 1:46 PM
2304481-004	SPG5-042023	04/20/2023 10:35 AM	04/20/2023 1:46 PM

Note: If no "Time Collected" is supplied, a default of 12:00AM is assigned

Case Narrative

WO#: **2304481**
Date: **4/27/2023**

CLIENT: Pacific Crest
Project: Prime Cleaners

I. SAMPLE RECEIPT:
Samples receipt information is recorded on the attached Sample Receipt Checklist.

II. GENERAL REPORTING COMMENTS:
Air samples are reported in ppbv and ug/m3.

The validity of the analytical procedures for which data is reported in this analytical report is determined by the Laboratory Control Sample (LCS) and the Method Blank (MB). The LCS and the MB are processed with the samples to ensure method criteria are achieved throughout the entire analytical process.

III. ANALYSES AND EXCEPTIONS:
Exceptions associated with this report will be footnoted in the analytical results page(s) or the quality control summary page(s) and/or noted below.

Standard temperature and pressure assumes 24.45 = (25C and 1 atm).

Qualifiers:

* - Flagged value is not within established control limits
B - Analyte detected in the associated Method Blank
D - Dilution was required
E - Value above quantitation range
H - Holding times for preparation or analysis exceeded
I - Analyte with an internal standard that does not meet established acceptance criteria
J - Analyte detected below Reporting Limit
N - Tentatively Identified Compound (TIC)
Q - Analyte with an initial or continuing calibration that does not meet established acceptance criteria
S - Spike recovery outside accepted recovery limits
ND - Not detected at the Reporting Limit
R - High relative percent difference observed

Acronyms:

%Rec - Percent Recovery
CCB - Continued Calibration Blank
CCV - Continued Calibration Verification
DF - Dilution Factor
DUP - Sample Duplicate
HEM - Hexane Extractable Material
ICV - Initial Calibration Verification
LCS/LCSD - Laboratory Control Sample / Laboratory Control Sample Duplicate
MCL - Maximum Contaminant Level
MB or MBLANK - Method Blank
MDL - Method Detection Limit
MS/MSD - Matrix Spike / Matrix Spike Duplicate
PDS - Post Digestion Spike
Ref Val - Reference Value
REP - Sample Replicate
RL - Reporting Limit
RPD - Relative Percent Difference
SD - Serial Dilution
SGT - Silica Gel Treatment
SPK - Spike
Surr - Surrogate

Analytical Report

Work Order: **2304481**
Date Reported: **4/27/2023**

Client: Pacific Crest
Collection Date: 4/20/2023 10:35:00 AM
Project: Prime Cleaners
Lab ID: 2304481-004
Matrix: Soil Gas
Client Sample ID: **SPG5-042023**

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
Helium by GC/TCD				Batch ID: R83480		Analyst: AM
Helium	ND	0.300	D	%	1.5	4/25/2023 12:00:00 PM

Client: **Pacific Crest**
WorkOrder: 2304481
Project: Prime Cleaners

Client Sample ID: AA-042023
Lab ID: 2304481-001A
Sample Type: Summa Canister

Date Sampled: 4/20/2023
Date Received: 4/20/2023

Analyte	Concentration		Reporting Limit		Qual	Method	Date/Analyst	
Volatile Organic Compounds by EPA Method TO-15								
	(ppbv)	(ug/m³)	(ppbv)	(ug/m³)				
cis-1,2-Dichloroethene	<0.0245	<0.0972	0.0245	0.0972		EPA-TO-15	04/22/2023	LB
Tetrachloroethene (PCE)	<0.0111	<0.0753	0.0111	0.0753		EPA-TO-15	04/22/2023	LB
trans-1,2-Dichloroethene	<0.0246	<0.0977	0.0246	0.0977		EPA-TO-15	04/22/2023	LB
Trichloroethene (TCE)	<0.00125	<0.00672	0.00125	0.00672		EPA-TO-15	04/22/2023	LB
Vinyl chloride	<0.0774	<0.198	0.0774	0.198		EPA-TO-15	04/22/2023	LB
Surr: 4-Bromofluorobenzene	93.6 %Rec	--	70-130	--		EPA-TO-15	04/22/2023	LB

Client: **Pacific Crest**
WorkOrder: 2304481
Project: Prime Cleaners

Client Sample ID: IA1-042023
Lab ID: 2304481-002A
Sample Type: Summa Canister

Date Sampled: 4/20/2023
Date Received: 4/20/2023

Analyte	Concentration		Reporting Limit		Qual	Method	Date/Analyst	
Volatile Organic Compounds by EPA Method TO-15								
	(ppbv)	(ug/m³)	(ppbv)	(ug/m³)				
cis-1,2-Dichloroethene	<0.0245	<0.0972	0.0245	0.0972		EPA-TO-15	04/22/2023	LB
Tetrachloroethene (PCE)	0.0345	0.234	0.0111	0.0753		EPA-TO-15	04/22/2023	LB
trans-1,2-Dichloroethene	<0.0246	<0.0977	0.0246	0.0977		EPA-TO-15	04/22/2023	LB
Trichloroethene (TCE)	<0.00125	<0.00672	0.00125	0.00672		EPA-TO-15	04/22/2023	LB
Vinyl chloride	<0.0774	<0.198	0.0774	0.198		EPA-TO-15	04/22/2023	LB
Surr: 4-Bromofluorobenzene	96.0 %Rec	--	70-130	--		EPA-TO-15	04/22/2023	LB

Client: **Pacific Crest**
WorkOrder: 2304481
Project: Prime Cleaners

Client Sample ID: IA2-042023
Lab ID: 2304481-003A
Sample Type: Summa Canister

Date Sampled: 4/20/2023
Date Received: 4/20/2023

Analyte	Concentration		Reporting Limit		Qual	Method	Date/Analyst	
Volatile Organic Compounds by EPA Method TO-15								
	(ppbv)	(ug/m³)	(ppbv)	(ug/m³)				
cis-1,2-Dichloroethene	<0.0245	<0.0972	0.0245	0.0972		EPA-TO-15	04/22/2023	LB
Tetrachloroethene (PCE)	0.0419	0.284	0.0111	0.0753		EPA-TO-15	04/22/2023	LB
trans-1,2-Dichloroethene	<0.0246	<0.0977	0.0246	0.0977		EPA-TO-15	04/22/2023	LB
Trichloroethene (TCE)	<0.00125	<0.00672	0.00125	0.00672		EPA-TO-15	04/22/2023	LB
Vinyl chloride	<0.0774	<0.198	0.0774	0.198		EPA-TO-15	04/22/2023	LB
Surr: 4-Bromofluorobenzene	77.0 %Rec	--	70-130	--		EPA-TO-15	04/22/2023	LB

Client: **Pacific Crest**
WorkOrder: 2304481
Project: Prime Cleaners

Client Sample ID: SPG5-042023
Lab ID: 2304481-004A
Sample Type: Summa Canister

Date Sampled: 4/20/2023
Date Received: 4/20/2023

Analyte	Concentration		Reporting Limit		Qual	Method	Date/Analyst	
Volatile Organic Compounds by EPA Method TO-15								
	(ppbv)	(ug/m³)	(ppbv)	(ug/m³)				
cis-1,2-Dichloroethene	<0.0981	<0.389	0.0981	0.389		EPA-TO-15	04/23/2023	LB
Tetrachloroethene (PCE)	67.5	458	0.0444	0.301		EPA-TO-15	04/23/2023	LB
trans-1,2-Dichloroethene	0.102	0.403	0.0985	0.391		EPA-TO-15	04/23/2023	LB
Trichloroethene (TCE)	5.30	28.5	0.00500	0.0269		EPA-TO-15	04/23/2023	LB
Vinyl chloride	<0.310	<0.791	0.310	0.791		EPA-TO-15	04/23/2023	LB
Surr: 4-Bromofluorobenzene	74.8 %Rec	--	70-130	--		EPA-TO-15	04/23/2023	LB

Work Order: 2304481
CLIENT: Pacific Crest
Project: Prime Cleaners

QC SUMMARY REPORT

Helium by GC/TCD

Sample ID: **LCS-R83480**	SampType: **LCS**			Units: **%**		Prep Date: **4/25/2023**		RunNo: **83480**		
Client ID: **LCSW**	Batch ID: **R83480**					Analysis Date: **4/25/2023**		SeqNo: **1739080**		
Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Helium	5.91	0.200	5.000	0	118	80	120				

Sample ID: **MB-R83480**	SampType: **MBLK**			Units: **%**		Prep Date: **4/25/2023**		RunNo: **83480**		
Client ID: **MBLKW**	Batch ID: **R83480**					Analysis Date: **4/25/2023**		SeqNo: **1739081**		
Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Helium	ND	0.200									

Sample ID: **2304481-004AREP**	SampType: **REP**			Units: **%**		Prep Date: **4/25/2023**		RunNo: **83480**		
Client ID: **SPG5-042023**	Batch ID: **R83480**					Analysis Date: **4/25/2023**		SeqNo: **1739079**		
Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Helium	ND	0.300						0		30	D

Work Order: 2304481
CLIENT: Pacific Crest
Project: Prime Cleaners

QC SUMMARY REPORT

Volatile Organic Compounds by EPA Method TO-15

Sample ID: **LCS-R83444** SampType: **LCS** Units: **ppbv** Prep Date: **4/22/2023** RunNo: **83444**
Client ID: **LCSW** Batch ID: **R83444** Analysis Date: **4/22/2023** SeqNo: **1738038**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Vinyl chloride	1.89	0.0774	2.000	0	94.7	70	130				
trans-1,2-Dichloroethene	2.17	0.0246	2.000	0	108	70	130				
cis-1,2-Dichloroethene	2.09	0.0245	2.000	0	104	70	130				
Trichloroethene (TCE)	2.01	0.00125	2.000	0	100	70	130				
Tetrachloroethene (PCE)	2.23	0.0111	2.000	0	111	70	130				
Surr: 4-Bromofluorobenzene	4.06		4.000		102	70	130				

Sample ID: **MB-R83444** SampType: **MBLK** Units: **ppbv** Prep Date: **4/22/2023** RunNo: **83444**
Client ID: **MBLKW** Batch ID: **R83444** Analysis Date: **4/22/2023** SeqNo: **1738039**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Vinyl chloride	ND	0.0774									
trans-1,2-Dichloroethene	ND	0.0246									
cis-1,2-Dichloroethene	ND	0.0245									
Trichloroethene (TCE)	ND	0.00125									
Tetrachloroethene (PCE)	ND	0.0111									
Surr: 4-Bromofluorobenzene	3.79		4.000		94.8	70	130				

Sample ID: **2304481-004AREP** SampType: **REP** Units: **ppbv** Prep Date: **4/23/2023** RunNo: **83444**
Client ID: **SPG5-042023** Batch ID: **R83444** Analysis Date: **4/23/2023** SeqNo: **1738395**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Vinyl chloride	ND	0.310						0		25	
trans-1,2-Dichloroethene	ND	0.0985						0.1018	9.99	25	
cis-1,2-Dichloroethene	ND	0.0981						0		25	
Trichloroethene (TCE)	5.45	0.00500						5.298	2.83	25	
Tetrachloroethene (PCE)	70.1	0.0444						67.48	3.87	25	
Surr: 4-Bromofluorobenzene	14.8		16.00		92.4	70	130		0		

Sample Log-In Check List

Client Name:	PACIFIC	Work Order Number:	2304481
Logged by:	Clare Griggs	Date Received:	4/20/2023 1:46:00 PM

Chain of Custody

1.	Is Chain of Custody complete?	Yes	☑	No	☐	Not Present ☐
2.	How was the sample delivered?	Client				

Log In

3.	Coolers are present?	Yes	☐	No	☑	NA ☐
		Air Samples				
4.	Shipping container/cooler in good condition?	Yes	☑	No	☐	
5.	Custody Seals present on shipping container/cooler? (Refer to comments for Custody Seals not intact)	Yes	☐	No	☐	Not Present ☑
6.	Was an attempt made to cool the samples?	Yes	☐	No	☐	NA ☑
7.	Were all items received at a temperature of >2°C to 6°C *	Yes	☐	No	☐	NA ☑
8.	Sample(s) in proper container(s)?	Yes	☑	No	☐	
9.	Sufficient sample volume for indicated test(s)?	Yes	☑	No	☐	
10.	Are samples properly preserved?	Yes	☑	No	☐	
11.	Was preservative added to bottles?	Yes	☐	No	☑	NA ☐
12.	Is there headspace in the VOA vials?	Yes	☐	No	☐	NA ☑
13.	Did all samples containers arrive in good condition(unbroken)?	Yes	☑	No	☐	
14.	Does paperwork match bottle labels?	Yes	☑	No	☐	
15.	Are matrices correctly identified on Chain of Custody?	Yes	☑	No	☐	
16.	Is it clear what analyses were requested?	Yes	☑	No	☐	
17.	Were all holding times able to be met?	Yes	☑	No	☐	

Special Handling (if applicable)

18.	Was client notified of all discrepancies with this order?	Yes	☑	No	☐	NA ☐

Person Notified:	Michael Black	Date:	4/20/2023
By Whom:	Clare Griggs	Via:	☑ eMail ☐ Phone ☐ Fax ☐ In Person
Regarding:	Confirming select list.		
Client Instructions:	See revised COC.		

19. Additional remarks:

Item Information

* Note: DoD/ELAP and TNI require items to be received at 4°C +/- 2°C

Fremont Analytical

3600 Fremont Ave N.
Seattle, WA 98103
Tel: 206-352-3790
Fax: 206-352-7178

Air Chain of Custody Record & Laboratory Services Agreement

Date: 4/20/23 Page: 1 of: 1

Laboratory Project No (Internal): 2304489

Project Name: PRIME CLEANERS

Special Remarks:

Project No: 223-001

Location: BOTHELL, WA

Client: Pacific Crest

Collected by: MB

Address: PO Box 952

Reports to (PM): W. CARROLL

City, State, Zip: NORTH BEND, WA 98045

Email (PM): WCARROLL@ARROWENV.COM

Telephone: 425 888 4990

Air samples are disposed of one week after report is submitted to client unless otherwise requested. ☐ OK to Dispose ☐ Hold (fees may apply)

Fax: 425 888 4994

	Sample Name	Canister / Flow Reg Serial #	Sample Type (Matrix) *	Container Type **	Expected Fill Time / Flow Rate	Sample Start Date & Time	Field Initial Sample Pressure (" Hg)	Sample End Date & Time	Field Final Sample Pressure (" Hg)	Analysis: Full list VOCs TO15	Select VOCs TO15 ***	APH TO15	Siloxanes TO15	Sulfur TO15	Major Gases 3C	Helium 3C Mod	VOCs 8260	GX/BTEX 8260		Comments	Internal: Final Pressure ("Hg)
1	17237 AA-042023 FR8-35	~~12667~~ ~~FR8-40~~	AA	6L	8hr	4/19/23 1535	-30	4/20/23 0945	-1		X									CVOCs	7
2	12447 IA1-042023 FR8-40	~~13075~~ ~~FR8-08~~	IA	6L	8hr	4/19/23 1540	-30	4/20/23 0950	-1		X									"	2
3	13975 IA2-042023 FR8-08	~~17237~~ ~~FR8-35~~	IA	6L	8hr	4/19/23 1542	-30	4/20/23 1045	-2		X									"	2
4		17236 FR8-24		6L	8hr																
5	11014 SPGS-042023 FC-30	~~4684~~ ~~FC-18~~	S	1L	150mL/min	4/20/23 1030	-30	4/20/23 1035	-3		X									"	2

* Matrix Codes: AA = Ambient Air OA = Outdoor Air IA = Indoor Air S = Subslab / Soil Gas SVE = SVE L = Landfill D = Digester

** Container Codes: BV = 1 Liter Bottle Vac 6L = 6L Canister 1L = 1L Canister CYL = High Pressure Cylinder F = Filter S = Sorbent Tube TB = Tedlar Bag

*** Select one: ☐ BTEXN & APH ☒ PCE & Breakdown ☒ Other, specify in comments

Turn-Around Time: ☒ Standard ☐ Next Day ☐ 3 Day ☐ Same Day ☐ 2 Day ____ specify

I represent that I am authorized to enter into this Agreement with Fremont Analytical on behalf of the Client named above, that I have verified Client's agreement to each of the terms on the front and backside of this Agreement.

Relinquished (Signature)	Print Name	Date/Time	Received (Signature)	Print Name	Date/Time
x	MIKE BLAIR	4/21/23	x		4/20/23 1346
Relinquished (Signature)	Print Name	Date/Time	Received (Signature)	Print Name	Date/Time
x			x		

Air Chain of Custody Record & Laboratory Services Agreement

Fremont Analytical

3600 Fremont Ave N.
Seattle, WA 98103
Tel: 206-352-3790
Fax: 206-352-7178

Date: 4/20/23 Page: 1 of: 1

Laboratory Project No (Internal): 2304489

Project Name: PRIME CLEANERS

Special Remarks: edit per MB 4/21/23 -CG

Project No: 223-001

Location: BOTHELL, WA

Client: Pacific Crest

Collected by: MB

Address: PO Box 952

Reports to (PM): W.CARROLL

City, State, Zip: NORTH BEND, WA 98045

Email (PM): WCARROLL@ARROWENV.COM

Telephone: 425 888 4990

Fax: 425 888 4994

Air samples are disposed of one week after report is submitted to client unless otherwise requested. ☐ OK to Dispose ☐ Hold (fees may apply)

#	Sample Name	Canister / Flow Reg Serial #	Sample Type (Matrix) *	Container Type **	Expected Fill Time / Flow Rate	Sample Start Date & Time	Field Initial Sample Pressure (" Hg)	Sample End Date & Time	Field Final Sample Pressure (" Hg)	Analysis: Full list VOCs TO15	Select VOCs TO15 ***	APH TO15	Siloxanes TO15	Sulfur TO15	Major Gases 3C	Helium 3C Mod	VOCs 8260	GX/BTEX 8260		Comments	Internal: Final Pressure ("Hg)
1	17137 AA-042023 FR8-35	~~12667~~ ~~FR8-40~~	AA	6L	8hr	4/19/23 1535	-30	4/20/23 0945	-1		X									CVOCs	7
2	12447 IA1-042023 FR8-40	~~13075~~ ~~FR8-08~~	IA	6L	8hr	4/19/23 1540	-30	4/20/23 0950	-1		X									"	2
3	13975 IA2-042023 FR8-08	~~17237~~ ~~FR8-35~~	IA	6L	8hr	4/19/23 1542	-30	4/20/23 1045	-2		X									"	2
4		17236 FR8-24		6L	8hr																
5	11014 SVE5-042023 FC-30	~~4684~~ ~~FC-18~~	S	1L	150mL/min	4/20/23 1030	-30	4/20/23 1035	-3		X					X				"	2

* Matrix Codes: AA = Ambient Air OA = Outdoor Air IA = Indoor Air S = Subslab / Soil Gas SVE = SVE L = Landfill D = Digester

** Container Codes: BV = 1 Liter Bottle Vac 6L = 6L Canister 1L = 1L Canister CYL = High Pressure Cylinder F = Filter S = Sorbent Tube TB = Tedlar Bag

*** Select one: ☐ BTEXN & APH ☒ PCE & Breakdown ☒ Other, specify in comments

Turn-Around Time: ☒ Standard ☐ Next Day ☐ 3 Day ☐ Same Day ☐ 2 Day ☐ specify

I represent that I am authorized to enter into this Agreement with Fremont Analytical on behalf of the Client named above, that I have verified Client's agreement to each of the terms on the front and backside of this Agreement.

Relinquished (Signature)	Print Name	Date/Time	Received (Signature)	Print Name	Date/Time
x	MIKE BLAIR	4/21/23	x		4/20/23 1346
Relinquished (Signature)	Print Name	Date/Time	Received (Signature)	Print Name	Date/Time
x			x		