March 7, 2025

Seed 153, LLC.
c/o Mr. Ryan Kang
4805 69th Avenue Court West
University Place, WA 98467

Subject: **Technical Assistance and Additional Site Characterization Proposal**
Red Lion Hotel, Hosmer Street
8402 South Hosmer Street, Tacoma, WA 98444
Facility/Site ID: 23307
Ecology VCP ID: SW1656
Bluestone Project Number: BE-0174-B

Dear Mr. Kang:

Bluestone Environmental NW (Bluestone) is pleased to present this Technical Assistance and Additional Site Characterization Proposal, which has been prepared to assist you with environmental matters at the subject property (Figure 1). Specifically, we understand that Seed 153, LLC. (Seed 153) requires technical assistance to address the specific items requested by the Washington Department of Ecology (Ecology) in their Further Action Letter, dated February 18, 2020 (FA Letter).

Bluestone is committed to providing a level of service that suits our client's requirements. If the proposed efforts are not aligned with your needs, please contact us to discuss how we can better assist you.

Background and Purpose of Proposed Efforts

The subject property (Property) is known as the Red Lion Hotel, Hosmer Street located on the southwest corner of the intersection at South Hosmer Street and South 84th Street, in Tacoma, Washington. Based on historical aerial photographs and telephone directories, a service station was constructed in the early to mid-1960s on the southeastern portion of the Property. According to reports prepared by Envitechnology, Inc. (Envitech), the service station was demolished in the mid-1980s.

Bluestone understands that documentation regarding underground storage tank (UST) decommissioning and assessment efforts have not been made available. Bluestone also understands that environmental investigations have occurred on the Property beginning as early as 2011. However, records of these older investigation efforts have not been identified by Bluestone. In 2019, Envitech prepared a *Remedial Investigation & Independent Cleanup Action Report*, dated September 25, 2019 (Envitech, 2019), and requested a No Further Action (NFA) opinion from Ecology. Ecology responded to the request with their FA Letter, informing Envitech that additional site characterization and reporting efforts were needed before an NFA could be considered.

Based on our review of the FA Letter, Ecology identified the following data gaps that need to be addressed before a No Further Action (NFA) determination can be considered.

- Additional Site Characterization
    - Sample reused soil (soil used as backfill in excavation area) based on Table 6.9 of Ecology's Guidance for Remediation of Petroleum Contaminated Sites document.
    - Provide vertical delineation for soil contamination and non-impacted site soils.
    - Soil sampling required in areas of previous boring and excavation sample locations: S1, S2, S4, B7, MW-2, MW-5, EB-1, EB-2, EB-3,
    - Sample soils at each geological contact encountered as shown on Figure 6 of the Envitech, *Remedial Investigation & Independent Cleanup Action Report*, dated September 25, 2019 (Envitech 2019).
    - Demonstrate groundwater contact information, characterizing groundwater at the Site.

- Analyze all soil samples as required in the Washington Model Toxic Control Act (MTCA) Table 830.1 (i.e., gasoline, diesel, fuel additives/volatile organic compounds (VOCs), waste oil, and unknown oil).

- Development of Conceptual Site Model
  - Ecology needs a fully developed conceptual site model which can be used to evaluate the lateral and vertical extent of soil and groundwater contamination.
  - Develop geological cross-sections for the Site with isopleths for contaminant conditions in soil and groundwater.
  - Complete elevation survey at Site for previous and new exploration locations (will require use of licensed surveyor).
  - Prepare Site maps showing groundwater gradient.
  - Reassess and confirm all release mechanisms for the Site.
  - Assess and define potential and complete pathways and receptors at the Site.

- Additional Documentation
  - Documentation of certain interim action activities are referenced in the Envitech 2019 report but are not included in the report. Accordingly, Ecology has requested the following data:
    - For samples obtained at excavation sidewalls and pit bottom, provide confirmation sample information such as collection depth, collection location details, and any photographs of the sample locations.
    - All available Site monitoring well construction detail and boring logs.
  - Include assessment of all applicable laws and regulations with updated Site Characterization reporting.
  - Assess and identify if the use of a Model Remedy and/or Environmental Covenant will be used for the Site.

- Enter Site analytical data into Ecology's Information Management System (EIM).

Based on information requested by Ecology, Bluestone has prepared this document to outline the understood efforts needed to resolve the identified data gaps and address the additional needed efforts. Accordingly, this document will be provided to Ecology with a request for comment and opinion on the proposed efforts before completing additional investigation endeavors.

In addition to communication with Ecology regarding environmental efforts on this Property, this Site will also require communication with the Tacoma Pierce County Health Department (TPCHD) to obtain full regulatory closure for this Site.

Regulatory Background

The characterization and remediation of hazardous substances in Washington State is regulated under the Washington Model Toxic Control Act (MTCA). Specifically, MTCA establishes administrative processes and standards to identify, investigate, and cleanup facilities where hazardous substances have come to be located (WAC 173-340-100). The MTCA regulations are administered by the Washington Department of Ecology (Ecology).

Regulatory & Contaminant Definitions

The term 'Property' refers to the parcel boundaries that define the Subject Property as shown on Figure 1. The term 'Site' refers to the extent of contamination migration, be it on or off the Property.

The term 'contaminant' refers to the presence of petroleum or other hazardous substances that do not occur naturally or which are found at concentrations greater than what occur naturally. The term 'contamination' refers to the presence of petroleum or other hazardous substances that are at concentrations greater than established Cleanup Levels.

For this document, the term 'cleanup levels, or CULs' refer to the MTCA Method A Cleanup Levels.

Proposed Efforts to Address Data Gaps

Site Characterization Data Gaps

To address the site characterization data gaps identified by Ecology, Bluestone proposes to complete the following field exploration efforts.

- Complete 10 additional soil borings on the Property as shown on Figure 3. The borings will be completed to a minimum depth of 30-feet below the ground surface (bgs) using hollow-stem auger drilling and sampling equipment.
- Analyze approximately three soil samples from each boring for the analytes listed in the Analysis Tables below.
- Soil samples will be selected for analysis based on observed field conditions, the depths of previously analyzed soil samples, as well as at the different geological contacts identified during the drilling efforts.
- Locate and redevelop the five existing groundwater monitoring wells.
- Collect and analyze groundwater samples from each well for the chemicals of concern listed in the Analysis Tables below.
- Measure depth to water in order to plot groundwater contours.
- Have elevations established for the Property and monitoring wells by a licensed surveyor.

Conceptual Site Model Data Gaps

To address the Conceptual Site Model (CSM) data gaps identified by Ecology, Bluestone proposes to perform the following tasks.

- Create at least one cross-section figure to show detailed geological, groundwater, and potential contaminant information.
- Prepare a tabular CSM to demonstrate consideration of potential pathways and receptors. If deemed appropriate, a CSM drawing can be prepared.
- Identify historical/former release mechanisms.
- Prepare groundwater-contour mapping.
- Prepare figures showing isoconcentration contaminant information in soil and groundwater.

Additional Documentation Data Gaps

To address the additional documentation needs identified by Ecology, Bluestone proposes to complete the following tasks.

- Try to identify soil sample depths collected during the "*remedial excavation*" efforts.
- Attempt to collect missing boring logs from previously completed site investigation efforts.
- Identify / address all applicable regulations pertaining to the characterization and cleanup of the Site.
- Assess if a Model Remedy is appropriate for use at the Site.
- Enter all newly collected data into the EIM database and attempt to identify and correct historical data entered into EIM.

Proposed Services

As discussed above, Bluestone has prepared this document to address the understood efforts needed to resolve the data gaps and additional information as outlined by Ecology. The bullet points below summarize the understood efforts required to close the identified data gaps and address the additional reporting information.

1. Project management, communications, and negotiations with Ecology and TPCHD.
2. Coordinate public and private utility locating services.
3. Complete up to 10 soil borings to a depth of 30 feet.
4. Collect and analyze soil samples from the borings.
5. Redevelop the five existing groundwater-monitoring wells and assess their viability.
6. Collect and analyze groundwater samples from the five existing monitoring wells, if locatable.
7. Prepare a draft remedial investigation report with the requested information from Ecology. The report will consist of text, tables, figures, and other documents to detail historical and the newly collected data.
8. Submit the report to Ecology and TPCHD with a request for opinion and respond/communicate with the agencies as needed.

Details of these services is provided below.

Project Management and Planning Tasks

To support the proposed efforts, several tasks are required that may not be directly associated with a specific effort that is listed above. Accordingly, these tasks that support the project are referred to as project management tasks. These typically include scope development, management and communication, client and counsel correspondence, and interactions with contractors, vendors, and regulatory agencies.

Underground Utility Clearance

Due to the possible presence of subsurface utilities in the areas of the proposed explorations, Bluestone will coordinate with public and private utility-locating firms before beginning field work. The inferred locations of subsurface utility locations will be identified on the surface with paint. Although shown on Figure 3, the actual boring locations will be identified upon completion of the utility locate and confirmation of access availability. Bluestone and our subcontractors will not be held responsible for damage to utilities that cannot be located or are not identified.

Soil Sampling

For this effort, we propose to complete up to 10 borings on the property as shown on the attached Figure 3. Soil samples will be collected from split-spoon hollow-stem auger sampling equipment. It is anticipated that soil samples will be collected approximately every five feet of the boring.

General geological notes, including odors, soil staining, and discoloration will be noted on boring logs. A photoionization detector (PID) will be used to screen for the presence of volatile-organic compounds in the collected soil samples. PID readings will be noted on our boring logs.

Soil Sample Analysis

Selected soil samples will be submitted for laboratory analysis as proposed in the soil analysis table below. Specifically, soil samples will be selected for analysis based on observed field conditions, the depths of previously analyzed soil samples, as well as at the different geological contacts identified during the drilling efforts.

Groundwater Monitoring Well Assessment

Prior to purging and sampling efforts, Bluestone will redevelop the existing wells and assess the condition of each well. Redevelopment will be completed by over-pumping methods. The groundwater-sampling efforts assume the five previously installed monitoring wells can be located and are viable.

Groundwater Levels

Groundwater levels will be measured in existing and newly completed wells. Water-level measurements will be referenced to the top of the well casing. The static water level will be measured in the wells using a water-level probe.

Groundwater Samples

Monitoring well development, purging, and sampling will be completed using standard procedures outlined by Ecology. Collected groundwater samples will be submitted for laboratory analysis as proposed in the groundwater analyses table below.

Elevation Survey, Boring and Monitoring Well Locations

Following the exploration efforts, Bluestone will coordinate with a licensed land surveyor to survey the locations and elevation of completed borings and wells. Elevation data will be used to convert groundwater depth to elevations in order to interpret potentiometric groundwater contours, which provide information to interpret groundwater flow

directions. Additionally, relevant site features and identified subsurface utilities will be included on the survey.

Quality Assurance/Quality Control

Procedures for Quality Assurance/Quality Control (QA/QC) will be observed for the proposed efforts, including generally accepted procedures for sample collection, storage, tracking, and documentation. Collected samples will be labeled with a sample number, date, time, and sampler name, recorded on a chain-of-custody document, and will be placed in a cooler to be chilled before delivery to a laboratory for analysis. Additionally, at least 1 blind-field duplicate sample will be collected for quality-control procedures.

Report Preparation

A report will be prepared to document the findings of the proposed efforts. The report will include text, summary analytical tables, figures showing explored and sampled locations and the approximate locations of current and discovered former-site features, a cross-section to illustrate vertical sample distribution, photographs of the completed efforts, boring logs, laboratory analytical results, and a discussion of our findings.

Specifically, the report will be prepared using Ecology's Remedial Investigation Checklist to address the additional information requested by Ecology. Analytical results will be compared to appropriate cleanup levels (Method "A" or "B") set by Ecology under the MTCA Cleanup Regulation (revised in 2023).

Investigation-Derived Waste Disposal

Please note that the proposed efforts will produce investigation-derived waste (IDW). IDW is stored in 55-gallon drums and are left on the site until they can be properly disposed. The "generator" of the IDW is the person or entity for whom the investigation work is performed. Accordingly, Bluestone cannot and will not accept ownership or liability for IDW that is generated with the proposed efforts. Accordingly, Bluestone understands that Seed 153 will pay for necessary IDW management and disposal.

Typical efforts associated with the disposal of IDW include profiling, laboratory analysis, coordination/communications, and documentation, which cannot be accurately estimated until volumes and analytical data are known. **PLEASE NOTE** that the IDW disposal efforts are not included with these proposed efforts and will require separate authorization.

Project Parameters

The parameters and assumptions for the proposed costs regarding the efforts discussed above are based on the following.

- The proposed investigation, sampling, and reporting efforts are sufficient to address Ecology's data gaps and request additional information.
- Site access will be available to Bluestone personnel, subcontractors, and vendors.
- Traffic control will not be required.
- Concrete cores will not be necessary.
- Hollow-Stem Auger drilling and sampling equipment can be successfully used at the Site.
- Drilling and soil sampling will be completed within 3 ten-hour days.
- Up to 10 soil borings will be completed, analyzing approximately three soil samples from each boring.
- Analysis will be performed on a standard turn-around-time basis (7 to 10 days).
- The five existing groundwater-monitoring wells that are viable can be redeveloped prior to sampling.
- Groundwater samples will be collected from the five existing monitoring wells.
- Well development, water-level measurements, groundwater sampling, and elevation surveying can be completed in three additional days.
- Weekend and/or night work will not be performed to complete the proposed services.
- Bluestone will provide sampling equipment and sample containers for the proposed efforts.
- The drilling contractor will provide drums for IDW generated during the proposed efforts.
- Costs for the storage and disposal of drums with contaminated soil (IDW) generated during this effort are not included in this effort or cost estimate.

Proposed Project Cost and Authorization

The proposed costs and client authorization for the efforts discussed above are provided under separate cover.

Laboratory Analyses Tables

Proposed analyses for selected soil and groundwater samples are presented below. All samples analyzed for GRO, DRO, or ORO will first be analyzed by HCID to identify detected carbon ranges and applicability of further analysis. Based on field screening and/or HCID analysis, the listed quantities may change.

Soil Analyses, *Method*	**Estimated Quantity**
Hydrocarbon Identification (HCID), *by NWTPH-HCID*	30
Gasoline Range Organics (GRO), *by NWTPH-Gx*	20
Diesel – and Oil-Range Organics (DRO & ORO), *by NWTPH-Dx*	16
Volatile Petroleum Compounds and Fuel Additives (BTEX, MTBE, EDB, EDC), *by EPA 8260D*	20
Lead, *by EPA 6020*	20
Carcinogenic PAHs, Naphthalenes, and Halogenated VOCs, *by EPA 8270E*	10
Polychlorinated Biphenyls (PCB aroclors), *by EPA 8082A*	10

Groundwater Analyses, *Method*	**Estimated Quantity**
Hydrocarbon Identification (HCID), *by NWTPH-HCID*	5
Gasoline Range Organics (GRO), *by NWTPH-Gx*	3
Diesel – and Oil-Range Organics (DRO & ORO), *by NWTPH-Dx*	3

Groundwater Analyses, *Method*	**Estimated Quantity**
Volatile Petroleum Compounds and Fuel Additives (BTEX, MTBE, EDB, EDC), *by EPA 8260D*	5
Lead, *by EPA 6020*	5
Carcinogenic PAHs, Naphthalenes, and Halogenated VOCs, *by EPA 8270E*	3
Polychlorinated Biphenyls (PCB aroclors), *by EPA 8082A*	3

Limitations on Proposed Services

The proposed services are designed to provide an additional assessment of possible subsurface contamination on the Property. This assessment is not designed to find or identify all potential issues, or eliminate all risks associated with contaminants on the Property or at the Site. Even the most carefully performed environmental assessments are not likely to identify all contaminant conditions existing on the property/Site. Our assessment proposed with this effort may not be sufficient to identify or define the lateral and vertical extent of contaminants on the property/site. This proposal of services does not include any other services that are not specifically described above.

Our opinions regarding our findings of this assessment may change as new information is made available. This may be obtained during additional explorations, remediation actions, or redevelopment of the property. Additionally, regulations often change that may affect the findings of our proposed work. Accordingly, our opinions, findings, and recommendations are only valid up to the date of the proposed exploration.

The described services will be provided and are intended for the sole use by the client, Seed 153. Others may not use or rely on the proposed work product. Within the limitations of scope, schedule, and budget, the proposed work product will be completed in a manner consistent with that level of care and skill exercised by members of the profession currently practicing in the same locality under similar conditions as this project. No warranty is either expressed or implied.

Closing

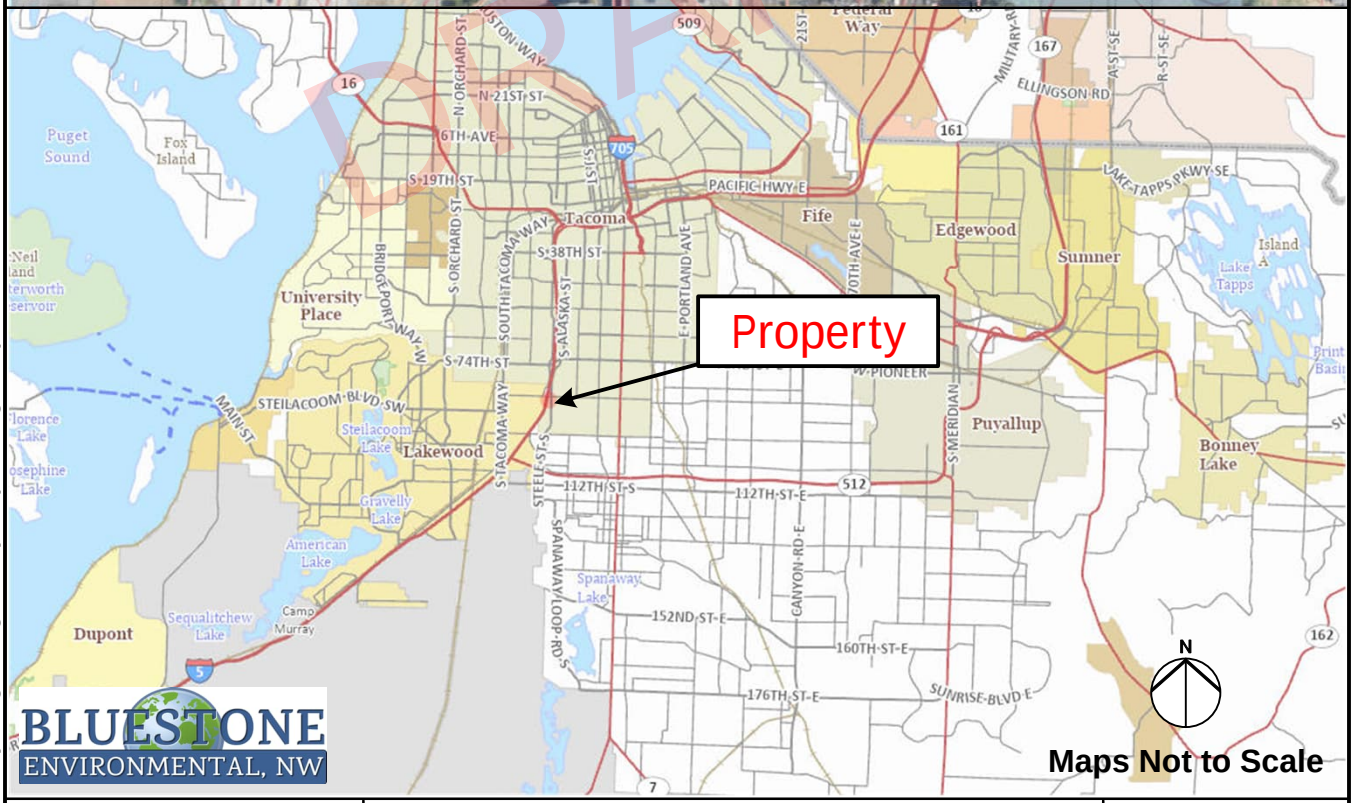
We appreciate this opportunity to provide our services. Please contact us at your convenience with any questions regarding the proposed services and presented fees.

Sincerely,
Bluestone Environmental NW

Dan Hatch
President

Attachments Figure 1, Site Location Maps
Figure 2, Site Diagram and Feature Overview
Figure 3, Exploration Locations, Previous and Proposed

Attachments



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Site Location Maps

Holiday Inn (Red Lion) Hotel Hosmer Street

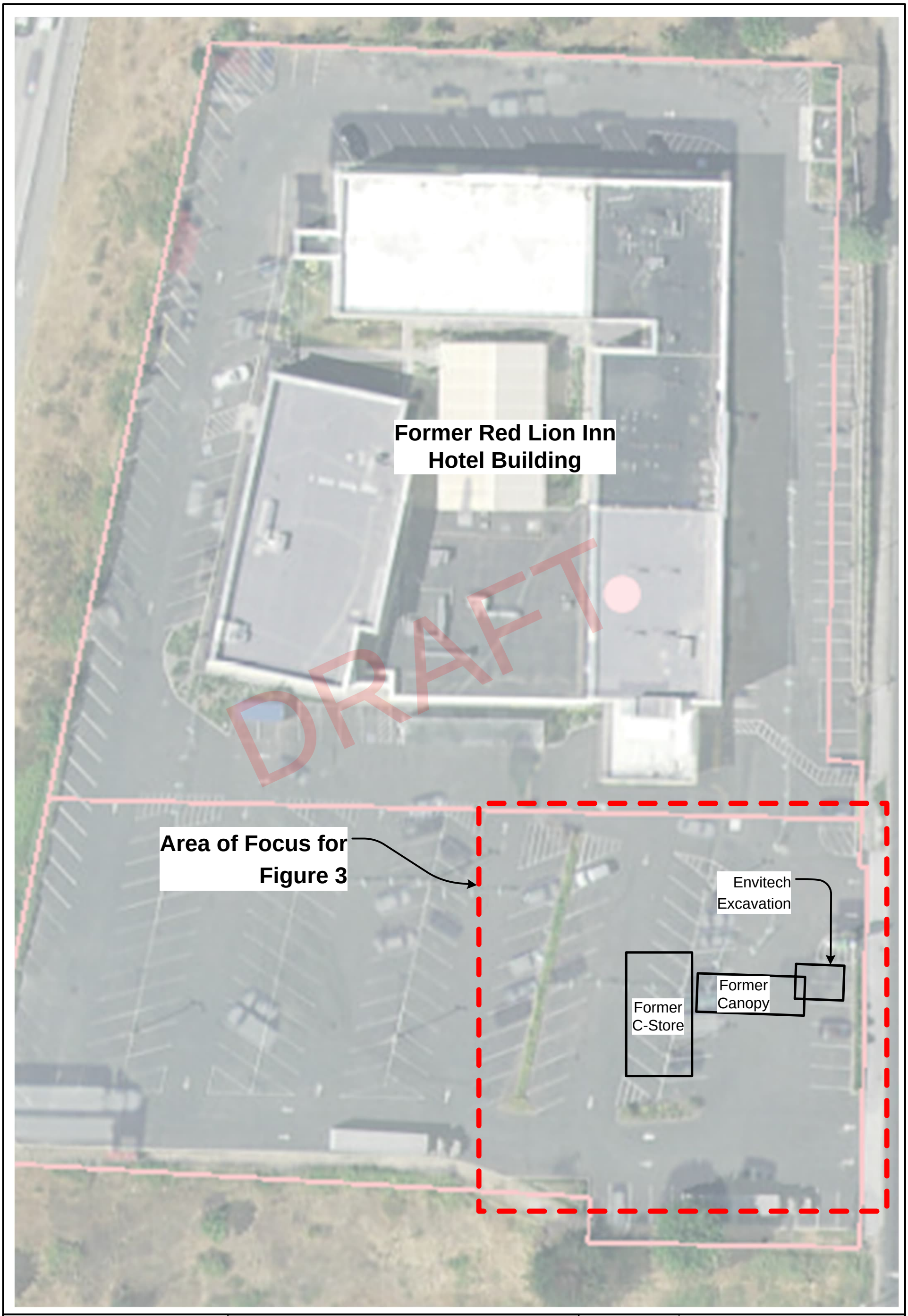
8402 South Hosmer Street,

Tacoma, WA 98444

Figure 1

Drawing References: Getty Image, King County iMaps, Google Maps

Project No. BE-0174-B F1.vsdx



General Legend

Site Diagram and Feature Overview

Red Lion Hotel, Hosmer Street
8402 South Hosmer St. Tacoma, WA 98444

Figure and notations are in color. Black and white copies may not be suitable for use.

Figure 2

N

Scale: 1" = 40'

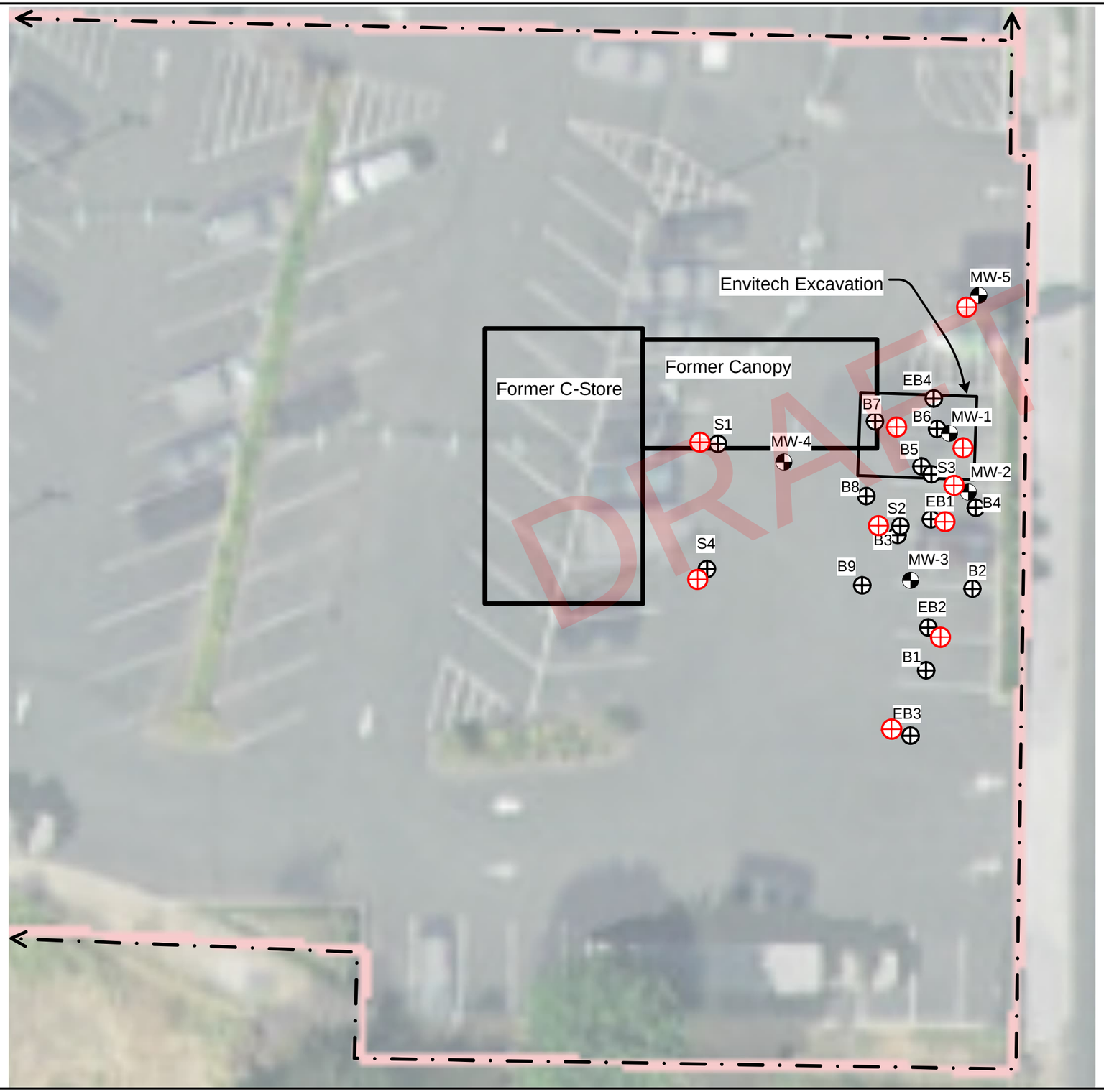
0 ft. 24 ft. 40 ft. 80 ft.

BLUESTONE ENVIRONMENTAL, NW

Project No. BE-0174-B-F2.vsdx

Drawing Date: 3/7/2025

Drawing References: Pierce County PublicGIS maps.



Legend

- Understood Property Boundary (As shown on Pierce Co. ParcelGIS)
- Previously completed boring or soil sample location
- Previously completed groundwater monitoring well location
- Proposed soil boring location

The locations of the former service station features were identified using a historical aerial photograph (1972) and aligning former and current property features after scaling the photograph.

Figure and notations are in color. Black and white copies may not be suitable for use.

Drawing Date: 3/7/2025

Exploration Locations, Previous and Proposed

Red Lion Hotel, Hosmer Street
8402 Hosmer Street
Tacoma, WA 98444

Figure 3

BLUESTONE ENVIRONMENTAL, NW

Project No. BE-0174-B-F3.vsdx

Drawing References: Getty Image, King County iMaps