



**Cleanup Action and Contaminated Media
Management Plan
Gilman Square
615 NW Gilman Blvd
Issaquah, WA 98027**

Prepared for: Mr. Thomas Bartholomew
Lennar Multifamily Investors
1325 Fourth Ave, Suite 1700
Seattle, WA 98101

Prepared by: G-Logics, Inc.
40 2nd Avenue SE
Issaquah, WA 98027

Telephone: (425) 391-6874
Facsimile: (425) 313-3074

April 21, 2014

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April 21, 2014
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Mr. Thomas Bartholomew
Lennar Multifamily Investors
1325 Fourth Ave, Suite 1700
Seattle, WA 98101

**Subject: Cleanup Action and Contaminated Media Management Plan
Gilman Square
615 NW Gilman Blvd
Issaquah, WA 98027**

Dear Mr. Bartholomew:

G-Logics is pleased to present this Cleanup Action and Contaminated Media Management Plan (CAP/CMMP) for the above-referenced Gilman Square Property (Property). This plan has been prepared to help manage contaminated and impacted soil and groundwater, as well as remove two suspected and any discovered Underground Storage Tanks (USTs), during redevelopment activities of the Property (Figure 1).

We trust the information presented in this document meets your needs at this time. Should you require additional information or have any questions, please contact us at your convenience. Thank you again for this opportunity to be of service.

Sincerely,
G-Logics, Inc.

A handwritten signature in black ink that reads 'Rory Galloway'.

Rory L. Galloway
LG, LHG, Principal

A handwritten signature in black ink that reads 'Stuart Hyde'.

Stuart Hyde
Staff Geologist

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1.0 INTRODUCTION

This document presents the Cleanup Action Plan and Contaminated Media Management Plan (collectively referred to as the CAP/CMMP) that will be used to address the soil and groundwater contaminants found on-site, as well as any suspected/discovered USTs found during Property redevelopment activities. Specifically, chlorinated-solvent contaminants are known to be locally present in the soil and perched groundwater near a former drycleaner property located in the Gilman Square Shopping Center building (675 NW Gilman Blvd). In addition, two USTs (associated with a former service station) are known to be present on the Property.

Based on the completed subsurface explorations and our understanding of the planned Property redevelopment and schedule, soil excavation and off-site recycling/disposal has been identified as the appropriate cleanup methods. It is the intent of Lennar Multifamily Investors (Lennar) to remove the contaminated soils (and associated groundwater) at the Property prior to site redevelopment. The USTs also are scheduled to be removed prior to redevelopment activities. After remedial excavations are complete, preload soils will be placed on the Property in areas to be developed with buildings. After two months of soil preloading, the preload soils will be removed and the Property development will begin.

The remedial work shall be managed in accordance with Washington's Model Toxics Control Act (MTCA) regulations, with excavated tanks, soils, and groundwater disposed in accordance with applicable state and local regulations. The work will be conducted in accordance with the Washington State Department of Ecology's (Ecology) Voluntary Cleanup Program (VCP).

Procedures for health and safety monitoring, personal protection, decontamination, sampling and analysis, and modifications to construction procedures for this work also are described in this plan. Additionally, the property has been entered into the VCP program to support a request for a No-Further Action Determination (NFA) from Ecology.

2.0 PROPERTY AND SITE DESCRIPTION

The Property includes eight parcels located along Northwest Gilman Boulevard at 615 NW Gilman Blvd in Issaquah, Washington (tax-parcel numbers and addresses are shown on Figure 2). Two of the parcels are occupied by the Issaquah Shopping Center building. This building provided retail and restaurant spaces. North of the shopping-center building is a large parking lot. The other parcels on the subject property currently are undeveloped. The neighboring properties at 607 and 555 NW Gilman Blvd are an auto-supply store and a fast-food restaurant, respectively.

For the purposes of this document, the Site refers to the area of soil, surfacewater, and/or groundwater that is impacted with chlorinated solvents originating from the former drycleaner located on the 695 NW Gilman Blvd Parcel (Figure 2). The Property refers to the eight parcels that collectively make up the redevelopment boundaries. Currently the Site appears to be contained within the Property boundaries.

Ecology has identified the Site, as described below:

Site Name: Gilman Square

Site Address: 675 NW Gilman Boulevard, Issaquah, WA 98027

Facility/Site No.: 15541

CS ID: 12286

VCP Project No.: NW2823

3.0 REMEDIAL INVESTIGATION

G-Logics has previously prepared four environmental reports for the Property (Remedial Investigation). These documents, listed below, identify chlorinated-solvent contamination on the western portion of the Property (all reports are included in Appendix A). In addition, the Phase I and Phase II work indicated the presence of at least two USTs associated with a former service station.

- *Phase I Environmental Site Assessment*, prepared by G-Logics, Inc., June 18, 2013.
- *Phase II Environmental Site Assessment*, prepared by G-Logics, Inc., October 25, 2013.

- *Additional Site Exploration, Former Drycleaner Area*, prepared by G-Logics, Inc., January 6, 2014.
- *Additional Well Installation, January 2014*, prepared by G-Logics, Inc., February 11, 2014.
- *Additional Borings and Testpit Sampling*, work performed by G-Logics, Inc, April 2014 (report not yet produced at the time of this document).

Below is a summary of the physical and chemical settings of the Property, as well as the findings from the previous subsurface explorations. All boring and groundwater-monitoring well locations are shown on Figure 3. A detail of the former drycleaner area is shown on Figure 4. Groundwater elevation contours for the former drycleaner area are shown on Figure 5. This information represents the Remedial Investigation (RI) tasks and findings for the Site.

3.1 Subsurface Conditions – Physical

The following summarizes the physical conditions as observed during the G-Logics subsurface explorations at the Property.

- Prior to construction of the shopping center in approximately 1961, the property was farmland (pasture land).
- Currently, the site generally is level with elevations ranging between 64 and 66 feet above mean sea level (based on survey prepared by Encompass Engineering & Surveying).
- Borings generally encountered loose, dry to moist, brown, silty sand with some gravel from approximate depths of ground surface to four feet (possibly structural-fill material).
- At depths between approximately two and five feet, soils are soft to medium stiff, moist to wet, gray, silt and clay (overbank deposits). Several borings contained a thin layer of peat/organic soil.
- At depths between approximately five and fifteen feet, soils are soft to medium stiff, moist to wet, gray, sandy silt and clay (lacustrine deposits). Thin fine-grained sand layers and peat/organic layers also were present at varying depths.
- Groundwater was encountered in most borings between depths of four to six feet. No odors, staining, or discoloration were observed in any of the borings. Groundwater flow direction is generally to the north as shown on Figure 5.

- It is understood that two large USTs (10,000+ gallon capacity) are on-site near the former service station. These tanks purportedly have been emptied and filled with “slurry”. Other service-station features (i.e., fuel lines, hoists, or additional USTs) may be discovered during redevelopment activities.

3.2 Soil Conditions – Chemical

The following summarizes the findings of the soil sampling and analyses performed by G-Logics at the Property. The analytical data for these samples are included in Table 1. Cleanup levels also are included on the tables.

- Heavy Oil Range Organics (ORO) were detected in a sample collected from boring GL-B-2, located near the former gas and service station. The concentration was below the MTCA Method A Cleanup Level (Figure 4, Table 1).
- Chlorinated solvents were detected in samples collected in the immediate vicinity of the former drycleaner. Tetrachloroethylene (PCE) was detected above the MTCA Method A Cleanup Level in borings GL-B-7 and GL-B-10 (Figure 4, Table 1).

3.3 Groundwater Conditions – Chemical

The following summarizes the findings of the groundwater sampling and analyses performed by G-Logics at the Property. The analytical data for these samples are included in Table 2. Cleanup levels also are included on the tables. Groundwater elevation data is presented in Table 3.

- Vinyl Chloride was detected in groundwater samples collected from well GL-MW-4 and in grab-groundwater samples from borings GL-B-11 and GL-B-16 (located near the former drycleaner) at concentrations above the MTCA Method A Cleanup Level. Vinyl Chloride is a degradation product of PCE.
- Vinyl Chloride also was detected in groundwater samples collected from well GL-MW-6 at concentrations above the MTCA Method A Cleanup Level. This well is located approximately 340 feet north of the former drycleaner. Groundwater samples from surrounding borings and wells did not indicate the presence of Vinyl Chloride.
- Cis-1,2-Dichloroethylene, also a degradation product of PCE, was detected in several groundwater samples. However, all concentrations were below the MTCA Method A Cleanup Level.

- Based on well locations and sampling results, chlorinated-solvent contaminants in the groundwater do not appear to be migrating off-Property and only are present in the area of the former drycleaner.

Findings from these explorations indicate that soil and groundwater containing chlorinated-solvents and soil containing low-level concentrations of petroleum contaminants are present on the Property, but in limited and localized areas.

4.0 FEASIBILITY STUDY AND CLEANUP STANDARDS

The rules that guide the cleanup process at sites within Washington are known as the Model Toxics Control Act (MTCA), which is administered by the Washington Department of Ecology (Ecology). MTCA “establishes administrative processes and standards to identify, investigate, and cleanup facilities where hazardous substances have come to be located” (WAC 173-340-100). Section 4.0 represents the Feasibility Study tasks for the Site.

4.1 Procedures for Selecting a Cleanup Action

Under MTCA, independent cleanup actions can be conducted without Ecology oversight or approval as long as those actions meet the substantive requirements presented in WAC 173-340-515. These requirements are comparable to federal criteria, although federal criteria provide additional flexibility with regard to the balancing of relevant considerations. The overall cleanup action needs to meet the following threshold requirements:

- Protection of Human Health and the Environment.
- Compliance with Cleanup Standards.
- Compliance with Applicable State and Federal Laws.
- Provision for Compliance Monitoring.

In addition, cleanup actions should provide for the following.

- Permanent solutions to the maximum extent practicable, which includes consideration of cost, short and long term effectiveness, and the ability of the cleanup option to be implemented.
- A reasonable restoration time frame.

- Consideration of public concerns, if any, given the administrative procedures used to document the cleanup.
- If it is not practicable to restore the Site to the cleanup standards, the regulation allows use of engineered containment systems, provided the cleanup will still be protective of human health and environment.

4.2 Establishing Cleanup Standards

Cleanup actions at the Site will be performed for the protection of human health and the environment. The determination of cleanup standards under MTCA is a three-step process (WAC 173-340-700) involving:

- Identification of “Cleanup Levels”. These are concentrations that are “determined to be protective of human health and the environment under specified exposure conditions”.
- Identification of “Points of Compliance”, defined as “the location where Cleanup Levels must be met”.
- Identification of other regulatory requirements (also known as Applicable State and Federal Laws).

4.2.1 Cleanup Levels

Cleanup levels are to be based on the potential receptors that could be exposed to contamination during current and future conditions. “Cleanup Levels” under MTCA are specified by regulation without regard for site-specific considerations. MTCA identifies Method A cleanup levels for several chemicals in soil, groundwater, and surfacewater. According to the regulation (WAC 173-340-740(2)):

Method A tables have been developed for specific purposes. They are intended to provide conservative cleanup levels for sites undergoing routine cleanup actions or those sites with relatively few hazardous substances. The tables may not be appropriate for defining cleanup levels at other sites. For these reasons, the values in these tables should not automatically be used to define cleanup levels that must be met for financial, real estate, insurance coverage or placement, or similar transactions or purposes. Exceedances of the values in these tables do not necessarily trigger requirements for cleanup action under this chapter.

4.2.2 Points of Compliance

In accordance with MTCA requirements, points of compliance are to be used to define areas where cleanup levels shall be met. For Method A soil cleanup levels (protection of groundwater), the standard point of compliance for soils are all soils throughout the Site. The point of compliance for direct contact cleanup levels is throughout the property from the ground surface to a depth of 15 feet. When cleanup levels cannot be met at these “standard” points of compliance, conditional points of compliance can be identified. Conditional points of compliance include soils from a depth of 6 to 15 feet for ecological pathways with institutional controls (such as surface paving). The standard point of compliance for contaminated groundwater includes the uppermost level of the saturated zone, extending vertically to the lowest depth that could potentially be affected by the Site.

4.2.3 Terrestrial Ecological Evaluation

A cleanup level that is protective of the environment requires a terrestrial ecological evaluation (TEE) under certain circumstances. The MTCA regulation establishes a tiered process for evaluating potential risks to terrestrial ecological receptors. This process is set forth in MTCA in WAC 173-340-7490 through 173-340-7494. WAC 173-340-7491 provides for specific exclusions from the TEE requirements. Certain circumstances provide exclusion from further ecological evaluation at the Site because the contaminants either have no pathway to harm the plants and animals or there is no habitat where plants or animals live or forage near the contamination.

The exemptions for conducting a TEE are as follows:

- Contamination is below 15 feet without institutional controls, or below 6 feet with institutional controls
- Contamination is (or will be) covered by buildings or pavement.
- Concentrations are below natural background levels.
- Insufficient contiguous undeveloped land (for petroleum contamination, at least 1.5 acres existing on the property, or within 500 feet of the property)

5.0 PROPOSED CLEANUP ACTION

Based on Site information and our understanding of the planned Property redevelopment and schedule, soil excavation and off-site recycling/disposal has been identified as the appropriate Site-cleanup method. This was due to the planned redevelopment excavations, the relatively shallow nature and limited extent of soil and groundwater contamination, the opportunity to remove groundwater with the excavated soils, and because this technique is rapid, simple to implement, and remediates the contamination with little uncertainty. Other possible areas of contamination during redevelopment (e.g., UST removal) also can be simply addressed by excavation. Furthermore, confirmation of cleanup is easy to demonstrate by soil sampling and laboratory analysis.

Confirmation samples can be collected at all excavation boundaries to document remaining contaminant concentrations. Complete removal of soil contaminants above project cleanup levels also is anticipated to be achieved. The removal of chlorinated-solvent contaminated soils near the former drycleaner also will eliminate a continuing source for groundwater contamination in the western area of the Property.

The chosen cleanup action was based on the MTCA cleanup standards described below.

5.1 Cleanup Levels

The findings of the completed explorations and the MTCA regulations described above were used to review cleanup alternatives for the Property. The intent of the planned cleanup work at the Site is to achieve MTCA Method A cleanup levels for unrestricted land-use. These cleanup levels are the most protective of human health and the environment.

5.2 Points of Compliance

The lateral points of compliance proposed for soils at the Site are the Property boundary. Based on sampling results, contamination is not expected to be found migrating off of the Property. Therefore, the west and north points of compliance are anticipated to be the Property boundary. The lateral boundaries will be confirmed based on field observations during cleanup work. The vertical point of compliance for soil at the Site is the deepest extent of chlorinated-solvent and petroleum contamination. The vertical boundaries also will be confirmed based on field observations during cleanup work, but are expected to

be no greater than six feet below current surface grade in the area of the former drycleaner.

5.3 Terrestrial Ecological Evaluation

In the case of the Property, primary exclusions are believed to apply. In its current form, the Site does not provide a quality habitat for ecological receptors. Additionally, 1.5 acres of contiguous undeveloped land does not exist within 500 feet of the Site. Accordingly, further consideration of ecological receptors for calculating a cleanup level is not necessary for this Site.

5.4 Soil Cleanup Levels and Categories

Based on soil-sample analyses conducted at the Property, four distinct categories of soil regarding chlorinated-solvent and petroleum contaminants may apply at the Property. These four categories are based on contaminant type and concentrations in soil in comparison to the cleanup requirements established by MTCA regulations.

To assist the understanding of the four soil categories, diagrams showing the area of the planned excavations (including former sampling locations) are included as Figure 6. These soil categories are further discussed below.

- **“Non-Contaminated Soil” (Clean)** – These soils are identified as those that do not contain analyzed contaminants at laboratory-detectable concentrations and have no evidence of contamination during field screening (based on PID readings, sheen in water, staining, odors, etc.).
 - Sampling indicates that these soils generally are located throughout most of the Property.

- **Chlorinated-Solvent Contaminated Soils** – These soils are identified as having concentrations of chlorinated-solvents above Method A cleanup levels. These soils cannot be reused on the Property. Chlorinated-solvent contaminated soil will need to be removed to the soil point of compliance, properly handled, and disposed at a permitted facility.
 - Chlorinated-solvent contaminated soils are located near the former drycleaner. Excavation from this area will likely produce soils that have detectable concentrations of PCE (F002, spent-halogenated solvents) and possibly Vinyl Chloride.

- **Petroleum-Impacted Soil (Impacted)** – These soils are identified as containing concentrations of petroleum contaminants below MTCA Method A Cleanup Levels. These soils can be reused on the Property. However, if they cannot be reused during redevelopment, Impacted soil will need to be properly handled and disposed at a permitted facility.
 - The diagonal-hatched area on Figure 6 indicates an area where USTs from the former service station will need to be removed during construction of the “swale”. This area has low concentrations of ORO in the soil (below cleanup levels). There is a potential for more Impacted soil to be discovered during the UST excavation near the former service station.

- **Petroleum-Contaminated Soil (PCS)** – These soils are identified as having concentrations of petroleum above Method A cleanup levels. These soils cannot be reused on the Property. PCS will need to be removed to the soil point of compliance, properly handled, and disposed at a permitted facility.
 - Soils containing petroleum contaminants above cleanup levels have not been discovered on the Property. However, there is a potential for PCS to be discovered during the UST excavation near the former service station.

6.0 CLEANUP ACTION PLAN

The primary objective of this Cleanup Action Plan (CAP/CMMP) is to outline the procedures to successfully remove, segregate, and dispose contaminated soils and groundwater, to the greatest extent possible, prior to the planned redevelopment of the Property. This cleanup work will be conducted by a Remediation Contractor (Contractor) selected by Lennar. The Contractor will be assisted by G-Logics with respect to soil designation (e.g., clean vs contaminated), soil and groundwater sampling, and documentation.

As described above, existing information for collected soil samples has been summarized in Table 1. Existing information for collected groundwater samples has been summarized in Table 2. The extents of the proposed excavations, as well as the extent of known groundwater impacts, are shown on Figure 6. Based on the current understanding of Site conditions, the Site-contamination issues can be addressed by the following generalized approach.

1. G-Logics will prepare MTCA project workplans for review and approval by all interested parties (e.g., this document).
2. Prior to performing the proposed cleanup actions, groundwater-monitoring wells located within building-preload and remedial-excavation boundaries will be abandoned in accordance with Ecology regulations.
3. Prior to redevelopment activities, the Contractor, working cooperatively with G-Logics, will remove and properly dispose the USTs, fuel lines, and any other related underground features (e.g., sumps, drains, hoists, etc.) associated with the former service station that are encountered during excavation.
4. The Contractor will excavate known and discovered contaminated soils as described in this CAP/CMMP. G-Logics will collect confirmation samples in these areas. The Contractor will dispose/treat contaminated soils as described in this CAP/CMMP.
5. The Contractor will manage the collected groundwater and/or rainwater in the remedial excavations. This water will be collected and discharged as described in this CAP/CMMP.
6. G-Logics will install confirmation groundwater-monitoring wells in the remediated areas after “preload” soils have been placed.
7. G-Logics will prepare a comprehensive Site Cleanup Action Report and will submit the report to Ecology with the request for an NFA.

8. On-site groundwater-monitoring wells will be sampled with analytical results presented to Ecology to support the NFA request.

Additional information regarding the cleanup actions planned at this Property is discussed below.

6.1 Notifications

The Contractor shall not begin any excavation work until notification has been given to the property owner and their representatives. The Contractor shall notify the property owner within a minimum of 72 hours in advance (excluding weekends and holidays) of their intended start of excavation activity to allow sufficient time for coordination with the disposal/recycling facilities and the Contractor. Furthermore, the Contractor must not perform any site work unless the property-owner's representative (G-Logics) is present and/or informed. This provision shall be applicable during the entire project. The Contractor shall periodically provide a schedule and sequence of their intended work activity, and revision of same if necessary, to the property owner.

6.2 Site Inspections

The Contractor shall allow and facilitate any inspections made by governing authorities such as the local fire department, health department, Puget Sound Clean Air Agency, the Washington State Department of Labor and Industries, Ecology, and/or any other governing authority with jurisdiction. If notified by the property owner or any regulatory authority of any violation of either health and safety or environmental regulations, the Remediation Contractor shall take immediate and decisive corrective action.

6.3 Truck Loading Zone, Staging Areas

The Contractor will construct a truck-loading area on the property such that the different disposal categories of soil (as described in Section 7.0) can be excavated and transported off-site while minimizing the potential for cross-contamination and worker exposure. The Contractor will provide a stable platform for staging of soil bins and/or dump trucks. A portion of this area shall be designated for the drop-off, storage, and pickup of boxes/trucks filled with chlorinated-solvent and possibly petroleum-contaminated soils. A separate area can be designated for the loading of non-contaminated soils. These areas

shall be constructed such that non-excavation equipment (support vehicles, soil bins, dump trucks, etc.) do not come in contact with contaminated soil.

Movement of equipment over contaminated soils will be minimized to the extent possible, while allowing construction work to continue. Before equipment demobilization, the contractor will clean excavation equipment on-site as appropriate. This cleaning is anticipated to be dry-broom sweeping. If necessary, equipment decontamination by use of hot-water and/or pressure wash also will be conducted. Wash water will be collected and managed as described in Section 6.5 below.

6.4 Wheel Wash Area

It is understood that the Contractor will construct a wheel-wash area on the property such that vehicles exiting the Property will drive through a water-filled basin. The purpose of this wheel-wash area is to reduce the potential for off-site transport of soils adhering to vehicle tires. This water will be collected and managed using an on-site treatment system that prevents direct discharge to surface water. For further information, please refer to the project's Temporary Erosion and Sediment Control (TESC) Report and Stormwater Pollution Prevention Plan (SWPPP) and section 10.2 of this document. We understand more specific requirements for this basin are detailed in the site grading-permit application.

6.5 Well Abandonment Prior to Remedial Excavation

Prior to performing the proposed cleanup actions, groundwater-monitoring wells located within building-preload and remedial-excavation boundaries will be abandoned. G-Logics will provide a Washington State Licensed Driller (WSLD) for this work. Specifically, wells GS-MW-1, GS-MW-2, PG-1, GL-MW-2, GL-MW-4, GL-MW-5, GL-MW-6, and GL-MW-7 (Figure 6) will need to be abandoned. The wells will be abandoned in accordance with Ecology's Minimum Standards for Construction and Maintenance of Wells. This regulation is identified as Chapter 173-160 WAC dated December 22, 2006, specifically WAC 173-160-460 which pertains to abandonment of resource-protection wells.

Groundwater-monitoring wells GL-MW-3, GL-MW-8, GL-MW-9, and GL-MW-10 will be protected during the building-preload and remedial-excavation activities. These wells

will be used to monitor groundwater conditions once remedial excavations have been completed.

6.6 Removal of Underground-Storage Tanks

Two underground-storage tanks (assumed 10,000+ gallon capacities) are located near the former service station. The approximate location of former service station and the suspected USTs are shown on Figure 4. The USTs have purportedly been closed in-place and filled with concrete. The Contractor will uncover, open, inspect, and extract the USTs. If residual fuel is discovered in the tanks, the Contractor will remove the residual fuel, inert, and clean the tanks prior to removal. Associated features (e.g., fuel lines, hoists, or additional USTs), as well as petroleum-contaminated media discovered during excavation also will be removed. This work will be conducted in accordance with appropriate Ecology UST-closure requirements. Documentation regarding tank closure and disposal will be provided by the Contractor to G-Logics.

6.7 Removal and Monitoring of Soil Contaminants

G-Logics will observe and document Contractor activities during excavation of the soils in the areas of the former drycleaner and service station. G-Logics also will assist the Contractor in the identification and segregation of soils as described in Section 7.0 of this CAP/CMMP. A photoionization detector (PID) may be used during the soil excavation to screen for Volatile Organic Compounds (VOCs). Results will be measured in parts per million by volume (ppmv). Visual and olfactory observations also will be used, predominately in the area of the former service station.

During and upon completion of the planned remedial excavation, G-Logics will collect performance and confirmation soil samples from the base and sidewalls of the excavation at representative locations. This work will be performed to document the successful removal of the contaminated soils and underground features. If soil contamination is found in the confirmation samples at concentrations above the identified cleanup levels, additional soil excavation will be performed up to the excavation boundary. MTCA Method A cleanup levels will be used to compare sample results, as described in Section 5.1 of this CAP/CMMP.

6.8 Removal and Monitoring of Groundwater Contaminants

To removal residual contaminants in the groundwater, the Contractor will excavate soils in the area of the former drycleaner and in the northwest corner of the Property (near well GL-MW-6). By removing chlorinated-solvent impacted soils and dewatering the excavation, it is believed that a majority of contaminated groundwater will be successfully removed at the Site. Performance grab-groundwater samples will be collected from the infiltrating groundwater during the remedial excavations.

If residual contaminants are present in the infiltrating groundwater, the following process will be performed by the Contractor. Once the soil removal is complete (based on confirmation soil samples), groundwater will be allowed to infiltrate into the excavation pit for several days. During this time, infiltrating groundwater will be removed and stored in on-site holding tanks. After one to two weeks, confirmational-groundwater samples will be collected from the excavation pit and analyzed prior to backfilling. If contamination remains, more soil will be removed and the process will be repeated. Project dewatering and discharge requirements are further described in Section 8.0 of this document.

In addition, groundwater-monitoring wells GL-MW-3, GL-MW-8, GL-MW-9, and GL-MW-10 are located outside of the planned building-preload and remedial-excavation areas and shall remain during preloading activities on the Property. These wells shall be protected and maintained during this work to document groundwater conditions. If contaminants remain in the groundwater after the excavation is complete, concentrations are anticipated to quickly attenuate below applicable cleanup levels.

6.8.1 Groundwater-Monitoring Well Installation

Once the remedial excavations are complete and the site is backfilled for preloading, several groundwater-monitoring wells will be installed in the vicinity of the former drycleaner and near current well GL-MW-6. The new and previously installed wells will be used to document the successful cleanup of contaminated groundwater on the Property.

6.9 Sample Collection and Analysis

G-Logics will collect soil and groundwater samples during the remedial excavations and UST removal activities at the Property. As necessary, G-Logics will use a mobile

analytical laboratory (Washington certified) at this site. This approach is beneficial in providing real-time data during the remedial excavations, allowing for the modification (such as depth and extent) of the excavations. Collected samples will be analyzed for concentrations of chlorinated solvents and petroleum hydrocarbons.

For the planned excavations, soil samples also will be collected from the excavated materials for disposal characterization and of the remaining, non-excavated soils for remediation confirmation. All samples will be collected using hand-sampling equipment such as a stainless steel spoon or trowel. The samples will be placed into a laboratory supplied glass sample container (methanol added if necessary) with a Teflon-lined lid. The sample container will be closed as soon as possible following sample collection.

Groundwater samples will be collected either by bailer or peristaltic pump. Groundwater samples will be placed into a laboratory supplied glass sample container (hydrochloric acid added if necessary) with a Teflon-lined lid. The sample container will be closed as soon as possible following sample collection.

The collected samples will be provided to the analytical laboratory for chemical analysis by standard Ecology methods. Appropriate chain-of-custody procedures will be followed during sample handling. All sample containers will be labeled with a sample identification number, the date, the time, and the sampler's name.

6.10 Quality Assurance/Quality Control

Quality Assurance/Quality Control (QA/QC) will include generally accepted procedures for sample collection, storage, tracking, documentation, and analysis. In addition, blind-duplicate samples will be submitted to the laboratory for data repeatability information (approximately 10%).

6.11 Stockpiling of Contaminated Soils

Depending on how contaminated and impacted soils are managed, stockpiling of excavated soils may be necessary. Stockpiles may be generated with samples collected in order to provide disposal information for the following day as described in Section 7.0 of this document (prior to loading and off-site transportation).

Segregated soils will be stockpiled on top of 8 Mil thick plastic sheeting until analytical data has been acquired to determine soil disposal classifications (see Section 7.0). If

significant rain is forecast, stockpiled soils shall be covered with at least 8 Mil thick plastic sheeting. The cover shall be maintained tightly in place by using sandbags and ropes to secure the plastic. These materials are to be supplied by the Contractor. General sediment-control procedures will be followed by the Contractor to prevent sediment runoff.

6.12 Site Mapping and Reporting

Daily field records will be prepared by G-Logics field personnel during the soil-excavation work. Copies of the daily records will be provided with a weekly summary report. Weekly reports, in the form of a summary memorandum, will include an update of the cleanup progress and documentation regarding any changes to this Cleanup Action Plan due to changed conditions. This memo also will include available analytical data from performance and compliance sampling and available disposal manifests. Sample locations will be documented on to-scale mapping and analytical data can be summarized on spreadsheet reports.

G-Logics will prepare a final report documenting the site-remediation effort. The report will include site diagrams showing sampling locations relative to former site features, laboratory analytical results, site-work photographs, soil treatment/disposal documentation, and a discussion of project findings.

6.13 Vapor/Moisture Barriers

G-Logics understands that the buildings planned in the area of the former drycleaner will be constructed with one level of underground parking. A subsurface moisture-barrier membrane is planned to be installed on subsurface concrete (i.e., underground-parking garage foundation and slab) to prevent groundwater infiltration into the structure. In addition, this membrane will act as a vapor-mitigation measure for potential vapor-intrusion concerns. These spaces also will be mechanically ventilated (for removal of auto exhaust) further mitigating the vapor-intrusion pathway. However, this scenario is likely unnecessary considering contaminant concentrations and assuming the successful removal of chlorinated solvents from the subsurface.

We understand that *Voltex DS* (by CETCO) has been identified for use on the planned buildings. For this project, G-Logics has reviewed the manufactures specifications for this product (as well as obtaining assurances from the manufacture) to identify that

Voltex DS is acceptable for the intended use on the planned redevelopment. The vapor-barrier membrane design and installation should adhere to manufacturer's specifications and product requirements. Information regarding the identified *Voltex DS* is attached in Appendix B.

6.14 Miscellaneous

The planned work shall be performed in a manner that will cause minimal disruption to the daily activities of the surrounding neighborhood. This shall include, but is not limited to, performing the work in an orderly, courteous, and professional manner. This includes the proper storage and removal of all excavation equipment, excavated soils, and excess materials in an expeditious manner.

7.0 CONTAMINATED MEDIA-MANAGEMENT PLAN

Lennar will use this CAP/CMMP as the basis for the cleanup soil-excavation work on the Property. The remaining sections of this CAP/CMMP describe the information to be used by the Contractor for cleanup work performed on the Property.

To assist the excavation contractor with the segregation of the contaminated soils, G-Logics will provide pre-excavation information based on existing mapping. In addition, G-Logics will systematically collect samples that will be rapidly analyzed, with most analyses expected to be conducted on a 24-hour turnaround basis. The level of effort and number of samples (Performance and Confirmational samples) likely will increase as the excavations reach the depths and map boundaries of the four soil-category areas, as described below.

7.1 Soil Disposal Classifications and Discussion

Because of the nature of the project and soils found at the Property, the development excavation (i.e., below-grade parking structure) will generate soils that may not be able to be used elsewhere on the Property and therefore will require off-site disposal. Four distinct classifications for soil disposal exist on the Property:

- Clean Soils
- Contained-In Soils (soils containing low concentrations of chlorinated-solvent contaminants)

- Petroleum Class 2 Soils
- Petroleum Class 3 Soils

These classifications are further described below.

7.1.1 Clean Soils

There are numerous facilities or projects that could accept the Clean soils at very little cost to the project (e.g., CEMEX or AAA Monroe Rock, both in Snohomish County).

The Clean classification is identified as follows:

- **Clean Soils** – These soils are identified as those that do not contain analyzed contaminants at laboratory-detectable concentrations and have no indications of contamination during field screening (based on PID readings, sheen in water, staining, odors, etc.).

7.1.2 Detectable Concentrations of Chlorinated-Solvent Contaminants

For disposal of soils with detectable concentrations of chlorinated-solvent contaminants, the contaminant concentrations within the soils will largely dictate the allowable disposal locations in accordance with State and Federal disposal regulations. Soils containing chlorinated-solvent contaminants will require segregation from other soils excavated on the Property.

We understand that if chlorinated-solvent contaminants in soils do not exceed the MTCA Method B Soil Cleanup Level (for Direct Contact) or the Universal Treatment Standards, then these soils may be managed as non-hazardous waste given they are disposed at a permitted Subtitle D landfill facility. If these requirements are met, Ecology can grant a “Contained-In” determination for disposing soils. The request for a Contained In determination from Ecology is included as Section 7.5 of this document. The Contained In classification is identified as follows:

- **Contained-In Soils** – These soils are identified as having detectable concentrations of chlorinated-solvents that do not exceed the MTCA Method B cleanup level concentrations for Direct Contact or the Universal Treatment Standards.

7.1.3 Detectable Concentrations of Petroleum Contaminants

For disposal of soils with detectable concentrations of petroleum contaminants, the contaminant concentrations within the soils will largely dictate the allowable disposal locations in accordance with State and Federal disposal regulations. Petroleum-contaminant concentrations for soil disposal differ from the soil-cleanup levels (as described in Section 5.4 above).

There are some facilities (e.g., CEMEX or AAA Monroe Rock) that can accept petroleum Impacted/Contaminated soils at a significantly reduced fee, based on petroleum-contaminant concentrations. These classifications are identified as follows:

- **Petroleum Class 2 Soils** – These soils are identified as having indications of petroleum contamination during field screening (based on PID readings, sheen in water, staining, odors, etc.) and/or containing concentrations of Gasoline Range Hydrocarbons (GRO) less than **100 mg/kg**, or DRO or ORO less than **450 mg/kg**.
- **Petroleum Class 3 Soils** – These soils are identified as containing concentrations of GRO greater than **100 mg/kg**, or DRO or ORO greater than **450 mg/kg**.

In addition, there are facilities that charge the same rate (similar to Class 3 pricing) to receive all soils, regardless of the contaminant concentrations. Facilities that accept these soils must be permitted as a RCRA Subtitle D landfill (e.g., Republic Services or Waste Management, both with receiving facilities in Seattle, WA). These facilities also will accept Clean soils, but this is typically not cost-effective for large volumes. There are numerous facilities or projects that could accept the Clean soils at very little cost to the project.

As such, given the expected small volume of soils containing petroleum contaminants present on the Property, construction schedules, available space, and weather conditions, it may not be cost-effective to segregate Class 2 and 3 soils for disposal (Clean soils will continue to be segregated). If segregation of Class 2 and 3 soils is **not** selected, all soils with indications of petroleum contamination during field screening (based on PID

readings, sheen in water, staining, odors, etc.) must be handled and disposed as Class 3 soils. Additionally, if soil conditions during excavation indicate the presence of petroleum contaminants that were not discovered during the previous explorations, then soils from those areas can be disposed as Class 3 soils without further analytical testing (assuming no segregation for Class 2 and 3).

The decision to perform segregation needs to be decided by the project proponent after evaluating logistics, impacts to production due to segregation activities, physical needs for segregation and possible stockpiling activities, impacts to transportation times, disposal costs, and overall project schedule.

7.2 Soil Segregation, Four Soil Classifications

During soil excavation, G-Logics will assist the Contractor by providing pre-excavation directions based on existing mapping (this CAP/CMMP). G-Logics also will be on-site to collect additional samples when necessary to be analyzed by a local laboratory. The level of effort and sampling frequency is expected to be the greatest as excavation activities are performed near the known areas of contamination. This is where existing data indicates the interface between Clean and those containing detectable concentrations and indications of contamination will be encountered (Figure 6). Specifically, G-Logics would perform the following to support delineation and characterization of excavated soils.

- **Clean Soils** – G-Logics will observe the excavation work, screening the excavated soils for the presence of contaminants based on odor, color, Photoionization Detector (PID) readings, and whether a sample produces a sheen in water.
 - Soil samples will be collected and analyzed periodically to document that the soils can be classified as Clean. Depending upon logistics and timing, stockpiling of Clean soils may not be necessary, particularly if pre-characterization sample results and observations for the soils being excavated indicate that the soil will classify as Clean. If petroleum or chlorinated-solvent contaminants are detected, these materials will be mapped and managed under the appropriate category (as described below).

- **Contained-In Soils** – During segregation of Contained In soils, the following will apply.
 - When indications of chlorinated-solvent contamination are observed during excavation by field screening (based on PID readings) and/or analytical testing detects the presence of chlorinated-solvent contaminants, the excavated soils will be classified as Contained In. These soils will be segregated and/or stockpiled separately from other soils for disposal purposes.

- **Petroleum Class 2 Soil** – If segregation of soil is selected, the follow will apply.
 - When indications of petroleum contamination are observed during excavation by field screening (based on PID readings, sheen in water, staining, odors, etc.) and/or analytical testing detects the presence of GRO at concentrations less than **100 mg/kg**, or DRO or ORO at concentrations less than **450 mg/kg**, the excavated soils will be classified as Class 2. These soils will be segregated and/or stockpiled separately from other soils for disposal purposes.

- **Petroleum Class 3 Soil** – If segregation of soil is selected, the follow will apply.
 - When indications of petroleum contamination are observed during excavation and/or analytical testing detects the presence of GRO at concentrations greater than **100 mg/kg**, or DRO or ORO at concentrations greater than **450 mg/kg**, the excavated soils will be classified as Class 3. These soils will be segregated and/or stockpiled separately from other soils for disposal purposes.

In addition, other possible areas of site contamination (e.g., unknown areas of contamination) also likely can be simply addressed by excavation. Additionally, if soil conditions during excavation indicate the presence of contaminants that were not discovered during the previous explorations, then soils from those areas also should be segregated and handled separately (until sampling can be conducted to confirm soil category).

7.3 Soil Disposal Requirements

With the described understanding of the four soil classifications, and with Ecology’s concurrence with a “Contained-In” determination, disposal requirements for soils are described below.

- **Clean Soils** – If necessary, excess soils will be excavated and loaded into standard dump trucks for off-site transportation and disposal. The truck beds will be covered with tarps during transportation to prevent wind-generated dust. The disposal facility receiving these materials will be local and Health-Department permitted aggregate-pit backfill locations or similar. The final disposition locations of disposal/use for these soils should be fully documented (i.e. site address, contact person authorizing disposal/acceptance, amounts and dates delivered/accepted, etc.) and approved by Lennar.

- **Contained-In Soil** – These soils will be excavated and loaded into dump trucks or rail containers that have been lined (plastic liner) and covered. The soils will be directly delivered to the Rabanco (Roosevelt Regional) facility, a permitted RCRA Subtitle D landfill. The soils will be delivered to the landfill with the Contained In determination letter, instructing the facility that soils are not to be used for daily, intermediate, or final landfill cover. The landfill will be provided with soil analytical data and copies of signed solid-waste receipts will be forwarded by the remediation Contractor to G-Logics (for subsequent submittal to Ecology) within 15 days of receipt.

- **Petroleum Class 2 Soils** – If segregation of soils containing petroleum contaminants is selected, Class 2 soils will be handled and disposed accordingly.
 - These soils will be excavated and loaded into standard dump trucks for off-site transportation and disposal. The disposal facility receiving these materials will be a local and permitted to accept Class 2 soils (e.g., CEMEX in Snohomish County).

- **Petroleum Class 3 Soil:** If segregation of soils containing petroleum contaminants is selected, Class 3 soils will be handled and disposed accordingly.
 - These soils will be excavated and loaded into standard dump trucks for off-site transportation and disposal. The disposal facility receiving these materials will be a local and permitted to accept Class 3 and/or petroleum-contaminated soils (e.g., Republic Services transfer facility in South Seattle).

- **All Soils Containing Petroleum Contaminants:** If segregation of Class 2 and 3 soils is **not** selected, all soils with indications of petroleum contamination during excavation must be handled and disposed as Class 3 soils.

7.4 Soil Volume Review

For the planned work, locations and volume estimates of soils that were identified to contain contaminants are presented on Figure 6. For these soil-volume reviews, soil depths are taken from existing surface/grade elevations. This information was used to identify general areas and corresponding volumes and should not be taken as definitive locations or absolute volumes.

Final excavated volumes will not exactly match these estimated quantities, given actual excavated depths/areas, discovered Site and Property conditions, contractor capabilities, weather conditions, etc. The soil-volume estimates provided on Figure 6 are only presented for review purposes.

7.5 Request for “Contained In” Determination

This plan presents the rationale for a “Contained-In” determination from Ecology with respect to the third category of soil. To receive a “Contained In” determination for chlorinated-solvent contaminated soils, concentrations will need to be compared to the following criteria:

- MTCA Method B Direct Contact Cleanup Levels (for listed waste)
- Land Disposal Restrictions (LDR) and Universal Treatment Standards (UTS)

We understand that if contaminants in soils do not exceed the MTCA Method B Soil Cleanup Level for Direct Contact or the Universal Treatment Standards, then these soils may be managed as non-hazardous waste given they are disposed at a permitted Subtitle D landfill facility. Soils from this cleanup work will be disposed at the Rabanco Roosevelt Regional Facility. Among the foregoing criteria, the most stringent numerical value often is the MTCA cleanup level (Method B Direct Contact).

For this project, and with Ecology concurrence, soils may be managed as non-hazardous waste if they:

- are below the MTCA Method B Soil Cleanup Level concentrations for Direct Contact
- are below the Universal Treatments Standards concentrations
- are disposed at a permitted Subtitle D landfill facility (below LDR standards)

Based on samples collected near the former drycleaner, none of the detected soil concentrations exceed Method B cleanup levels. Furthermore, none of the detected soil concentrations exceed the Universal Treatment Standards for PCE (6.0 mg/kg). Given these understandings, Ecology will be requested to provide a “Contained-In” Determination for chlorinated-solvent contaminated soils generated by the Site-excavation work (under separate cover).

8.0 PROJECT DEWATERING REQUIREMENTS

Groundwater dewatering is anticipated to be necessary to complete some of the below-grade work for this project. A dewatering and stormwater discharge plan has been prepared by the Contractor (Stormwater Pollution Prevention Plan or SWPPP) for approval by the owner, architect, and/or engineer.

For excavation dewatering, G-Logics understands that perforated piping will be installed at the base of the excavation. This piping will be directed to a central location for pumping and discharge. Groundwater discharge will be monitored for contaminants and discharged to the appropriate receiving system accordingly. According to the SWPPP, collected water with contaminants will be discharged to the existing sanitary-sewer system located on 7th Avenue NW or to on-site temporary storage until analytical testing is completed. A King County Metro Industrial Wastewater Permit will be obtained to allow discharge into the sanitary-sewer system. Stormwater without contaminants and meeting allowable water quality discharge requirements will be released to the existing storm-sewer system at the intersection of 7th Avenue NW and Gilman Boulevard or to the on-site temporary sediment pond.

9.0 REQUIRED PERMITS

The site-cleanup work is not being performed under an Agreed Order or Consent Decree with Ecology. As such, compliance with the requirements of state and local permits is required. G-Logics understands that necessary development permits have been requested, as briefly summarized below.

9.1 Grading Permit

Given the large volume of soils to be excavated for the planned construction, we understand the Contractor will apply for all necessary permits, which will be received prior to beginning excavation work.

9.2 Water-Discharge Permit

Given the nature of the project, we understand the Contractor will apply for all necessary water-discharge permits, which will be received prior to beginning excavation work.

10.0 CONTRACTOR REQUIREMENTS

The selected environmental Contractor shall be properly licensed in the state of Washington to provide these described services and shall furnish all labor, equipment, and material necessary to satisfactorily complete the work associated with the excavation and disposal of contaminated soils and groundwater as described in this CAP/CMMP.

Soil removal will be performed in a timely manner. The Contractor shall be prepared to perform additional excavation should confirmation sample results indicate the need for additional excavation, if possible within site constraints. Work is to be performed in this manner to achieve project efficiencies and to minimize disruptions to the Property, its owners, and the surrounding areas.

Presented below is a summary of the Contractor's required tasks.

10.1 Project Meeting

Before beginning the described work, a meeting between the Contractor and the project representatives will be conducted. The purpose of this meeting is to confirm the schedule and nature of the planned work and to address any identified work modifications.

Additionally, a representative of the Property owner will be available at all times during the performance of this work to address other possible project changes. This includes decisions regarding alternative cleanup levels, conditional points of compliance, alternative remediation methods, necessary monitoring wells, consideration of vapor issues, and/or the need for additional Site explorations or remediation. Contractor notifications also are required, as described in Section 6.1 of this CAP/CMMP.

10.2 Temporary Erosion and Sediment Control Report and Stormwater Pollution Prevention Plan

The Contractor shall make every effort to not contribute contamination to the work area. Additionally, the Contractor is responsible for control, cleanup, and disposal of soil, water, fuel, lubrication oil, or other material resulting from spills, accidents, or other releases caused by the Contractor. Spill-response materials shall be kept on site by the Contractor. As soon as a spill or leak is detected, the Contractor shall initiate immediate steps to stop the release and began cleanup (as safety permits).

To document these responsibilities and appropriate precautionary measures, the Contractor shall prepare Temporary Erosion and Sediment Control (TESC) Report and Stormwater Pollution Prevention Plan (SWPPP) for their operations. These documents shall be submitted to the property owner and their environmental and safety representatives (e.g., G-Logics) for review and approval prior to the start of site work. These documents will include, but not be limited to, the following:

- Dust-control plans and equipment to be used.
- Stormwater management plans can equipment to be used.
- Equipment decontamination plans and equipment to be used.
- Fuel-spill prevention plans and spill-cleanup materials and methods in the event of a spill.
- Material Source Forms.
- Subcontractor Approval Forms.

10.3 Contractor Certifications and Licenses

The Contractor shall provide copies of all employee certifications as required by WAC 296-300, “Hazardous Waste Operations and Emergency Response,” and all other applicable licenses or training documentation prior to start of work. For soil

transportation, the Contractor must be able to demonstrate Hazmat endorsed CDL and pollution-liability insurance. The Contractor also must be able to provide two references, and sufficient insurance coverage, and evidence of three years of experience working on similar projects and with similar contaminated materials.

10.4 Utilities

The work to be performed will involve soil excavation near, across, or below existing structures and/or utilities. However, these utilities should be removed or disconnected prior to this excavation work. Locations and dimensions of existing structures and other surface features must be evaluated by the Contractor and then take precautions to protect these utilities during the work.

In addition to site utilities, several groundwater-monitoring wells are located on the Property. Once cleanup work is complete, these monitoring wells are to be scheduled for abandonment by G-Logics in accordance with Ecology regulations (see Section 6.5).

10.5 Worker Protection Monitoring

The Contractor shall identify personal-protection equipment (PPE) that may be needed during the Site-excavation work. The specific air-monitoring procedures and PPE requirements shall be defined in their Health and Safety Plan. Specific worker-exposure zones also shall be identified in the contractor HASP.

10.6 Fences

The Contractor may need to erect fencing as necessary to enclose the boundaries of the work area prior to mobilization. Access to the Property should be through controlled gates, which are to be secured by the Contractor when work is not being performed. Upon completion of the site-excavation work, the temporary fencing will be removed by Contractor as required to facilitate building construction.

10.7 Dust Control

Water will be used by the Contractor to prevent wind transport of soil. Exposed soils will be sprayed until wet and re-sprayed as needed. At the Contractor's option, a tackifier may be used with approval from the project Engineer. For further information, please refer to the project's TESC Report.

10.8 Erosion Control

The Contractor shall employ erosion-control measures to mitigate off-site migration of contaminated waters and sediments during the Site excavation. These procedures will include control and containment of stormwater runoff, sediment (mud) on equipment and truck tires, decontamination wash water, and collected surfacewater/groundwater.

In addition, stabilized construction entrances and wheel-wash areas may need to be used for trucks and equipment. As a precaution, nearby storm drains should be protected with inlet filters, and a street sweeper should be employed as necessary to clean up any soils that inadvertently leave the Site. For further information, please refer to the project's TESC Report.

10.9 Work Completion

The on-site G-Logics representative will assist in identifying the location and volumes of contaminated soils in the field. Additionally, if questions arise concerning the location or scope of planned activities, the Contractor shall immediately contact G-Logics and other project representatives.

At the completion of the Site work, the excavated areas shall meet the satisfaction of the Property owner. The Contractor shall repair any damage done by the Contractor to parameter fencing, utilities, or other site improvements that are not a part of this project, also to the satisfaction of the Property owner.

11.0 CONTRACTOR SAFETY REQUIREMENTS

The selected Contractor shall prepare a Health and Safety Plan (HASP) for this project. The Contractor shall strictly follow applicable local, state, and federal safety and environmental laws, statutes, regulations, permits, and common law regarding human health or the environment, particularly those outlined by the Washington State Department of Labor and Industries (Washington Administrative Code [WAC] 296-155, WAC 296-24, and WAC 296-62), and the Washington State Department of Ecology (WAC 173-303 and WAC 173-340). The Contractor shall provide a safe environment for personnel involved in the performance of work under this contract, and prevent unauthorized persons from entering the work site. The work site shall be kept in a safe and orderly condition during each aspect of work.

11.1 Contractor Health and Safety Plan (HASP)

The work requires the excavation, handling, loading, transportation, and disposal of contaminated soils (primarily chlorinated-solvent contaminated soil and groundwater). Accordingly, the Contractor shall prepare a site-specific health and safety plan (HASP) for their operations and workers prior to start of work. The HASP shall be submitted to the Property owner and their safety representative for review and approval prior to the start of any work on the Property. The Contractor's site personnel shall be given a copy of this plan, and will be briefed daily on health, safety, and emergency response procedures. A copy of the HASP will be available at the job site. Additionally, a brief meeting to review the project's health and safety issues will occur each morning prior to the start of work.

The HASP will be prepared so that cleanup activities performed by the Contractor are in accordance with Federal Occupational Safety and Health Administration standards, and Washington Industrial Safety and Health Act standards. The Contractor's health and safety plan will include requirements for personnel who will be handling contaminated soils and waters. These requirements will include training, medical monitoring, personal protective equipment (PPE), and decontamination procedures. For further information, please refer to the project's HASP.

12.0 LIMITATIONS

G-Logics has prepared this Plan in accordance with the generally accepted standards of care that exist in the state of Washington at the time of this work. G-Logics should be notified for additional consultation if uncertainties need to be reduced beyond the level associated with this Plan.

Estimates of soil-disposal volumes are subject to numerous unknowns, including subsurface conditions, planned construction methods, contractor capabilities, discovery of additional contaminants, required schedules, project financing, and the ultimate determination of "how clean is clean". G-Logics does not warrant or guarantee presented estimates.

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13.0 REFERENCES

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**Cleanup Action and Contaminated Media Management Plan
Gilman Square, 615 NW Gilman Blvd
Issaquah, WA 98027**

**G-Logics Project 01-0868-G
April 21, 2014**

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