April 1, 2024

Mr. Ted Uecker, LHG
Toxics Cleanup Program
Washington State Department of Ecology | Eastern Regional Office
4601 North Monroe Street
Spokane, Washington 99205

Re: Work Plan for a Phase II Subsurface Investigation
9944 US Highway 2
Coulee City, Washington 99115

Dear Mr. Uecker:

AEI Consultants (AEI) is provided this Work Plan outlining a Phase II Subsurface Investigation at 9944 US Highway 2 in Coulee City, Washington 99115("the Site") as part of the requirements from the *Environmental Covenant* dated June 24, 2013 for the Site. As part of due diligence for a property transaction, a *Phase I Environmental Site Assessment* (ESA) was prepared by AEI, dated February 23, 2024. The Phase I ESA identified a former automotive gasoline station and existing subsurface product piping at the Site as recognized environmental conditions (RECs). The purpose of this investigation is to evaluate whether the subsurface at the Site (i.e., soil and soil gas) has been significantly impacted by the RECs identified in the Phase I ESA for due diligence purposes.

BACKGROUND:
Based on the February 23, 2024 Phase I ESA, the Site is equipped with an above ground storage tank (AST) nest located in the western portion of the Site, which houses three 6,000-gallon gasoline tanks and a 4,000- and 10,000-gallon diesel ASTs. Surficial staining was not observed in the AST secondary containment nest; however, the area of the Site was experiencing heavy snowfall at the time of the inspection. The ASTs are connected to underground fiberglass reinforced double wall piping which leads to the dispenser islands. Soil sampling was conducted in the vicinity of the AST nest in 2011 due to a release from damaged piping; however, the sampling was limited to the damaged area. Based on the age of the AST system and underground piping (34 years) and limited nature of previous sampling activities, the underground piping at the Site represents a REC.

Prior to the current developments in 1990, the Site was developed with an apparent gasoline station in a slightly different configuration from at least 1955 until 1982. A commercial building was present on the eastern portion with dispenser islands and a likely tank cavity to the southeast of the building. No information regarding fuel tanks associated with the initial gasoline station was provided during this assessment, and it is unknown if they were above or belowground; however, it should be noted that no ASTs are visible in the aerial photographs reviewed between 1955 and 1982. Based on the lack of information regarding the removal/closure of former tanks at the Site and the limited nature of the previous sampling, the initial gasoline station and associated tank system at the Site represent a REC.

SCOPE OF WORK:
AEI proposes to complete a geophysical survey in the eastern-southeastern portion of the Site, advance four exploratory soil borings and two temporary soil gas probes, and collect one water sample from the existing onsite well to evaluate the Site for the REC(s) identified in the Phase I ESA. AEI proposes performing the following tasks to conduct its investigation:

- Mark each drilling location with white paint and notify the Washington Utilities Notification Center, who, in turn, will contact subscribing utility companies to mark the locations of their underground utilities along property boundaries and around proposed investigation locations, as appropriate.
- Arrange for a private geophysical survey in the eastern-southeastern portion of the Site (see GPR area on Figure 1) to evaluate the presence of underground structures including the presence of USTs and/or other subsurface features at the proposed subsurface sample locations using ground penetrating radar (GPR), electromagnetic induction and possibly utility tracing instruments. In addition, each drilling location will be cleared from utilities and hand auger clearing to a depth of at least four to five feet beneath ground surface (bgs) will be performed to check the planned drilling location(s) visually for possible utilities.

- AEI will contract a licensed driller to advance four soil borings at the Site with a track- or truck-mounted direct-push drilling rig depending upon access limitations. The locations of the proposed borings are shown on the Figure 1 and may be modified based on the results of the geophysical survey and location of the product piping. Two borings will be advanced to the planned depth of 15 feet bgs and two borings will be advanced to 10 feet bgs or refusal, whichever is encountered first for the collection of soil samples.
- Each boring will be logged by AEI staff, soil core will be logged and described in general accordance with the Unified Soil Classification System; soils will be screened with a portable photoionization detector (PID) and for sensory perception. Soil samples will be collected for laboratory analyses from the intervals that represent the highest likelihood for contamination based on the field PID screening results. If no contamination is evident, the soil samples will be collected from the estimated invert depth of a potential UST (12-15 feet bgs) on the east side of the Site and from 4-5 feet bgs, beneath the product piping, from the borings near the product piping and downgradient of the ASTs. It is anticipated that two soil samples will be collected from each of the eastern borings and one soil sample will be collected from the 10-foot bgs borings. Each sample will be selected for analysis for total petroleum hydrocarbon (TPH) and volatile organic compounds (VOCs).
- Advance two shallow soil borings for the collection of temporary soil gas samples at approximately 5-feet bgs. The borings will be advanced at the locations shown on the attached figure and may be modified based on actual Site conditions. The soil borings will be completed as temporary soil gas probes between 4-5 feet bgs or refusal to collect soil gas samples. Sampling of soil gas will be conducted by vacuum testing and purging the probes and by using a tracer compound. The soil gas samples will be collected using a laboratory supplied, 1-liter Summa© Canister equipped with a calibrated flow controller. The soil gas samples will be analyzed for VOCs and helium as a leak check.
- Collect one water sample from the existing potable water well for select TPH and VOCs. The sample will be collected from a spigot at the wellhead or from a faucet in the Site building.
- Samples collected for potential laboratory analysis will be sealed, labeled, and entered onto chain-of-custody documentation for transportation for analysis to a state-certified laboratory.
- Backfill borings per applicable regulations.
- Prepare a final technical report, detailed methods, and results of the investigation, including tables, figures, boring logs, and appendices. Analytical results generated during the investigation will be compared to applicable State of Washington Department of Ecology (WDOE) Method Toxic Control Act (MTCA) Methods. Conclusions to be presented in the report will indicate if there is an indication for further investigation or regulatory reporting.
- If waste is generated, AEI will collect one sample from the investigation waste drums for potential laboratory analysis. These samples will be placed on a laboratory hold pending analytical results of soil samples collected. If the initial soil data indicates that waste will require off-Site disposal, then the sample will be analyzed for Resource Conservation and Recover Act 8 metals, copper, nickel, and zinc. AEI will liaison with a licensed waste hauler to create a waste profile, transport and property dispose of the waste as non-hazardous waste.

SCHEDULE:

AEI will schedule the drilling upon approval from the WDOE. AEI anticipates completing the drilling activities in one to two weeks following WDOE approval. If you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,

Jacqueline C. Day, LG 3011
Principal Geologist

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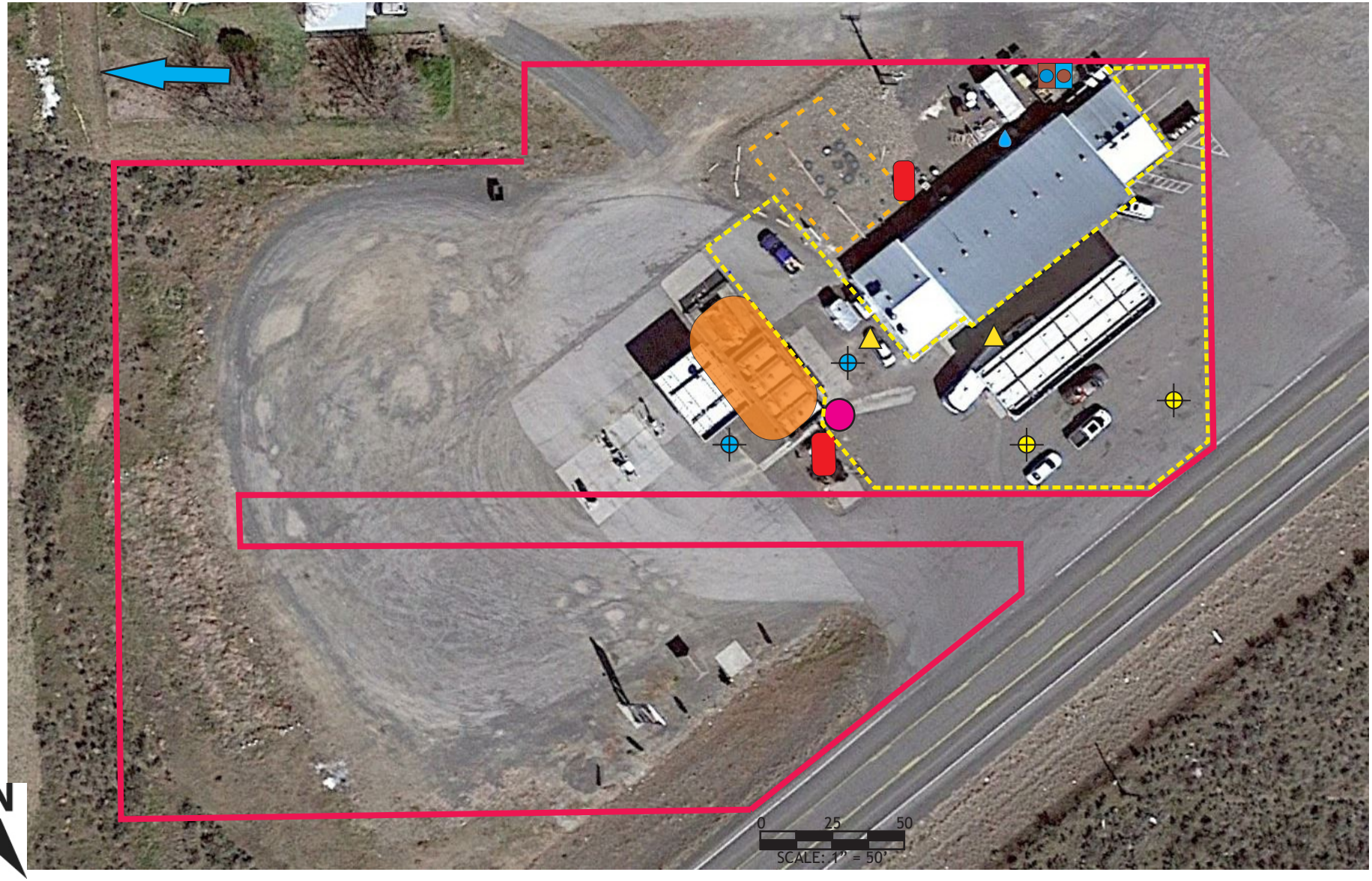
Licensed Geologist
JACQUELINE CHRISTINE DAY
expires: 12/20/2024

Enclosed: Figure 1 – Site Map



LEGEND

- Approximate Site Boundary
- Proposed Boring Location (15 ft)
- Proposed Boring Location (10 ft)
- Estimated Groundwater Flow Direction
- Water Well
- Propane Above Ground Storage Tank (AST)
- Fuel AST
- Grease Trap
- Septic System
- Proposed Soil Gas Probe
- Proposed Geophysical Survey Area
- Residual Impacts

PROPOSED SAMPLING LOCATIONS

AEI

9944 US-2
Coulee City, Washington 99115

FIGURE 1
Proposal No. 95109