ENVITECHNOLOGY
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October 29, 2024

To Prabhdip Parmar
West Hill Market Llc.
10439 SE 212th Street
Kent, WA 98031

Cc David Unrih
Department of Ecology
Toxics Cleanup Program

Proposal: Additional Subsurface Investigation
West Hill Market
24526 36th Avenue South, Kent, WA 98032

We are pleased to forward this proposal to provide environmental consulting services for the above-referenced property in response to your recent request.

STATEMENT OF UNDERSTANDING

The subject property is a convenience store known as West Hill Market, located on the south corner of the three-way intersection between Military Road South (36th Avenue South) and 38th Avenue South in Kent, King County, Washington.

A fueling service station was constructed on vacant land in 1962. The Site was equipped with four (4) USTs – one (1) 8,000-gallon gasoline tank, one (1) 6,000-gallon unknown tank, and two (2) 4,000-gallon gasoline tanks. The fueling service station ceased operating during the 1980s, and the convenience store without gas sales has been used since the 1980s. In 1990, four (4) USTs were removed by decommissioning. In 2005, two (2) additional USTs, one (1) 500-gallon heating oil tank and one (1) 500-gallon waste oil tank, were also removed by decommissioning. About 357 tons of accessible petroleum-contaminated soils (PCS) were successfully removed to the extent practicable. However, some impacted soils remained at the Site due to depth and proximity to the buried utilities and building. In 2005, The Site received a conditional no further action (NFA) determination from the Department of Ecology, and a restrictive covenant was filed for the property. However, in 2011, the NFA was rescinded, and the Site's LUST was reopened because Ecology noticed that the restrictive covenant was recorded mistakenly for the adjoining southern property in 2005.

Envitechnology applied for the Voluntary Cleanup Program (VCP) of the Department of Ecology (Ecology) in early 2024. The application was accepted by Ecology on April 5, 2024. The Site's manager, David Unrih, provided the following opinion regarding further action:

- The existing Restrictive Covenant (RC) for the Property (24526 Military Rd S, Kent, WA 98032, King Co. Parcel No 2222049145) was recorded with the King County Recorder for 24602 Military Rd S (King Co. Parcel No. 2222049144). From what I can tell, this appears

to be due to an error on the cover sheet for the Recorder's office. It is likely that the VCP Customer at the time made this error since Ecology does not record Restrictive Covenants. The legal description on the cover sheet and in the RC itself is the same as the legal description for Parcel No. 2222049145. From my discussion with Tamara Welty, our periodic reviewer, Ecology recommends reviewing a title search for the property if available. Even though the RC shows up on Parcel No. 2222049144 in the King County Recorder's office, a title search **may** show that the RC applies to the Property. If no title search is available, it may be worthwhile to conduct a new title search. Ecology requires a title search be conducted within 6 months of any recording or amendment of new covenant documents.

- Based on the review of the above documents, Ecology has made the following conclusions and recommendations:

    - Results from B7, B9, and TP-2 indicate gasoline-range (TPH-G) total petroleum hydrocarbons and benzene meet cleanup standards in the this portion of the site. Soil impacted by TPH-G and benzene releases in this location is located below 15 feet below ground surface (bgs). Despite results from B9 at 35 and 40 feet bgs containing TPH-G and benzene above the Method A cleanup level, impacts are to groundwater at the Site are unlikely. Therefore, these soils are in compliance with the direct contact point of compliance (see WAC 173-340-740(6)(d)). No further investigation is needed in this area.

    - Ecology recommends reviewing historical reports cited above to evaluate the need for additional sampling to confirm the extent of contamination in the vicinity of excavation sidewall sample EX2-SWC. From Ecology's initial review of reports cited above, it appears that soil samples from boring B2 were not analyzed for diesel- and oil-range (TPH-D+O) total petroleum hydrocarbons. Ecology recommends reviewing laboratory reports to see if any TPH-D+O is available for this location. Additionally, Ecology recommends drafting a figure to show the location of boring B4 with respect to sidewall sample EX2-ESW. Boring B4 does not contain TPH-D+O above the Method A cleanup level.

    - If TPH-D+O results are not available for B2, Ecology recommends collecting an additional soil sample from the southern property boundary of 24526 Military Rd S. Per the requirements of WAC 173-340-350 through -360, and -440, the full extent of contamination must be defined to determine where institutional controls apply.

    - Ecology also recommends evaluating whether contaminated soil remains on the Property. Since the last samples were collected in 2005, it is possible that concentrations of petroleum hydrocarbons meet cleanup standards. If it can be demonstrated that soil throughout the Site meets cleanup standards, institutional controls may no longer be necessary.

- The error in the RC was noted in Periodic Reviews conducted by Ecology in 2011 and 2016. Ecology requires that revised institutional controls for the Property meet the requirements of the Uniform Environmental Covenants Act (UECA), passed in 2007. For additional information regarding the UECA please see Chapter 64.70 RCW and *Procedure 440* linked above.

You have advised us that you are interested in having Envitechnology conduct a Limited Phase II Environmental Site Assessment to address recognized environmental conditions and potential environmental concerns discussed previously.

Under this proposal, Envitechnology will provide the necessary technical expertise, laboratory services, and other services required to address this objective. The following paragraphs briefly discuss the various technical tasks proposed to address your interests.

Task 1. Utility Location

Before performing the soil borings, the Site will be marked by a public utility locator. In addition, Envitechnology will subcontract with a private locator to perform an additional site-specific utility clearance on the subject property before drilling.

Task 2. Geophysical Survey

The geophysical survey will employ electromagnetic (EM) equipment and ground-penetrating radar (GPR) to screen the Site for subsurface anomalies, such as the characteristics of USTs and other buried metallic objects.

A magnetometer is an instrument used to measure a magnetic field's strength and direction. Magnetometer is widely used for measuring the earth's magnetic fields and in geophysical surveys. The magnetic properties of naturally occurring materials, such as magnetic ore bodies and basic igneous rocks, allow them to be identified and mapped by magnetic surveys. Buried steel objects also produce strong local magnetic fields or anomalies. Magnetometer surveys find underground storage tanks, drums, piles, and reinforced concrete foundations by detecting the magnetic anomalies they produce.

Ground-penetrating radar (GPR) is a geophysical method that uses radar pulses to image the subsurface. It is the most common method for locating underground storage tanks (USTs) and other underground utilities.

Task 3. Soil Borings

Envitechnology plans to conduct four (4) soil borings at the subject property, as follows:

- One (1) soil boring, labeled B11, will be situated between the southern edge of the building and the northern edge of the former excavation pit (EX-2). This location was chosen because excavation was not performed there due to its proximity to the structure.

- Two (2) soil borings, labeled B12 and B13, will be placed near the southern edge of the former excavation pit (EX-2). This area was also avoided for excavation due to the buried utility lines nearby.
- One (1) additional soil boring, labeled B14, will be located near B9, where petroleum-contaminated soil (PCS) was found to remain below 14 feet below ground surface (bgs) in the area of the former underground storage tanks (USTs).

Three (3) soil borings (B11 through B13) near the former excavation pit (EX-2) will be advanced to a depth of 15 feet bgs. The boring method will be a direct push probe, which uses a truck-mounted hydraulic hammer to push a series of 1.5-inch diameter steel rods to the sampling depth. The rods will be removed every five feet, and disposable Teflon sampling tubes will be recovered.

One (1) soil boring (B14) near the former USTs will be drilled to a depth of 40 feet bgs. The soil boring will be advanced using a truck-mounted drill rig equipped with a hollow stem auger (HAS) to verify the vertical extent of soil contamination.

Exact boring locations will be selected based on geophysical survey results and observed site conditions, such as proximity to on-site obstructions (e.g., building overhead obstructions, utility piping, etc.) that may limit accessibility.

Task 4. Soil Sampling

A total of fourteen (14) undisturbed soil samples will be collected. Three (3) samples will be collected at a depth of 5, 10, and 15 feet bgs per borehole near the former excavation pit (EX-2).

A total of fourteen (14) undisturbed soil samples will be collected. For the boreholes (B11 through B13) near the former excavation pit (EX-2), three (3) samples each will be taken at depths of 5, 10, and 15 feet below the ground surface (bgs). For the borehole (B14) near the former USTs, five (5) soil samples will be taken at depths of 10, 20, 30, 35, and 40 feet bgs.

Soil samples at each location will be collected under EPA method 5035A. Approximately 5-gram core samples will be dispensed immediately into pre-weighted 40-mL VOA vials. All samples will be transferred from the respective samplers to sterilized glassware with Teflon-sealed lids furnished by the project laboratory. Samples shall be stored in an iced chest at the Site and taken to the lab in this condition to minimize excessive dissipation of volatile fraction hydrocarbons. Each container will be clearly labeled as a boring number, sample number, geologist, etc. EPA-recommended sampling protocol and management, including maintenance of chain-of-custody documentation, will be observed at each project stage.

During probing, a field log will be made for each boring. The information recorded versus corresponding depth shall include soil classification (Unified Soil Classification System), color, texture, moisture content, odor (if present), seepage zones (if present), etc.

Task 6. Laboratory Analysis

As noted earlier, Envitechnology intends to analyze soil samples for the presence of the following contaminants of concern (COCs):

- GRO, DRO, ORO, VOCs, PCBs, PAHs, and lead for soil samples collected from B11 through B13.
- GRO, DRO, ORO, VOC, and lead for soil samples collected from B14.

The analytical approach described above is intended to provide a basis for comparing soil quality at the Site to guideline standards set by the Washington State Department of Ecology.

Task 7. Data Analysis, Report Preparation

After completing all field and laboratory work, Envitechnology will analyze the data and prepare a brief written report summarizing the approach, methods, and findings. The report will include conclusions and recommendations regarding prevailing regulations, including but not necessarily limited to the Model Toxics Control Act (MTCA), Chapter 173-340 WAC.

SCOPE OF WORK

Site Utility Location
Geophysical Survey
Mobilization/Demobilization
Soil borings (4) at the AOCs
Soil sampling (14)
Laboratory analysis of COCs
Subsurface Investigation Report

SCHEDULE

The work will be completed in four weeks (4) weeks.

PAYMENT TERM

Customers will pay Envitechnology as follows: 100% of the contract price shall be paid upon the project's initiation.

LIMITATIONS AND EXCEPTIONS OF ASSESSMENTS

The report will be prepared under the American Society of Testing and Materials (ASTM) Standard Practices for Environmental Site Assessments: Phase II ESA Process (ASTM Designation: E1903-19). No other warranties, expressed or implied, will be made regarding the professional services provided under the terms of our contract and included in this report.

If you find the scope and costs of this proposal acceptable, please indicate your authorization by signing at the appropriate location on the following and by returning one complete executed copy of the signature page only for our records.

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Respectfully submitted,

October 29, 2024

Signature of Envitechnology representative Date

Jake S. Lee, Ph.D.
President
Envitechnology, Inc.
9805 NE 116th Street Suite 300, Kirkland, WA 98034

ACCEPTANCE OF PROPOSAL

The prices, specifications, and conditions above are satisfactory and hereby accepted. You are authorized to supply the service and equipment as specified. Payment will be made as outlined above.

Print or type the name of the person authorized to sign acceptance of the proposal

Authorized signature Date

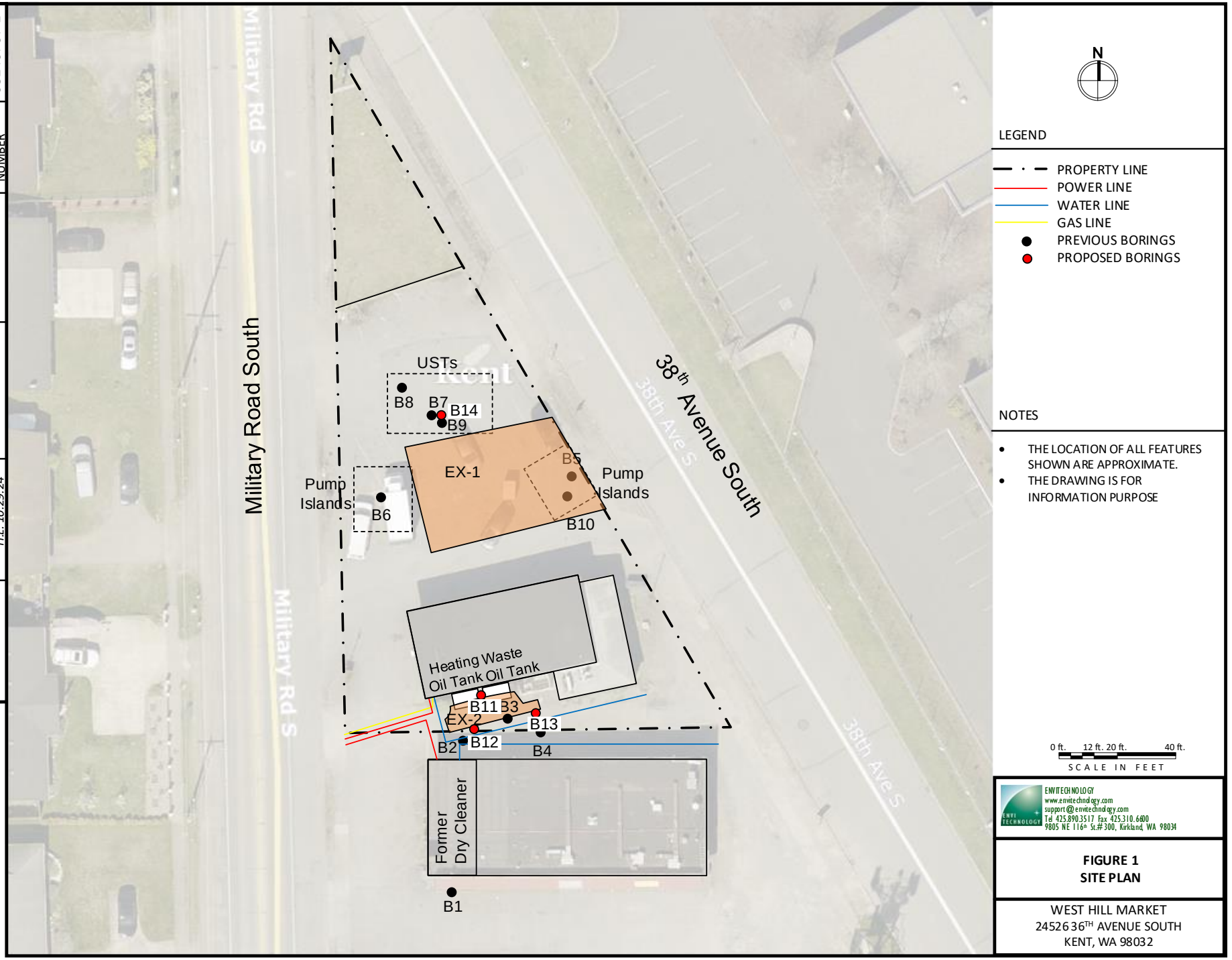
Military Road South
Military Rd S
38th Avenue South
38th Ave S
USTs
B8
B7
B14
B9
EX-1
B5
Pump Islands
Pump Islands
B6
B10
Heating Waste Oil Tank
Oil Tank
B11
B3
EX-2
B13
B2
B12
B4
Former Dry Cleaner
B1
N
LEGEND
PROPERTY LINE
POWER LINE
WATER LINE
GAS LINE
PREVIOUS BORINGS
PROPOSED BORINGS
NOTES
THE LOCATION OF ALL FEATURES SHOWN ARE APPROXIMATE.
THE DRAWING IS FOR INFORMATION PURPOSE
0 ft. 12 ft. 20 ft. 40 ft.
SCALE IN FEET
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FIGURE 1
SITE PLAN
WEST HILL MARKET
24526 36TH AVENUE SOUTH
KENT, WA 98032
FILE NAME
DRAWED BY H.L. 10.29.24
CHECKED BY
APPROVED BY
PROJECT NUMBER 032407 07-1