MIGIZI GROUP, INC.

17921 Bothell-Everett Hwy., Suite 102 PHONE (425) 398-2300
Bothell, Washington 98012 FAX (425) 398-2333

September 5, 2017

Schlueter Family Trust
c/o Mr. Helmuth Schlueter
620 112th Street S.E., #366
Everett, WA 98208

Subject: Additional Soil Sampling and Localized Groundwater Elevation Data And Request for No Further Action opinion. 1515 196th Street S.E., Bothell, WA

Dear Mr. Schlueter,

Migizi Group Inc. (MGI) is pleased to present this letter report further characterizing the conditions at 1515 196th Street S.E., Bothell, WA (Property). This letter is intended to be an addendum to the *Initial Characterization Subsurface Investigation* (MGI, June 12, 2017).

On May 12, 2017, twenty soil samples were collected from 6 to 10 inches[1] below ground surface (bgs) and analyzed for HCID, lead (Pb) and cadmium (Cd). MGI used MTCA Table 749-3 as the evaluation criteria for the Site. These values represent soil concentrations that are expected to be protective at any MTCA site and are meant to use in eliminating hazardous substances from further consideration under WAC 173-340-7493(2)(a)(i). Of these samples, only one location required further characterization: location 75. Laboratory analytical data indicates that soil sample 75 contained 1,500 mg/kg gasoline, 0.11 mg/kg benzene and 16 mg/kg xylenes, which exceed cleanup criteria listed in Table 740-1 (Method A Soil Cleanup Levels for Unrestricted Land Uses). No detections for any analytes were present at detectable levels at location 74, directly north of location 75.

On June 27, 2017 four additional soil samples were collected. Sample collection was performed by removing the top ten inches of soil on Area 75. Four additional samples were collected from 16 to 20 inches bgs, vertically composited. One location (75-1) was directly below the May 12th

[1] Consistent with Snohomish Health District sampling. February 9, 2005.

sample collection point. The three remaining soil samples were spaced ~120 degrees radially (75-2, 75-3 and 75-4) around 75-1. The samples were analyzed for TPH-Gx and BTEX by method NWTPH-Gx; none of the detections exceeded the practical quantification limit of the laboratory. Soil contamination detected in the May 12th sample 75 at six to ten inches is not present at depths of 16 to 20 inches, and appears to be isolated. Visually, the soil in the six to ten inches depth horizon appeared to be surface fill.

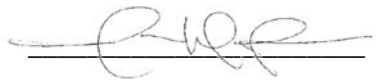
MGI evaluated online Washington State Department of Ecology boring logs. Alderwood Water District has 19 separate boring logs for dewatering wells installed at the Property[2]. The static water level is clearly documented as at least five feet bgs. When viewing the property from 196th, the surface elevation of the Property near location 75 is situated approximately four feet above, or higher in elevation, than the street and other lower-lying areas of the Property. Groundwater has been documented at five feet bgs. The isolated surface soil detection at location 75 did not extend in any detectable concentrations for any gasoline constituents, below sixteen inches bgs documenting several feet of vertical separation from the local groundwater resources. Laterally, location 75 is 526 feet from the nearest down-slope and down-gradient surface water feature[3].

[2] Ecology Water Well Reports, February 20, 2009 to March 17, 2009, NOI DE00849, 334916 through 334935.
[3] USGS 7.5 minutes series map, 2014, MGI Phase I ESA

Soil at location 75 was excavated and transported for recycling by Cemex, Everett, WA. On July 10, a total of 2.51 tons of soil was excavated from surface to a depth of sixteen inches bgs. The material was placed directly into a dump truck for off-site recycling; disposal documentation is provided in the attachments to this letter. Based upon our understanding of the Site, analytical soil data, and our first-hand observations in the field, we believe No Further Action is required at the Site.

Respectively submitted,

Migizi Group, Inc.



Jason Souza
CEO / PRINCIPAL SCIENTIST

Attachments: Soil Analytical Data and Waste Disposal Forms

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

July 6, 2017

Jason Souza
Migizi Group, Inc.
17921 Bothell-Everett Hwy. #102
Bothell, WA 98012

Re: Analytical Data for Project P966-B17
Laboratory Reference No. 1706-324

Dear Jason:

Enclosed are the analytical results and associated quality control data for samples submitted on June 27, 2017.

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

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

Sincerely,

David Baumeister
Project Manager

Enclosures

This report pertains to the samples analyzed in accordance with the chain of custody, and is intended only for the use of the individual or company to whom it is addressed.

Date of Report: July 6, 2017
Samples Submitted: June 27, 2017
Laboratory Reference: 1706-324
Project: P966-B17

Case Narrative

Samples were collected on June 27, 2017 and received by the laboratory on June 27, 2017. They were maintained at the laboratory at a temperature of 2°C to 6°C.

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

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

NWTPH Gx/BTEX Analysis

Method 5035A VOA vials were not provided for sample 75-1, 75-2, 75-3, and 75-4. The sample was therefore extracted from a 4-ounce jar for analysis. Some loss of volatiles may have occurred.

Any other QA/QC issues associated with this extraction and analysis will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

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Date of Report: July 6, 2017
Samples Submitted: June 27, 2017
Laboratory Reference: 1706-324
Project: P966-B17

NWTPH-Gx/BTEX

Matrix: Soil
Units: mg/kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**75-1**					
Laboratory ID:	06-324-01					
Benzene	**ND**	0.020	EPA 8021B	6-28-17	6-28-17	
Toluene	**ND**	0.081	EPA 8021B	6-28-17	6-28-17	
Ethyl Benzene	**ND**	0.081	EPA 8021B	6-28-17	6-28-17	
m,p-Xylene	**ND**	0.081	EPA 8021B	6-28-17	6-28-17	
o-Xylene	**ND**	0.081	EPA 8021B	6-28-17	6-28-17	
Gasoline	**ND**	8.1	NWTPH-Gx	6-28-17	6-28-17	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*93*	*63-124*				
Client ID:	**75-2**					
Laboratory ID:	06-324-02					
Benzene	**ND**	0.020	EPA 8021B	6-28-17	6-28-17	
Toluene	**ND**	0.073	EPA 8021B	6-28-17	6-28-17	
Ethyl Benzene	**ND**	0.073	EPA 8021B	6-28-17	6-28-17	
m,p-Xylene	**ND**	0.073	EPA 8021B	6-28-17	6-28-17	
o-Xylene	**ND**	0.073	EPA 8021B	6-28-17	6-28-17	
Gasoline	**ND**	7.3	NWTPH-Gx	6-28-17	6-28-17	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*97*	*63-124*				
Client ID:	**75-3**					
Laboratory ID:	06-324-03					
Benzene	**ND**	0.020	EPA 8021B	6-28-17	6-28-17	
Toluene	**ND**	0.075	EPA 8021B	6-28-17	6-28-17	
Ethyl Benzene	**ND**	0.075	EPA 8021B	6-28-17	6-28-17	
m,p-Xylene	**ND**	0.075	EPA 8021B	6-28-17	6-28-17	
o-Xylene	**ND**	0.075	EPA 8021B	6-28-17	6-28-17	
Gasoline	**ND**	7.5	NWTPH-Gx	6-28-17	6-28-17	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*93*	*63-124*				

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Date of Report: July 6, 2017
Samples Submitted: June 27, 2017
Laboratory Reference: 1706-324
Project: P966-B17

NWTPH-Gx/BTEX

Matrix: Soil
Units: mg/kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**75-4**					
Laboratory ID:	06-324-04					
Benzene	**ND**	0.020	EPA 8021B	6-28-17	6-28-17	
Toluene	**ND**	0.073	EPA 8021B	6-28-17	6-28-17	
Ethyl Benzene	**ND**	0.073	EPA 8021B	6-28-17	6-28-17	
m,p-Xylene	**ND**	0.073	EPA 8021B	6-28-17	6-28-17	
o-Xylene	**ND**	0.073	EPA 8021B	6-28-17	6-28-17	
Gasoline	**ND**	7.3	NWTPH-Gx	6-28-17	6-28-17	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*96*	*63-124*				

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Date of Report: July 6, 2017
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Laboratory Reference: 1706-324
Project: P966-B17

NWTPH-Gx/BTEX
QUALITY CONTROL

Matrix: Soil
Units: mg/kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB0628S1					
Benzene	**ND**	0.020	EPA 8021B	6-28-17	6-28-17	
Toluene	**ND**	0.050	EPA 8021B	6-28-17	6-28-17	
Ethyl Benzene	**ND**	0.050	EPA 8021B	6-28-17	6-28-17	
m,p-Xylene	**ND**	0.050	EPA 8021B	6-28-17	6-28-17	
o-Xylene	**ND**	0.050	EPA 8021B	6-28-17	6-28-17	
Gasoline	**ND**	5.0	NWTPH-Gx	6-28-17	6-28-17	
Surrogate:	*Percent Recovery*	*Control Limits*				
Fluorobenzene	*86*	*63-124*				

Analyte	Result		Spike Level		Source Result	Percent Recovery		Recovery Limits	RPD	RPD Limit	Flags
DUPLICATE											
Laboratory ID:	06-326-02 Comp.										
	ORIG	DUP									
Benzene	**ND**	**ND**	NA	NA		NA		NA	NA	30	
Toluene	**ND**	**ND**	NA	NA		NA		NA	NA	30	
Ethyl Benzene	**ND**	**ND**	NA	NA		NA		NA	NA	30	
m,p-Xylene	**ND**	**ND**	NA	NA		NA		NA	NA	30	
o-Xylene	**ND**	**ND**	NA	NA		NA		NA	NA	30	
Gasoline	**ND**	**ND**	NA	NA		NA		NA	NA	30	
Surrogate:											
Fluorobenzene						*78*	*75*	*63-124*			
SPIKE BLANKS											
Laboratory ID:	SB0628S1										
	SB	SBD	SB	SBD		SB	SBD				
Benzene	**0.885**	**0.901**	1.00	1.00		**89**	**90**	70-124	2	12	
Toluene	**0.897**	**0.915**	1.00	1.00		**90**	**92**	73-119	2	12	
Ethyl Benzene	**0.895**	**0.916**	1.00	1.00		**90**	**92**	74-117	2	12	
m,p-Xylene	**0.907**	**0.928**	1.00	1.00		**91**	**93**	75-117	2	13	
o-Xylene	**0.915**	**0.925**	1.00	1.00		**92**	**93**	75-116	1	12	
Surrogate:											
Fluorobenzene						*89*	*90*	*63-124*			

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Date of Report: July 6, 2017
Samples Submitted: June 27, 2017
Laboratory Reference: 1706-324
Project: P966-B17

% MOISTURE

Date Analyzed: 6-28-17

Client ID	Lab ID	% Moisture
75-1	06-324-01	23
75-2	06-324-02	26
75-3	06-324-03	22
75-4	06-324-04	25

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OnSite Environmental Inc.

Data Qualifiers and Abbreviations

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

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

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

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

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

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

I - Compound recovery is outside of the control limits.

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

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

L - The RPD is outside of the control limits.

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

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

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

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

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

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

Q - Surrogate recovery is outside of the control limits.

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

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

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

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

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

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

X - Sample extract treated with a mercury cleanup procedure.

X1- Sample extract treated with a Sulfuric acid/Silica gel cleanup procedure.

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

Z -

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

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Chain of Custody

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

Company: MGI ZH GROUP, INC.
Project Number: P966-BL7
Project Name: SCHLUETER RHFS
Project Manager: JDS
Sampled by: JDS

Turnaround Request (in working days)

(Check One)

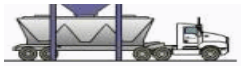
- ☐ Same Day
- ☐ 1 Day
- ☐ 2 Days
- ☐ 3 Days
- ☒ Standard (7 Days) (TPH analysis 5 Days)
- ☐ _____ (other)

Laboratory Number: 06-324

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	Number of Containers	NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-Gx	NWTPH-Dx (☐ Acid / SG Clean-up)	Volatiles 8260C	Halogenated Volatiles 8260C	EDB EPA 8011 (Waters Only)	Semivolatiles 8270D/SIM (with low-level PAHs)	PAHs 8270D/SIM (low-level)	PCBs 8082A	Organochlorine Pesticides 8081B	Organophosphorus Pesticides 8270D/SIM	Chlorinated Acid Herbicides 8151A	Total RCRA Metals	Total MTCA Metals	TCLP Metals	HEM (oil and grease) 1664A	% Moisture
1	75-1	27 JUN 17	1515	S	1		X																
2	75-2	↓	1520	↓	1		X																
3	75-3		1525		1		X																
4	75-4		1530		1		X																

	Signature	Company	Date	Time	Comments/Special Instructions
Relinquished		MGI	27 JUN 17	1610	
Received		OSE	6/27/17	1610	
Relinquished					
Received					
Relinquished					
Received					Data Package: Standard ☐ Level III ☐ Level IV ☐
Reviewed/Date		Reviewed/Date			Chromatograms with final report ☐ Electronic Data Deliverables (EDDs) ☐

Ticket List By Customer\Order\Product

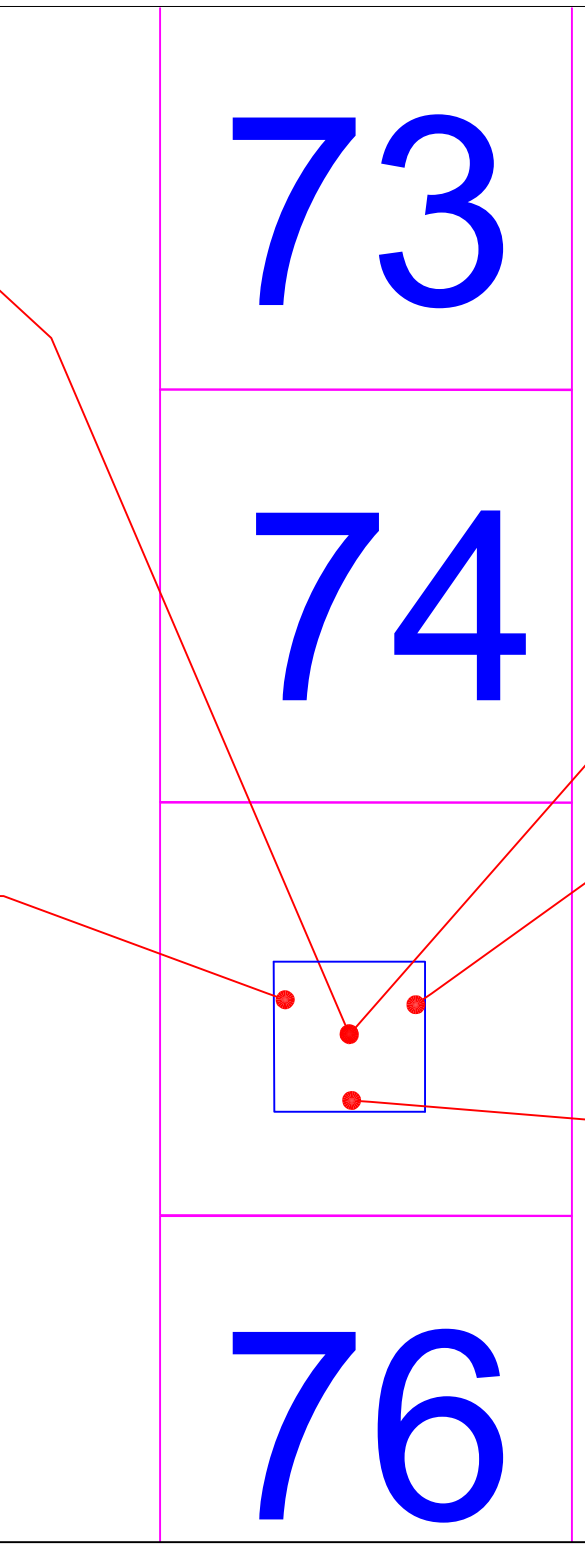


Date From 07/14/2017 **To** 07/19/2017
Location(s) 9571
Order: 41114475

Date	TicketNo	Delivery Address	Vehicle	TimeIn	TicketTime	Qty	Unit	Ship	Cash	Void
Scale Tickets										
CASH9571 AGG:CASH9571										
41114475										
1192508										
7/17/17	957100073	1515 196TH ST SE BOTHELL		0:00:00	12:31:25	2.51	TON		C	
Product Totals	**1**				**Qty**	**2.51**	**TON**			
Order Totals	**1**				**Qty**	**2.51**	**TON**			
Customer Totals	**1**				**Qty**	**2.51**	**TON**			
Grand Total		**1**			**Qty**	**2.51**	**TON**			

75 (6"-10")	
Gasoline	1,500 mg/Kg
Diesel	410 mg/Kg
Lube	430 mg/Kg
Benzene	0.11 mg/Kg
Ethyl- benzene	1.6 mg/Kg
Xylenes	16 mg/Kg
Pb	39 mg/Kg

75-3 (10"-16")	
Gasoline	ND (<7.5)
Benzene	ND (<0.02)
Toluene	ND (<0.075)
Ethyl Benzene	ND (<0.075)
Xylenes	ND (<0.150)



75-1 (10"-16")	
Gasoline	ND (<8.1)
Benzene	ND (<0.02)
Toluene	ND (<0.081)
Ethyl Benzene	ND (<0.081)
Xylenes	ND (<0.162)

75-2 (10"-16")	
Gasoline	ND (<7.3)
Benzene	ND (<0.02)
Toluene	ND (<0.073)
Ethyl Benzene	ND (<0.073)
Xylenes	ND (<0.146)

75-4 (10"-16")	
Gasoline	ND (<7.3)
Benzene	ND (<0.02)
Toluene	ND (<0.073)
Ethyl Benzene	ND (<0.073)
Xylenes	ND (<0.146)

Excavated Soil inside Sample Grid 75

N

6 0 6 12

APPROXIMATE SCALE IN FEET

Migizi Group, Inc.
17921 Bothell-Everett Hwy.
Suite 102
Bothell, WA 98012
425-398-2300
425-398-2333 fax
www.migizigroup.com

PROJECT: Schlueter RIFS

SHEET TITLE: Soil Excavation and Sampling Plan

DESIGNER: SKL	JOB NO. P966-B17
DRAWN BY: SKL	SCALE: As Shown
CHECKED BY: JDS	FIGURE: 3
DATE:November 3, 2017	FILE: 966 Figure 3.dwg