FINAL INTERIM ACTION WORK PLAN Former Chevron Service Station No. 90129 4700 Brooklyn Avenue NE, Seattle, WA

Prepared for: FH Brooklyn LLC & Chevron Environmental Management Company

Project No. 160092 • March 8, 2018 Final

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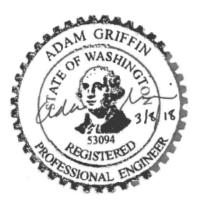
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Aspect Consulting, LLC



Adam Griffin, PE Senior Remediation Engineer agriffin@aspectconsulting.com

David A. Heffrer

Dave Heffner, PE Associate Remediation Engineer dheffner@aspectconsulting.com

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Contents

1	Int	oduction1	I
	1.1	Work Plan Organization2	2
2	Sit	e Description and Subsurface Conditions2	2
	2.1	Site Location and Description2)
	2.2	Site Geology and Hydrology	3
	2.3	Summary of Previous Cleanup Actions	3
		.3.1 UST Replacement and Soil Cleanup Action (1990)	
		.3.2 LNAPL Bailing	
		.3.3 Soil Vapor Extraction	
	2.4	LNAPL Occurrence	
	2.4	Soil Investigations and Proposed Cleanup Levels4	
	2.5	Groundwater Quality and Proposed Cleanup Levels	
	-		
3	Int	erim Action Summary6	
	3.1	Deep Soil Cleanup Level Exceedances6	
	3.2	Estimated Volume of Soil to be Removed7	/
4	Int	erim Action Elements7	,
	4.1	Construction and Safety Requirements7	7
	4.2	Monitoring Well Decommissioning8	3
	4.3	UST Removal8	3
	4.4	Soil Monitoring and Management8	3
	4	.4.1 Identification of Contaminated Soils8	
	-	4.2 Field Screening, Segregation, and Stockpiling9	
		.4.3 Soil Sampling and Analysis	
		.4.4 Soil Profiling and Off-Site Treatment/Disposal/Reuse	
	4.5	Dewatering and Water Management11	
5	Со	npliance Monitoring12	2
	5.1	Protection Monitoring12)
	5.2	Performance Monitoring13	3

6	Permits and Other Requirements	.13
7	Reporting	.15
8	Schedule	.15
9	References	.16
10	Limitations	.16

List of Tables

1	TPH and BTEX in Soil Exploration Samples
2	Other Analytes in Soil Exploration Samples

3 Groundwater Quality Results, November 2016

List of Figures

- 1 Site Location Map
- 2 Site Plan
- 3 Cross-Section B-B'
- 4 Cross-Section C-C'
- 5 Silt Layer Elevation Contours
- 6 GRO and Benzene Detections in Soil
- 7 Groundwater and LNAPL Conditions, November 2016

Appendices

- A Exploration Logs
- B Sampling and Analysis Plan/Quality Assurance Project Plan
- C Administrative Order Docket No. 15705
- D Health and Safety Plan
- E SEPA Checklist and Determination of Non-Significance

1 Introduction

Aspect Consulting, LLC (Aspect) presents this Interim Action Work Plan (Work Plan) for the former Chevron Service Station No. 90129 located at 4700 Brooklyn Avenue NE in Seattle, Washington (Site; Figure 1). The purpose of the interim action is to remove soils and groundwater impacted by petroleum hydrocarbons allowing for redevelopment of the property. These activities have been designed and will be conducted in full accordance with the Model Toxics Control Act (MTCA) implementing regulation found in Washington Administrative Code (WAC) 173-340 which "establishes administrative processes and standards to identify, investigate, and clean up facilities where hazardous substances have come to be located."

FH Brooklyn, LLC (FH Brooklyn) and Chevron Environmental Management Company (CEMC) are signatories to an Agreed Order (No. DE 13815, effective January 11, 2017) with the Washington State Department of Ecology (Ecology). The Agreed Order requires FH Brooklyn and CEMC to complete a remedial investigation (RI) and Feasibility Study (FS), and to complete a draft cleanup action plan (DCAP) for the Site. Under WAC-173-340-430, Ecology also permits implementation of interim actions when warranted. The Agreed Order requires FH Brooklyn and CEMC to complete a contaminated soil removal interim action.

Per the Agreed Order, the interim action is subject to:

- A draft work plan that outlines the proposed scope of work and schedule.
- Public review and comment.
- Ecology approval of the final work plan.

An Agency Review Draft Interim Action Work Plan was submitted to Ecology on August 18, 2017, and subsequently, a Public Review Draft Interim Action Work Plan was submitted to Ecology on October 16, 2017, addressing Ecology's comments. The public comment period for the IAWP and State Environmental Policy Act (SEPA) Determination of Non-Significance (DNS) was held from December 22, 2017, to January 22, 2018. Aspect formally requested a 15-day extension of the AO schedule for the Final IAWP in a February 21, 2018, letter (Aspect, 2018).

The first RI activities under the Agreed Order were completed in November 2016 by Aspect and documented in the On-Property Remedial Investigation Data Report dated January 17, 2017 (Aspect, 2017a). These RI activities were completed in accordance with the Ecology-approved Preliminary Draft Remedial Investigation Work Plan (Aspect, 2016) and consisted of investigations on the property necessary to design the interim action, specifically to establish the extent of petroleum-contaminated soil that exceeds MTCA Method A cleanup levels (CULs). The results are a design basis in this Work Plan and will also be incorporated into the Agreed Order-deliverable Remedial Investigation Report. For the purpose of this Work Plan, the Property refers to the 4700 Brooklyn Avenue NE tax parcel, and the Site is defined as wherever contamination has come to be located from releases on the Property.

A Final Remedial Investigation Work Plan (RIWP) was submitted on May 26, 2017, by Leidos on behalf of CEMC and in accordance with the requirements of the Agreed Order (Leidos, 2017). Ecology approved the Final RIWP on July 24, 2017. The objectives of this investigation are to address data gaps regarding the nature and extent of petroleum contamination in soil, groundwater, and soil vapor at the Site, and to comply with the requirements of Agreed Order No. DE 13815. The investigations proposed in the Final RIWP are off-Property and the results will be used to determine the full extent of the Site, as defined by WAC 173-340-200, and reported in the RI Report.

1.1 Work Plan Organization

This Work Plan is organized as follows:

- Section 2—Site Description and Subsurface Conditions
- Section 3—Interim Action Summary
- Section 4—Interim Action Elements
- Section 5—Compliance Monitoring
- Section 6—Permits and Approvals
- Section 7—Reporting
- Section 8—Schedule
- Section 9—References
- Section 10—Limitations

2 Site Description and Subsurface Conditions

2.1 Site Location and Description

The Site is located at 4700 Brooklyn Ave NE in the University District neighborhood in Seattle, Washington, and consists of King County Tax Parcel No. 8816400985 totaling approximately 0.38 acre (Figure 2). The Property and surrounding neighborhood is zoned for commercial/mixed use (Seattle Mixed U-District [SM-U 75-240]). Site topography is relatively flat, with ground surface ranging in elevation of approximately 214 to 217 feet above mean sea level (NAVD 88 vertical datum).

The Property is currently vacant. The former convenience store and fuel canopy remain at the Property pending demolition during the interim action. Gasoline service station operations began at the Property in the 1910s and ceased in November 2016. The most recent service station configuration (convenience store, pump islands, and fuel underground storage tanks [USTs]) is shown on Figure 2.

2.2 Site Geology and Hydrology

Fill is present in areas at the Property to a maximum depth of 15 feet below ground surface (bgs). Fill is primarily associated with station rebuilds and backfill of former UST removals. Native soils at the Property consist of fine to medium sand with silt and occasional gravel, grading from loose to dense from approximately 15 to between 25 to 30 feet bgs, where fill exists. The native soil (fine to medium sand) occurs at ground surface where no fill exists, generally outside the footprint of former USTs. Underlying the fine to medium sand unit, is hard gray silt that occurs at depths of 25 to 33 feet bgs and is greater than 2 feet thick at all boring locations. A north-south and east-west cross section are presented on Figures 3 and 4, respectively, showing the Site geology, UST features, and groundwater elevations. The boring and monitoring well logs from Site investigations (including the November 2016 on-Property RI activities) are provided in Appendix A.

The depth to groundwater observed at monitoring wells on the Property varies seasonally and typically ranges in depth from 15 to 18 feet bgs or approximately 198 to 202 feet above mean sea level. Abnormally shallow groundwater of 11 feet bgs was observed from July 2009 to June 2010 at multiple wells. The highest groundwater elevations are observed in November to May, during periods of high precipitation. Also, depths to groundwater of 21 to 26 feet bgs have infrequently been observed at the end of summer and early fall; the driest part of the year. Variability in groundwater levels corresponds to high and low precipitation periods, and the backfill in the former and current UST pits.

Historical groundwater depth-to-water measurements were reported using an arbitrary Site datum (SAIC, 2013); the existing Site monitoring wells were surveyed (vertical datum NAVD 88) in November 2016 and groundwater elevations reported in the On-Property Remedial Investigation Data Report (Aspect, 2017a).

Groundwater flow is predominantly to the southeast, with a more easterly direction of flow in the southern portion and southerly in the northern portion (Aspect, 2016). A southeasterly direction of groundwater flow is consistent with data from another gasoline-release site (the former 76 Station at 4557 Brooklyn Ave NE) located southwest of the Site. Horizontal hydraulic gradients at the Site range from 0.01 and 0.02 feet per foot (ft/ft).

2.3 Summary of Previous Cleanup Actions

2.3.1 UST Replacement and Soil Cleanup Action (1990)

Approximately 900 cubic yards of soil impacted with total petroleum hydrocarbons (TPH) were excavated and disposed of at a permitted landfill in the course of a service station renovation project in early 1990. The excavation area is shown on Figure 2. Three old USTs were removed from the northern portion of the excavation. In the course of digging the pit for three new 12,000-gallon USTs, a 1,000-gallon fuel UST was encountered in the southeast corner of the pit. That UST, which had been previously filled with pea gravel, was left in place when the new USTs were installed. Its approximate location is shown on Figure 2 along with that of the replacement USTs.

2.3.2 LNAPL Bailing

Fourteen groundwater monitoring wells (MW-01 through MW-14) were installed at the Site in January 1990, and light nonaqueous phase liquid (LNAPL) was observed floating on the groundwater in wells MW-04 and MW-12. LNAPL was intermittently removed from these two wells using a bailer. Approximately 32 gallons of LNAPL was reportedly removed through August 1990.

An LNAPL sample collected from MW-04 in early 1990 was submitted for laboratory analysis. It was quantified as weathered gasoline, with an API gravity of 52.5 (specific gravity of 0.769 at 60 degrees Celsius).

2.3.3 Soil Vapor Extraction

A soil vapor extraction (SVE) system began operating on the Property in May 1990. SVE wells included 10 of the 14 monitoring wells installed in January 1990 (all except MW-2, MW-5, MW-8, and MW-10) plus recovery well (R-01), installed in April 1990. Wells MW-4 and MW-12 also included air sparging via a 0.75-inch-diameter pipe installed inside the well casing to promote volatilization of LNAPL. Extracted soil vapors were treated in a thermal oxidizer.

Between May 1990 and June 1995, the SVE system removed an estimated 2,900 gallons of LNAPL. It is not known when the SVE system was shut down.

2.3.4 UST Decommissioning (2017)

The three USTs were decommissioned and permanently closed in February 2017 in accordance with Ecology UST regulations (WAC 173-360). Documentation of UST decommissioning (including UST Site Assessment Report and Checklist) activities was provided to Ecology's UST Section in a technical memorandum dated March 3, 2017 (Aspect, 2017b).

Existing Site monitoring wells within the footprint of UST infrastructure were abandoned on February 3, 2017, prior to UST decommissioning and in accordance with Ecology regulations (WAC 173-160-140). Monitoring wells MW- 1, MW-2, MW-4, MW-5, MW-8, MW-9, and recovery well (R-01) were abandoned (Figure 2).

2.4 LNAPL Occurrence

In addition to MW-04 and MW-12, LNAPL has been observed on at least one occasion in wells MW-03, MW-09, MW-10, MW-11, MW-13, and R-01 (refer to Figure 7). During the November 2016 event, LNAPL thicknesses of 0.98 foot and 0.11 foot were measured in wells MW-10 and MW-13, respectively, and LNAPL sheens (less than 0.01-foot thickness) were observed in wells MW-09, MW-11, and MW-12 (Figure 7).

2.5 Soil Investigations and Proposed Cleanup Levels

Between January/February 1990 and November 2016, borings were advanced on five occasions to investigate the lateral and vertical extent of petroleum-contaminated soil located on the Property. Soil samples collected from the borings were analyzed for the following petroleum hydrocarbon constituents:

- Total petroleum hydrocarbon (TPH) fractions: gasoline-range organics (GRO); diesel-range organics (DRO); and oil-range organics (ORO)
- The gasoline constituents: benzene, toluene, ethylbenzene, and total xylenes (BTEX)

Soil sampling results for the above analytes are summarized in Table 1. Selected soil samples were also analyzed for the following:

- Other volatile organic compounds (VOCs)
- Polychlorinated biphenyls (PCBs)
- Carcinogenic polycyclic aromatic hydrocarbons (cPAHs)
- The metals cadmium, chromium, lead, nickel, and zinc

Soil sampling results for these analytes are summarized in Table 2.

Tables 1 and 2 include the proposed soil cleanup levels for the Property and this interim action. Results that exceed those levels are highlighted in Tables 1 and 2. For all analytes that have Method A soil cleanup levels (for unrestricted land use) established under MTCA, those are the cleanup levels proposed for the interim action for the Property. MTCA Method B soil cleanup levels are proposed for analytes that do not have Method A cleanup levels; refer to the table footnotes.

As shown in Table 1, none of the soil samples have detections of DRO or ORO exceeding the corresponding cleanup levels. Only two samples, MW-3-18 and MW-4-15.5, have exceedances for toluene, ethylbenzene, and total xylenes. However, the magnitude of those exceedances is small compared to the magnitude of the GRO and benzene exceedances. Therefore, GRO and benzene are used for determining interim action excavation extent (which includes MW-3-18 and MW-4-15.5 sample locations with exceedances of toluene, ethylbenzene, and total xylenes). GRO and benzene concentrations detected in soil samples are depicted on Figure 6.

There are only two soil samples with concentrations exceeding cleanup levels for the analytes listed in Table 2:

- The naphthalene concentration detected in AB-6-17 (6.4 milligrams per kilogram [mg/kg]) is 1.3 times the corresponding cleanup level.
- The estimated total cPAH TEQ concentration detected in AB-7-6 (0.15 mg/kg) is 1.5 times the corresponding cleanup level.

Sample AB-6-17 has a much higher cleanup level exceedance for GRO (i.e., more than 30 times the GRO cleanup level).

2.6 Groundwater Quality and Proposed Cleanup Levels

Wells MW-01 through MW-14 were installed in early 1990, and wells MW-15 and MW-16 in early 2001 (monitoring well logs are provided in Appendix A.) These wells were sampled periodically from the time they were installed up until 2014. Groundwater samples were submitted for laboratory analysis of GRO, DRO, ORO, and BTEX. Starting in 2001, selected samples were also analyzed for the gasoline additive methyl tertiarybutyl ether (MTBE). If free product was present in the well at the time of monitoring, a groundwater sample was typically not collected.

Groundwater monitoring wells were sampled on November 21 and 22, 2016, for a broader range of constituents as described in the Preliminary Draft Remedial Investigation Work Plan (Aspect, 2016). Groundwater sampling results are summarized in Table 3 and on Figure 7. Figure 7 lists results for GRO, DRO, and benzene, since those are the analytes that exceeded proposed groundwater cleanup levels by the widest margins. Well MW-1 was not sampled due to an obstruction in the well. Well MW-8 was dry. Well MW-10 was not sampled due to the presence of measurable LNAPL. A sample was collected from below the LNAPL layer at MW-13 for VOC analysis to provide chlorinated VOC results.

The proposed groundwater cleanup levels for the Property for this interim action are listed in Table 3 (and on Figure 7 for GRO, DRO, and benzene). Results that exceed those levels are highlighted.

3 Interim Action Summary

The petroleum-contaminated soil removal interim action will allow for property redevelopment. Shoring will be installed to enable removal of contaminated soils above the proposed cleanup levels within the Property. For the purposes of this Work Plan, the average total excavation depth is assumed to be 24 feet bgs. The excavation may extend deeper at select locations where exceedances of proposed soil cleanup levels were identified, and where performance monitoring indicates exceedances. Excavated soils will be tested and, based on test results, will be screened for transport and disposal off-Property. Areas that are excavated below the final development depth will be backfilled with excavated soil suitable for reuse or clean, imported fill, and compacted for development requirements.

3.1 Deep Soil Cleanup Level Exceedances

The nine explorations advanced during the November 2016 Site investigation (AB-01 through AB-09) are the only Site explorations for which soil samples at or below 24-foot depth were submitted for laboratory analysis. As shown on Figure 6, soil cleanup level exceedances were detected at or below 24-foot depth in 4 explorations:

- AB-02 Benzene exceedance at 24-foot depth
- AB-06 Benzene exceedance at 24-foot depth
- AB-07 Benzene exceedance at 33-foot depth
- AB-09 Benzene exceedance at 27-foot depth

While AB-06 and AB-07 were drilled in an area of known historical release and LNAPL presence, AB-02 and AB-09 are situated along the eastern property boundary. Benzene

was not detected in any of the soil samples collected above 24-foot depth at AB-02 or above 27-foot depth at AB-09.

3.2 Estimated Volume of Soil to be Removed

Targeted soil excavation below the assumed 24-foot depth will be necessary to achieve the interim action goal of removing all soil cleanup level exceedances on the Property. This targeted excavation will occur at boring locations AB-07 and AB-09 to depths of at least 33 and 27 feet bgs, respectively (Figure 6).

Based on the above evaluation, exceedances of proposed soil cleanup levels extend down to the top of the silt layer in some areas. Figure 5 shows depths to the silt layer at all explorations that encountered that layer, based on soil classification during drilling. Those depths range from 25 feet at MW-16 to 33 feet at AB-01. Assuming an average total excavation depth of 24 feet, an estimated 26,000 tons of soil will be excavated during the interim action. Based on the available soil characterization data, an estimated 6,300 tons of this soil will be categorized as contaminated and an estimated 14,800 tons will be clean. The balance of soil will be Category 2 or "impacted," an estimated 4,900 tons. These estimated soil quantities are used for planning purposes; actual soil quantities will be determined during construction, based on methods described in Section 4.4.2.

The known clean and contaminated soil, based on Site characterization results (Figure 6), will be direct-loaded (to the extent possible) and transported to the appropriate, permitted disposal facility. All other soils will be managed as described in Section 4.4 and in accordance with Ecology's Guidance for Remediation of Petroleum Contaminated Sites. Additional construction detail will be included in the Environmental Construction Management Plan (ECMP) under separate cover.

4 Interim Action Elements

This section describes specific work elements of the interim action.

4.1 Construction and Safety Requirements

A traffic control plan will be implemented to minimize transportation impacts during the interim action. The traffic control plan will be prepared by the construction contractor and submitted to the City of Seattle for review and approval.

The following is a summary of construction and safety requirements to be employed at the Site when contamination is encountered during redevelopment construction:

• All persons performing Site activities where they may contact hazardous materials, including petroleum hydrocarbon-impacted soil or groundwater, must have completed Hazardous Waste Operations and Emergency Response (HAZWOPER) training in accordance with the Occupational Safety and Health Administration Part 1910.120 of Title 29 of the Code of Federal Regulations, and be in possession of a current HAZWOPER certification card.

- All work must be performed in accordance with the contractor's site-specific health and safety plan (HASP). The HASP includes guidelines to reduce the potential for injury, as well as incident preparedness and response procedures, emergency response and evacuation procedures, local and project emergency contact information, appropriate precautions for potential airborne contaminants, and Site hazards, and expected characteristics of generated waste. The general contractor will operate under its own HASP, as will any subcontractor performing site activities where hazardous materials may be contacted. The Aspect HASP establishes procedures and practices to protect employees of Aspect from potential hazards associated with interim action activities (Appendix D).
- A safety meeting will be conducted prior to the start of each workday to inform workers of changing work conditions, and to reinforce key safety requirements.

All work must be conducted in a manner consistent with federal, state, and local construction and health and safety standards applicable to the Site and to the work being performed. All companies are responsible for the health and safety of their own workers.

4.2 Monitoring Well Decommissioning

As discussed in Section 2.3.4, seven wells were abandoned in February 2017 prior to UST decommissioning. Before excavation commences, the remaining on-Property monitoring wells will be decommissioned in accordance with WAC 173-160-460. Additional monitoring wells are to be installed outside the footprint of the soil excavation and off-Property as described in the Final RIWP (Leidos, 2017) and will be used to monitor dewatering progress as discussed in Section 4.5.

4.3 UST Removal

As noted in Section 2.1 and shown on the attached figures, the three fuel USTs in the southwest portion of the property were removed in February 2017. The remaining 1,000-gallon UST, previously abandoned in place, will be removed during the interim action in accordance with Ecology's UST regulations (WAC 173-360-200 and WAC 173-360-385). If any additional USTs are encountered during soil excavation activities, they will be removed in accordance with Ecology's UST regulations.

4.4 Soil Monitoring and Management

4.4.1 Identification of Contaminated Soils

An Aspect field representative will be on-Site full-time to monitor excavation activities for evidence of unanticipated contamination. Criteria to be used include, but are not limited to:

- Petroleum hydrocarbon staining, sheen, or chemical color hues in soil or standing water.
- The presence of separate-phase petroleum hydrocarbon product or other chemicals.
- The presence of utility pipelines with sludge or trapped liquid indicating petroleum hydrocarbon or chemical discharge sludge.

- The presence of buried pipes, conduits, or tanks.
- Vapors causing eye irritation or nose tingling or burning.
- The presence of gasoline- or oil-like odors.

The remainder of Section 4.4 discusses monitoring and management protocols for soils contaminated with petroleum hydrocarbons, since those are the contaminants known to be present in Site soils. Soils impacted with petroleum hydrocarbons will be managed in accordance with Ecology's *Guidance for Remediation of Petroleum Contaminated Sites* (Ecology, 2016a). If other soil contaminants or other conditions are encountered, an appropriate environmental response will be developed on a case-by-case basis.

4.4.2 Field Screening, Segregation, and Stockpiling

Based on the results of the November 2016 investigation (Figure 6), the excavated soils will be handled as:

- Clean (Category 1) Petroleum hydrocarbon contaminant concentrations are not detected and there is no odor, staining, or visible sheen. Generally, soils less than 13 feet bgs are expected to be clean based on the nondetect analytical results.
- Impacted (Category 2) Petroleum hydrocarbon contaminants are detected below MTCA Method A cleanup levels.
- Contaminated (Categories 3 and 4) Petroleum hydrocarbon contaminants are detected above MTCA Method A cleanup levels. The soils between depths of 13 and 24 feet bgs are where the most contamination is observed as expected (smear zone associated with LNAPL and groundwater table fluctuations).

When evidence of petroleum hydrocarbon-contaminated soil is encountered (and no analytical data available), an Aspect field representative will use visual and PID field screening techniques to assess the extent of contamination, and instruct the contractor in segregation of impacted and contaminated soils. The segregation of soils will follow Ecology guidance (Ecology, 2016a).

Excavated soils that are known to be contaminated based on analytical data presented herein (or field-determined) may be direct-loaded and hauled to the selected off-Site treatment/disposal facility. It may be necessary to temporarily stockpile soils for final categorization and subsequent handling based on laboratory analytical results. All temporary stockpiles will be below grade (within the excavation); however, any stockpiling will include the following requirements:

- All stockpiles will be lined with plastic sheeting of 10-mil minimum thickness, with adjacent sheeting sections overlapping a minimum of 3 feet.
- The perimeter of stockpiles will be surrounded by a berm to prevent run-on and/or runoff of precipitation.
- All stockpiles will be covered with plastic sheeting of 6-mil minimum thickness when not in use, and the cover will be anchored to prevent it from being disturbed by wind.

4.4.3 Soil Sampling and Analysis

In addition to field screening, Aspect will collect soil samples for laboratory analysis. Soil samples may be collected for the following reasons:

- To document contaminant concentrations in soils that are excavated.
- To determine disposal location of stockpiled soils.
- To determine whether contaminant concentrations in soils that are left in place comply with cleanup levels. Performance monitoring is described in Section 5.2.

Soil sampling and analysis will be conducted in accordance with the project-specific Sampling and Analysis Plan/Quality Assurance Project Plan (SAP/QAPP), provided as Appendix B. Environmental data validation will be performed using Ecology's TCP Data Validation and Sampling Analysis Plan (SAP)/Quality Assurance Project Plan (QAAP) for data validation for all Formal Cleanup Sites (Ecology, 2016b). Data validation will be performed at Quality Assurance Level 2 (EPA2) with Third-Party Data Validation.

Soil samples for laboratory analysis will be collected using U.S. Environmental Protection Agency (EPA) Method 5035 sampling kits. Discrete grab samples will be submitted for analysis so that contaminant variability can be evaluated. Field screening techniques will generally be used to help ensure that a "worst-case" sample is collected for analysis. If a backhoe is used to collect the sample (e.g., when it is unsafe for the sampler to enter the excavation), care will be taken to ensure the backhoe bucket is clean of other soil before sampling. "Fresh" soils will be exposed just prior to sampling (to limit contaminant loss to volatilization), and the soil sample will be collected from the middle of the bucket, from soils that have not contacted the sides of the bucket. If sampling personnel are able to safely access the sampling location, a hand auger or shovel will be used to expose "fresh" soils just prior to sampling.

All laboratory analyses will include the following:

- GRO by Northwest Method NWTPH-Gx
- DRO and ORO by Northwest Method NWTPH-Dx
- BTEX by EPA Method 8021B

Additionally, select samples will be analyzed for the following from soils in the vicinity of AB-6 and AB-7:

- Naphthalene by EPA Method 8260
- Carcinogenic polycyclic aromatic hydrocarbons (cPAHs) by EPA Method 8270D

The overall scope of soil sampling and analysis activities will depend on field screening results, stockpile soil volumes, and treatment/disposal facility profiling requirements. The planned soil analytical is described below in Section 5.2 – Performance Monitoring.

4.4.4 Soil Profiling and Off-Site Treatment/Disposal/Reuse

All excavated soils with evidence of potential contamination will be characterized, primarily by laboratory analysis of representative samples, to determine off-Site treatment/disposal/reuse options. Contaminated and Impacted soils will be disposed of at

an appropriate, permitted disposal facility. Each landfill and treatment/disposal facility has its own waste acceptance criteria, and soil must be "profiled" to determine whether those criteria are met. The selected disposal facilities will be identified in the CMP. All soil segregation, profiling, and disposal will be conducted in accordance with Ecology guidance (Ecology, 2016a).

Aspect, in cooperation with the contractor, will be responsible for:

- Submitting representative soil samples for laboratory analysis and evaluating results to determine cost-effective treatment/disposal/reuse options.
- Identifying candidate landfills and treatment/disposal facilities, and interfacing with facility representatives to complete the soil profiling/acceptance process.

Contaminated soils shall be "preapproved" for acceptance at the selected treatment/disposal facility before soil excavation begins. Laboratory results from soil sampling conducted during the November 2016 Site investigation may be accepted by treatment/disposal facilities for this purpose. These actions will be completed prior to construction and the outcome presented in the CMP. Additionally, Aspect will be responsible for:

• Providing soil loadout assistance to ensure that all paperwork (waste manifests, bills of lading, soil tickets) is in place, monitor soil loadout, and track final soil disposition.

4.5 Dewatering and Water Management

Dewatering is necessary to advance the soil excavation to the target depths. Water generated during the interim action will consist of groundwater from the perimeter well-point system and sump dewatering,¹as well as any stormwater entering the excavation. A subset of the monitoring wells proposed in the Final RIWP will be monitored to track dewatering progress and detect any changes in water quality (Leidos, 2017). Four of the proposed monitoring wells will be gauged daily during dewatering activities to monitor the propagation of drawdown outside of the excavation. Additionally, these four wells will be sampled weekly during initial dewatering activities and analyzed for GRO, DRO, ORO, and VOCs (EPA Method 8260). Once steady-state conditions are established, the sampling frequency will be reduced to monthly. The monitoring results and any changes to the monitoring will be communicated to Ecology at a minimum frequency of monthly.

All generated water will be pumped to tanks, pretreated on-Site, and discharged to surface water via storm sewer under a Construction Stormwater General Permit (CSWGP) and accompanying Administrative Order Docket No. 15707 (Appendix C) issued through Ecology Water Quality Section. The CSWGP Permit Number WAR306191 will be issued on or around March 19, 2018, after the public notice period closes. The Administrative Order establishes Indicator Levels for the project based on known Site contaminants for compliance with Water Quality Standards for the Surface Water of the State of Washington. The Administrative Order defines the conditions and

¹ A dewatering plan developed by The Riley Group, Inc. (RGI, 2016) includes well points installed at 15-foot spacing around the property perimeter.

actions necessary to comply with CSWGP WAR306191, including the installation of a temporary treatment system to treat water to be discharged to below Indicator Levels (Appendix C).

The on-Site pretreatment system will include an oil/water separator to remove any LNAPL and granular activated carbon (if required) to remove dissolved-phase contaminants to achieve the Administrative Order Indicator Levels. The discharge will be monitored in accordance with CSWGP WAR306191 and Administrative Order No. 15707. If unanticipated liquid-phase contamination is encountered that is outside the scope of the discharge authorization, Aspect will assist the contractor in evaluating treatment/disposal options that comply with Ecology and local requirements.

5 Compliance Monitoring

In accordance with WAC 173-340-410, compliance monitoring includes the following elements:

- **Protection monitoring** confirms that human health and the environment are adequately protected during the cleanup action.
- **Performance monitoring** confirms that the cleanup action has attained cleanup levels and/or other performance standards, such as permit requirements.
- **Confirmation monitoring** confirms the long-term effectiveness of the cleanup action once cleanup levels and/or other performance standards have been attained.

For this interim action, protection and performance monitoring will be conducted, as outlined below. Confirmation monitoring will be conducted as part of the final cleanup action for the Site, not as part of this interim action.

5.1 Protection Monitoring

Protection monitoring will be conducted during the interim action by requiring that on-Site workers conducting the soil handling and management are appropriately trained in hazardous waste operations and follow applicable HASPs prepared specifically for this interim action project. Aspect's HASP for the interim action is provided as Attachment D. The general contractor will operate under its own HASP, as will any subcontractor performing Site activities where hazardous materials may be contacted.

Protection monitoring includes real-time air monitoring within the worker breathing zone and at the downgradient property boundary. Air monitoring to be performed by Aspect is discussed in Aspect's HASP. Air monitoring data will be made available to on-Site workers and Ecology. Nothing in this Work Plan precludes contractors/consultants on-Site from choosing to conduct additional air monitoring.

5.2 Performance Monitoring

Performance monitoring will include laboratory analysis of both excavation sidewall and excavation bottom samples. The distance between samples will not exceed 20 feet, and closer sample spacing may be necessary. The samples will be submitted for laboratory analysis of parameters described in Section 4.3.3 and in accordance with the SAP/QAPP (Appendix B).

Once the assumed excavation depth of 24 feet bgs is reached, additional soil will be excavated at the four locations where soil cleanup level exceedances (for benzene) were detected at or below 24-foot depth (refer to Section 3.2 and Figure 6). Targeted excavations at these locations will extend to approximately 1 foot below the depths at which the benzene exceedances were detected (i.e., to 25 feet at AB-02 and AB-06; to 28 feet at AB-09; and to 34 feet at AB-07). Given the proximity to the Property perimeter of AB-02, AB-09, and AB-07, the temporary shoring-wall design (aligned on the Property boundary) was designed deeper at these locations to allow excavation of these contaminated soils. One bottom sample and four sidewall samples² from each targeted excavation³ will be collected and submitted for BTEX analysis. If cleanup levels are exceeded in any sample, and if constructible, the localized excavation may be extended laterally an additional 2 feet in that direction and a second round samples will be submitted for BTEX analysis. The temporary shoring-wall design will not allow excavation greater than 1 foot deeper than the contaminated soil sample depth.

For performance monitoring of the assumed excavation bottom at 24 feet bgs, Aspect will establish a three-by-four sampling grid that divides the excavation bottom into twelve equal-area rectangles with dimensions of approximately 34 feet by 40 feet. Within each rectangular area, Aspect will field-screen the soil for evidence of contamination, and samples will be collected for laboratory analysis of GRO and BTEX at up to four locations where contamination is potentially indicated. If there are no indications of contamination within the entire rectangular area, a single soil sample will be collected for analysis from the approximate center of the rectangle. Where sampling results indicate cleanup level exceedances in the bottom samples, and if feasible, soil may be overexcavated and resampled, following the procedure outlined above, until all sampling results are at or below the proposed cleanup levels.

6 Permits and Other Requirements

The following permits and/or other requirements are required for this soil removal interim action:

² Sidewall samples will be collected at the four cardinal compass points, near the base of the excavation.

³ If field-screening indicates the presence of contamination, Aspect may recommend that an excavation be further extended laterally prior to sample collection. However, this is unlikely, given the low concentrations detected in the November 2016 samples.

- Grading permit and SSPTD from the City of Seattle. The grading permit application, prepared by Caron Architecture, has been accepted by the City of Seattle Department of Construction and Inspections (Project No. 6499919).
- There are low levels of detections of chlorinated solvent degradation products (cis-1,2 Dichloroethene and vinyl chloride) in groundwater in the southwestern corner of the Property, where soil is contaminated with petroleum hydrocarbons. There is one detection of cis-1,2 Dichloroethene in soil at 29 feet bgs. The source of these detections is unknown and there is no known listed hazardous waste generator. The maximum soil excavation depth at that location of the cis-1,2 Dichlorethene detection in soil is 24 feet bgs. All Site COCs present in groundwater that could designate dangerous waste, also have Indicator Limits in the Administrative Order that, in all cases, are significantly less than any and all dangerous waste listing criteria.

Aspect conducted thorough review of these data in light of Ecology's Dangerous Waste Regulations (WAC 173-303) and have self-designated the excavated soil, and treated water as nondangerous requiring no special handling, disposal, or discharge requirements. As there is not regulated dangerous waste being generated, the need for a Contained in Determination is precluded. These data were presented to and discussed with Ecology Dangerous Waste staff on January 17, 2018, who emphasized that designation is the responsibility of the generator, not Ecology, but verbally agreed with this basis of designation.

- All generated water will be pretreated and discharged to surface water via storm sewer under a Construction Stormwater General Permit (CSWGP) and accompanying Administrative Order Docket No. 15707 (Appendix C) issued through Ecology Water Quality Section. The CSWGP Permit Number WAR306191 will be issued on or around March 19, 2018, after the public notice period closes.
- Approvals from the treatment/disposal facilities receiving the excavated soils that are not suitable for reuse. Aspect is responsible for obtaining the treatment/disposal facility approvals and the selected facilities will be identified in the CMP.
- Compliance with SEPA, Chapter 43.21C RCW, will be achieved by conducting a SEPA review in accordance with applicable regulatory requirements, including WAC 197-11-268 (Ecology, 2014). A SEPA checklist was submitted to Ecology on April 5, 2017. Ecology issued a DNS on December 8, 2017, and held a public comment period for the DNS (and the Public Review Draft Interim Action Work Plan) from December 22, 2017 January 22, 2017. Both the SEPA Checklist and Ecology's DNS are included in Appendix E.

7 Reporting

Upon completion of the interim action and in accordance with the Agreed Order, an Agency Review Draft Interim Action Report will be submitted within 60 days of receipt of all analytical data. The Report will describe the methods and outcome of the interim action, will be prepared and submitted to Ecology for review and comment. Ecology's comments will be incorporated into the Final Interim Action Report.

Pursuant to WAC 173-340-840(5), all sampling data shall be submitted to Ecology in both printed and electronic formats in accordance with Section VII (Work to be Performed), Ecology's Toxics Cleanup Program Policy 840 (Data Submittal Requirements), and/or any subsequent procedures specified by Ecology for data submittal.

8 Schedule

Aspect submitted a letter to Ecology on May 10, 2017, requesting an extension to the schedule for initiating the Interim Action. The requested extension to initiate by no later than March 15, 2018, was approved by Ecology on July 10, 2017. It is estimated that the Interim Action total construction duration is two to three months. It is also expected that the RI activities proposed in the Final RIWP (Leidos, 2017) will be conducted prior to initiation of the Interim Action. The start date of Interim Action subsurface excavation will be confirmed to Ecology once the final permits or authorizations are obtained/confirmed for the CSWGP and from the City of Seattle.

9 References

- Aspect Consulting, LLC (Aspect), 2016, Preliminary Draft Remedial Investigation Work Plan, 4700 Brooklyn Ave., Seattle, Washington, November 4, 2016.
- Aspect Consulting, LLC (Aspect), 2017a, Technical Memorandum to Washington State Department of Ecology (D. Myers) Re: On-Property Remedial Investigation Data Report, 4700 Brooklyn Avenue NE, Seattle, Washington, January 17, 2017.
- Aspect Consulting, LLC (Aspect), 2017b, Technical Memorandum to Washington State Department of Ecology – UST Section Re: UST Site Assessment Report and Checklist, Chevron 90129 (UST ID No. 5046), 4700 Brooklyn Avenue NE, Seattle, Washington, March 3, 2017.
- Aspect Consulting, LLC (Aspect), 2018, Re: Final Interim Action Work Plan Schedule Extension, 4700 Brooklyn Avenue NE (Chevron 90129), Seattle, Washington, February 21, 2018.
- Leidos, 2017, Final Remedial Investigation Work Plan, Former Chevron Station No. 90129, May 26, 2017.
- SAIC, 2013, First Quarter 2013 Ground water Monitoring and Sampling Report, Chevron Service Station No. 9-0129, July 10, 2013.
- The Riley Group, Inc. (RGI), 2016, Chevron Station No. 9-0129 Dewatering Plan, 4700 Brooklyn Avenue Northeast, Seattle, Washington, January 27, 2016.
- Washington State Department of Ecology (Ecology), 2004, Toxics Cleanup Program Policy 130A, Coordination of SEPA and MTCA, Revised July 28, 2004.
- Washington State Department of Ecology (Ecology), 2016a, Guidance for Remediation of Petroleum Contaminated Sites, Ecology Publication No. 10-09-057, Revised June 2016.
- Washington State Department of Ecology (Ecology), 2016b, TCP Data Validation and Sampling Analysis Plan (SAP)/ Quality Assurance Project Plan (QAPP), September 23, 2016.

10Limitations

Work for this project was performed for FH Brooklyn (Client), and this report was prepared in accordance with generally accepted professional practices for the nature and conditions of work completed in the same or similar localities, at the time the work was performed. This report does not represent a legal opinion. No other warranty, expressed or implied, is made. All reports prepared by Aspect Consulting for the Client apply only to the services described in the Agreement(s) with the Client. Any use or reuse by any party other than the Client is at the sole risk of that party, and without liability to Aspect Consulting. Aspect Consulting's original files/reports shall govern in the event of any dispute regarding the content of electronic documents furnished to others.

TABLES

Table 1. TPH and BTEX in Soil Exploration Samples4700 Brooklyn Avenue NE, Seattle, WA 160092

Exploration ID/Date	Proposed Cleanup			AB-1/Nov	2016					AB-2/N	lov 2016				AB-3/N	ov 2016	
Sample ID	Levels	AB-1-8	AB-1-14	AB-1-19	AB-1-24	AB-1-29	AB-1-35	AB-2-6	AB-2-10	AB-2-14	AB-2-17.5	AB-2-24	AB-2-28	AB-3-4	AB-3-8	AB-3-14	AB-3-19
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	8 ft	14 ft	19 ft	24 ft	29 ft	35 ft	6 ft	10 ft	14 ft	17.5 ft	24 ft	28 ft	4 ft	8 ft	14 ft	19 ft
Total Petroleum Hydrocarbons in mg/kg																	
Gasoline Range Organics	30	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	6.6	2 U	2 U	2 U	3	2 U
Diesel Range Organics	2,000	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Motor Oil Range Organics	2,000	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U
BTEX Compounds in mg/kg																	
Benzene	0.03	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.053	0.02 U	0.02 U	0.02 U	0.05	0.02 U
Ethylbenzene	6	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.33	0.02 U	0.02 U	0.02 U	0.067	0.02 U
Toluene	7	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.05	0.02 U	0.02 U	0.02 U	0.26	0.02 U
Total Xylenes	9	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	1	0.06 U	0.06 U	0.068	0.17	0.06 U

Exploration ID/Date	Proposed Cleanup	AB-3/Nov 2016			AB-4/N	ov 2016					1	AB-5/Nov 201	6			AB-6/N	lov 2016
Sample ID	Levels	AB-3-24	AB-4-6	AB-4-10	AB-4-16.5	AB-4-19	AB-4-24	AB-4-29	AB-5-5	AB-5-10	AB-5-14	AB-5-19	AB-5-24	AB-5-29	AB-5-32	AB-6-8	AB-6-13
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	24 ft	6 ft	10 ft	16.5 ft	19 ft	24 ft	29 ft	5 ft	10 ft	14 ft	19 ft	24 ft	29 ft	32 ft	8 ft	13 ft
Total Petroleum Hydrocarbons in mg/kg																	
Gasoline Range Organics	30	2 U	2 U	2 U	16	2 U	2 U	2 U	2 U	2 U	2 U	4	5.3	2 U	2 U	11	2 U
Diesel Range Organics	2,000	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Motor Oil Range Organics	2,000	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	400
BTEX Compounds in mg/kg																	
Benzene	0.03	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Ethylbenzene	6	0.02 U	0.02 U	0.02 U	0.068	0.02 U	0.068	0.041	0.02 U	0.02 U	0.02 U	0.056	0.14	0.02 U	0.02 U	0.02 U	0.02 U
Toluene	7	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Total Xylenes	9	0.06 U	0.06 U	0.06 U	0.15	0.06 U	0.09	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U

Exploration ID/Date	Proposed Cleanup		AB-6/Nov	/ 2016					AB-7/Nov 2016	5					AB-8/Nov 2010	6	
Sample ID	Levels	AB-6-24	AB-6-17	AB-6-29	AB-6-33	AB-7-6	AB-7-10	AB-7-14	AB-7-19	AB-7-24	AB-7-29	AB-7-33	AB-8-6	AB-8-10	AB-8-14	AB-8-18	AB-8-24
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	24 ft	17 ft	29 ft	33 ft	6 ft	10 ft	14 ft	19 ft	24 ft	29 ft	33 ft	6 ft	10 ft	14 ft	18 ft	24 ft
Total Petroleum Hydrocarbons in mg/kg																	
Gasoline Range Organics	30	3.9	920	2 U	2 U	2 U	2 U	2 U	1,100	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U
Diesel Range Organics	2,000	50 U	840	50 U	50 U	110 X	50 U	50 U	480 X	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Motor Oil Range Organics	2,000	250 U	250 U	250 U	250 U	1900	250 U	250 U	250 U	250 U	250 U	250 U	780	250 U	250 U	250 U	250 U
BTEX Compounds in mg/kg																	
Benzene	0.03	0.12	0.02 UJ	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.15 J	0.024	0.02 U	0.09	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Ethylbenzene	6	0.39	0.1 U	0.087	0.02 U	0.02 U	0.02 U	0.02 U	8.2	0.16	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Toluene	7	0.02 U	0.1 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	4.3	0.02 U	0.02 U	0.074	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Total Xylenes	9	0.073	1.5	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	7.5	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U

Exploration ID/Date	Proposed Cleanup	AB-8/Nov	v 2016			AB-9/N	ov 2016			MW-01/	/Jan 1990	MW-02/	/Jan 1990	MW-03/	Jan 1990	MW-04	/Jan 1990
Sample ID	Levels	AB-8-29	AB-8-33	AB-9-5	AB-9-8	AB-9-14	AB-9-19	AB-9-24	AB-9-27	MW-1-7	MW-1-13	MW-2-8	MW-2-13	MW-3-13	MW-3-18	MW-4-15.5	MW-4-20.5
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	29 ft	33 ft	5 ft	8 ft	14 ft	19 ft	24 ft	27 ft	7 ft	13 ft	8 ft	13 ft	13 ft	18 ft	15.5 ft	20.5 ft
Total Petroleum Hydrocarbons in mg/kg																	
Gasoline Range Organics	30	2 U	2 U	2.5	2 U	2 U	2.8	2 U	2 U	ND	ND	ND	ND	ND	5,568	3,267	ND
Diesel Range Organics	2,000	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	ND	ND	ND	ND	ND	ND	ND	ND
Motor Oil Range Organics	2,000	250 U	250 U	520	250 U	250 U	250 U	250 U	250 U								
BTEX Compounds in mg/kg																	
Benzene	0.03	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.06	ND	ND	ND	ND	ND	27.1	1.58	ND
Ethylbenzene	6	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.039	0.02 U	0.02 U	0.1	ND	0.12	0.14	ND	88.1	9.71	ND
Toluene	7	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	ND	ND	ND	ND	ND	327	31.1	ND
Total Xylenes	9	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.28	0.18	0.14	0.31	0.21	614	52.6	ND

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Table 1 Interim Action Work Plan Page 1 of 2

Table 1. TPH and BTEX in Soil Exploration Samples

4700 Brooklyn Avenue NE, Seattle, WA 160092

Exploration ID/Date	Proposed Cleanup	MW-0	5/Jan 1990	MW-06/Ja	n 1990	MW-07/	Jan 1990	MW-08/	'Jan 1990	MW-09/	/Jan 1990	MW-10	/Jan 1990
Sample ID	Levels	MW-5-5.5	MW-5-10.5	MW-6-10.5	MW-6-15.5	MW-7-8	MW-7-13	MW-8-13	MW-8-18	MW-9-8	MW-9-13	MW-10-8	MW-10-13
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	5.5 ft	10.5 ft	10.5 ft	15.5 ft	8 ft	13 ft	13 ft	18 ft	8 ft	13 ft	8 ft	13 ft
Total Petroleum Hydrocarbons in mg/kg													
Gasoline Range Organics	30	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Diesel Range Organics	2,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Motor Oil Range Organics	2,000												
BTEX Compounds in mg/kg													
Benzene	0.03	ND	ND	ND	ND	ND	0.17	ND	ND	ND	ND	ND	ND
Ethylbenzene	6	ND	ND	ND	ND	ND	0.17	ND	ND	ND	ND	ND	ND
Toluene	7	ND	ND	ND	ND	ND	0.25	ND	ND	ND	ND	ND	ND
Total Xylenes	9	ND	ND	ND	ND	ND	0.93	0.18	ND	0.33	ND	ND	ND

Exploration ID/Date	Proposed Cleanup	MW-11	L/Jan 1990	MW-12/Ja	n 1990	MW-13/.	Jan 1990	MW-14/	'Feb 1990	MW-15/Mar 2001	MW-16/Mar 2001
Sample ID	Levels	MW-11-13	MW-11-18	MW-12-13	MW-12-23	MW-13-8	MW-13	MW-14-10	MW-14-15	MW-15-15	MW-16-15
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	13 ft	18 ft	13 ft	23 ft	8 ft	13 ft	10 ft	15 ft	15 ft	15 ft
Total Petroleum Hydrocarbons in mg/kg											
Gasoline Range Organics	30	ND	ND	ND	45	ND	ND	ND	ND	5 U	5 U
Diesel Range Organics	2,000	ND	ND	ND	ND	ND	ND	ND	ND	10 U	
Motor Oil Range Organics	2,000									25 U	
BTEX Compounds in mg/kg											
Benzene	0.03	ND	ND	ND	0.77	ND	ND	ND	ND	0.05 U	0.05 U
Ethylbenzene	6	ND	ND	ND	1.44	ND	ND	ND	ND	0.05 U	0.05 U
Toluene	7	ND	0.14	ND	1.19	ND	0.12	ND	ND	0.05 U	0.05 U
Total Xylenes	9	ND	0.34	0.18	7.24	ND	0.35	ND	ND	0.1 U	0.1 U

Exploration ID/Date	Proposed Cleanup	P2/Feb 2015	P3/Feb 2015	P4/Feb 2	015	P6/Fe	b 2015	P7/Feb 2015	P8/Feb 2015	SB-1/0	ct 2010
Sample ID	Levels	P2-5	P3-5	P4-10	P4-15	P6-5	P6-13	P7-15	P8-14	SB-1-15	SB-1-17.5
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	5 ft	5 ft	10 ft	15 ft	5 ft	13 ft	15 ft	14 ft	15	17.5
Total Petroleum Hydrocarbons in mg/kg											
Gasoline Range Organics	30	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	1.2 U	1.3 U
Diesel Range Organics	2,000	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	3.3U	3.6 U
Motor Oil Range Organics	2,000	250 U	250 U	250 U	250 U	250 U	250 U	250 U	250 U	11 U	12 U
BTEX Compounds in mg/kg											
Benzene	0.03	0.02 U	0.02 U	0.032	0.025	0.02 U	0.063	0.02 U	0.02 U	0.0006 U	0.0005 U
Ethylbenzene	6	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.001 U	0.001 U
Toluene	7	0.02 U	0.02 U	0.14	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.001 U	0.001 U
Total Xylenes	9	0.06 U	0.06 U	0.10	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.001 U	0.001 U

J Analyte was positively identified. The reported result is an estimate.

U Analyte was not detected at or above the reported result.

ND Not detected; detection limit unknown

UJ Analyte was not detected at or above the reported estimate

Х The sample chromatographic pattern does not resemble the fueld standard used for quantitation by the laboratory.

Notes

1) Proposed cleanup levels are MTCA Method A cleanup levels for unrestricted land use. 2) Bold indicates detected analyte; shading indicates detection above proposed cleanup level. BTEX Benzene, toluene, ethylbenzene, and total xylenes

TPH Total petroleum hydrocarbon

Table 1

Interim Action Work Plan Page 2 of 2

Table 2. Other Analytes in Soil Exploration Samples4700 Brooklyn Avenue NE, Seattle, WA 160092

Exploration ID/Date	Proposed Cleanup			AB-3/Nov 201	6				AB-4/N	ov 2016				AB-5/N	ov 2016	
Sample ID	Levels	AB-3-4	AB-3-8	AB-3-14	AB-3-19	AB-3-24	AB-4-6	AB-4-10	AB-4-16.5	AB-4-19	AB-4-24	AB-4-29	AB-5-5	AB-5-10	AB-5-14	AB-5-19
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	4 ft	8 ft	14 ft	19 ft	24 ft	6 ft	10 ft	16.5 ft	19 ft	24 ft	29 ft	5 ft	10 ft	14 ft	19 ft
Volatile Organic Compounds in mg/kg			•							•	•					
Methyl tert-butyl ether (MTBE)	0.1															
Naphthalene	5															
1,2-Dibromoethane (EDB)	0.005															
1,2-Dichloroethane (EDC)	480 ⁽³⁾	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
Tetrachloroethene (PCE)	0.05	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
Trichloroethene (TCE)	0.03	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
1,1-Dichloroethene	4,000 ⁽³⁾	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
cis-1,2-Dichloroethene (DCE)	160 ⁽³⁾	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.066	0.05 U	0.05 U	0.05 U	0.05 U
trans-1,2-Dichloroethene	1,600 ⁽³⁾	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
Vinyl Chloride	0.67 ⁽³⁾	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
Methylene Chloride	0.02	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
1,1,1-Trichloroethane	2	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
1,1-Dichloroethane	175 ⁽³⁾	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
Chloroethane		0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Total Metals in mg/kg					2			2				2			2	
Cadmium	2															
Chromium	19/2,000 ⁽⁴⁾															
Lead	250															
Nickel	1,600 ⁽³⁾															
Zinc	24,000 ⁽³⁾															
Polychlorinated Biphenyls (PCBs) in mg/kg						•								•		
Aroclor 1016																
Aroclor 1221																
Aroclor 1232																
Aroclor 1242																
Aroclor 1248																
Aroclor 1254																
Aroclor 1260																
Aroclor 1262																
Aroclor 1268																
Total PCBs (Sum of Aroclors)	1															
Carcinogenic Polycyclic Aromatic Hydrocarbons	(cPAHs) in mg/kg					•								•		
Benz(a)anthracene																
Benzo(a)pyrene																
Benzo(b)fluoranthene																
Benzo(k)fluoranthene																
Chrysene																
Dibenzo(a,h)anthracene																
Indeno(1,2,3-cd)pyrene																
Total cPAHs TEQ (ND = 1/2 RDL)	0.1			1		t i			1					İ		

Table 2 Interim Action Work Plan Page 1 of 2

Table 2. Other Analytes in Soil Exploration Samples

4700 Brooklyn Avenue NE, Seattle, WA 160092

Exploration ID/Date	Proposed Cleanup		AB-5/Nov 201	6		AB-6/Nov 2010	6	AB-7/N	lov 2016	AB-8/Nov 2016	AB-9/Nov 2016	MW-15/Mar 2001	MW-16/Mar 2001	P4/Feb 2015	P6/Feb 2015	SB-1/Oct 2010
Sample ID	Levels	AB-5-24	AB-5-29	AB-5-32	AB-6-13	AB-6-17	AB-6-24	AB-7-6	AB-7-19	AB-8-6	AB-9-5	MW-15-15	MW-16-15	P4-10	P6-5	SB-1-15
Sample Depth in Feet Below Ground Surface	in mg/kg ⁽¹⁾	24 ft	29 ft	32 ft	13 ft	17 ft	24 ft	6 ft	19 ft	6 ft	5 ft	15 ft	15 ft	10 ft	5 ft	15
Volatile Organic Compounds in mg/kg			•	•												
Methyl tert-butyl ether (MTBE)	0.1	0.05 U				0.05 U	0.05 U		0.05 U							0.006 U
Naphthalene	5	0.05 U				6.4	0.084		3.5							, , , , , , , , , , , , , , , , , , ,
1,2-Dibromoethane (EDB)	0.005	0.005 U				0.005 UJ	0.005 U		0.005 UJ							
1,2-Dichloroethane (EDC)	480 ⁽³⁾	0.05 U	0.05 U	0.05 U		0.05 U	0.05 U		0.05 U							,
Tetrachloroethene (PCE)	0.05	0.025 U	0.025 U	0.025 U												, , , , , , , , , , , , , , , , , , ,
Trichloroethene (TCE)	0.03	0.02 U	0.02 U	0.02 U												
1,1-Dichloroethene	4,000 ⁽³⁾	0.05 U	0.05 U	0.05 U												, , , , , , , , , , , , , , , , , , ,
cis-1,2-Dichloroethene (DCE)	160 ⁽³⁾	0.05 U	0.05 U	0.05 U												, , , , , , , , , , , , , , , , , , ,
trans-1,2-Dichloroethene	1,600 ⁽³⁾	0.05 U	0.05 U	0.05 U												,
Vinyl Chloride	0.67 ⁽³⁾	0.05 U	0.05 U	0.05 U												,
Methylene Chloride	0.02	0.5 U	0.5 U	0.5 U												, , , , , , , , , , , , , , , , , , ,
1,1,1-Trichloroethane	2	0.05 U	0.05 U	0.05 U												,
1,1-Dichloroethane	175 ⁽³⁾	0.05 U	0.05 U	0.05 U												,
Chloroethane		0.5 U	0.5 U	0.5 U												,
Total Metals in mg/kg																· · · · · · · · · · · · · · · · · · ·
Cadmium	2				1 U			1 U		1 U	1 U					ļ,
Chromium	19/2,000 ⁽⁴⁾				23.3 J			17.5 J		15.5 J	21.6 J					ļ,
Lead	250	1.7				5.14	2.00		5.73			2.00	2.05	1.89	2.21	2.28
Nickel	1,600 ⁽³⁾				32.5 J			19.2 J		23 J	25.2 J					ļ,
Zinc	24,000 ⁽³⁾				21.8			32.4		42.2	49.7					ļ
Polychlorinated Biphenyls (PCBs) in mg/kg																, , , , , , , , , , , , , , , , , , ,
Aroclor 1016					0.2 U			0.2 U		0.2 U	0.2 U					,
Aroclor 1221					0.2 U			0.2 U		0.2 U	0.2 U					,
Aroclor 1232					0.2 U			0.2 U		0.2 U	0.2 U					,
Aroclor 1242					0.2 U			0.2 U		0.2 U	0.2 U					,
Aroclor 1248					0.2 U			0.2 U		0.2 U	0.2 U					,
Aroclor 1254					0.2 U			0.2 U		0.2 U	0.2 U					,
Aroclor 1260					0.2 U			0.2 U		0.2 U	0.2 U					ļ
Aroclor 1262					0.2 U			0.2 U		0.2 U	0.2 U					,
Aroclor 1268					0.2 U			0.2 U		0.2 U	0.2 U					,
Total PCBs (Sum of Aroclors)	1				0.2 U			0.2 U		0.2 U	0.2 U					,
Carcinogenic Polycyclic Aromatic Hydrocarbons	(cPAHs) in mg/kg															· · · · · ·
Benz(a)anthracene	, ,				0.01 UJ			0.1 UJ		0.052 J	0.01 UJ					,
Benzo(a)pyrene					0.01 UJ			0.11 J		0.052 J	0.01 UJ					,
Benzo(b)fluoranthene					0.01 UJ			0.18 J		0.074 J	0.011 J					,
Benzo(k)fluoranthene					0.01 UJ			0.1 UJ		0.025 J	0.01 UJ					,
Chrysene					0.01 UJ			0.21 J		0.11 J	0.019 J					ļ
Dibenzo(a,h)anthracene					0.01 UJ			0.1 UJ		0.011 J	0.01 UJ					ļ
Indeno(1,2,3-cd)pyrene					0.011 J		1	0.1 UJ		0.025 J	0.01 UJ				Ì	ļ
Total cPAHs TEQ (ND = 1/2 RDL)	0.1				0.008 J			0.15 J		0.072 J	0.008 J				1	ļ

J Analyte was positively identified. The reported result is an estimate.

U Analyte was not detected at or above the reported result.

Analyte was not detected at or abo

Notes

1) Unless otherwise noted, proposed cleanup levels are MTCA Method A cleanup levels for unrestricted land use.

2) Bold indicates detected analyte; shading indicates detection above proposed cleanup level.

3) Method A does not have a soil cleanup level for vinyl chloride. The value listed is Method B - Soil Direct Contact.

4) Method A soil cleanup levels for Chromium IV/Chromium III

V:\160092 - 4700 Brooklyn Ave\Deliverables\Final IAWP\Tables\Tbls_IAWP.xlsx

X The sample chromatographic pattern does not resemble the fueld standard used for quantitation by the laboratory.

UJ Analyte was not detected at or above the reported estimate

Table 3. Groundwater Quality Results, November, 2016

4700 Brooklyn Avenue NE, Seattle, WA 160092

	Proposed Cleanup Levels ⁽¹⁾	MW-02 11/21/2016	MW-03 11/21/2016	MW-3D 11/21/2016	MW-04 11/21/2016	MW-05 11/21/2016	MW-06 11/21/2016	MW-07 11/22/2016	MW-09 11/22/2016	MW-11 11/22/2016	MW-12 11/22/2016	MW-13 11/22/2016	MW-14 11/21/2016	MW-15 11/22/2016	MW-16 11/22/2016
Total Petroleum Hydrocarbons in ug/L	-														
Gasoline Range Organics (GRO)	800	< 100 U	110	120	780	< 100 U	< 100 U	< 100 U	23,000	55,000	120,000		< 100 U	< 100 U	2,300
Diesel Range Organics (DRO)	500	58 X	170 X	120 X	810	< 50 U	< 50 U	200 X	3,500 X	4,500 X	8,800 X		110 X	< 60 U	660 X
Motor Oil Range Organics (MORO)	500	< 250 U		< 250 U	< 300 U	< 250 U									
Metals in ug/L															
Lead (Dissolved)	15	< 1 UJ	17.2 J	2.89 J		< 1 UJ	< 1 UJ	< 1 UJ							
Volatile Organic Compounds in ug/L															
Benzene	5	< 0.35 U	940	90	5,500		< 0.35 U	< 0.35 U	77						
Toluene	1,000	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	740	530	6,300		< 1 U	< 1 U	2.6
Ethylbenzene	700	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	420	1,500	2,300		< 1 U	< 1 U	100
m,p-Xylenes		< 2 U	< 2 U	< 2 U	< 2 U	< 2 U	< 2 U	< 2 U	660	5,800	10,000		< 2 U	< 2 U	5.3
o-Xylene		< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	110	1,300	4,100		< 1 U	< 1 U	1.1
Total Xylenes	1,000	< 2 U	< 2 U	< 2 U	< 2 U	< 2 U	< 2 U	< 2 U	770	7,100	14,100		< 2 U	< 2 U	6.4
Methyl tert-butyl ether (MTBE)	20	< 1 U	< 1 U	< 1 U	1.8	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U	< 1 U		< 1 U	< 1 U	< 1 U
Tetrachloroethene (PCE)	5								< 1 U	< 1 U		< 1 U			
Trichloroethene (TCE)	5								< 1 U	< 1 U		< 1 U			
1,1-Dichloroethene	400 ⁽³⁾								< 1 U	< 1 U		< 1 U			
cis-1,2-Dichloroethene (DCE)	16 ⁽³⁾								15	9.7		15			
trans-1,2-Dichloroethene	160 ⁽³⁾								< 1 U	< 1 U		1			
Vinyl Chloride	0.2								< 0.2 U	< 0.2 U		0.22			
1,1,1-Trichloroethane	200								< 1 U	< 1 U		<10			
1,1-Dichloroethane	7.68 ⁽³⁾								< 1 U	< 1 U		< 1 U			1
1,2-Dichloroethane (EDC)	5								21	< 1 U		<1U			
Chloroethane	-								< 1 U	<10		<10			1
Methylene Chloride	5								< 5 U	< 5 U		< 5 U			1

J Analyte was positively identified. The reported result is an estimate.

UJ Analyte was not detected at or above the reported estimate

U Analyte was not detected at or above the reported result.

X The sample chromatographic pattern does not resemble the fuel standard used for quantitation by the laboratory.

Notes:

1) Unless otherwise noted, proposed cleanup levels are MTCA Method A cleanup levels for unrestricted land use.

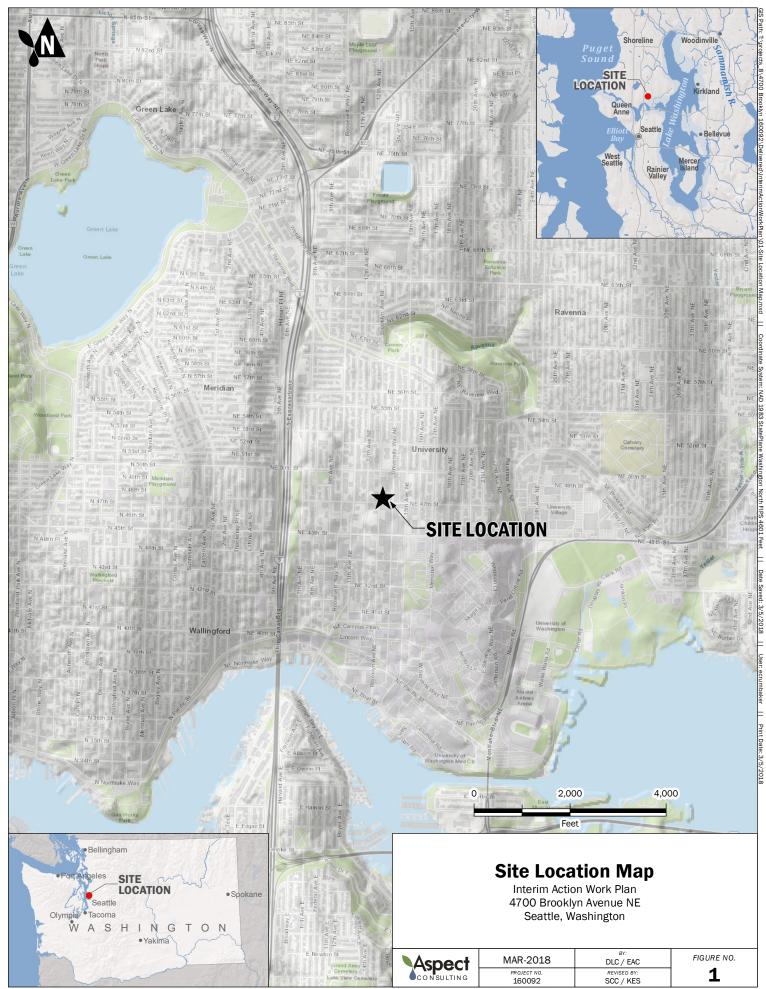
2) Bold indicates detected analyte; shading indicates detection above proposed cleanup level.

3) There is no Method A groundwater cleanup level. The value listed is Method B - noncancer.

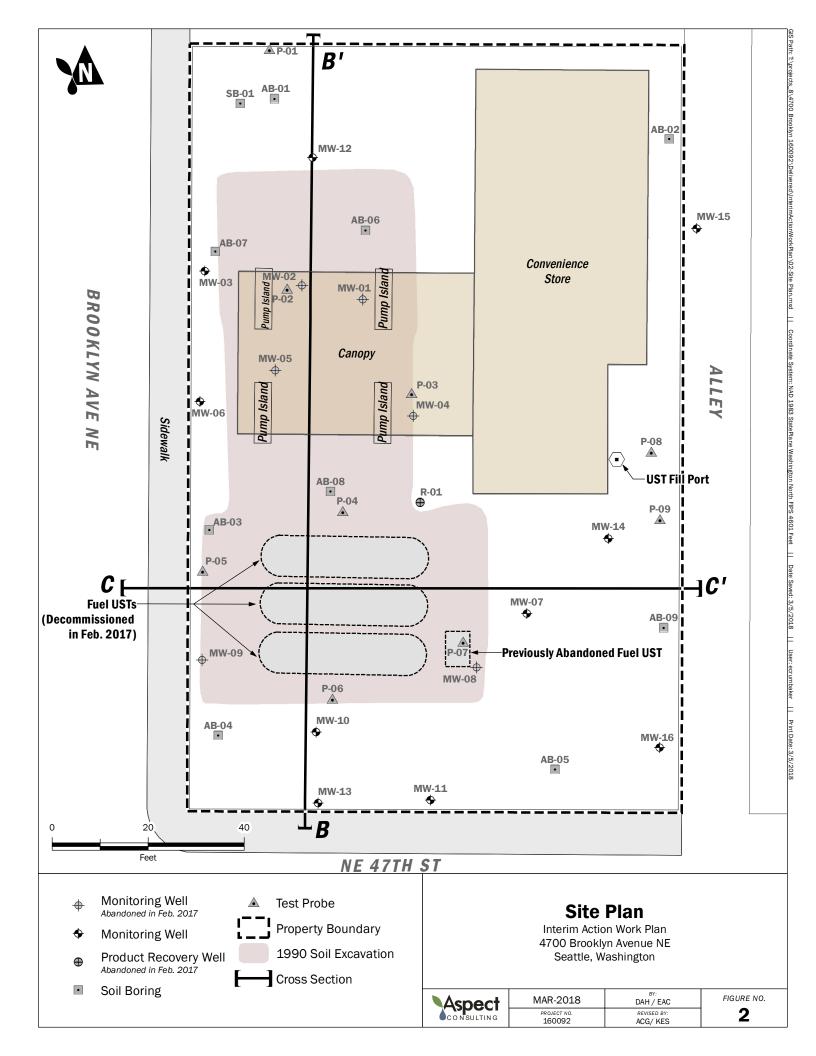
Table 3

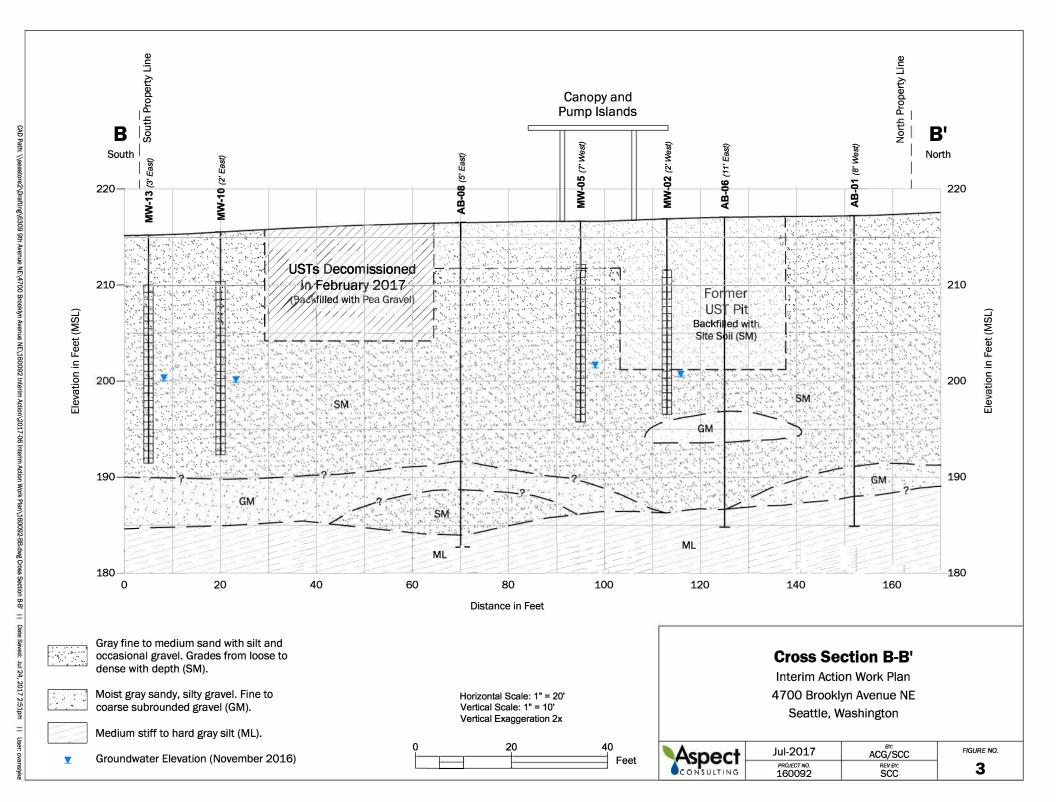
Interim Action Work Plan Page 1 of 1

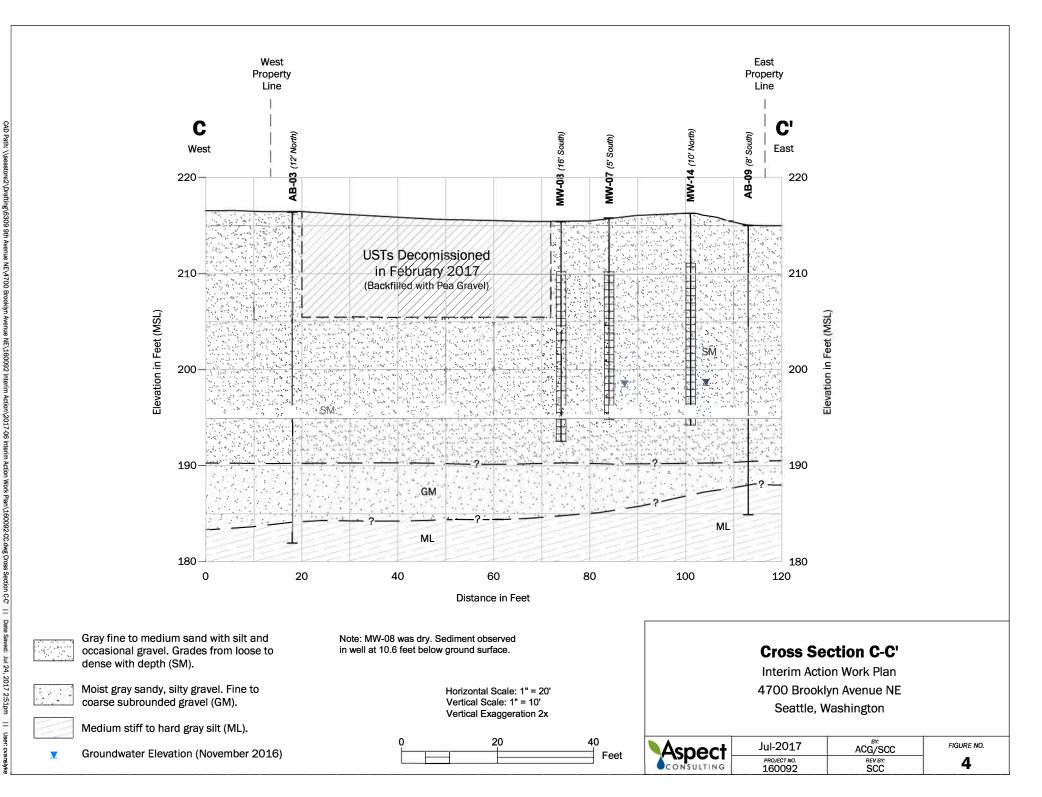
FIGURES

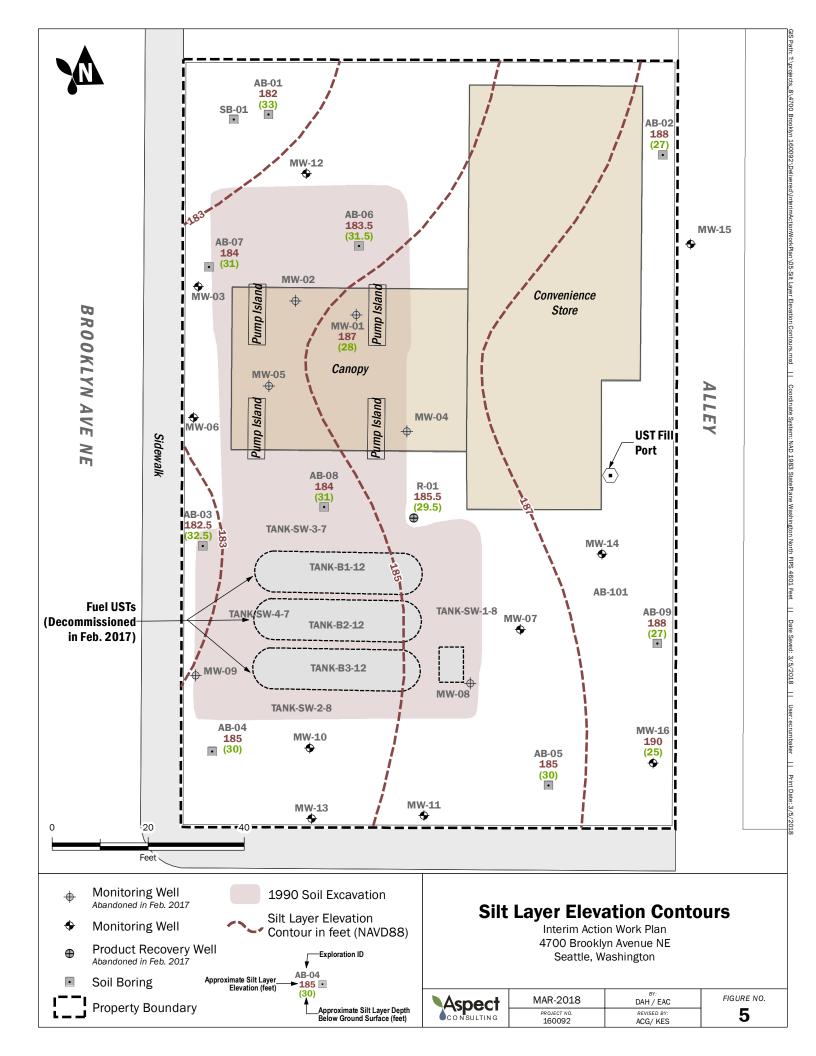


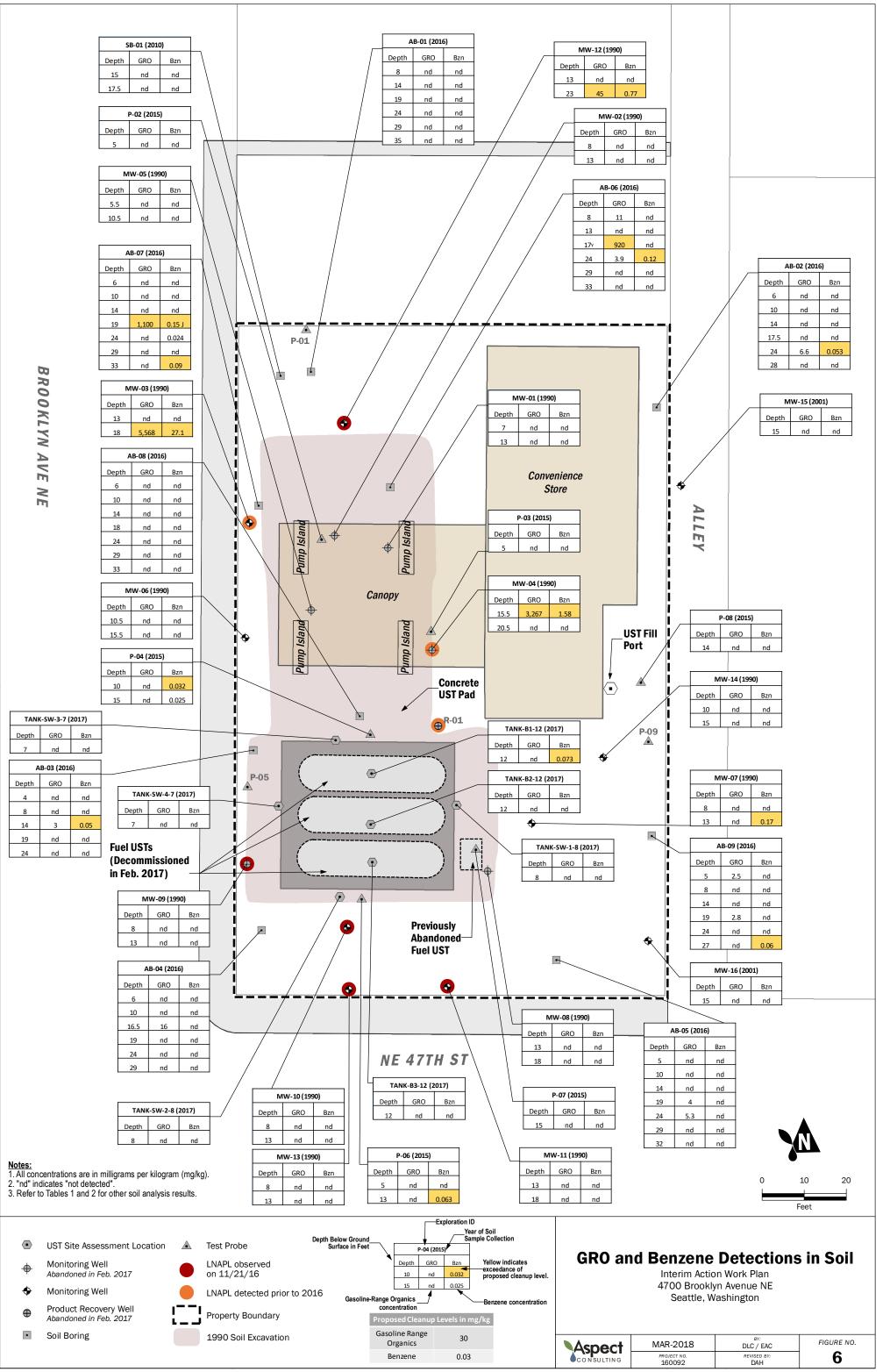
Basemap Layer Credits || Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MagmyIndia, © OpenStreetMap contributors, and the GIS User Community Copyright:© 2014 Esri

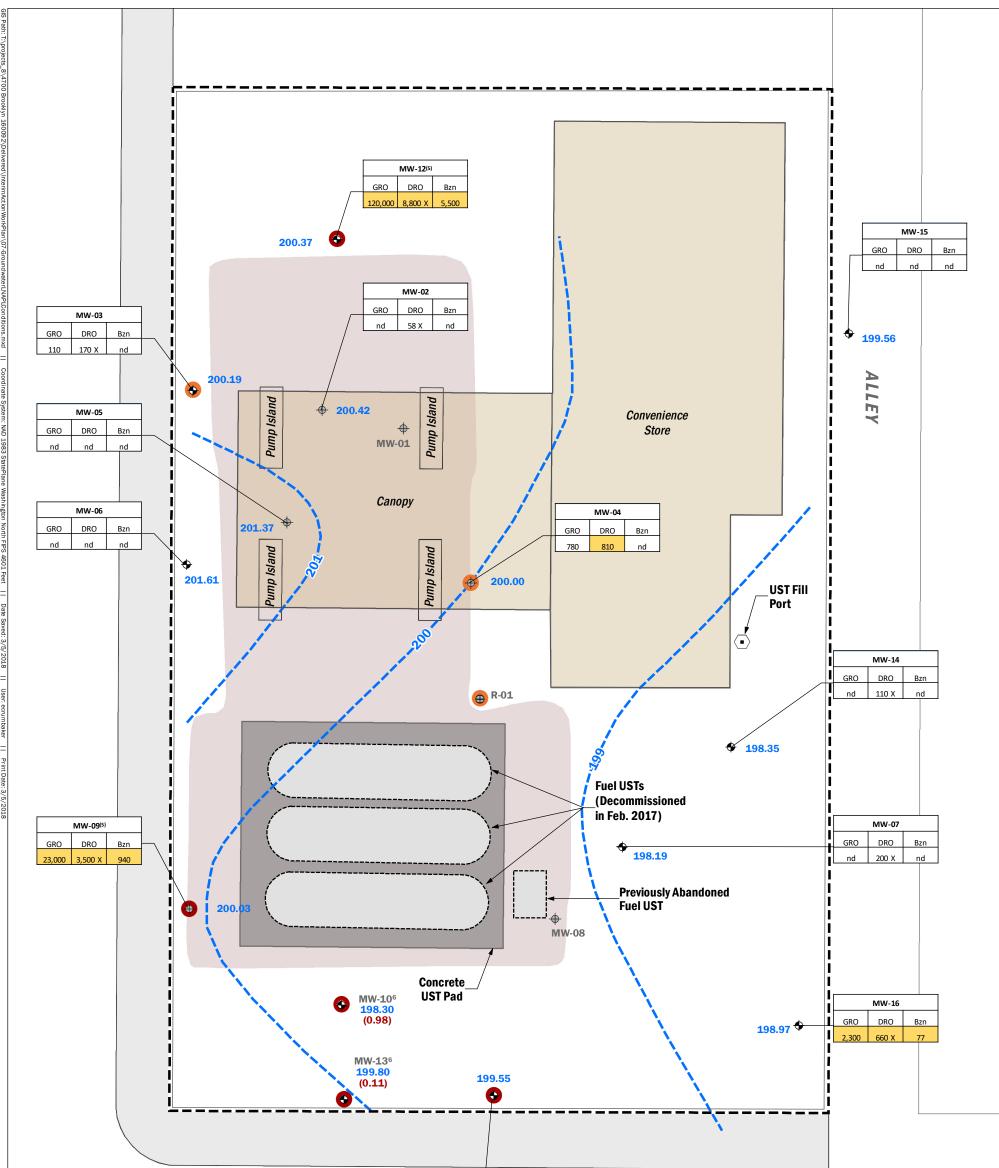












	MW-11 ⁽⁵⁾							
GRO	DRO	Bzn						
55,000	4,500 X	90						

15

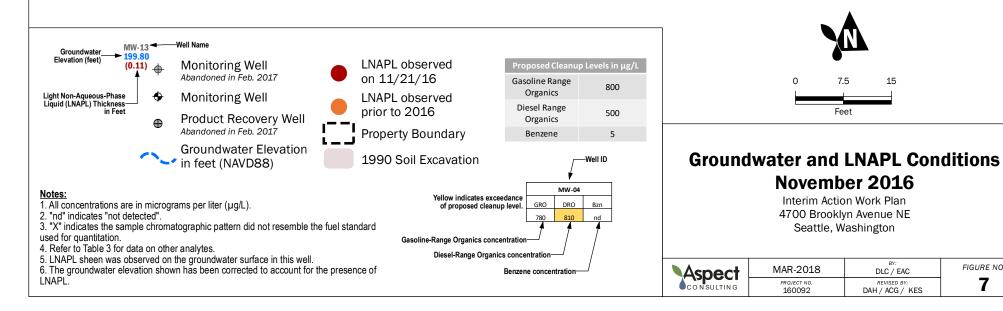
DLC / EAC

REVISED BY: DAH / ACG / KES

FIGURE NO.

7

NE 47TH ST

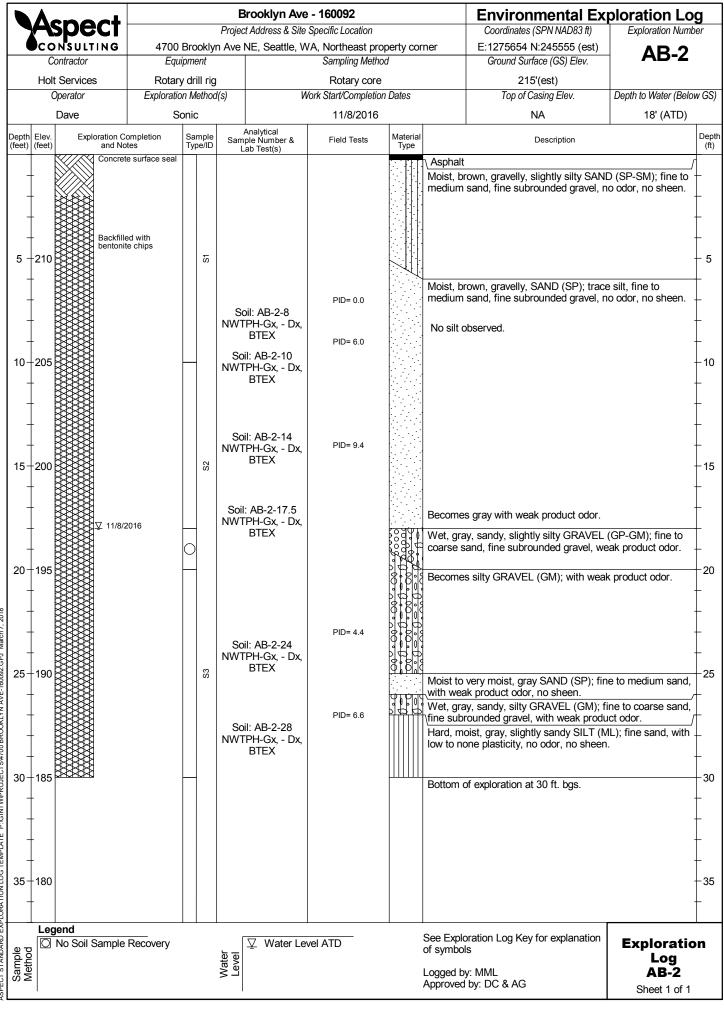


APPENDIX A

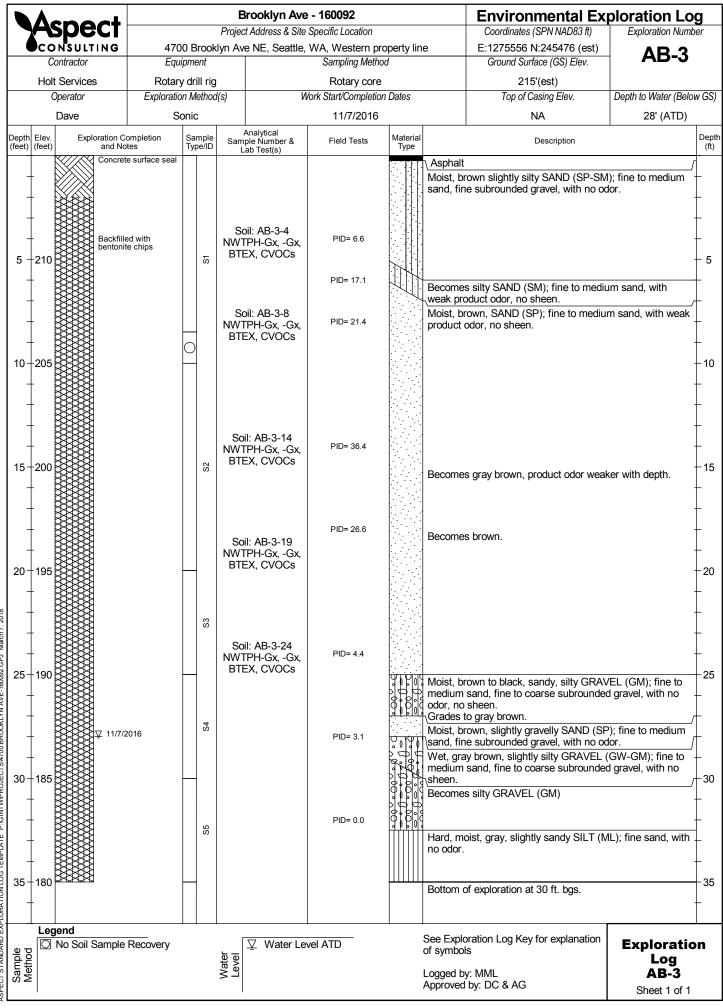
Boring Logs

	u		0.0		Well-graded gravel and	Terms I	Describing	Relative Densi	ty and Consistency
	Coarse Fraction Sieve	S 2		GW	gravel with sand, little to		Density	SPT ⁽²⁾ blows/foot	
	Е	nes 0			no fines		Very Loose	0 to 4	Test Symbols
υ	arse		500		Poorly, graded gravel	Coarse- Grained Soils	Loose	4 to 10	FC = Fines Content
	Coarse Sieve				Poorly-graded gravel and gravel with sand,	Graineu Solis	Medium Dens		GS = Grain Size
0 S	4 م	6		GP	little to no fines		Dense Van: Danas	30 to 50	MC = Moisture Content AL = Atterberg Limits
50	50% ⁽¹⁾ on No.						Very Dense	>50	C = Consolidation
l l 2	50% ⁽¹⁾ on No.	- P	000		Silty gravel and silty]	<u>Consistency</u>	SPT ⁽²⁾ blows/foot	DD = Dry Density
5	han	g û	9	GM	gravel with sand	Fine-	Very Soft	0 to 2	K = Permeability
eq	Vore than Retained	ues	<u>9</u> 99	•	-	Grained Soils	Soft Medium Stiff	2 to 4 4 to 8	Str = Shear Strength
tain	- More than Retained						Stiff	8 to 15	Env = Environmental PiD = Photojonization
Rei	s	12	ĽA		Clayey gravel and		Very Stiff	15 to 30	Detector
E,	Gravels			GC	clayey gravel with sand		Hard	>30	
20%	ū		HA				Con	nponent Definit	tions
an	۲ ۲				Well-graded sand and	Descriptive		Range and Sieve Nu	
₽	<u>cto</u>	(2)		sw	sand with gravel, little	Boulders		er than 12"	
Jor I	Fra	Jes		••••	to no fines	Cobbles	3" to	12"	
	se					Grave	3" to	No. 4 (4.75 mm)	
	f Coar Sieve	N2%			Poorly-graded sand	Coarse Gra			
l N	C S			SP	and sand with gravel,	Fine Grave	3/4" t	o No. 4 (4.75 mm)	
l l	re o 0.4		····		little to no fines	Sand		(4.75 mm) to No. 200	
Coarse-Grained Soils - More than 50% ⁽¹⁾ Retained on No. 200 Sieve	50% ⁽¹⁾ or More of Coarse Fraction Passes No. 4 Sieve				Silty sand and	Coarse Sar		(4.75 mm) to No. 10 (2	
l e	or	: (2)		SM	silty sand with	Medium Sa Fine Sand		0 (2.00 mm) to No. 40 0 (0.425 mm) to No. 20	
Soal	Pa;	Fines		•	gravel				
	50		<u></u>			Silt and Clay	Smal	ler than No. 200 (0.075	mm)
	Sands - {	12	//		Clayey sand and clayey sand with gravel	⁽³⁾ Estimat	ed Percent	age	Moisture Content
	San			SC	l clayey sand with graver	Percentag		•	Dry - Absence of moisture,
	<i>°</i>					by Weigh	t <u>Mo</u>	difier	dusty, dry to the touch
					Silt, sandy silt, gravelly silt,	<5	Trac	ce	Slightly Moist - Perceptible
e l		8 III		ML	silt with sand or gravel	5 1 1 5	0.		moisture Moist - Damp but no visible
						5 to 15		ıhtly (sandy, silty, /ey, gravelly)	water
l g	ays				Clay of low to medium	15 to 30		idy, silty, clayey,	Very Moist - Water visible but
	U C C C C			CL	plasticity; silty, sandy, or			velly)	not free draining
Z	an			CL	gravelly clay, lean clay	30 to 49	Ver	y (sandy, s il ty,	Wet - Visible free water, usually
Passes No. 200 Sieve	Silts and Clays	quid Limit Less trian 30					clay	/ey, gravelly)	from below water table
Pa;		unt F	==		Organic clay or silt of low			Symbols	Cement grout
ore	-	Ē		OL	plasticity	Sampler	Blows/6" or		surface seal
Ι		F					portion of 6"		Bentonite chips
(<u>1</u>)					Elastic silt, clayey silt, silt	2.0" OD	🦯 San	npler Type	chips
%		ъ II		мн	with micaceous or diato-	Split-Spoon		escription	Grout
- ¹					maceous fine sand or silt	Sampler (SPT)	Continuous F	Push	↔ seal
l sie	ays				Oley, of block is leasting to		Non-Standar	d Samp l er	Filter pack with
d S	U C C	R 🖌			Clay of high plasticity, sandy or gravelly clay, fat	Bulk sample			
	an	ë V		СН	clay with sand or gravel		(including Sh	Wall Tube Sampler elby tube)	Screened casing
Gra	silts					Grab Sample	B	Gro	ansducer
Fine-Grained Soils - 50% ⁽¹⁾ or More	Silts and Clays	nb 🖌			Organic clay or silt of		O Portion not re		End cap
	-	-		он	medium to high	(1) Percentage b		(5)	Combined USCS symbols used for
					plasticity	(1) Percentage L	rd Penetration Te	st fi	nes between 5% and 15% as
	0	- É	<u> </u>		Peat, muck and other	(ASTM D-158	86)		stimated in General Accordance
	Organic Soils			РТ	highly organic soils	(3) In General Ac			with Standard Practice for
⁹	, g s	The second secon		FI			actice for Descript ation of Soils (AST		Description and Identification of
	<u> </u>	¥				(4) Depth of grou			Coils (ASTM D-2488)
								ATD = At time of drillin Static water level (date)	
						1	<u>+</u>		
					ort are based on visual field and/or la				
					ot be construed to imply field or labo -2488 were used as an identification				oratory classification
method	13 UI AS		2-10/ 0	unu D		gaine for the Online		- Cystem.	DATE: PROJECT NO.
	enc	ct.		ي منغل					PROJECT NO.
	lspe		onsu arth+'		Ex	ploration	Log Key	/	DESIGNED BY:
	www.	aspecto				-		-	DRAWN BY: FIGURE NO.
		a limited	liability o	company					REVISED BY: A-1
L									I

	Δ	spe	ct				Brooklyn Ave						
(4700) Brookly	-	ct Address & Site S NE, Seattle, WA		operty co	rner	Coordinates (SPN NAD83 ft) E:1275572 N:245566 (est)	Exploration Num	ver
		Contractor			uipment	,,		Sampling Metho			Ground Surface (GS) Elev.	AB-1	
	Hol	t Service	s	-	ry drill ri	g		Rotary core	1		215'(est)		
		Operator			ion Metho	-	Wa	ork Start/Completio			Top of Casing Elev.	Depth to Water (Belo	ow G
		Dave			Sonic			11/9/2016			NA	No Water Encour	ntere
Depth	Elev.	Exp	oration C	ompletion	Sample		Analytical	Field Tests	Material		Description		De
feet)	(feet)		and No	otes le surface sea	Type/IE	, Joan	ple Number & .ab Test(s)		Туре				(
_			Concier	e sunace sea						Asphal	t moist, brown, gravelly, slightly s		/
-	- 		Backfille	ed with le chips	20	NW	AB-1-8 IPH-Gx, -Dx, BTEX	PID= 0.1 PID= 0.3		gravel, i Vacuum Moist, b); fine to medium sand, fine to c no odor. ned to <u>6</u> ft rown, SAND (SP); trace fine sul nedium sand, no odor, no sheen	brounded gravel,	
- - 15 - - -	- - 200 - -				S2	NW ⁻	AB-1-14 IPH-Gx, -Dx, BTEX	PID= 0.4					- - - -
- 20 <i>-</i> -	-195						AB-1-19 IPH-Gx, -Dx, BTEX	PID= 1.0		Grades	to gray brown		
- - 25- -	-190				ß	NW	AB-1-24 IPH-Gx, -Dx, BTEX	PID= 1.0 PID= 0.2 PID= 6.8					
- - 30 -	- - -185						AB-1-29 IPH-Gx, -Dx, BTEX	PID= 2.1					+
-	-				S4			PID= 0.0 PID= 3.1	$\frac{1}{10000}$	coarse product Hard, m	bist, gray, sandy, silty GRAVEL (sand, fine to coarse subrounded odor, no sheen. loist, gray, slightly sandy SILT (N ticity, no odor, no sheen.	gravel, slight	
35-	-180		1				AB-1-35 IPH-Gx, -Dx, BTEX	PID= 0.0		Bottom	of exploration at 35 ft. bgs.		+;
Sample	Ē	gend Continue	ous core	e 4" ID		Water Level	No Water I	Encountered		of symbol		Exploration Log AB-1 Sheet 1 of 1	



ISPECT STANDARD EXPLORATION LOG TEMPLATE P:/GINTW/PROJECTS4700 BROOKLYN AVE-160092.GPJ March 7, 2018



KSPECT STANDARD EXPLORATION LOG TEMPLATE P:/GINTWPROJECTS#700 BROOKLYN AVE-160092.GPJ March 7, 2018

Specific Direct Advance Environment and some as the specific Loader Environment and some as the specific Loader and some as the s
Contractor Edupron Supplies Method Control Surface (S) Eliv. AD-4 Holt Services Robary definition Education Method(s) Work Surface(Compliane Datas Top (Casing Env. Depin to Mater (S) Eliv.
Centor Exploration Method (s) Wark Start/Completion Dates Top of Caring Elev. Depth is Mater (back C) Unit Sonic 11//2016 NA 28' (ATD) Unit Exploration Competition and Nodes Sample Start/Completion Dates NA 28' (ATD) Exploration Competition and Nodes Sample Start/Completion Dates Processor Description Description 5 210 Concrete sufface seat Image Start/Completion Processor Description Description 5 210 Description of the processor Sample Start/Completion Completion Notest, Environment of the processor Vacuumed out from 0 to 6 ft togs for utilities. 6 210 Soit: AB-4-16, NWTTPH-CX, -GX, BTEX, CVOCS PID= 16.5 Molest, brown SAND (SP); fine to medium sand. Image Start/Completion Completion 15 200 Soit: AB-4-16, NWTTPH-CX, -GX, BTEX, CVOCS PID= 16.5 Molest, brown SAND (SP); fine to medium sand. Image Start/Completion 16 Soit: AB-4-16, NWTTPH-CX, -GX, BTEX, CVOCS PID= 16.5 PID= 16.5 PID= 16.5 17 PID= 16.5 Soit: AB-4-16, NWTTPH-CX, -GX, BTEX, CVOCS
Operator Exploration Method [3] Work Start/Completion Date Top of Casing Elev. Dight is Writer (Bolor G 28' (ATD) and Rince et [theor et] (theor et] (the
End Exponention Commution Spector Spector Simple Subscription Simple Subscription Field Tests Minimal The Spector Concents unifice seed Simple Subscription Simple Subscription 5 2100 Inscription Selection suffice seed Inscription Simple Subscription Simple Subscription Simple Subscription Vacuumed out from 0 to 6 ft bgs for utilities. 5 2100 Inscription Soil: AB-4-6 NWTPH-Cx, -Gx, BTEX, CVCCs PID= 15.5 6 Soil: AB-4-16, Soil: AB-4-18, Soil: AB-4-18, Soil: AB-4-19, Soil: AB-4-19, NWTPH-Cx, -Gx, BTEX, CVCCs, BTEX, CVCCs, B
Tent Tent Tent Tent Tent Tent Description Tent
Backflind with sententile clips Soit AB-4-6 NWTPH-GX_GX_B PD= 15.5 BTEX_CVOCS PD= 15.5 PD= 450 0-205 Soit AB-4-10 BTEX_CVOCS PD= 15.5 BTEX_CVOCS PD= 16.3 PD= 71.7 Moist, trown, SAND (SP); fine to medium sand. 0-205 Soit AB-4-10 BTEX_CVOCS PD= 163.5 BTEX_CVOCS PD= 163.5 BTEX_CVOCS Moist, trown SAND (SP); fine to medium sand. 11 0-185 Soit AB-4-16,5 BTEX_CVOCS PD= 163.5 BTEX_CVOCS Soil coarsening with depth. 20 1115 Soil AB-4-24 BTEX_CVOCS PD= 10.5 BTEX_CVOCS
35 + 180 Dettem of overlapping at 25 ft has

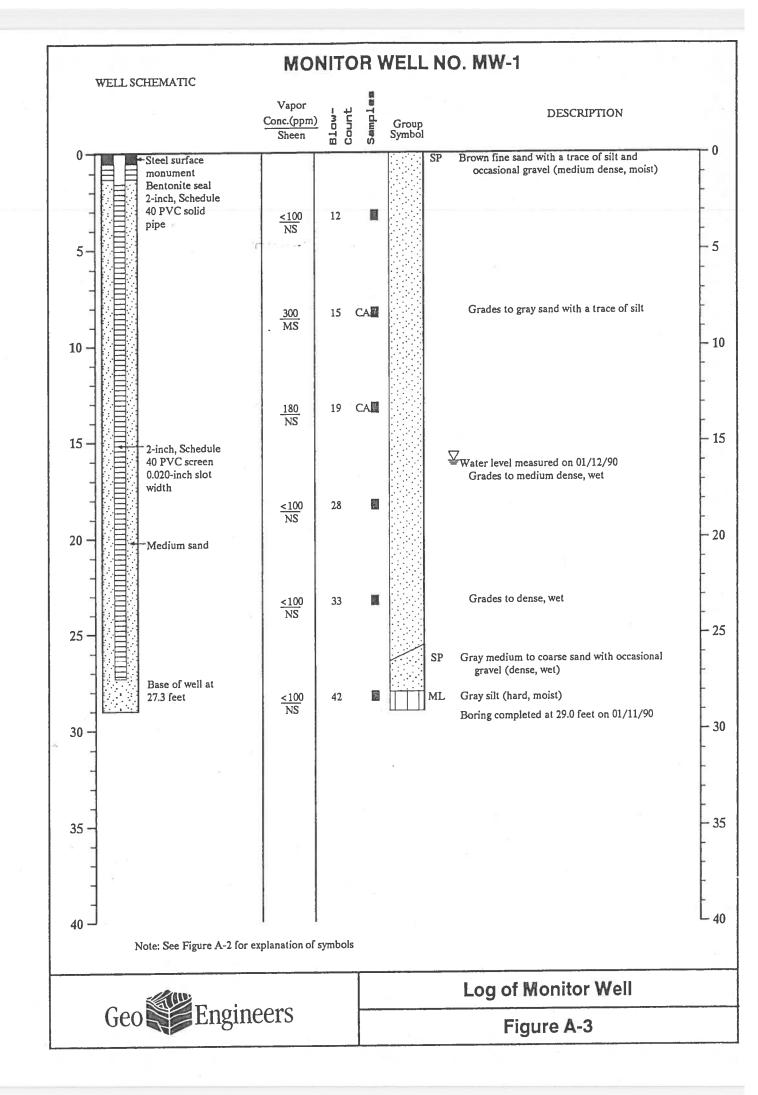
	spe	~+			ooklyn Ave				Environmental Exp	ploration Lo	g
	ONSULTI	NG 47		•		Specific Location A, Southwest pr		rner	Coordinates (SPN NAD83 ft) E:1275627 N:245425 (est)	Exploration Num	
	Contractor		Equipment			Sampling Meth			Ground Surface (GS) Elev.		
	It Services Operator		otary drill ri	-	Wc	Rotary core			215'(est) Top of Casing Elev.	Depth to Water (Belo	ow (-
	Dave		Sonic	50(0)		11/8/2016	II Datoo		NA	27' (ATD)	
				Ar	nalytical	11/0/2010				27 (AID)	
Depth Elev. (feet) (feet))	ation Completion and Notes	Sample Type/IE	e Sampl	e Number & b Test(s)	Field Tests	Material Type		Description		De (
- - - - - - - - - - - - - - - - - - -		concrete surface s sackfilled with entonite chips	seal	Soil: NWTF BTE2 Soil: NWTF BTE2 Soil: NWTF BTE2 Soil: NWTF BTE2 Soil: NWTF BTE2 Soil: NWTF	AB-5-10 H-Gx, -Dx, X, CVOCs AB-5-14 H-Gx, -Dx, X, CVOCs AB-5-19 PH-Gx, -Dx, X, CVOCs AB-5-24 PH-Gx, -Dx, X, CVOCs AB-5-24 PH-Gx, -Dx, X, CVOCs AB-5-24 PH-Gx, -Dx, X, CVOCs AB-5-29 PH-Gx, -Dx, X, CVOCs	PID= 41.2		Moist, b with no Become Moderat Wet, gra medium sheen. Moist, g subrour fabric, n Hard, m no odor	moist, brown, slightly silty SAND rounded gravel, fine to medium s Vacuumed out from 0 to 5	and, with no odor. The tops for utilities. The medium sand, The medium sand, SP-SM); fine to The top fine to The top fine to SM); fine sand, with SM); fine sand, with	
†								Note: P	D malfunction, measurements no	ot made.	t
Sample Method	gend			Water Level	Z Water Lev	el ATD		See Expl of symbo Logged b	oration Log Key for explanation ls	Exploration Log AB-5 Sheet 1 of 1	

	Δc	spe	ct 🗆				ooklyn Ave				Environmental Ex	ploration Lo)g
ð		NSULT		4700	Brooklv	•		Specific Location A, Southwest pr	operty co	rner	Coordinates (SPN NAD83 ft) E:1275591 N:245538 (est)	Exploration Numb	ver
		ontractor			uipment		_, , ,	Sampling Meth			Ground Surface (GS) Elev.	AB-6	
		Services	6		ry drill riq			Rotary core			215'(est)		
	С	Operator		Explorati	on Metho	d(s)	Wa	ork Start/Completio	on Dates		Top of Casing Elev.	Depth to Water (Belo	ow G
		Dave		S	Sonic			11/9/2016			NA	21' (ATD)	
epth E eet) (f		Explo	oration Comp and Notes	oletion	Sample Type/ID	Sampl	alytical e Number & o Test(s)	Field Tests	Material Type		Description		De (
feet) (1	^{feet)} 210 205 195 190		and Notes Concrete su Backfilled w bentonite ch	irface seal	Type/ID	Soil: NWTF Soil: NWTF BTE VC Soil: NWTF BTE VC		PID= 27.8 PID= 0.0 PID= 0.0 PID= 21.7 PID= 1043 PID= 1043 PID= 68.2 PID= 11.8 PID= 2.5 PID= 0.3 PID= 0.0 PID= 0.0 PID= 0.0 PID= 0.0		Moist, L odor. Weak p Grades Become Wet, gr fine to c Moist to medium No proc Become Hard, m none to	•	vith no odor. 6 ft bgs for utilities. m sand, with no or. ine to coarse sand, product odor. SP-SM); fine to dor.	
+	Leg	j end Continuc	ous core 4"	 ' ID		Water Level	Z Water Lev	el ATD		of symbol		Exploration Log AB-6 Sheet 1 of 1	

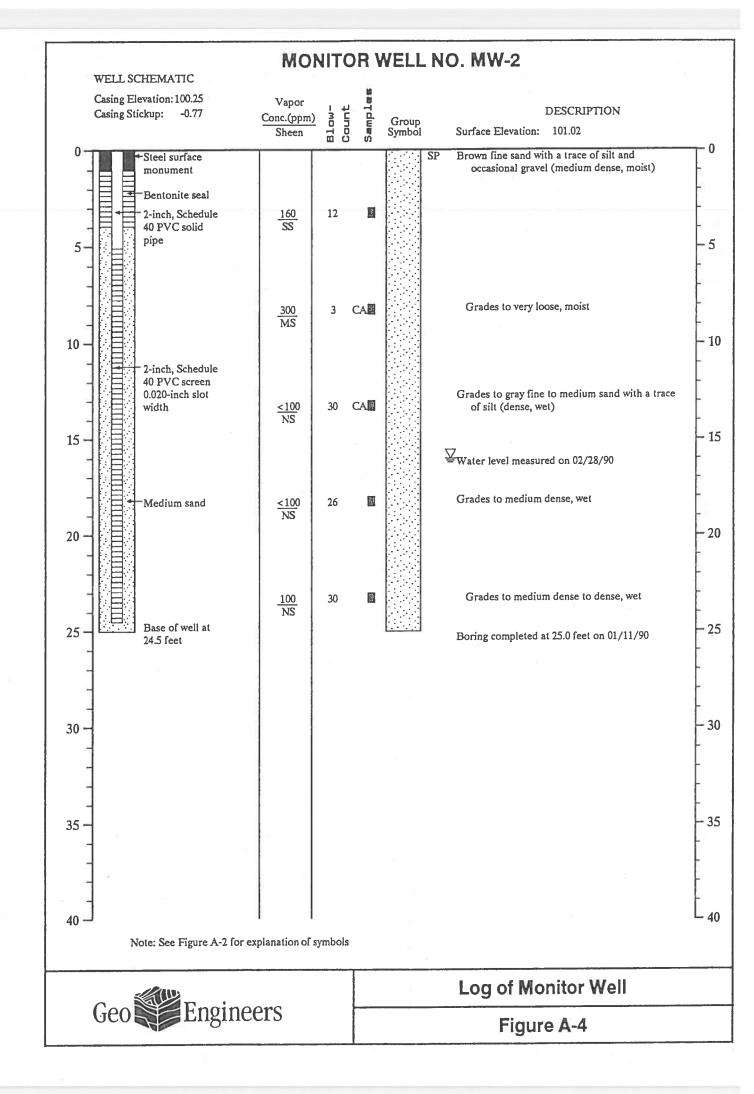
		spe	nct				Brooklyn Ave				Environmental Ex	ploration Lo	<u>g</u>
7					4700 0		pject Address & Site S		north line		Coordinates (SPN NAD83 ft)	Exploration Num	
		Contractor	ING		auipmer		n Ave NE, Seattle	, vvA, vvest pro			E:1275559 N:245534 (est) Ground Surface (GS) Elev.	AB-7	
		t Service			ary dril			Rotary core			215'(est)		
		Operator	5	Explora		-	W	ork Start/Completio			Top of Casing Elev.	Depth to Water (Beld	ow G
		Dave			Sonic	1100(0)		11/9/2016			NA	27' (ATD)	011 0
		I			SUIIC		Analytical	11/9/2010			INA	27 (AID)	
	Elev. (feet)		loration Cor and Note		Sam Type		ample Number & Lab Test(s)	Field Tests	Material Type		Description		D
			Concrete	surface sea	al					∖ Asphalt			Л
- - - - - - - - - - - - - - - - - - -	- - - - - - - - - - - - - - - - - - -		Backfillec bentonite	chips		33 10 10 10 10 10 10 10 10 10 10 10 10 10	Soil: AB-7-6 WTPH-GX, -DX, BTEX Soil: AB-7-10 WTPH-GX, -DX, BTEX Soil: AB-7-14 WTPH-GX, -DX, BTEX Soil: AB-7-19 WTPH-GX, -DX, BTEX Soil: AB-7-24 WTPH-GX, -DX, BTEX Soil: AB-7-29 WTPH-GX, -DX, BTEX	 PID= 0.0 PID= 0.0 PID= 28.7 PID= 550 PID= 232 PID= 1656 PID= 42.0 PID= 42.0 PID= 29.6 PID= 25.1 PID= 25.1 PID= 9.3 		Moist, brodor. Become: Product Product Woodch Become: Wet, gra fine to co product of Become: Hard, mo	own, gravelly, slightly silty SANI sand, fine subrounded gravel, n own SAND (SP); fine to mediur s gray with weak product odor. odor becomes moderate. odor becomes moderate. odor becomes very strong. odor becomes very strong. ips between 20 and 21 ft bgs. s gravelly with fine subrounded gra barse sand, fine subrounded gra odor, gravelly, slightly silty S barse sand, fine subrounded gra barse sand sature sat	n sand, with no gravel. AND (SP-SM); avel, with moderate ict odor.	
-	+						Soil: AB-7-33 WTPH-Gx, -Dx, BTEX	PID= 8.9		none to I	ow plasticity, no odor.	,,, mill	+
- 35-	-180												-
Method		gend Continue	ous core	 4" ID		Water	Ū Į Į Į Į Į Į Į Į Į Į Į Į Į Į Į Į Į Į Į	el ATD		See Explo	pration Log Key for explanation s	Exploratio Log	or
Sa						×.	<u>ا</u> ت			Logged by Approved	y: MML by: DC & AG	AB-7 Sheet 1 of 1	

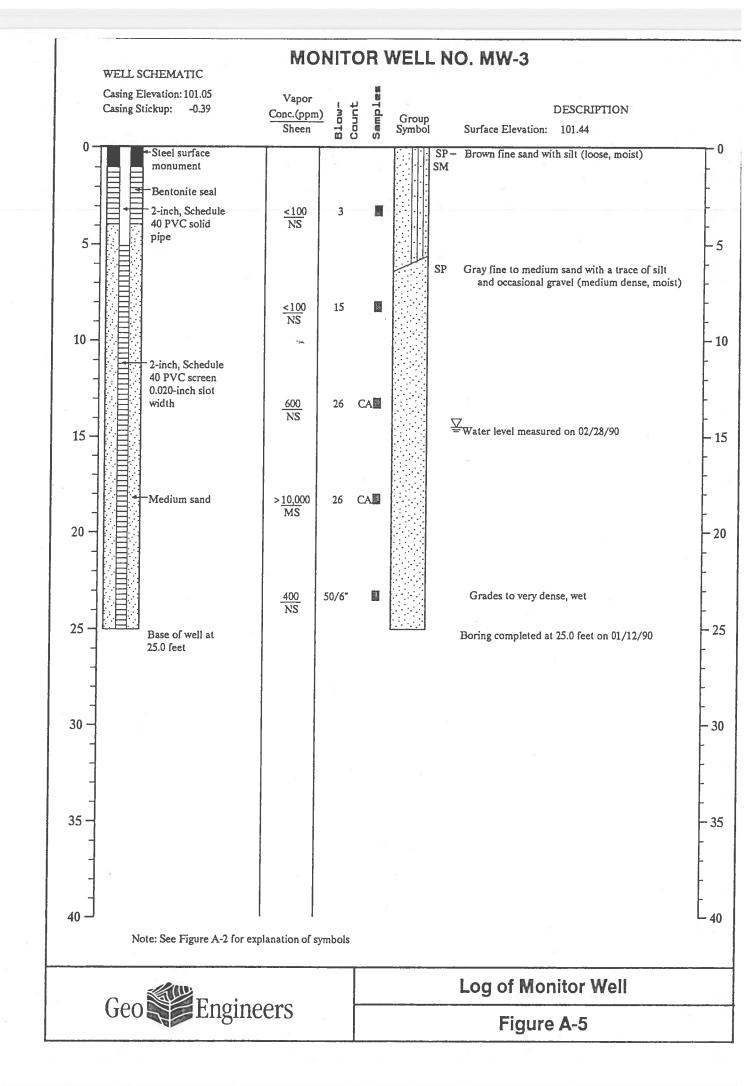
	spect	•		Brooklyn Ave			Environmental Expl	oration Log
	ONSULTING	470		Project Address & Site S n Ave NE, Seattle, V			Coordinates (SPN NAD83 ft) ds E:1275582 N:245484 (est) Ground Surface (GS) Elev.	Exploration Number
	Contractor olt Services						215'(est)	
	Operator		ry drill rig ion Method(s	s) Wo	Rotary core			epth to Water (Below
	Dave		Sonic	,	11/9/2016		NA	25' (ATD)
epth Elev	. Exploration	Completion	Sample	Analytical Sample Number &	Field Tests	Material	Description	
feet) (feet		Notes rete surface seal	Type/ID	Lab Test(s)		Туре	∖ Asphalt	
+							Moist, brown SAND (SP); fine to medium s Vacuumed out from 0 to 6 ft	
5 -210 -	bento	illed with nite chips		Soil: AB-8-6				-
+			S.	NWTPH-Gx, -Dx, BTEX Soil: AB-8-10	PID= 4.8			+
10-205				NWTPH-Gx, -Dx, BTEX	PID= 39.7 PID= 28.8			+
- - 15-200			S2	Soil: AB-8-14 NWTPH-Gx, -Dx, BTEX	PID= 32.6		Becomes gray brown, with a very weak pro	duct odor.
+ + + + + + + + + + + + + + + + + + + +				Soil: AB-8-18 NWTPH-Gx, -Dx, BTEX	PID= 39.5 PID= 18.6			-
20-195			T		PID= 22.5		No product odor.	-
25-190	0 ▼ 11/2	9/2016	S3	Soil: AB-8-24 NWTPH-Gx, -Dx, BTEX	PID= 17.1		Wet, brown, silty GRAVEL (GM); fine to co to coarse subrounded gravel, with no odor.	arse sand, fine
+ + - 30 - 185				Soil: AB-8-29 NWTPH-Gx, -Dx, BTEX	PID= 25.4		Wet, gray, gravelly, silty SAND (SM); fine to fine to coarse subrounded gravel, with no o	
+			S4	Soil: AB-8-33 NWTPH-Gx, -Dx,	PID= 10.8 PID= 12.4		Hard, moist, gray, slightly sandy SILT (ML); none to low plasticity, no odor.	
- - 35-180				BTEX			Bottom of exploration at 35 ft. bgs.	
	gend No Soil Samp			∑ Water Lev	el ATD		See Exploration Log Key for explanation of symbols	Exploratior Log AB-8

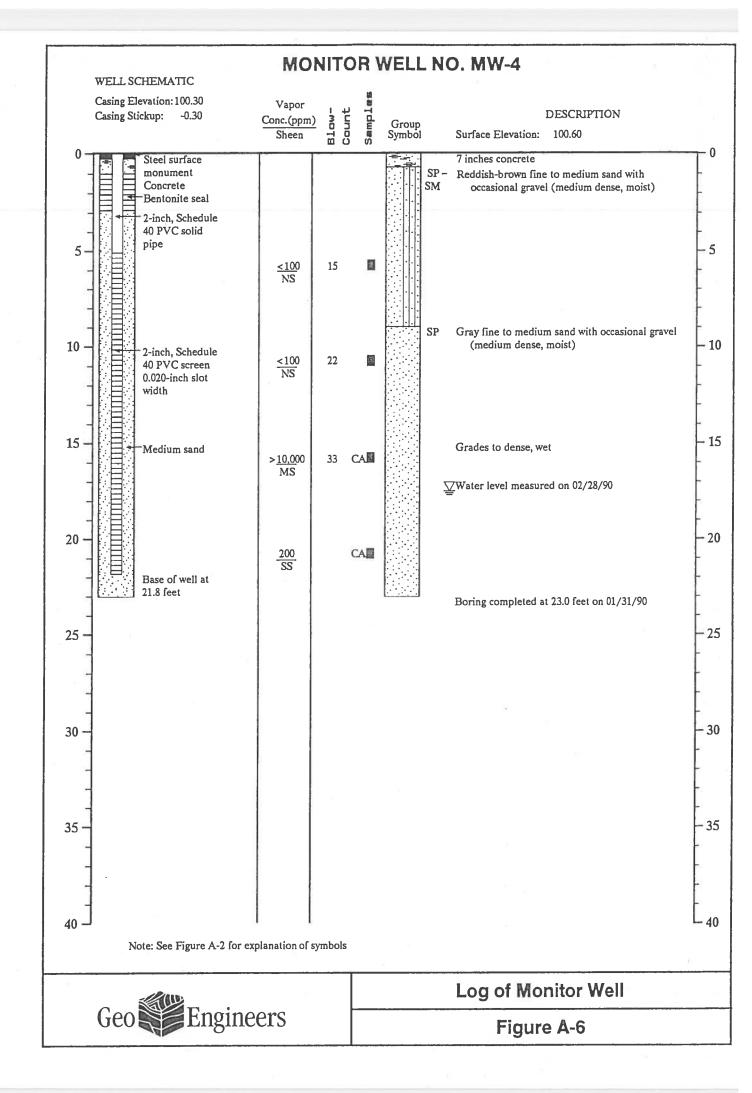
	cno	∕∼∔⊢			Brooklyn Ave				Environmental Ex		
-	SPE DNSULT			700 0**	Project Address & Site	•	nortuline		Coordinates (SPN NAD83 ft)	Exploration Numb	ber
	Contractor	ING		ipment	oklyn Ave NE, Seattle	e, vvA, East pro Sampling Meth			E:1275650 N:245454 (est) Ground Surface (GS) Elev.	AB-9	
			,	,					. ,		
	t Services	5	Exploratio	y drill rig		Rotary core			215'(est) Top of Casing Elev.	Depth to Water (Belo	w G
,	•				10)				, .		
	Dave			Sonic	Analytical	11/7/2016			NA	No Water Encoun	
epth Elev. eet) (feet)	Expl	oration Com and Note	S	Sample Type/ID	Sample Number & Lab Test(s)	Field Tests	Material Type		Description		Dep (ft
20 - 195 - - - - - - - - - - - - - - - - - - -			surface seal with		Soil: AB-9-5 NWTPH-Gx, -Dx, BTEX Soil: AB-9-8 NWTPH-Gx, -Dx, BTEX Soil: AB-9-14 NWTPH-Gx, -Dx, BTEX Soil: AB-9-19 NWTPH-Gx, -Dx, BTEX Soil: AB-9-24 NWTPH-Gx, -Dx, BTEX Soil: AB-9-27 NWTPH-Gx, -Dx, BTEX	PID= 36.6 PID= 76.1 PID= 106 PID= 46.1 PID= 59.2 PID= 72.9 PID= 317 PID= 317 PID= 472 PID= 472 PID= 79.1 PID= 79.1 PID= 36.1 PID= 24.3		 (SP-SM) weak pro Becomes Moist, br odor, no Becomes Becomes Sand coa Becomes Sand coa Becomes Moist, gr Sand, fin Hard, mo (ML); fin plasticity Bottom compared 	ay brown, slightly gravelly, sligh fine to medium sand, fine sub duct odor. brown with no product odor. own SAND (SP); fine to mediur sheen. s gray with weak product odor. s slightly gravelly with fine subro very thin beds of silty sand. arsening with depth. s gravelly with fine to coarse su ay, sandy, silty GRAVEL (GM); a subrounded gravel, with no or ist, gray, slightly sandy, slightly e sand, fine subrounded gravel, no odor, no sheen.	m sand, with no bunded gravel, and brounded gravel, and fine to medium dor.	
35+180											+3
											t
	gend No Soil S	Sample R	ecovery	<u> </u>	No Water Fevel	Encountered		of symbol		Exploratio Log AB-9	on

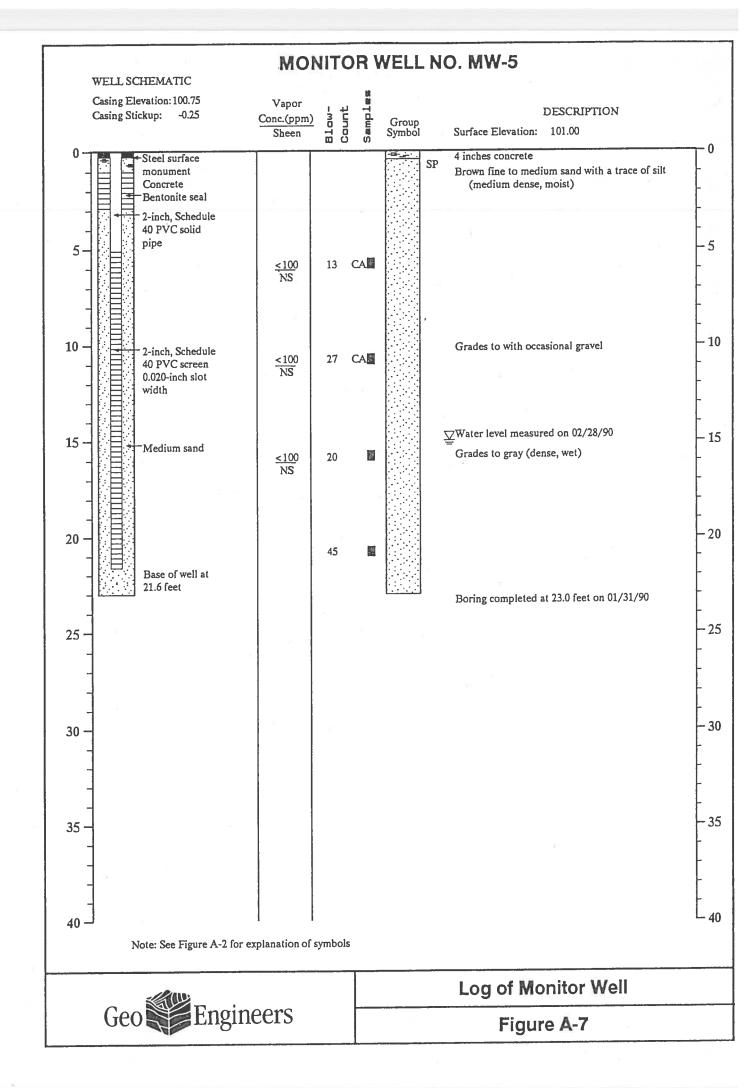


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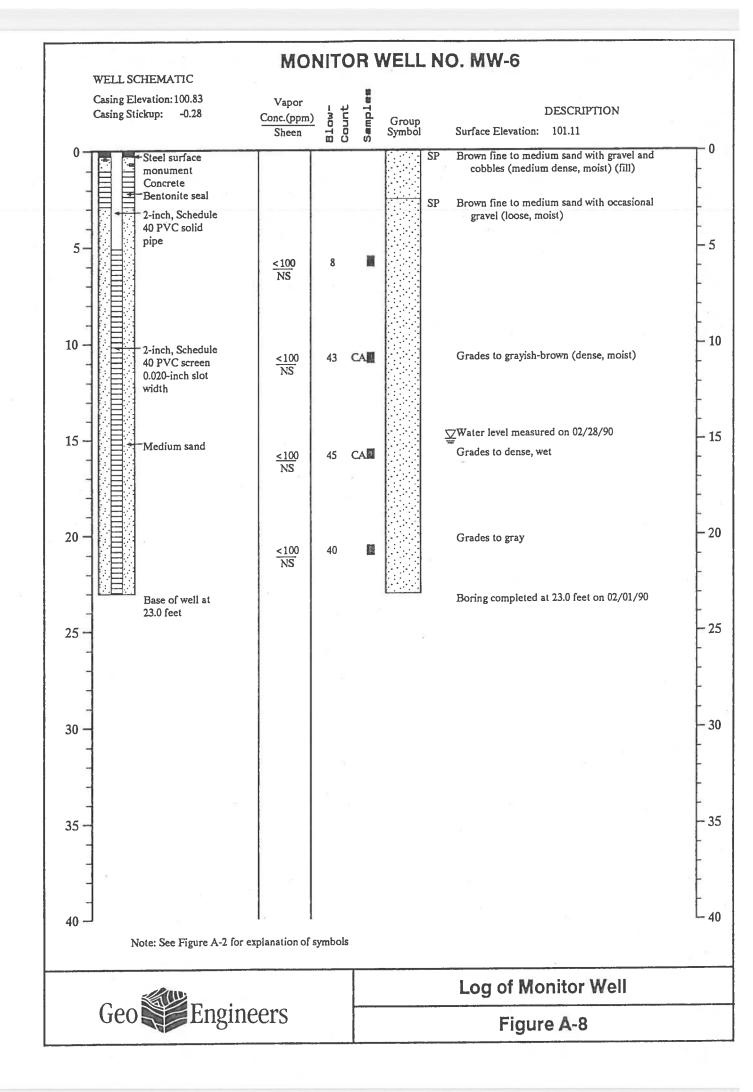




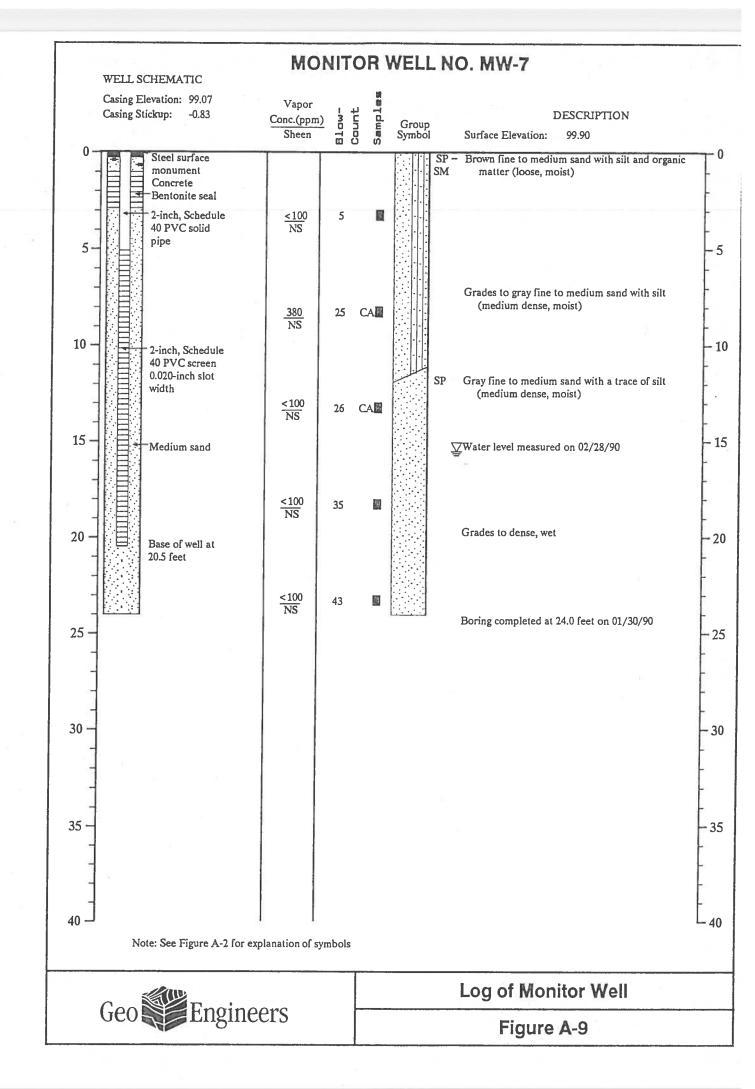


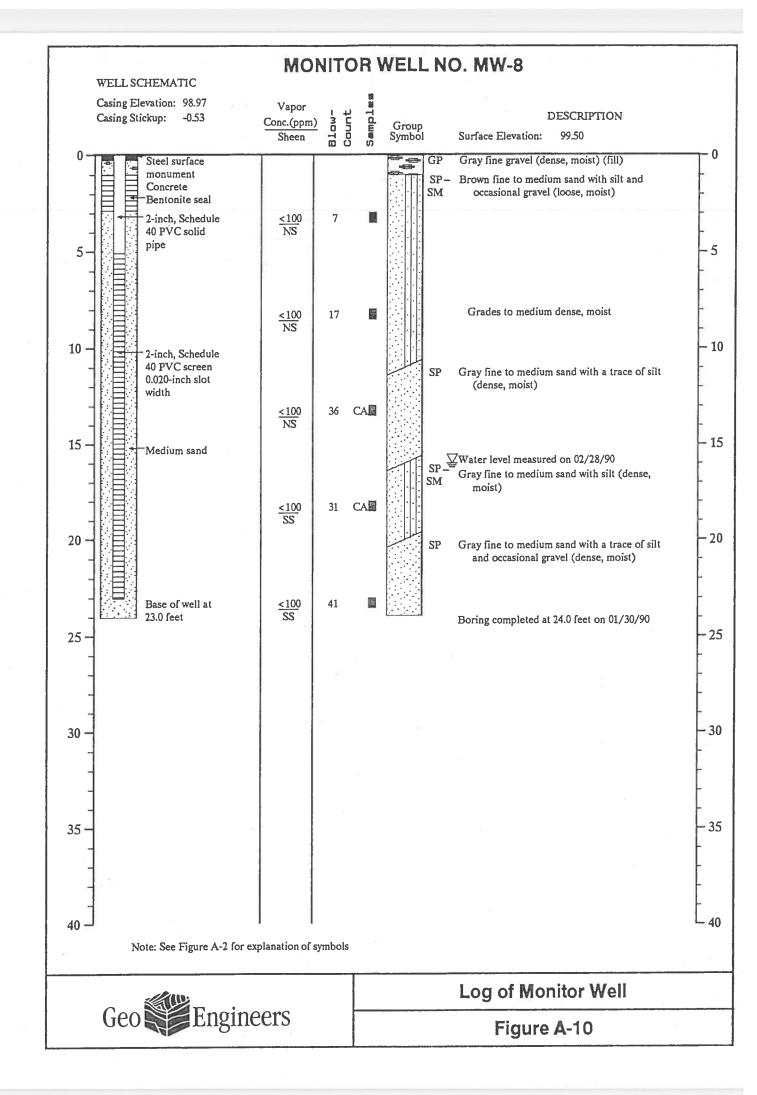


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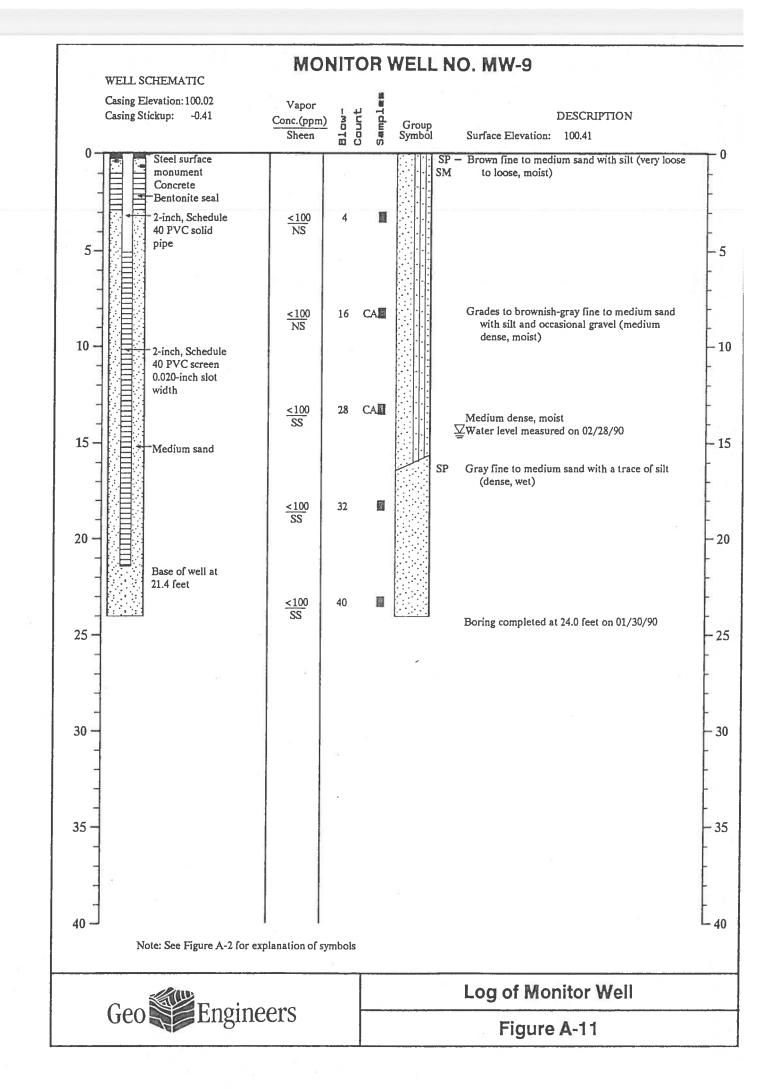
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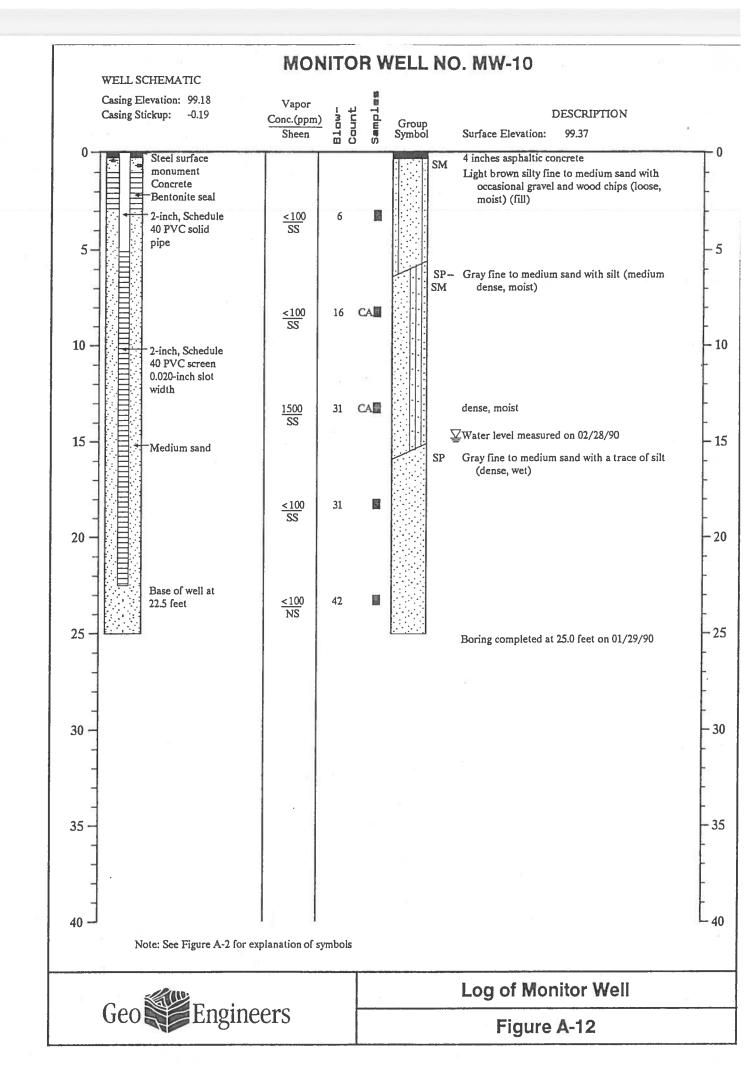


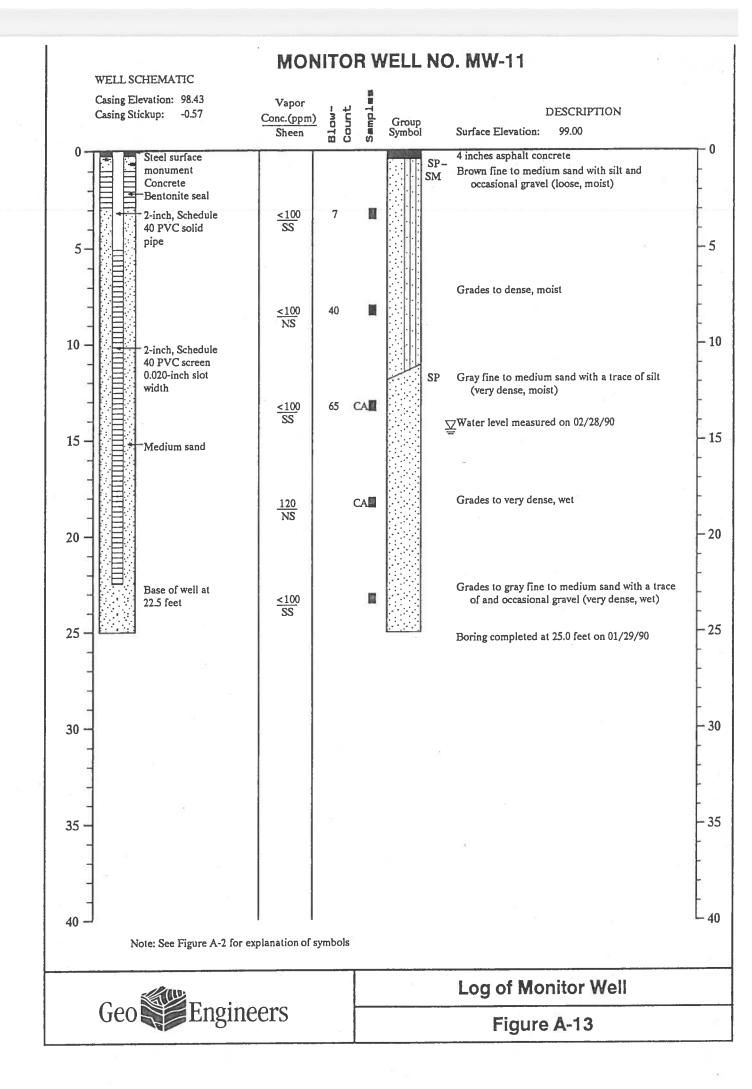


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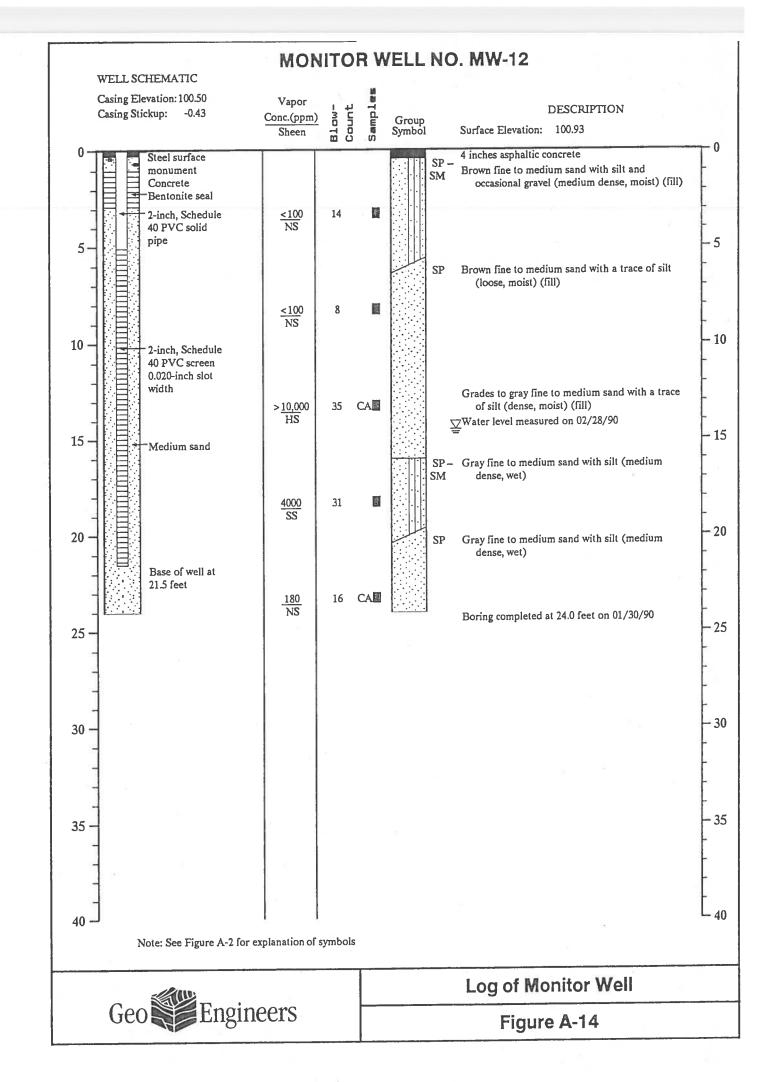
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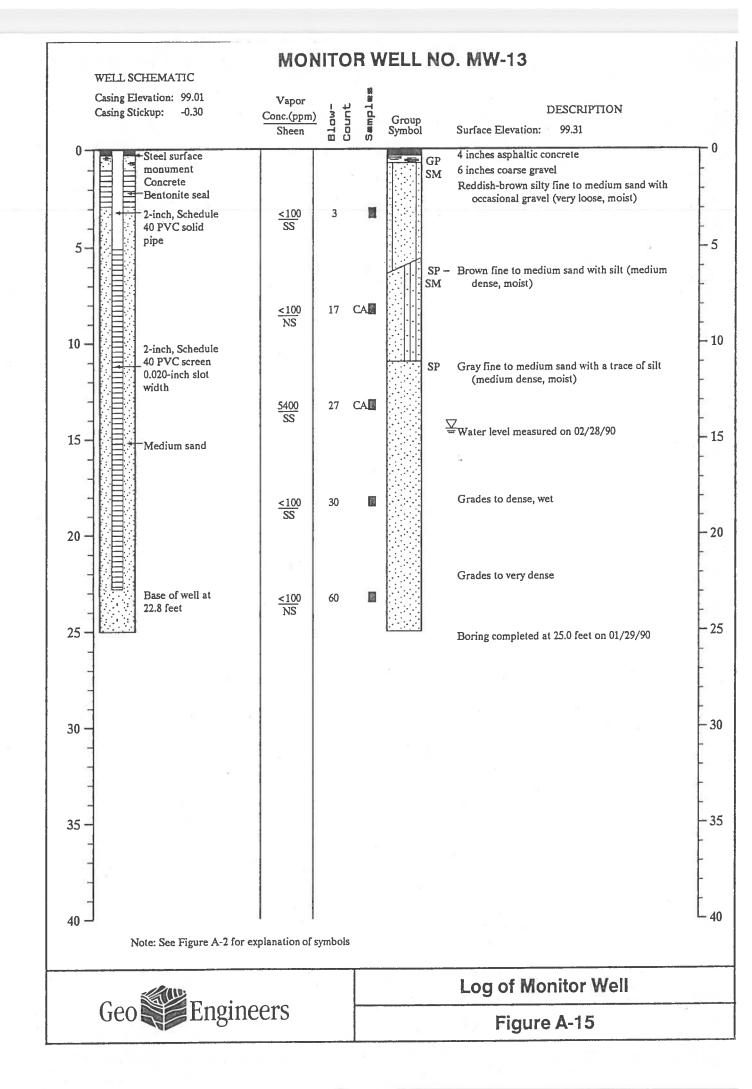




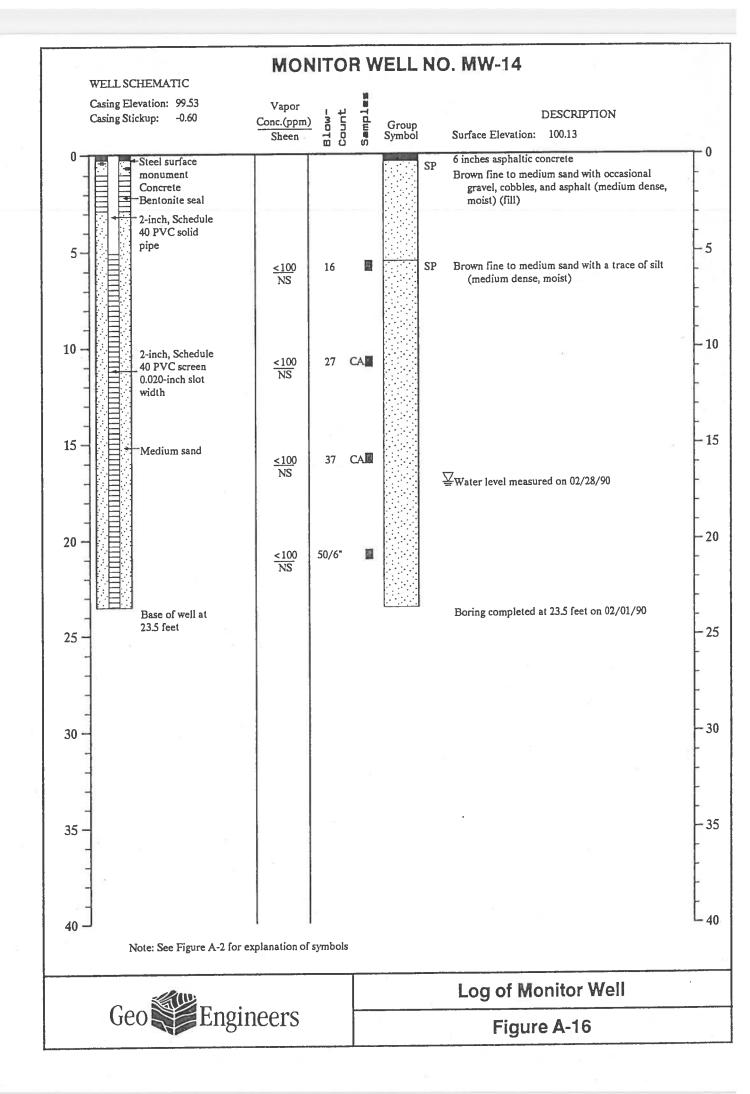


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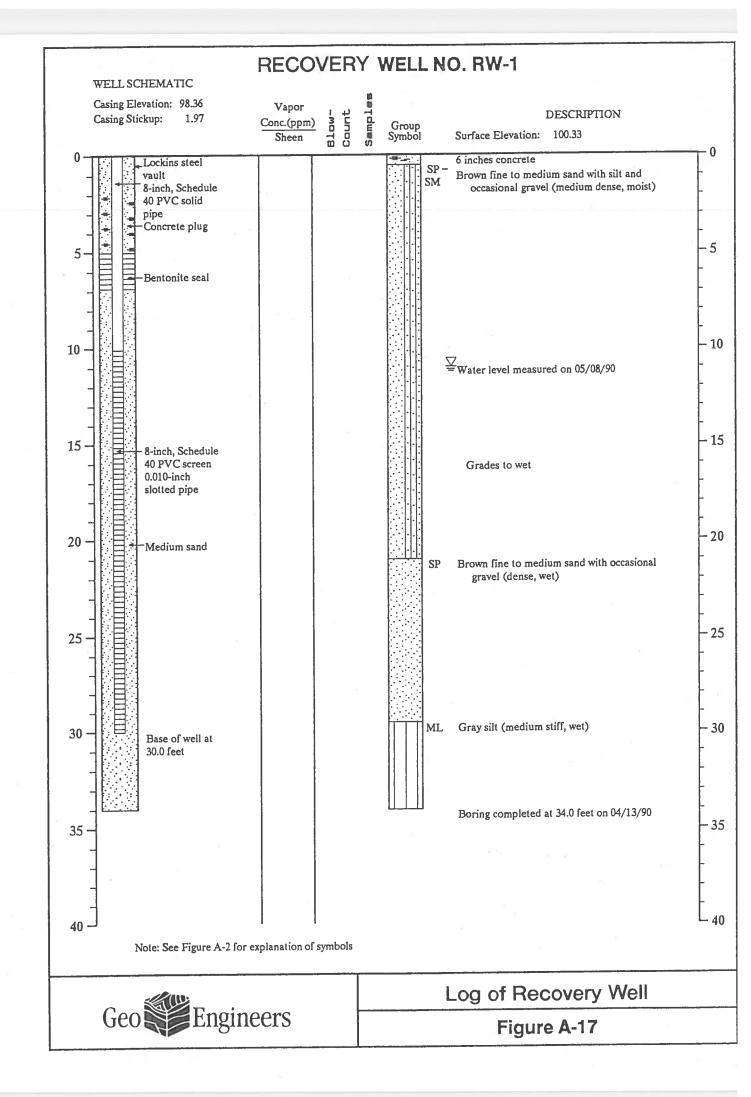




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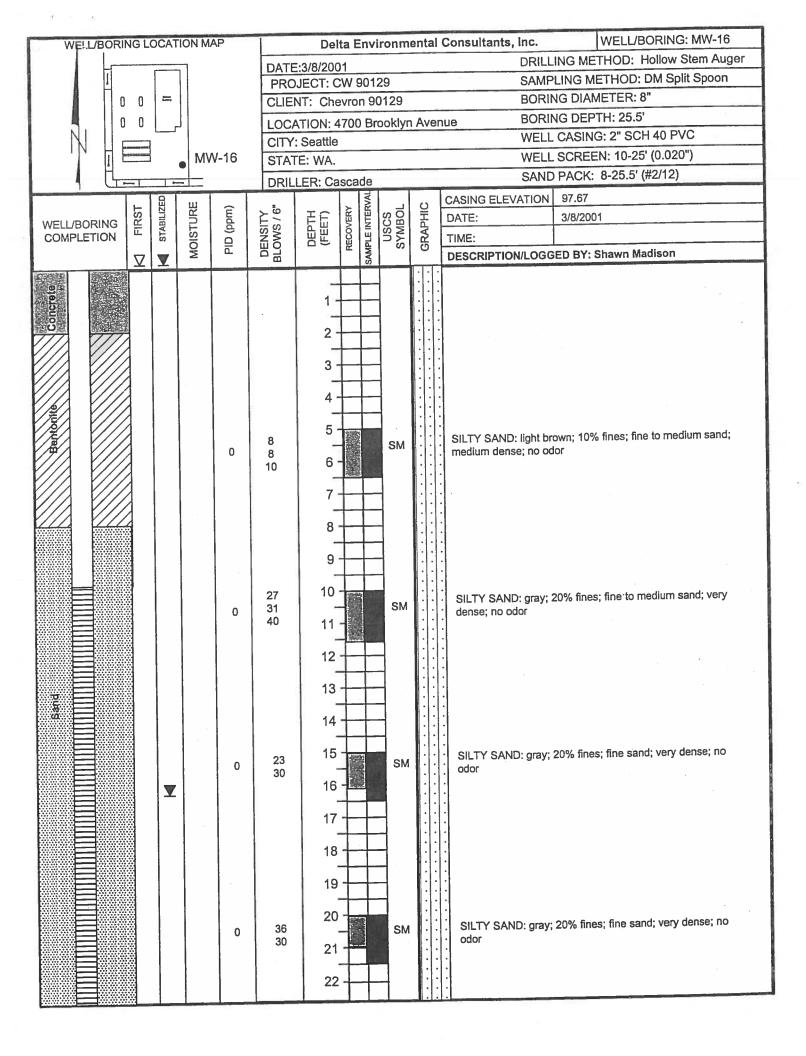


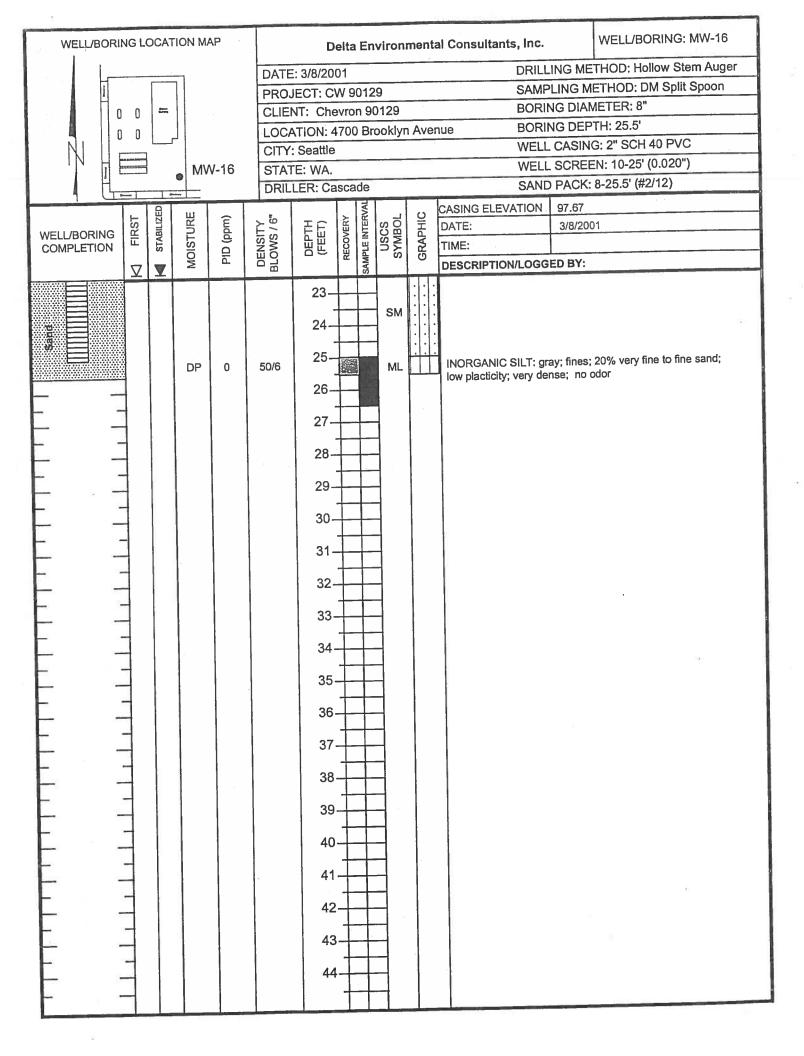
6/15/90 : LRM: CLH: IRA

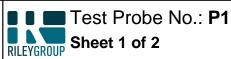
WELL/BORIN	NG L	OCATI	ON MA	P	1	Delta E	Invi	ronme	ntal	Consultants, Inc. WELL/BORING: MW-15
					DATE	:3/8/2001				DRILLING METHOD: Hollow Stem Auger
Ī			٦ ٢	/W-15		JECT: CW	9012	9		SAMPLING METHOD: DM Split Spoon
H	0 0	=		// ¥ ¥ ~ I J		IT: Chevro	_			BORING DIAMETER: 8"
	0 0					TION: 4700			Ave	BORING DEPTH: 25.5'
NI		_ L				Seattle				WELL CASING: 2" SCH 40 PVC
		1				E: WA.				WELL SCREEN: 10-25' (0.020")
H,						ER: Casca	de			SAND PACK: 8-25.5' (#2/12)
1 4		9					R		~	CASING ELEVATION 99.09
	FIRST	STABILIZED	MOISTURE	PID (ppm)	29	DEPTH (FEET) RECOVERY	ПЕК	USCS SYMBOL	GRAPHIC	DATE: 3/8/2001
WELL/BORING	Ē	STA	IST	9	ISN	DEPTH (FEET) RECOVERN	LE IV	NNN N	RAF	TIME:
			Ω N		DENSITY BLOWS / 6"		SAMPLE INTERVAL	S	G	DESCRIPTION/LOGGED BY: Shawn Madison
Bandonie - Cooccela			DP	0	27 38 39 24 26 29 50/6 80/6			SM		SILTY SAND: brown; 10% fines; fine to medium sand; very dense; no odor SILTY SAND: grayish brown; 20% fines; fine to medium sand; dense; no odor SILTY SAND: gray; 10% fines; fine to medium sand; very dense; no odor

6 6

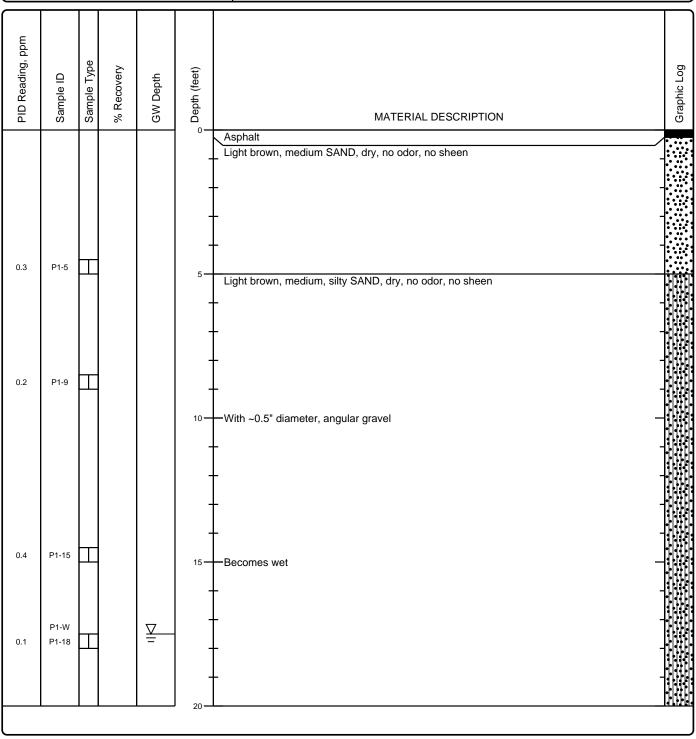
WELL/BORI	NG LO	OCAT	ION M	AP		Delt	a E	nvii	ronme	ntal	Consultants, Inc.	WELL/BORING: N	
					DATE	E:3/8/200	_				DRILL	ING METHOD: Hollow Ste	m Auger
Ī	Γ		MW-	15		JECT: C		012	29			LING METHOD: DM Split S	Spoon
	0					NT: Che	_	-			BORIN	IG DIAMETER: 8"	
	0					ATION: 4				Aven		IG DEPTH: 25.5'	
	~ L					: Seattle					WELL	CASING: 2" SCH 40 PVC	
						TE: WA.						SCREEN: 10-25' (0.020")	
	· · · · ·	Branar	_			LER: Cas	sca	de			SAND	PACK: 8-25.5' (#2/12)	
		8								~	CASING ELEVATION	99.09	
WELL/BORING	FIRST	STABILIZED	MOISTURE	PID (ppm)	76,⊤	ΞĒ	RECOVERY	Ë	USCS SYMBOL	GRAPHIC	DATE:	3/8/2001	
COMPLETION	Ē	STAI	IST	e e	INSI	DEPTH (FEET)	ECO		NN	RAF	TIME:		į
1			MO	Ы	DENSITY BLOWS / 6"		۳	SAMPLE INTERVAL	0,	0	DESCRIPTION/LOGG	ED BY: Shawn Madison	
			WT	0	50/6	23 - 23 - 24 - 25 - 26 - 27 - 28 - 29 - 30 - 31 - 32 - 33 - 34 - 35 - 36 - 37 - 38 - 36 - 37 - 38 - 39 - 40 - 41 - 42 - 43 - 44 - 44 - 44 - 44 - 44 - 44 - 44			GM	·· 000000000		; 25% silt; 10% fine to medium	n sand;



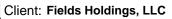


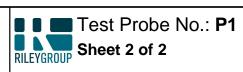


Date(s) Drilled: 02/24/15	Logged By: SL	Surface Conditions: Asphalt
Drilling Method(s): Direct Push	Drill Bit Size/Type: 2.25" Diameter	Total Depth of Borehole: 22 feet bgs
Drill Rig Type: Track-Mounted	Drilling Contractor: The Riley Group, Inc.	Approximate Surface Elevation: n/a
Groundwater Level: 17.5 feet bgs	Sampling Method(s): Continuous	Hammer Data : n/a
Borehole Backfill: Bentonite	Location: 4700 Brooklyn Avenue Northeast, So	eattle, Washington 98105

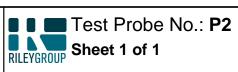


Project Name: Chevron Station No. 9-0129 Project Number: 2015-006A



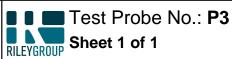


0.2 P1:22 P1:22 P1:22 P1:22 Light gray, medium, silty SAND, wet, no odor, no sheen Test probe terminated at 22 feet bgs - - - - - - - - -	PID Reading, ppm	Sample ID	Sample Type	% Recovery	GW Depth	bepth (feet) □	MATERIAL DESCRIPTION	Graphic Log
	0.2	P1-22				- - - - - - - - - - - - - - - - - - -		



Date(s) Drilled: 02/24/15	Logged By: SL	Surface Conditions: Concrete	
Drilling Method(s): Direct Push	Drill Bit Size/Type: 2.25" Diameter	Total Depth of Borehole: 10 feet bgs	
Drill Rig Type: Track-Mounted	Drilling Contractor: The Riley Group, Inc.	Approximate Surface Elevation: n/a	
Groundwater Level: Not Encountered	Sampling Method(s): Continuous	Hammer Data : n/a	
Borehole Backfill: Bentonite	Location: 4700 Brooklyn Avenue Northeast, Seattle, Washington 98105		

PID Reading, ppm	Sample ID	Sample Type	% Recovery	GW Depth	Depth (feet)	MATERIAL DESCRIPTION	Graphic Log
			-		0	Concrete Light brown, fine to coarse, silty SAND, dry, no odor, no sheen	
1.7					-		
0.4	P2-5				5	Vacuum, excavated to 5 feet bgs	2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2
					-	· ·	
0.1	P2-10				10 — - -	Test probe terminated at 10 feet bgs	
							-
					-		-
							-



 Date(s) Drilled: 02/24/15
 Logged By: SL
 Surface Conditions: Concrete

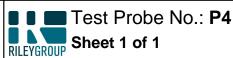
 Drilling Method(s): Direct Push
 Drill Bit Size/Type: 2.25" Diameter
 Total Depth of Borehole: 10 feet bgs

 Drill Rig Type: Track-Mounted
 Drilling Contractor: The Riley Group, Inc.
 Approximate Surface Elevation: n/a

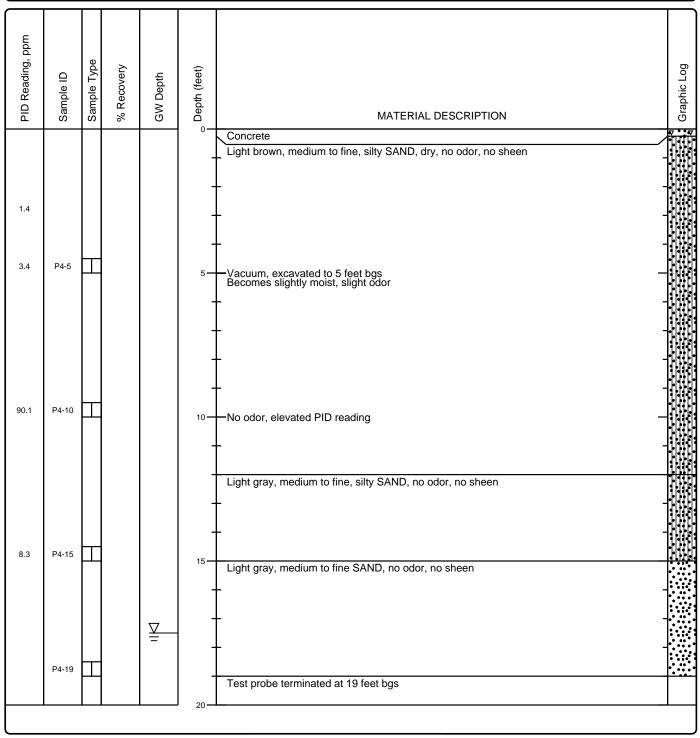
 Groundwater Level: Not Encountered
 Sampling Method(s): Continuous
 Hammer Data : n/a

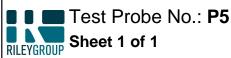
 Borehole Backfill: Bentonite
 Location: 4700 Brooklyn Avenue Northeast, Seattle, Washington 98105

	1.0	1.7	PID Reading, ppm
	P3-10	P3-5	Sample ID
			Sample Type
			% Recovery
			GW Depth
- - 15 - - -	- - 10	-	o Depth (feet)
	Test probe terminated at 10 feet bgs	Concrete Pea GRAVEL Product lines and air sparge/vapor extraction lines observed Light brown, medium to fine, silty SAND, dry, no odor, no sheen Vacuum, excavated to 5 feet bgs	MATERIAL DESCRIPTION
			Graphic Log



Date(s) Drilled: 02/24/15	Logged By: SL	Surface Conditions: Concrete	
Drilling Method(s): Direct Push	Drill Bit Size/Type: 2.25" Diameter	Total Depth of Borehole: 19 feet bgs	
Drill Rig Type: Track-Mounted	Drilling Contractor: The Riley Group, Inc.	Approximate Surface Elevation: n/a	
Groundwater Level: 17.5 feet bgs	Sampling Method(s): Continuous	Hammer Data : n/a	
Borehole Backfill: Bentonite	Location: 4700 Brooklyn Avenue Northeast, Seattle, Washington 98105		





 Date(s) Drilled: 02/24/15
 Logged By: SL
 Surface Conditions: Asphalt

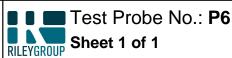
 Drilling Method(s): Direct Push
 Drill Bit Size/Type: 2.25" Diameter
 Total Depth of Borehole: 5 feet bgs

 Drill Rig Type: Track-Mounted
 Drilling Contractor: The Riley Group, Inc.
 Approximate Surface Elevation: n/a

 Groundwater Level: Not Encountered
 Sampling Method(s): Continuous
 Hammer Data : n/a

 Borehole Backfill: Bentonite
 Location: 4700 Brooklyn Avenue Northeast, Seattle, Washington 98105

\square							
PID Reading, ppm	Sample ID	Sample Type	% Recovery	GW Depth	₀ Depth (feet)	MATERIAL DESCRIPTION	Graphic Log
0.7						Asphalt Gray, pea GRAVEL, dry, no odor, no sheen	00000000000000000000000000000000000000
1.1	P5-5	T			_	Test probe terminated at 5 feet bgs	
						- - -	-
					15	- - -	-
					+		-
					20		



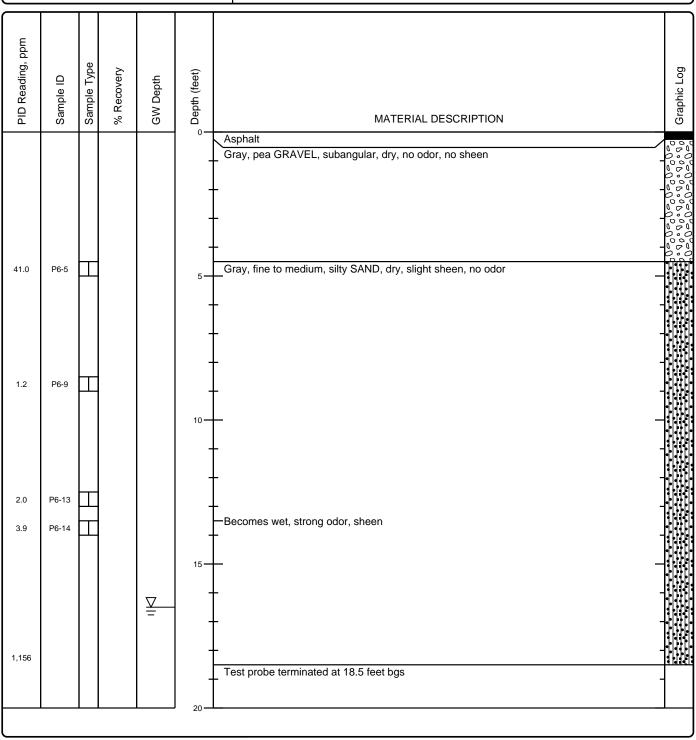
 Date(s) Drilled: 02/24/15
 Logged By: SL
 Surface Conditions: Asphalt

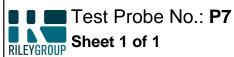
 Drilling Method(s): Direct Push
 Drill Bit Size/Type: 2.25" Diameter
 Total Depth of Borehole: 18.5 feet bgs

 Drill Rig Type: Track-Mounted
 Drilling Contractor: The Riley Group, Inc.
 Approximate Surface Elevation: n/a

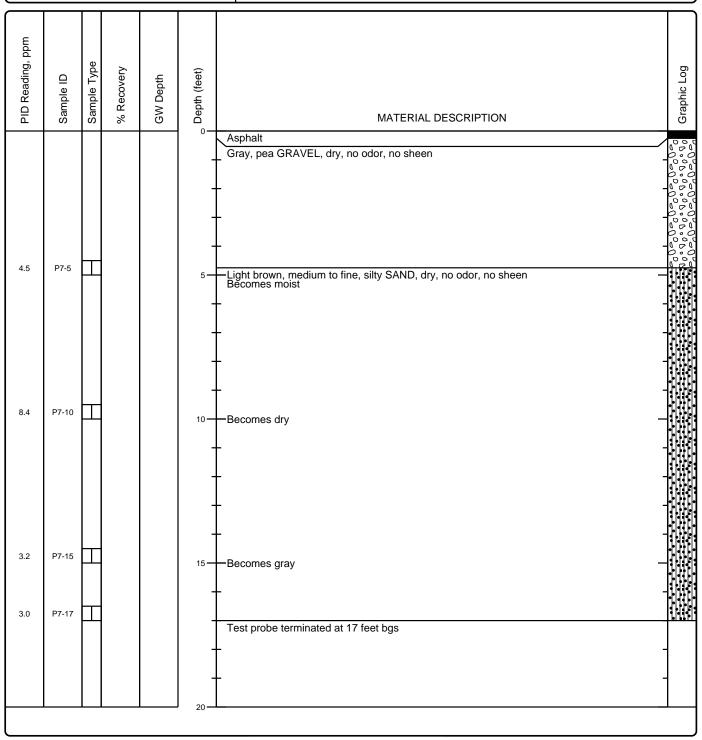
 Groundwater Level: 16.5 feet bgs
 Sampling Method(s): Continuous
 Hammer Data : n/a

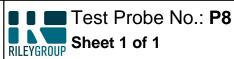
 Borehole Backfill: Bentonite
 Location: 4700 Brooklyn Avenue Northeast, Seattle, Washington 98105



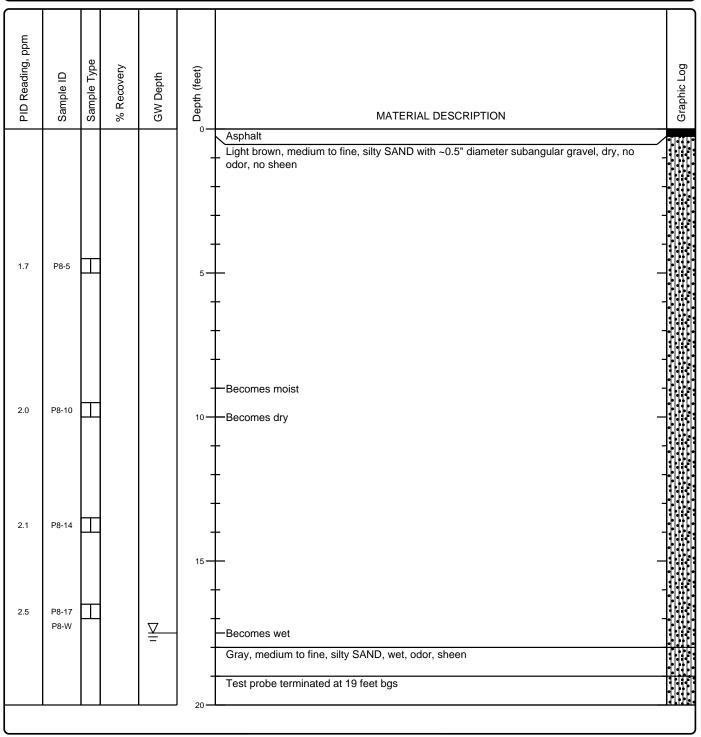


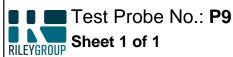
Date(s) Drilled: 02/24/15	Logged By: SL	Surface Conditions: Asphalt			
Drilling Method(s): Direct Push	Drill Bit Size/Type: 2.25" Diameter Total Depth of Borehole: 17 feet bgs				
Drill Rig Type: Track-Mounted	Drilling Contractor: The Riley Group, Inc.	Approximate Surface Elevation: n/a			
Groundwater Level: Not Encountered	Sampling Method(s): Continuous	Hammer Data : n/a			
Borehole Backfill: Bentonite	Location: 4700 Brooklyn Avenue Northeast, Seattle, Washington 98105				





Date(s) Drilled: 02/24/15	Logged By: SL	Surface Conditions: Asphalt			
Drilling Method(s): Direct Push	Drill Bit Size/Type: 2.25" Diameter	Total Depth of Borehole: 19 feet bgs			
Drill Rig Type: Track-Mounted	Drilling Contractor: The Riley Group, Inc.	Approximate Surface Elevation: n/a			
Groundwater Level: 17.5 feet bgs	Sampling Method(s): Continuous	Hammer Data : n/a			
Borehole Backfill: Bentonite	Location: 4700 Brooklyn Avenue Northeast, Seattle, Washington 98105				





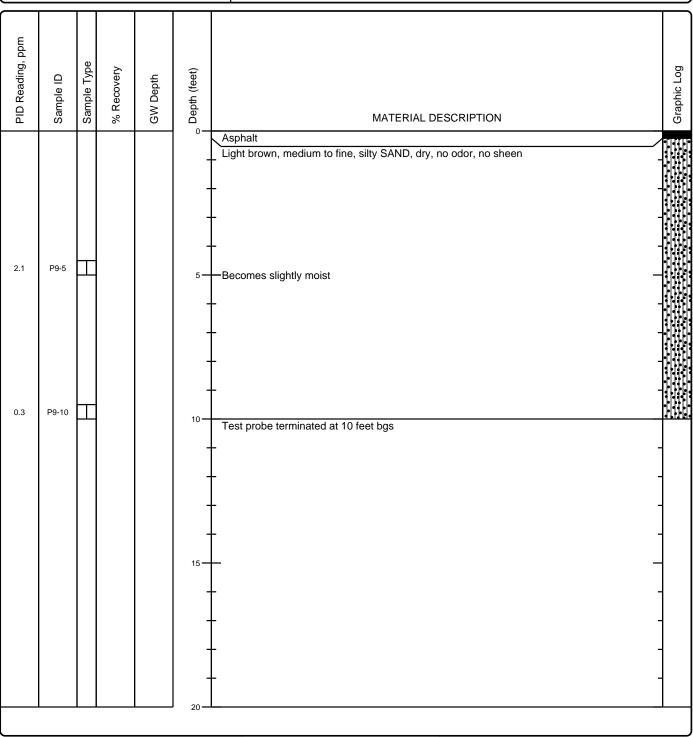
 Date(s) Drilled: 02/24/15
 Logged By: SL
 Surface Conditions: Asphalt

 Drilling Method(s): Direct Push
 Drill Bit Size/Type: 2.25" Diameter
 Total Depth of Borehole: 10 feet bgs

 Drill Rig Type: Track-Mounted
 Drilling Contractor: The Riley Group, Inc.
 Approximate Surface Elevation: n/a

 Groundwater Level: Not Encountered
 Sampling Method(s): Continuous
 Hammer Data : n/a

 Borehole Backfill: Bentonite
 Location: 4700 Brooklyn Avenue Northeast, Seattle, Washington 98105



Client: Fields Holdings, LLC



PID Reading, ppm	Sample ID	Sample Type	% Recovery	GW Depth	Depth (feet)	MATERIAL DESCRIPTION								
1	2	3	4	5	6			7		8				
COLU	COLUMN DESCRIPTIONS													
in 2 Sa 3 Sa sh	I PID Reading, ppm: The reading from a photo-ionization detector, in parts per million.5GW Depth: Groundwater depth in feet below the ground surface.6Depth (feet): Depth in feet below the ground surface.													
FIELD	AND L	ABC	RATO			EVIATIONS								
COME	P: Comp	actio imer	on test Isional c		corrosivit			UC: Unconfined comp	ercent ercent passing No. 200 Sieve) rressive strength test, Qu, in ksf cent passing No. 200 Sieve)					
MATE	RIAL G	RAP	HIC SY	MBOLS	<u>i</u>									
₹ • ↓ • ↓ • ↓ • ↓	Asphaltic Concrete (AC) Portland Cement Concrete Silty SAND (SM) Poorly graded SAND (SP)													
TYPIC	CAL SAI	MPL	ER GRA	APHIC S	YMBOL	<u>S</u>			OTHER GRAPHIC SYMBOLS					
Bu 3-ii bra	ger sam lk Samp nch-OD ass rings IE Samp	le Calif	ornia w/			mple -OD Modified ia w/ brass liners	N spo ∏ She	nch-OD unlined split ion (SPT) elby Tube (Thin-walled, d head)	 ✓ Water level (at time of drilling, ATD) ✓ Water level (after waiting) Minor change in material properties within a stratum – Inferred/gradational contact between strata –? – Queried contact between strata 					
			•											

GENERAL NOTES

1: Soil classifications are based on the Unified Soil Classification System. Descriptions and stratum lines are interpretive, and actual lithologic changes may be gradual. Field descriptions may have been modified to reflect results of lab tests.

2: Descriptions on these logs apply only at the specific boring locations and at the time the borings were advanced. They are not warranted to be representative of subsurface conditions at other locations or times.



18912 North Creek Parkway, Suite 101 Bothell, WA 98011

Boring: SB-1

Project: Chevron Service Station No. 9-0129 Client: Chevron Location: 4700 Brooklyn Ave NE, Seattle, WA						Date Sta	By: G. Ci arted: 10/ mpleted:	2/2010	Driller: Cascade Drill Method: AK/HSA 0 Total Boring Depth: 25 ft
MOISTURE CONTENT	ORGANIC VAPOR (ppm)	BLOWS/6"	SAMP. INTERVAL	ANALYTICAL SAMPLE	Analyical Results (mg/mk)	U.S.C.S. SYMBOL	GRAPHIC LOG	DEPTH (ft)	LITHOLOGY/DESCRIPTION
							×××××		Asphalt (SW) Brown, loose, fine to medium SAND with 20% fine to medium gravel &
Moist	0.3		Sur			sw		1 2	<5% silt. No odor; No sheen. (Fill)
Moiot			3			sw		3	Bricks (SW) Brown, loose, fine to medium SAND with 20% fine to medium gravel & <5% silt. No odor; No sheen. (Fill)
Moist	0.3		m.					4	(GP) Same as above, less gravel, No odor; No sheen.
Moist	0.0		ews.			GP		5 	
								7	
			5m2			GP		8 9	(GP) Light brown, loose, fine to medium SAND with <20% fine to medium gravel, <5% silt. No odor; No sheen.
Moist	0.0							10-	
	0.0	21 31 50	\times					 11	(SP) Brown, dense, medium SAND with 10% fine gravel. No odor; No sheen.
		50				SP		 12	
Moist	0.0		\backslash					13-	(SP) Brown, dense, medium to coarse SAND w/10% fine gravel. No odor; No
		32 50	\wedge			00		-	sheen.
					0.115	SP		14	
Wet	1.9	50	\bigvee	-1-15	G = N.D. D = N.D. HO = N.D.			15	(SP) Orange brown, dense, medium SAND. No odor; No sheen; 10.0ppm.
			\square	SB-1-	B = N.D.	SP		¥16	
Saturated	0.0			7.5	G = N.D.			17	(SP) Light brown to gray, dense, medium to coarse SAND with 5% gravel. No
		50	$\left \right\rangle$	SB-1-17.5	D = N.D. HO = N.D. B = N.D.	SP		18	odor; No sheen.
				S	D - N.D.	5P		19-	
Saturated			\backslash					20-	(SP) Gray, dense, medium to coarse SAND with 10% fine to medium gravel.
		50	\wedge			SP		21-	
Saturated								22	
	1.3	25 50	\mathbb{N}					23-	(SP) Gray, dense, medium to coarse SAND with 5% fine to medium gravel. No odor; No sheen.
			$\langle \rangle$			SP		24-	
								-25-	Bottom of borehole at 25.0 feet.

APPENDIX B

Sampling and Analysis Plan/ Quality Assurance Project Plan (Revised August 22, 2017)

Contents

B1	Intr	oduction	1
B2	Fiel	d Sampling Plan	1
	B2.1	Soil Sampling	1
	B2	2.1.1 Soil Sample Collection and Handling Procedures	2
	B2	2.1.2 Soil Sample Identification	3
		Ground Water Sampling	
		2.2.1 Ground water Sample Identification	
		Sample Custody and Field Documentation	
		2.3.1 Sample Custody	
		2.3.2 Field Documentation	
		Ground Water Level Monitoring	
		Surveying	
	B2.6	Decontamination and Investigative-Derived Waste Management	6
B 3	Qua	lity Assurance Project Plan	6
	B3.1	Purpose of the QAPP	7
	B3.2	Project Organization and Responsibilities	7
	B3.3	Analytical Methods and Reporting Limits	8
	B3	3.3.1 Method Detection Limit and Method Reporting Limit	
	B3.4	Data Quality Objectives	9
		3.4.1 Precision	
		3.4.2 Accuracy1	
		3.4.3 Representativeness1	
		3.4.4 Comparability1 3.4.5 Completeness	
		3.4.6 Sensitivity	
	B3.5		
	B3	3.5.1 Field Quality Control1	
	B3	3.5.2 Laboratory Quality Control1	3
	B3.6	Corrective Actions1	3
	B3.7	Data Reduction, Quality Review, and Reporting1	4
	B3	3.7.1 Minimum Data Reporting Requirements1	4
	B3.8	Data Quality Verification and Validation1	5

B4 References	j	19
B3.11.2	Analytical Data Management	
B3.11.1	Field Documentation	
B3.11 Data	and Records Management	
B3.10 Perfo	ormance and System Audits	
B3.9 Prev	entative Maintenance Procedures and Schedules	

List of Tables

- B-1 Analytical Methods, Sample Containers, Preservation, and Holding Times
- B-2 OC Parameters Associated with PARCCS
- B-3 Measurement Quality Objectives for Water Samples, Friedman and Bruya, Inc.
- B-4 Measurement Quality Objectives for Soil Samples, Friedman and Bruya, Inc.
- B-5 Measurement Quality Objectives for Water Samples, Eurofins Lancaster Laboratories
- B-6 Measurement Quality Objectives for Soil Samples, Eurofins Lancaster Laboratories

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B1 Introduction

Aspect Consulting, LLC (Aspect) prepared this Sampling and Analysis Plan/Quality Assurance Project Plan (SAP/QAPP) for the 4700 Brooklyn Ave NE Site (Site) as Appendix B to the Interim Action Work Plan (Work Plan). The purpose of this SAP/QAPP is to ensure that field sample collection, handling, and laboratory analysis will generate data to meet project-specific data quality objectives (DQOs) in accordance with the Model Toxics Control Act (MTCA) requirements (WAC 173-340-350). This SAP/QAPP is comprised of two major components: a Field Sampling Plan (FSP) for defining field protocols and a Quality Assurance Project Plan (QAPP) for defining analytical protocols.

Environmental investigation activities to be performed under this SAP/QAPP are on behalf of two parties, FH Brooklyn LLC (FH Brooklyn) and Chevron Environmental Management (Chevron) according to the Agreed Order 13815. The parties have an agreement of responsibility for the different environmental investigations to be performed and therefore each investigation will have a lead party. FH Brooklyn is the lead party for on-property activities and Aspect will perform activities on behalf of FH Brooklyn. Chevron is the lead party for off-property activities and Leidos will perform activities on behalf of Chevron. Given this joint party agreement, this SAP/QAPP contains counterpart elements that apply to the on-property work performed by Aspect, and the off-property work performed by Leidos. It is the responsibility of the Aspect and Leidos personnel and subcontracted analytical laboratory personnel performing the sampling and analysis activities to adhere to the requirements of this SAP/QAPP.

The Field Sampling Plan (Section C2) and Quality Assurance Project Plan (Section C3) are presented below.

B2 Field Sampling Plan

B2.1 Soil Sampling

Performance monitoring associated with the Interim Action will include laboratory analysis of both excavation sidewall and excavation bottom samples. The distance between samples will not exceed 20 feet, and closer sample spacing may be necessary. The samples will be submitted for laboratory analysis of parameters described in this QAPP.

For performance monitoring of the assumed excavation bottom at 24 ft bgs, Aspect will establish a three by four sampling grid that divides the excavation bottom into twelve equal-area rectangles with dimensions of approximately 34 feet by 40 feet. Within each rectangular area, Aspect will field-screen the soil for evidence of contamination, and samples will be collected for laboratory analysis of GRO and BTEX at up to four locations where contamination is potentially indicated. If there are no indications of contamination within the entire rectangular area, a single soil sample will be collected for analysis from the approximate center of the rectangle.

The following subsections detail the procedures for soil sample collection, handling, identification, and sample quality assurance/quality control (QA/QC).

B2.1.1 Soil Sample Collection and Handling Procedures

A geologist from Aspect and/or Leidos will oversee the drilling activities and prepare a geologic log for each of the explorations completed, including an examination of the full length of each soil core recovered by the sonic drilling rig. The field representative will visually classify the soils in accordance with American Society of Testing and Materials (ASTM) Method D2488 and record soil descriptions, field screening results, and other relevant details (e.g., staining, debris, odors, etc.) on the boring log form. If samples are collected for chemical analysis, the sample ID and depth will also be recorded on the log.

Soil samples collected during the Interim Action will be grab samples.

Headspace Vapor

Samples will be field screened to obtain a relative estimate of its volatile organic carbon (VOC) concentration. This field screening will be performed by measuring the concentration of VOCs in the headspace above the sample in a closed container using a field flame-ionization detector (FID) or photoionization detector (PID). The field screening will be performed by placing the soil into a sealed plastic bag (e.g., Ziploc), disaggregating the soil by hand, allowing the sample to equilibrate for at least five minutes, and then opening the bag slightly, inserting the instrument probe, and measuring the VOC concentration in the headspace. If the ambient temperature is below 65°F, the sample will be warmed (e.g., in a heated vehicle) before the headspace measurement is made.

The PID will be calibrated daily in the field using the manufacturer's calibration standard (100 ppm isobutylene gas). A calibration test, referred to as a "bump test," will be performed as necessary in the field using the calibration gas to check that the PID remains properly calibrated throughout the day.

Sheen Testing

Sheen testing will be conducted by placing soil in a pan of water and observing the water surface for signs of sheen. Sheens are classified as follows:

- Slight Sheen: Light, colorless, dull sheen. The spread is irregular and dissipates rapidly.
- **Moderate Sheen:** Light to heavy sheen, may show color/iridescence. The spread is irregular to flowing. Few remaining areas of no sheen are evident on the water surface.
- **Heavy Sheen:** Heavy sheen with color/iridescence. The spread is rapid and the entire water surface may be covered with sheen.

Sample Collection for Laboratory Analysis

All soil samples to be submitted for gasoline-range total petroleum hydrocarbons (TPH-Gx) and VOC analyses will be collected in accordance with U.S. Environmental Protection Agency (EPA) Method 5035A. The soil aliquot for these analyses will be

collected using a laboratory-supplied modified disposable plastic syringe as required by the EPA Method 5035A, and placed in preweighed laboratory-supplied vials.

For all other analyses, the soil samples will be removed from the sampler using a stainless-steel spoon and placed in a stainless-steel bowl for homogenization with the stainless-steel spoon. Gravel-sized material greater than approximately 0.5 inch will be removed from the sample during mixing. A representative aliquot of the homogenized soil will be placed into certified-clean jars supplied by the analytical laboratory.

The initial laboratory submittal will have samples selected for TPH-Gx, TPH-Dx, and BTEX. Samples will be selected based on field screening and to provide proper horizontal and vertical characterization. Select soil samples will be submitted for analysis of chlorinated volatile compounds (CVOCs).

QC soil samples (e.g., field duplicates and trip blanks) will be collected at the respective frequencies prescribed in Section B3.5 of the QAPP.

B2.1.2 Soil Sample Identification

Each soil sample collected for chemical analysis will be assigned a unique sample identification number including the location ID and the depth from which the sample was collected. For example, the soil sample collected from sidewall location 5 at a depth of 10 feet below ground surface (bgs) would be identified as SW-5-10.

B2.2 Ground Water Sampling

Any ground water samples will be collected and handled in accordance with the procedures described below:

- The locking well cap will be removed and the depth-to-ground water will be measured from the surveyed location to the nearest 0.01 foot using an electronic water level measuring device. The depth to the bottom of the monitoring well will also be measured to evaluate siltation of the monitoring well. The water level indicator will be decontaminated between wells.
- The presence of light non-aqueous phase liquid (LNAPL) will be evaluated in all wells screened in the 15-foot zone within the area of LNAPL indicators depicted in Figure 6 of the RIWP. LNAPL presence and thickness will be evaluated using an electronic oil/water interface probe. The oil/water interface probe will be decontaminated between wells.
- Each monitoring well will be purged at a low-flow rate less than 0.5 liter per minute (Puls and Barcelona, 1996; Ecology, 2012) using a peristaltic pump and dedicated tubing (polyethylene tubing with a short length of silicon tubing through the pump head). The tubing intake will be placed just below the center of the saturated section of well screen. During purging, field parameters (temperature, pH, specific electrical conductance, dissolved oxygen, and oxidation-reduction potential [ORP]) will be monitored using a YSI meter and flow-through cell, or equivalent. These field parameters will be recorded at 2- to 4-minute intervals throughout well purging until they stabilize. Stabilization is defined as three successive readings where the parameter values vary by less than

10 percent (or 0.5 milligrams per liter [mg/L] dissolved oxygen if the readings are below 1 mg/L). However, no more than three well casing volumes will be purged prior to ground water sample collection. Three turbidity measurements will also be made before collecting the sample (Hach 2100Q turbidimeter).

- Samples with a field-measured specific electrical conductance greater than 1,000 microSiemans per centimeter (μ S/cm) or turbidity greater than 25 nephelometric turbidity units (NTU) will be denoted as such on the chain-of-custody (COC) form, so that the laboratory can employ appropriate sample preparation techniques to avoid analytical interferences for specific analyses.
- If the monitoring well is completely dewatered during purging, samples will be collected when sufficient recharge has occurred to allow filling of all sample containers.
- Once purging is complete, the ground water samples will be collected using the same low-flow rate directly into laboratory-supplied sample containers. Samples for dissolved metals analyses will be filtered using an in-line 0.45 micrometer (µm) filter; at least 0.5 liter of water will be purged through the filter prior to sample collection.
- In wells that have measurable LNAPL, but that require sample collection for CVOC analysis, an additional sampling procedure will be implemented to advance the 1/4-inch peristaltic tubing past the LNAPL. One end of a length of 3/8-inch tubing will be covered with Teflon plumbers tape and the tubing will be placed into the well to a level below the measured LNAPL layer. The 1/4-inch peristaltic tubing will be inserted into the 3/8-inch tubing and pushed through the Teflon tape at the end of the 3/8-inch tubing. Purging and sample collection will then proceed as described above.
- QC ground water samples (e.g., field duplicates and trip blanks) will be collected at the respective frequencies prescribed in Section B3.5.
- Following sampling, the wells cap and monument cap will be secured. Each well's dedicated tubing will be retained in a labeled Ziploc bag for subsequent sampling events. Any damaged or defective well caps or monuments will be noted and scheduled for replacement, if necessary.

B2.2.1 Ground water Sample Identification

Each ground water sample will be assigned a unique sample identification number that includes the well number and the 8-digit date on which the sample was collected. For example, a ground water sample collected from monitoring well MW-10 on December 10, 2016, would be identified as MW-10-121016.

B2.3 Sample Custody and Field Documentation

B2.3.1 Sample Custody

Upon collection, samples will be placed upright in a cooler. Ice or blue ice will be placed in each cooler to meet sample preservation requirements. Inert cushioning material will be placed in the remaining space of the cooler as needed to limit movement of the sample containers. If the sample coolers are being shipped, not hand carried, to the laboratory, the COC form will be placed in a waterproof bag taped to the inside lid of the cooler for shipment.

After collection, samples will be maintained in the consultant's custody until formally transferred to the analytical laboratory. For purposes of this work, custody of the samples will be defined as follows:

- In plain view of the field representatives;
- Inside a cooler that is in plain view of the field representative; or
- Inside any locked space such as a cooler, locker, car, or truck to which the field representative has the only immediately available key(s).

A COC record provided by the laboratory will be initiated at the time of sampling for all samples collected. The record will be signed by the field representative and others who subsequently take custody of the sample. Couriers or other professional shipping representatives are not required to sign the COC form; however, shipping receipts will be collected and maintained as a part of custody documentation in project files. A copy of the COC form with appropriate signatures will be kept by consultants's project manager.

Upon sample receipt, the laboratory will fill out a cooler receipt form to document sample delivery conditions. A designated sample custodian will accept custody of the shipped samples and will verify that the COC form matches the samples received. The laboratory will notify the project manager, as soon as possible, of any issues noted with the sample shipment or custody.

B2.3.2 Field Documentation

While conducting field work, the field representative will document pertinent observations and events, specific to each activity, on field forms (e.g., boring log form, as-built well completion form, well development form, ground water sampling form, etc.) and/or in a field notebook, and, when warranted, provide photographic documentation of specific sampling efforts. Field notes will include a description of the field activity, sample descriptions, and associated details such as the date, time, and field conditions.

B2.4 Ground Water Level Monitoring

Depth-to-ground water measurements will be conducted in monitoring wells using an electric well sounder, graduated to 0.01 foot. Where there is potential for light or dense non-aqueous phase liquid (NAPL), an oil-water interface probe will be used to measure water levels and evaluate the presence of separate-phase product—either floating or at the bottom of the well.

B2.5 Surveying

Horizontal coordinates for each soil sampling location will be recorded using a hand-held global positioning system (GPS) instrument with real-time differential correction, or with survey equipment, if available.

B2.6 Decontamination and Investigative-Derived Waste Management

All nondisposable sampling equipment (stainless steel spoons and bowls) will be decontaminated before collection of each sample. The decontamination sequence consists of a scrub with a non-phosphate (Alconox or Liquinox) solution, followed by tap water (potable) rinse, and finished with thorough spraying with deionized or distilled water. A solvent rinse – methanol or hexane – may be used to remove petroleum product from sampling equipment prior to the decontamination procedure described above.

Investigation-derived waste (IDW) water generated during equipment decontamination and sampling will be containerized in labeled drums. The containerized IDW water will be disposed of appropriately at a permitted off-site disposal facility.

Soil cuttings from borings and disposable personal protective equipment (PPE) will be placed in labeled Department of Transportation (DOT)-approved drums pending the analytical results to determine appropriate disposal. Each drum will be labeled with the following information:

- Non-Classified IDW
- Content of the drum (soil, water, PPE) and its source (i.e., the exploration[s] from which the contents came);
- Date IDW was generated; and
- Name and telephone number of the contact person.

The drums of IDW will be temporarily consolidated on-site, profiled (in accordance with applicable waste regulations) based on available analytical data, and disposed of appropriately at a permitted off-site disposal facility. Containers of IDW will be on site less than 90 days from date of generation.

Documentation for off-site disposal of IDW will be maintained in the project file.

B3 Quality Assurance Project Plan

This QAPP identifies QC procedures and criteria required to ensure that data collected are of known quality and acceptable to achieve project objectives. Specific protocols and criteria are also set forth in this QAPP for data quality evaluation, upon the completion of data collection, to determine the level of completeness and usability of the data. It is the responsibility of the project personnel performing or overseeing the sampling and analysis activities to adhere to the requirements of the FSP and this QAPP.

B3.1 Purpose of the QAPP

As stated in the Washington State Department of Ecology's (Ecology) Guidelines for Preparation of Quality Assurance Project Plans for Environmental Studies (Ecology Publication No. 04-03-030, July 2004), specific goals of this QAPP are as follows:

- Focus project manager and project team to factors affecting data quality during the planning stage of the project;
- Facilitate communication among field, laboratory, and management staff as the project progresses;
- Document the planning, implementation, and assessment procedures for QA/QC activities for the investigation;
- Ensure that the DQOs are achieved; and
- Provide a record of the project to facilitate final report preparation.

The DQOs for the project include both qualitative and quantitative objectives, which define the appropriate type of data, and specify the tolerable levels of potential decision errors that will be used as a basis for establishing the quality and quantity of data needed to support the environmental assessment. To ensure that the DQOs are achieved, this QAPP details aspects of data collection including analytical methods, QA/QC procedures, and data quality reviews. This QAPP describes both quantitative and qualitative measures of data to ensure that the DQOs are achieved. DQOs dictate data collection rationale, sampling and analysis designs that are presented in the main body of the RIWP, and sample collection procedures that are presented in the FSP (Section B2 of this Appendix).

B3.2 Project Organization and Responsibilities

The project consultant team involved with data generation includes representatives from the lead party, either Aspect or Leidos, depending on party responsible for the investigation component. Key individuals and their roles on this project are as follows:

Project Manager—Aspect; Leidos. The project manager is responsible for the successful completion of all aspects of this project, including day-to-day management, production of reports, liaison with party and regulatory agencies, and coordination with the project team members. The project manager is also responsible for resolution of non-conformance issues, is the lead author on project plans and reports, and will provide regular, up-to-date progress reports and other requested information to project team and Ecology.

Field Manager—Aspect; Leidos. The field manager is responsible for overseeing the field sampling program outlined in this plan, including collecting representative samples and ensuring that they are handled properly prior to transfer of custody to the project laboratory. The field manager will manage procurement of necessary field supplies, assure that monitoring equipment is operational and calibrated in accordance with the specifications provided herein, and act as the Site Health and Safety Officer.

Data Quality Manager—Aspect; Leidos. The data quality manager is responsible for developing data quality objectives, selecting analytical methods, coordinating with the analytical laboratory, overseeing laboratory performance, and approving QA/QC procedures. The data quality manager is also responsible for overseeing QA validation of the analytical data reports received from the project laboratory. Data will be validated inhouse by the lead party for the data collection, either Aspect or Leidos. The validator works independently, with no interference from those who collect and use the Site data.

Laboratory Project Manager—Friedman and Bruya, Inc. (FBI); Eurofins Lancaster Laboratories. Aspect will contract FBI laboratory for the analysis described in the Interim Action Work Plan. Chevron will contract Eurofins Lancaster Laboratories for investigation activities for which their responsible. The laboratory project manager is responsible for ensuring that all laboratory analytical work for soil and water media complies with project requirements, and acting as a liaison with the project manager, field manager, and data quality manager to fulfill project needs on the analytical laboratory work. This responsibility also applies to analysis the laboratory project manager subcontracts to another laboratory.

B3.3 Analytical Methods and Reporting Limits

Laboratory analytical methods for soil and ground water analyses to be performed during this environmental characterization are as follow:

Chemical Group and Analyte	Analytical Method
Gasoline Range Organics	NWTPH-Gx
Diesel & Residual Range Organics	NWTPH-Dx
Benzene, Toluene, Ethylbenzene, Xylenes	EPA 8260C or 8021B
Chlorinated Volatile Organic Compounds	EPA 8260C
Petroleum Fractionation (EPH/VPH)	NWEPH and NWVPH
Total/Dissolved Lead, cadmium, chromium, nickel, and zinc	EPA 6000 series
Methyl tert-butyl ether (MTBE) Ethylene dibromide (EDB) and Ethylene Dichloride (EDC), Naphthalene	EPA 8260C
Carcinogenic polycyclic aromatic hydrocarbons (cPAHs)	EPA 8270
Polychlorinated biphenyls (PCBs)	EPA 8082

Table C-1 lists samples containers, preservation, and analytical holding times for each analysis.

B3.3.1 Method Detection Limit and Method Reporting Limit

The method detection limit (MDL) is the minimum concentration of a compound that can be measured and reported with a 99-percent confidence that the analyte concentration is greater than zero. MDLs are established by the laboratory using prepared samples, not samples of environmental media.

The method reporting limit (RL) is defined as the lowest concentration at which a chemical can be accurately and reproducibly quantified, within specified limits of

precision and accuracy, for a given environmental sample. The RL can vary from sample to sample depending on sample size, sample dilution, matrix interferences, moisture content, and other sample-specific conditions. As a minimum requirement for organic analyses, the RL should be equivalent to or greater than the concentration of the lowest calibration standard in the initial calibration curve. The expected MDLs and RLs from FBI laboratory are summarized in Tables C-3 and C-4 for water and soil samples collected by Aspect, respectively The expected MDLs and RLs from Eurofins Lancaster Laboratory are summarized in Tables C-5 and C-6 for water and soil samples collected by Leidos, respectively.

B3.4 Data Quality Objectives

DQOs, including the Measurement Quality Indicators (MQIs)—precision, accuracy, representativeness, comparability, completeness, and sensitivity (namely PARCCS parameters) —and sample-specific RLs are dictated by the data quality objectives, project requirements, and intended uses of the data. For this project, the analytical data must be of sufficient technical quality to determine whether contaminants are present and, if present, whether their concentrations are greater than or less than applicable screening criteria based on protection of human health and the environment.

The quality of data generated will be assessed against the MQIs set forth in this QAPP. Specific QC parameters associated with each of the MQIs are summarized in Table C-2. Specific MQI goals and evaluation criteria (i.e., MDLs, RLs, percent recovery (%R) for accuracy measurements, relative percent difference (RPD) for precision measurements, are defined in Tables C-3 through C-6. Definitions of these parameters and the applicable QC procedures are presented below.

B3.4.1 Precision

Precision measures the reproducibility of measurements under a given set of conditions. Specifically, it is a quantitative measure of the variability of a group of measurements compared with their average values. Analytical precision is measured through matrix spike/matrix spike duplicate (MS/MSD) samples and laboratory control samples/laboratory control sample duplicate (LCS/LCSD) when there is sufficient sample volume. A laboratory duplicate sample or just an LCS/LCSD may be used in place of an MS/MSD if there is insufficient volume.

Analytical precision is quantitatively expressed as the relative percent difference (RPD) between the LCS/LCSD, MS/MSD, or laboratory duplicate pairs and is calculated with the following formula:

RPD (%) =
$$100 \times \frac{|S - D|}{(S + D)/2}$$

where:

S = analyte concentration in sample D = analyte concentration in duplicate sample

Analytical precision measurements will be carried out at a minimum frequency of 1 per 20 samples for each matrix sampled, or one per laboratory analysis group. Laboratory precision will be evaluated against laboratory quantitative RPD performance criteria as defined in Tables C-3 through C-6 for specific analytical methods and sample matrices. If the control criteria are not met, the laboratory will supply a justification of why the limits were exceeded and implement the appropriate corrective actions. The RPD will be evaluated during data review and validation. The data reviewer will note deviations from the specified limits and will comment on the effect of the deviations on reported data.

B3.4.2 Accuracy

Accuracy measures the closeness of the measured value to the true value. The accuracy of chemical test results is assessed by "spiking" samples with known standards (surrogates, blank spikes, or matrix spikes) and establishing the average recovery. Accuracy is quantified as the %R. The closer the %R is to 100%, the more accurate the data.

Surrogate recovery will be calculated as follows:

Recovery (%) =
$$\frac{MC}{SC} \times 100$$

where:

SC = spiked concentration MC = measured concentration

MS percent recovery will be calculated as follows:

Recovery (%) = $\frac{MC - USC}{SC} \times 100$

where:

SC = spiked concentration MC = measured concentration USC = unspiked sample concentration

Accuracy measurements on MS samples will be carried out at a minimum frequency of 1 in 20 samples per matrix analyzed. Blank spikes will also be analyzed at a minimum frequency of 1 in 20 samples (not including QC samples) per matrix analyzed. Surrogate recoveries for organic compounds will be determined for each sample analyzed for respective compounds. Laboratory accuracy will be evaluated against the performance criteria defined in Tables C-3 through C-6. If the control criteria are not met, the laboratory will supply a justification of why the limits were exceeded and implement the appropriate corrective actions. Percent recoveries will be evaluated during data review and validation, and the data reviewer will comment on the effect of the deviations on the reported data.

B3.4.3 Representativeness

Representativeness measures how closely the measured results reflect the actual concentration or distribution of the chemical compounds in the matrix sampled. The FSP sampling techniques and sample handling protocols (e.g., homogenizing, storage, preservation, and use of duplicates and blanks) have been developed to ensure representative samples. Only representative data will be deemed usable.. The field sampling procedures are described in the FSP (Section B2) of this SAP.

The representativeness of a data point is determined by assessing the integrity of the sample upon receipt at the laboratory (e.g., consistency of sample ID and collection date/time between container labels versus COC forms, breakage/leakage, cooler temperature, preservation, headspace for VOA containers, etc.); compliance of method required sample preparation and analysis holding times; the conditions of blanks (trip blank, rinsate blank, field blank, method/preparation blank, and calibration blank) associated with the sample; and the overall consistency of the results within a field duplicate pair.

B3.4.4 Comparability

Comparability is a qualitative parameter expressing the confidence with which one data set can be compared with another. This goal will be achieved through the use of standard techniques to collect samples, USEPA-approved standard methods to analyze samples, and consistent units to report analytical results. Data comparability also depends on data quality. Data of unknown quality cannot be compared.

B3.4.5 Completeness

Completeness is defined as the percentage of measurements made that are judged to be valid. Results will be considered valid if the precision, accuracy, and representativeness objectives are met and if RLs are sufficient for the intended uses of the data. Completeness is calculated as follows:

$$Completeness (\%) = \frac{V}{P} \times 100$$

where:

V = number of valid measurements P = number of measurements taken

Valid and invalid data (i.e., data qualified with the R flag [rejected]) will be identified during data validation. The target completeness goal for this project is 95 percent.

B3.4.6 Sensitivity

Sensitivity depicts the level of ability an analytical system (i.e., sample preparation and instrumental analysis) of detecting a target component in a given sample matrix with a defined level of confidence. Factors affecting the sensitivity of an analytical system include: analytical system background (e.g., laboratory artifact or method blank contamination), sample matrix (e.g., mass spectrometry ion ratio change, coelution of peaks, or baseline elevation), and instrument instability.

B3.5 Quality Control Procedures

Field and laboratory QC procedures are outlined below.

B3.5.1 Field Quality Control

Beyond use of standard sampling protocols defined in the FSP, field QC procedures include maintaining the field instrumentation used. Field instruments (e.g., PID for evaluating presence of VOCs in soil samples, and the YSI meter for measuring field parameters during ground water sampling) are maintained and calibrated regularly prior to use, in accordance with manufacturer recommendations.

In addition, field QC samples will be collected and submitted for analyses to monitor the precision and accuracy associated with field procedures. Field QC samples to be collected and analyzed for this RI include field duplicates, trip blanks, and equipment rinsate blanks. The definition and sampling requirements for field QC samples are presented below.

Blind Field Duplicates

Blind field duplicate samples are used to check for sampling and analysis reproducibility; however, the field duplicate sample results include variability introduced during both field sampling and laboratory preparation and analysis, and EPA data validation guidance provides no specific evaluation criteria for field duplicate samples. Advisory evaluation criteria are set forth at 35 percent for RPD (if both results are greater than five times the RL) and two times the RLs for concentration difference (if either of the result is less than five times the RL) between the original and field duplicate results.

Field Duplicates will be submitted "blind" to the laboratory as discrete samples (i.e., given unique sample identifiers to keep the duplicate identity unknown to the laboratory), but will be clearly identified in the field log. Field duplicate samples will be collected at a frequency of 5 percent (1 per 20) of the field samples for each matrix and analytical method, but not less than one duplicate per sampling event per matrix.

If a given soil sample depth interval lacks sufficient volume (recovery) to supply material for a planned analysis and its field duplicate analysis, the field duplicate aliquot will be collected for that analysis from another depth interval in that same location if practical.

Trip Blank

Trip blank samples will be used to monitor possible VOC cross-contamination occurring during sample transport. Trip blank samples are prepared and supplied by the laboratory using organic-free, reagent-grade water into a VOC vial prior to the collection of field samples. The trip blank sample vials are placed with and accompany the VOC and TPH-Gx samples through the entire transporting process. **One trip blank will be collected for each soil sampling round and each ground water sampling round where VOC or TPH-Gx analyses are conducted.**

In case a target compound is present in a trip blank, results for all samples shipped with this trip blank will be evaluated and data qualified accordingly if determined that the results are affected.

Equipment Rinsate Blank

Equipment rinsate blanks are collected to determine the potential of cross-contamination introduced by nondedicated equipment (e.g., bladder pump and YSI meter) that is used at multiple sample locations. Deionized water (obtained from the laboratory) is rinsed through the decontaminated sampling equipment and collected into adequate sample containers for analysis. The equipment rinsate blank is then handled in a manner identical to the primary samples collected with that piece of equipment. The blank is then processed, analyzed, and reported as a regular field sample. **The rinsate blank collection frequency will be 1 per 20 samples for each matrix and analytical method, but not less than one equipment rinsate per sampling event per matrix**. When dedicated equipment is used, equipment rinsate blanks will not be collected.

B3.5.2 Laboratory Quality Control

The laboratories' analytical procedures must meet requirements specified in the respective analytical methods or approved laboratory standard operating procedures (SOPs), e.g., instrument performance check, initial calibration, calibration check, blanks, surrogate spikes, internal standards, and/or labeled compound spikes. Specific laboratory QC analyses required for this project will consist of the following at a minimum:

- Instrument tuning, instrument initial calibration, and calibration verification analyses as required in the analytical methods and the laboratory standard operating procedures (SOPs);
- Laboratory and/or instrument method blank measurements at a minimum frequency of 5percent (1 per 20 samples) or in accordance with method requirements, whichever is more frequent; and
- Accuracy and precision measurements as defined in Table C-2, at a minimum frequency of 5 percent (1 per 20 samples) or in accordance with method requirements, whichever is more frequent. In cases where a pair of MS/MSD or MS/laboratory duplicate analyses are not performed on a project sample, a set of LCS/LCSD analyses will be performed to provide sufficient measures for analytical precision and accuracy evaluation.

The laboratory's QA officers are responsible for ensuring that the laboratory implements the internal QC and QA procedures detailed in the laboratory's Quality Assurance Manual.

B3.6 Corrective Actions

If routine QC audits by the laboratory result in detection of unacceptable conditions or data, actions specified in the laboratory SOPs will be taken. Specific corrective actions are outlined in each SOP used and can include the following:

• Identifying the source of the violation;

- Reanalyzing samples if holding time criteria permit;
- Resampling and analyzing;
- Evaluating and amending sampling and analytical procedures; and/or
- Accepting but qualifying data to indicate the level of uncertainty.

If unacceptable conditions occur, the laboratory will contact the project manager to discuss the issues and determine the appropriate corrective action. Corrective actions taken by the laboratory during analysis of samples for this project will be documented by the laboratory in the case narrative associated with the affected samples.

In addition, the project data quality manager will review the laboratory data generated for this investigation to ensure that project DQOs are met. If the review indicates that nonconformances in the data have resulted from field sampling or documentation procedures or laboratory analytical or documentation procedures, the impact of those nonconformances on the overall project data usability will be assessed. Appropriate actions, including re-sampling and/or re-analysis of samples may be recommended to the project manager to achieve project objectives.

B3.7 Data Reduction, Quality Review, and Reporting

All data will undergo a QA/QC evaluation at the laboratory which will then be reviewed by the responsible data quality manager. Initial data reduction, evaluation, and reporting at the laboratory will be carried out in full compliance with the method requirement and laboratory SOPs. The laboratory internal review will include verification (for correctness and completeness) of electronic data deliverable (EDD) accompanied with each laboratory report. The responsible database manager will verify the completeness and correctness of all laboratory deliverables (i.e., laboratory report and EDDs) before releasing the deliverables for data validation.

B3.7.1 Minimum Data Reporting Requirements

The following sections specify general and specific requirements for analytical data reporting to provide sufficient deliverables for project documentation and data quality assessment.

General Requirements

The following requirements apply to laboratory reports for all types of analyses:

- A laboratory report will include a cover page signed by the laboratory director, the laboratory QA officer, or his/her designee to certify the eligibility of the reported contents and the conformance with applicable analytical methodology.
- Definitions of abbreviations, data flags and data qualifiers used in the report.
- Cross reference of field sample names and laboratory sample identity for all samples in the SDG.
- Completed COC document signed and dated by parties of acquiring and receiving.

- Completed sample receipt document with record of cooler temperature and sample conditions upon receipt at the laboratory. Anomalies such as inadequate sample preservation, inconsistent bottle counts, and sample container breakage, and communication record and corrective actions in response to the anomalies will be documented and incorporated in the sample receipt document. The document will be initialed and dated by personnel that complete the document.
- Case narrative that addresses any anomalies or QC outliers in relation to sample receiving, sample preparation, and sample analysis on samples in the sample delivery group (SDG). The narrative will be presented separately for each analytical method and each sample matrix.
- All pages in the report are to be paginated. Any insertion of pages after the laboratory report is issued will be paginated with starting page number suffixed with letters (e.g., pages inserted between pages 134 and 135 should be paginated as 134A, 134B, etc.)
- Any resubmitted or revised report pages will be submitted to project manager with a cover page stating the reason(s) and scope of resubmission or revision, and signed by laboratory director, QA officer, or the designee.

Specific Requirements

The following presents specific requirements for laboratory reports:

- Sample results: All soil sample results will be reported on a dry-weight basis. The report pages for sample results (namely Form 1s) will, at minimum, include sample results, RLs, unit, proper data flags, preparation, and analysis, dilution factor, and percent moisture (for solid samples).
- Method blank results.
- LCS and LCSD (if matrix spike duplicate analysis is not performed) results with laboratory acceptance criteria for %R and RPD.
- Surrogate spike results with laboratory acceptance criteria for %R.
- MS and MSD results with laboratory acceptance criteria for %R and RPD. In cases where MS/MSD analyses were not performed on a project sample, LCS/LCSD analyses should be performed and reported instead.

B3.8 Data Quality Verification and Validation

Reported analytical results will be qualified by the laboratory to identify QC concerns in accordance with the specifications of the analytical methods. Additional laboratory data qualifiers may be defined and reported by the laboratory to more completely explain QC concerns regarding a particular sample result. All data qualifiers will be defined in the laboratory's narrative reports associated with each case.

Data validation will be performed on all data consistent with United States Environmental Protection Agency Stage 2B requirements. Environmental data validation will be performed using Ecology's TCP Data Validation and Sampling Analysis Plan (SAP)/Quality Assurance Project Plan (QAAP) for data validation for all Formal Cleanup Sites (Ecology September 23, 2016). Data validation shall be performed at Quality Assurance Level 2 (EPA2) with Third Party Data Validation.

In cases where a systematic QC problem is suspected, such as unusual detections of an analyte or consistent outlying results of a QC parameter, a more detailed review will be performed on laboratory records pertinent to the concerned analysis to further evaluate the extend of the QC issue and the final data quality and usability. The actual level of validation for each data point will be entered in the electrical database submitted to the Ecology Environmental Information Management system (EIMs). Data validation will be conducted following the guidance below:

- EPA Contract Laboratory Program National Functional Guidelines for Inorganic Superfund Data Review, Office of Superfund Remediation and Technical Innovation, U.S. Environmental Protection Agency, January 2010, USEPA 540/R-10/011
- EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review, Office of Superfund Remediation and Technical Innovation, U.S. Environmental Protection Agency, June 2008, USEPA-540-R-08-01.

The data validation will examine and verify the following parameters against the method requirements and laboratory control limits specified in Tables C-3 through C-6:

- Sample management and holding times;
- Instrument performance check, calibration, and calibration verification;
- Laboratory and field blank results;
- Detection and reporting limits;
- Laboratory replicate results;
- MS/MSD results;
- LCS and/or standard reference material results;
- Field duplicate results;
- Surrogate spike recovery (organic analyses only);
- Internal standard recovery (internal calibration methods only);
- Inter-element interference check (ICP analyses only);
- Serial dilution (metals only);
- Labeled compound recovery (isotope dilution methods only); and
- Ion ratios for detected compounds (high resolution GC/MS methods only).

Data qualifiers will be assigned based on outcome of the data validation. Data qualifiers are limited to and defined as follows:

• U—The analyte was analyzed for but was determined to be non-detect above the reported sample quantitation limit, or the quantitation limit was raised to the concentration found in the sample due to blank contamination.

- J—The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
- UJ—The analyte was not detected above the reported quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.
- R—The sample results are rejected due to serious deficiencies in the ability to analyze the sample and meet QC criteria. The presence or absence of the analyte cannot be verified.
- DNR—Do not report from this analysis; the result for this analyte is to be reported from an alternative analysis.

In cases of multiple analyses (such as an undiluted and a diluted analysis) performed on one sample, the optimal result will be determined and only the determined result will be reported for the sample.

The scope and findings of the data validation will be documented and discussed in the Data Validation Report(s). The Data Validation Report(s) will be appended to the RI report.

B3.9 Preventative Maintenance Procedures and Schedules

Preventative maintenance in the laboratory will be the responsibility of the laboratory personnel and analysts and ensured by the laboratory project manager. This maintenance includes routine care and cleaning of instruments and inspection and monitoring of carrier gases, solvents, and glassware used in analyses. Details of the maintenance procedures are addressed in the respective laboratory SOPs.

Precision and accuracy data are examined for trends and excursions beyond control limits to determine evidence of instrument malfunction. Maintenance will be performed when an instrument begins to change as indicated by the degradation of peak resolution, shift in calibration curves, decrease in sensitivity, or failure to meet one or another of the method-specific QC criteria.

Maintenance and calibration of instruments used in the field for sampling (e.g., PID for evaluating presence of VOCs in soil samples, and the YSI meter for measuring field parameters during ground water sampling) will be conducted regularly in accordance with manufacturer recommendations prior to use.

B3.10 Performance and System Audits

The project manager has responsibility for reviewing the performance of the laboratory QA program; this review will be achieved through regular contact with the analytical laboratory's project manager. To ensure comparable data, all samples of a given matrix to be analyzed by each specified analytical method will be processed consistently by the same analytical laboratory.

B3.11 Data and Records Management

Records will be maintained documenting all activities and data related to field sampling and chemical analyses.

B3.11.1 Field Documentation

Raw data received from the analytical laboratory will be reviewed, entered into a computerized database, and verified for consistency and correctness. The database will be updated based on data review and independent validation if necessary.

The following field data will be included in the database:

- Sample location coordinates
- Sample type (i.e., ground water or soil)
- Soil or ground water sampling depth interval

Information regarding whether concentrations represent total phase (unfiltered samples) or dissolved phase (filtered samples) will be compiled and stored in the database. Data will be submitted to Ecology's Environmental Information Management (EIM) database once data have been reviewed and validated.

B3.11.2 Analytical Data Management

Raw data received from the analytical laboratory will be reviewed, entered into a computerized database, and verified for consistency and correctness. The database will be updated based on data review and independent validation if necessary.

The following field data will be included in the database:

- Sample location coordinates
- Sample type (i.e., ground water or soil)
- Soil or ground water sampling depth interval

Information regarding whether concentrations represent total phase (unfiltered samples) or dissolved phase (filtered samples) will be compiled and stored in the database. Data will be submitted to Ecology's Environmental Information Management (EIM) database once data have been reviewed and validated.

B4 References

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- Washington State Department of Ecology (Ecology), 2004, Collecting and Preparing Soil Samples for VOC Analysis, Implementation Memorandum Number 5, June 17, 2004.
- Washington State Department of Ecology (Ecology), 2012, Guidance for Groundwater Monitoring at Landfills and Other Facilities Regulated Under Chapters 173-304, 173-306, 173-350, and 173-351 WAC, Publication No. 12-07-072.

TABLES

Sample Matrix	Analytical Parameter	Analytical Method	Sample Container	No. Containers	Preservation Requirements	Holding Time
	Gasoline Range TPH	NWTPH-Gx	Method 5035A, 40-mL vials	4	4°C ±2°C, Freeze within 48 hours to <-7°C	14 days
	Diesel and Motor Oil Range TPH	NWTPH-Dx/SW846 Method 3630 (Silica Gel Cleanup)	4 ounce jar	1	4°C ±2°C	14 days for extraction; 40 days for analysis
	втех	Method 8021 B	Method 5035A, 40-mL vials	4	4°C ±2°C, Freeze within 48 hours to <-7°C	14 days
Soil	EPH/VPH	NWEPH/NWVPH	4 Ounce Jar/Method 5035A, 40-mL vials	5	4°C ±2°C, Freeze within 48 hours to <-7°C	14 days
	MTBE, EDC, EDB, Naphthalene	Method 8260	Method 5035A, 40-mL vials	4	4°C ±2°C, Freeze within 48 hours to <-7°C	14 days
	Polychlorinated Biphenyls (PCBs)	Method 8082	4-ounce jar	1	4°C ±2°C	6 months
	Carcinogenic Polycyclic Aromatic Hydrocarbons (cPAHs)	Method 8270	4-ounce jar	1	4°C ±2°C	6 months
	Cadmium, Chromium, Lead, Nickel, Zinc	Method 6020	4-ounce jar	1	4°C ±2°C	6 months
	Gasoline Range TPH	Method NWTPH-Gx	40-mL VOA vials	3	4°C ±2°C, HCl pH < 2	14 days
	Diesel and Motor Oil Range TPH	NWTPH-Dx/SW846 Method 3630 (Silica Gel Cleanup)	500-mL amber glass bottle	1	4°C ±2°C	7 days for extraction, 40 days for analysis
Wator	VOCs (including MTBE)	Method 8260	40-mL VOA vials	3	4°C ±2°C, 1 with HCl pH < 2, 2 without HCl	14 days for analysis
Water	EPH/VPH	NWEPH/NWVPH	1000-mL amber/40-mL VOA vials	4	4°C ±2°C, HCl pH < 2	7 days for extraction, 40 days for analysis/14 days for anlaysis
	Lead	Method 6020	500-mL HDPE bottle	1	4°C ±2°C, HN0 ₃ pH < 2 (after field filtration)	28 days

Notes:

HCL = hydrochloric acid TPH = total petroleum hydrocarbons VOA = volatile organic analysis BTEX = benzene, toluene, ethylbenzene, xylenes MTBE = methyl tert-butyl ether

Table B-2. QC Parameters Associated with PARCCS

Project No. 160092, 4700 Brooklyn Ave, Seattle, Washington

Data Quality Indicators	QC Parameters
	RPD values of:
Precision	(1) LCS/LCS Duplicate
Frecision	(2) MS/MSD
	(3) Field Duplicates
	Percent Recovery (%R) or Percent Difference (%D) values of:
	(1) Initial Calibration and Calibration Verification
	(2) LCS
	(3) MS
Accuracy/Bias	(4) Surrogate Spikes
Accuracy/Dias	Results of:
	(1) Instrument and Calibration Blank
	(2) Method (Preparation) Blank
	(3) Trip Blank
	(4) Equipment Rinsate Blank (if appropriate)
	Results of All Blanks
Representativeness	Sample Integrity (Chain-of-Custody and Sample Receipt Forms)
	Holding Times
	Sample-specific Reporting Limits
Comparability	Sample Collection Methods
	Laboratory Analytical Methods
	Data Qualifiers
Completeness	Laboratory Deliverables
	Requested/Reported Valid Results
Sensitivity	MDLs and MRLs

Notes:

LCS = laboratory control sample MDL = method detection limit MRL = method reporting limit MS/MSD = matrix spike/matrix spike duplicate QC = Quality Control PARCCS = Precision, Accuracy, Representativeness, Comparability, Completeness, Sensistivity

Table B-3. Measurement Quality Objectives for Water Samples

Friedman and Bruya, Inc

Project No. 160092, 4700 Brooklyn Avenue, Seattle, Washington

			LCS/LCS	RPD	Surrogate
Analyte Name	MDL ^(A)	MRL	%R ^(A)	(%)	%R ^(A)
Volatile Organic Compounds (VOCs) by S	SW8260C (J	ug/L)			
1,1,1,2-Tetrachloroethane	0.040	0.2	80 – 128	≤40	n/a
1,1,1-Trichloroethane	0.041	0.2	79 – 124	≤40	n/a
1,1,2,2-Tetrachloroethane	0.060	0.2	80 – 120	≤40	n/a
1,1,2-Trichloro-1,2,2-Trifluoroethane	0.043	0.2	76 – 124	≤40	n/a
1,1,2-Trichloroethane	0.129	0.2	80 – 120	≤40	n/a
1,1-Dichloroethane	0.053	0.2	80 – 120	≤40	n/a
1,1-Dichloroethene	0.054	0.2	74 – 120	≤40	n/a
1,1-Dichloropropene	0.034	0.2	80 – 120	≤40	n/a
1,2,3-Trichlorobenzene	0.110	0.5	80 -125	≤40	n/a
1,2,3-Trichloropropane	0.131	0.5	80 – 120	≤40	n/a
1,2,4-Trichlorobenzene	0.107	0.5	77 – 127	≤40	n/a
1,2,4-Trimethylbenzene	0.024	0.2	80 – 122	≤40	n/a
1,2-Dibromo 3-Chloropropane	0.366	0.5	79 – 129	≤40	n/a
1,2-Dibromoethane (Ethylene Dibromide)	0.075	0.2	80 – 120	≤40	n/a
1,2-Dichlorobenzene	0.036	0.2	80 – 120	≤40	n/a
1,2-Dichloroethane	0.072	0.2	80 – 121	≤40	n/a
1,2-Dichloropropane	0.035	0.2	80 – 120	≤40	n/a
1,3,5-Trimethyl Benzene	0.015	0.2	80 – 120	≤40	n/a
1,3-Dichlorobenzene	0.036	0.2	80 – 120	≤40	n/a
1,3-Dichloropropane	0.062	0.2	80 – 120	≤40	n/a
1,4-Dichlorobenzene	0.040	0.2	80 – 120	≤40	n/a
2,2-Dichloropropane	0.052	0.2	72 – 133	≤40	n/a
2-Butanone	0.814	5.0	73 – 123	≤40	n/a
2-Chloro Toluene	0.024	0.2	80 – 120	≤40	n/a
2-Chloroethylvinyl Ether	0.250	1.0	62 – 130	≤40	n/a
2-Hexanone	0.902	5.0	80 – 129	≤40	n/a
4-Chloro Toluene	0.016	0.2	80 – 120	≤40	n/a
4-Isopropyl Toluene	0.026	0.2	80 – 124	≤40	n/a
4-Methyl-2-Pentanone	0.974	5.0	80 – 125	≤40	n/a
Acetone	2.057	5.0	64 – 125	≤40	n/a
Acrolein	2.476	5.0	60 – 124	≤40	n/a
Acrylonitrile	0.604	1.0	76 – 123	≤40	n/a
Benzene	0.027	0.2	80 – 120	≤40	n/a
Bromobenzene	0.060	0.2	80 – 120	≤40	n/a
Bromochloromethane	0.061	0.2	80 – 120	≤40	n/a

Table B-3. Measurement Quality Objectives for Water Samples

Friedman and Bruya, Inc

Project No. 160092, 4700 Brooklyn Avenue, Seattle, Washington

			LCS/LCS	RPD	Surrogate
Analyte Name	MDL ^(A)	MRL	%R ^(A)	(%)	%R ^(A)
Volatile Organic Compounds (VOCs)	by SW8260C (µ	ıg/L)			
Bromodichloromethane	0.051	0.2	80 – 122	≤40	n/a
Bromoethane	0.041	0.2	77 – 122	≤40	n/a
Bromoform	0.062	0.2	62 – 149	≤40	n/a
Bromomethane	0.252	1.0	68 – 130	≤40	n/a
Carbon Disulfide	0.037	0.2	77 – 124	≤40	n/a
Carbon Tetrachloride	0.044	0.2	71 – 139	≤40	n/a
Chlorobenzene	0.023	0.2	80 – 120	≤40	n/a
Chloroethane	0.086	0.2	68 – 133	≤40	n/a
Chloroform	0.027	0.2	80 – 120	≤40	n/a
Chloromethane	0.095	0.5	77 – 122	≤40	n/a
cis 1,3-dichloropropene	0.061	0.2	80 – 127	≤40	n/a
cis-1,2-Dichloroethene	0.043	0.2	78 – 120	≤40	n/a
Dibromochloromethane	0.048	0.2	80 – 120	≤40	n/a
Dibromomethane	0.145	0.2	80 – 120	≤40	n/a
Dichlorodifluoromethane	0.052	0.2	68 – 133	≤40	n/a
Ethyl Benzene	0.037	0.2	80 – 120	≤40	n/a
Hexachloro-1,3-Butadiene	0.073	0.5	80 – 135	≤40	n/a
lodomethane (Methyl lodide)	0.227	1.0	76 – 123	≤40	n/a
iso-propyl Benzene	0.021	0.2	80 – 120	≤40	n/a
Methylene Chloride	0.485	1.0	71 – 125	≤40	n/a
Methyl-tert-butyl ether	0.073	0.5	79 – 121	≤40	n/a
Naphthalene	0.118	0.5	80 – 128	≤40	n/a
n-Butyl Benzene	0.025	0.2	80 – 125	≤40	n/a
n-Propyl Benzene	0.023	0.2	80 – 120	≤40	n/a
sec-Butyl Benzene	0.024	0.2	80 – 121	≤40	n/a
Styrene	0.045	0.2	80 – 121	≤40	n/a
tert-Butyl Benzene	0.026	0.2	80 – 121	≤40	n/a
Tetrachloroethene	0.047	0.2	80 – 120	≤40	n/a
Toluene	0.040	0.2	80 – 120	≤40	n/a
trans 1,3-Dichloropropene	0.081	0.2	79 – 132	≤40	n/a
trans-1,2-Dichloroethene	0.048	0.2	75 – 120	≤40	n/a
trans-1,4-Dichloro 2-Butene	0.324	1.0	47 – 147	≤40	n/a
Trichloroethene	0.049	0.2	80 – 120	≤40	n/a
Trichlorofluoromethane	0.037	0.2	74 – 135	≤40	n/a
Vinyl Acetate	0.069	0.2	74 – 120	≤40	n/a
Vinyl Chloride	0.069	0.2	74 – 120	≤40	n/a
m,p-xylene	0.052	0.4	80 – 120	≤40	n/a
o-Xylene	0.035	0.2	80 - 120	<u>≤</u> 40	n/a

Table B-3. Measurement Quality Objectives for Water Samples

Friedman and Bruya, Inc

Project No. 160092, 4700 Brooklyn Avenue, Seattle, Washington

Analyte Name	MDL ^(A)	MRL	LCS/LCS %R ^(A)	RPD (%)	Surrogate %R ^(A)
Volatile Organic Compounds (VOCs) by	SW8260C (ug/L)			
1,2-Dichloroethane-d4	n/a	n/a	80 – 130	≤40	80 – 120
1,2-Dichlorobenzene-d4	n/a	n/a	80 – 120	≤40	80 – 120
Toluene-d8	n/a	n/a	80 – 120	≤40	80 – 120
4-Bromofluorobenzene	n/a	n/a	80 – 120	≤40	80 – 120
Gasoline Range Hydrocarbons by NWTP	H-Gx (µg/L)				
Gasoline Range Hydrocarbons	0.057	0.25	80 – 120	≤40	n/a
Bromobenzene	n/a	n/a	77 – 120	≤40	n/a
Diesel and Motor Oil Range Hydrocarbor	ns by NWTF	PH-Dx with	Silica Gel C	leanup (µg	ı/L)
Diesel Range Hydrocarbons	39	100	61-104	≤40	n/a
Oil Range Hydrocarbons	10	200	60 – 130	≤40	n/a
o-Terphenyl	n/a	n/a	50 – 150	≤40	n/a
Metals					
Lead	0.046	0.1	80 – 120	≤20	n/a

Notes:

^(A) = Based on current laboratory control criteria. Some values may vary slightly between instruments and can be subject to change as the laboratory updates the charted values periodically.

%R = percent recovery

LCS/LCSD = laboratory control samples and laboratory control sample duplicate

MDL = method detection limit

MRL = method reporting limit

n/a = not applicable

RPD = relative percent difference

µg/L = microgram per liter

(--) = No PSL identified

Table B-4. Measurement Quality Objectives for Soil Samples

Friedman and Bruya, Inc. Project No. 160092, 4700 Brooklyn Ave, Seattle, Washington

Analyte Name	MDL ^(A)	MRL	LCS/LCS %R ^(A)	RPD (%)	Surrogate %R ^(A)
Volatile Organic Compounds (VOCs) by	SW8260C	(mg/kg)			
1,1,1,2-Tetrachloroethane	0.000233	0.001	80 – 120	≤40	n/a
1,1,1-Trichloroethane	0.000226	0.001	78 – 133	≤40	n/a
1,1,2,2-Tetrachloroethane	0.000253	0.001	71 – 120	≤40	n/a
1,1,2-Trichloro-1,2,2-Trifluoroethane	0.000287	0.002	72 – 142	≤40	n/a
1,1,2-Trichloroethane	0.000286	0.001	77 – 120	≤40	n/a
1,1-Dichloroethane	0.000203	0.001	65 – 139	≤40	n/a
1,1-Dichloroethene	0.000336	0.001	73 – 138	≤40	n/a
1,1-Dichloropropene	0.000312	0.001	80 – 123	≤40	n/a
1,2,3-Trichlorobenzene	0.000305	0.005	76 – 122	≤40	n/a
1,2,3-Trichloropropane	0.000517	0.002	75 – 120	≤40	n/a
1,2,4-Trichlorobenzene	0.000332	0.005	75 – 130	≤40	n/a
1,2,4-Trimethylbenzene	0.00023	0.001	77 – 125	≤40	n/a
1,2-Dibromo-3-Chloropropane	0.000586	0.005	61 – 128	≤40	n/a
1,2-Dibromoethane (Ethylene Dibromide	0.000176	0.001	79 – 120	≤40	n/a
1,2-Dichlorobenzene	0.000293	0.001	77 – 120	≤40	n/a
1,2-Dichloroethane	0.000191	0.001	77 – 120	≤40	n/a
1,2-Dichloropropane	0.000162	0.001	74 – 120	≤40	n/a
1,3,5-Trimethylbenzene	0.000254	0.001	77 – 126	≤40	n/a
1,3-Dichlorobenzene	0.000227	0.001	76 – 120	≤40	n/a
1,3-Dichloropropane	0.000209	0.001	77 – 120	≤40	n/a
1,4-Dichlorobenzene	0.000232	0.001	75 – 120	≤40	n/a
2,2-Dichloropropane	0.000292	0.001	77 – 137	≤40	n/a
2-Butanone	0.000513	0.005	64 – 120	≤40	n/a
2-Chloroethyl Vinyl Ether	0.000276	0.005	20 – 157	≤40	n/a
2-Chlorotoluene	0.0003	0.001	76 – 120	≤40	n/a
2-Hexanone	0.000439	0.005	62 – 128	≤40	n/a
4-Chlorotoluene	0.000277	0.001	75 – 121	≤40	n/a
4-Isopropyl Toluene	0.000236	0.001	78 – 131	≤40	n/a
4-Methyl-2-Pentanone	0.00042	0.005	70 – 124	≤40	n/a
Acetone	0.000482	0.005	48 – 132	≤40	n/a
Acrolein	0.003809	0.05	60 – 130	≤40	n/a
Acrylonitrile	0.001026	0.005	59 – 124	≤40	n/a
Benzene	0.000296	0.001	80 – 120	≤40	n/a
Bromobenzene	0.000153	0.001	75 – 120	≤40	n/a
Bromochloromethane	0.000323	0.001	69 – 133	≤40	n/a
Bromodichloromethane	0.000254	0.001	80 – 122	≤40	n/a
Bromoethane	0.00044	0.002	74 – 132	≤40	n/a
Bromoform	0.000297	0.001	63 – 120	≤40	n/a
Bromomethane	0.000187	0.001	40 – 172	≤40	n/a
Carbon Disulfide	0.000559	0.001	72 – 146	≤40	n/a

Table B-4. Measurement Quality Objectives for Soil Samples

Friedman and Bruya, Inc. Project No. 160092, 4700 Brooklyn Ave, Seattle, Washington

Analyte Name	MDL ^(A)	MRL	LCS/LCS %R ^(A)	RPD (%)	Surrogate %R ^(A)
Carbon Tetrachloride	0.000213	0.001	76 – 136	≤40	n/a
Chlorobenzene	0.000219	0.001	80 – 120	≤40	n/a
Chloroethane	0.000462	0.001	53 – 154	≤40	n/a
Chloroform	0.000234	0.001	75 – 126	≤40	n/a
Chloromethane	0.000263	0.001	65 – 129	≤40	n/a
cis-1,2-Dichloroethene	0.00024	0.001	75 – 124	≤40	n/a
cis-1,3-Dichloropropene	0.000226	0.001	80 – 124	≤40	n/a
Dibromochloromethane	0.000266	0.001	77 – 123	≤40	n/a
Dibromomethane	0.000147	0.001	80 – 120	≤40	n/a
Dichlorodifluoromethane	0.000207	0.001	67 – 142	≤40	n/a
Ethyl Benzene	0.000202	0.001	80 – 120	≤40	n/a
Hexachloro-1,3-Butadiene	0.00041	0.005	72 – 135	≤40	n/a
lodomethane (Methyl lodide)	0.000215	0.001	34 – 181	≤40	n/a
Isopropyl Benzene	0.000233	0.001	77 – 127	≤40	n/a
Methylene Chloride	0.000635	0.002	61 – 128	≤40	n/a
Methyl-t-butyl ether (MTBE)	0.000231	0.001	68 – 124	≤40	n/a
Naphthalene	0.000429	0.005	71 – 122	≤40	n/a
n-Butylbenzene	0.000262	0.001	75 – 134	≤40	n/a
n-Propyl Benzene	0.000272	0.001	76 – 126	≤40	n/a
s-Butylbenzene	0.00024	0.001	77 – 127	≤40	n/a
Styrene	0.000138	0.001	80 – 122	≤40	n/a
t-Butylbenzene	0.000306	0.001	77 – 125	≤40	n/a
Tetrachloroethene	0.000257	0.001	76 – 131	≤40	n/a
Toluene	0.000151	0.001	78 – 120	≤40	n/a
Volatile Organic Compounds (VOCs) by SW8260C	(mg/kg)	-		
trans-1,2-Dichloroethene	0.000266	0.001	73 – 131	≤40	n/a
trans-1,3-Dichloropropene	0.000216	0.001	80 – 126	≤40	n/a
trans-1,4-Dichloro-2-Butene	0.000437	0.005	62 – 127	≤40	n/a
Trichloroethene	0.000212	0.001	80 – 120	≤40	n/a
Trichlorofluoromethane	0.000266	0.001	57 – 161	≤40	n/a
Vinyl Acetate	0.000381	0.005	54 – 138	≤40	n/a
Vinyl Chloride	0.000235	0.001	74 – 134	≤40	n/a
m,p-Xylene	0.000392	0.001	80 – 123	≤40	n/a
o-Xylene	0.000224	0.001	80 – 120	≤40	n/a
1,2-Dichloroethane-d4	n/a	n/a	80 – 149	≤40	80 – 122
1,2-Dichlorobenzene-d4	n/a	n/a	80 – 120	≤40	80 – 120
Toluene-d8	n/a	n/a	77 – 120	≤40	80 – 120
4-Bromofluorobenzene	n/a	n/a	80 – 120	≤40	80 – 120

Table B-4. Measurement Quality Objectives for Soil Samples

Friedman and Bruya, Inc.

Project No. 160092, 4700 Brooklyn Ave, Seattle, Washington

			LCS/LCS		Surrogate
Analyte Name	MDL ^(A)	MRL	%R ^(A)	RPD (%)	%R ^(A)
Gasoline Range Hydrocarbons by NWT	PH-Gx (mg/	/kg)			
Gasoline Range Hydrocarbons	0.057	0.25	80 – 120	≤40	n/a
Bromobenzene	n/a	n/a	49 – 143	≤40	n/a
Diesel and Motor Oil Range Hydrocarbo	ons by NWT	PH-Dx wit	h Silica Gel C	leanup (mo	g/kg)
Diesel Range Hydrocarbons	1.28	5	60 – 108	≤40	n/a
Oil Range Hydrocarbons	1.57	10	60 – 130	≤40	n/a
o-Terphenyl	n/a	n/a	50 – 150	≤40	n/a
Polychlorinated Biphenyls (PCBs; mg/k	g)				
PCB Arochlors	0.0021	0.1	55-130	≤20	n/a
Carcinogenic Polycyclic Aromatic Hydr	ocarbons				
benzo[a]pyrene	0.000065	0.01	51-118	≤20	24-168
benzo[a]anthracene	0.000088	0.01	51-115	≤20	24-168
benzo[b]fluoranthene	0.000182	0.01	56-123	≤20	24-168
benzo[k]fluoranthene	0.000194	0.01	54-131	≤20	24-168
chrysene	0.000165	0.01	55-129	≤20	24-168
dibenz[a,h]anthracene	0.00025	0.01	50-141	≤20	24-168
indeno[1,2,3-cd]pyrene	0.000183	0.01	49-148	≤20	24-168
Metals					
Lead	n/a	0.1	80-120	≤20	75-125
Cadmium	0.0198	1	70-130	≤20	n/a
Copper	0.189	1	70-130	≤20	n/a
Nickel	0.0335	1	70-130	≤20	n/a
Zinc	0.089	1	70-130	≤20	n/a

Notes:

^(A) = Based on current laboratory control criteria. Some values may vary slightly between instruments

%R = Percent recovery

LCS/LCSD = Laboratory control samples and laboratory control sample duplicate

MDL = Method detection limit

mg/kg = milligram per kilogram

MRL = Method reporting limit

n/a = not applicable

RPD = Relative percent difference

Table B-4 SAP/QAPP Page 3 of 3

Table B-5. Measurement Quality Objectives for Water Samples

Eurofins Lancaster Laboratories

Project No. 160092, 4700 Brooklyn Avenue, Seattle, Washington

	Groundwater					
Analyte	Analytical	MDL	LOD	LOQ	LCS	RPD
	Method		(ug/L)		(%)
Petroleum Hydrocarbons (µg/L)						
Gasoline-Range Hydrocarbons	NWTPH-Gx	50	100	250	75-135	≤ 30
Diesel-Range Hydrocarbons	NWTPH-Dx	45	90	100	32-115	≤ 20
Heavy Oil-Range Hydrocarbons	NWTPH-Dx	100	250	250		
Volatile Organic Compounds (VOCs) by	SW8260C (µg/L)					
Benzene	USEPA 8260B	0.5	1	1	78-120	≤ 30
Ethylbenzene	USEPA 8260B	0.5	1	1	78-120	≤ 30
Toluene	USEPA 8260B	0.5	1	1	80-120	≤ 30
Total Xylenes	USEPA 8260B	0.5	1	1	80-120	≤ 30
Methyl tert-butyl ether	USEPA 8260B	0.5	1	1	75-120	≤ 30
Vinyl Chloride	USEPA 8260B	0.5	1	1	63-121	≤ 30
Cis-1,2-Dichloroethene	USEPA 8260B	0.5	1	1	80-120	≤ 30
1,2 Dichloroethane (EDC)	USEPA 8260B	0.5	1	1	66-128	≤ 30
1,2-Dibromoethane (EDB)	USEPA 8011	0.0	0.02	0.03	60-140	≤ 20
Metals	Metals					
Lead	USEPA 6010	6.2	15	15	80-120	≤ 20

Notes:

LCS = laboratory control sample (supplied by Eurofin Lancaster Labs)

LOD = limit of detection (supplied by Eurofin Lancaster Labs)

LOQ = limit of quantitation (supplied by Eurofin Lancaster Labs; equivalent to PQLs or RLs)

MDL = method detection limit (supplied by Eurofin Lancaster Labs)

RPD = relative percent difference (supplied by Eurofin Lancaster Labs)

 μ g/L = Micrograms per liter

-- Not applicable or available

Table B-6. Measurement Quality Objectives for Soil Samples

Eurofins Lancaster Laboratories

Project No. 160092, 4700 Brooklyn Avenue, Seattle, Washington

	Soil					
Analyte	Analytical	MDL	LOD	LOQ	LCS	RPD
	Method		(mg/kg)			(%)
Petroleum Hydrocarbons (mg/kg)						
Gasoline Range Hydrocarbons	NWTPH-Gx	1.000	2.000	5.000	80-120	≤ 30
Diesel-Range Hydrocarbons	NWTPH-Dx	3	6	7	61-115	≤ 20
Heavy Oil-Range Hydrocarbons	NWTPH-Dx	10	20	30		
Volatile Organic Compounds (mg/kg)						
Benzene	USEPA 8260B	0.0005	0.002	0.005	80-120	≤ 30
Ethylbenzene	USEPA 8260B	0.001	0.002	0.005	80-120	≤ 30
Toluene	USEPA 8260B	0.001	0.002	0.005	80-120	≤ 30
Total Xylenes	USEPA 8260B	0.001	0.002	0.005	80-120	≤ 30
Vinyl Chloride	USEPA 8260B	0.001	0.002	0.005	59-120	≤ 30
Cis-1,2-Dichloroethene	USEPA 8260B	0.001	0.002	0.005	8-120	≤ 30
1,2 Dichloroethane (EDC)	USEPA 8260B	0.001	0.002	0.005	70-133	≤ 30
1,2-Dibromoethane (EDB)	USEPA 8260B	0.001	0.002	0.005	80-120	≤ 30
Metals	Metals					
Lead	USEPA 6010	0.55	1.5	1.5	80-120	≤ 20

Notes:

LCS = laboratory control sample (supplied by Eurofin Lancaster Labs)

LOD = limit of detection (supplied by Eurofin Lancaster Labs)

LOQ = limit of quantitation (supplied by Eurofin Lancaster Labs; equivalent to PQLs or RLs)

MDL = method detection limit (supplied by Eurofin Lancaster Labs)

RPD = relative percent difference (supplied by Eurofin Lancaster Labs)

mg/kg = milligrams per kilogram

-- Not applicable or not available

APPENDIX C

Administrative Order Docket No. 15705



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

FEB 2 2 2018

Mr. Eran Fields FH Brooklyn, LLC 2251 Linda Flora Drive Los Angeles, CA 90077-1410

Order Docket No.	15705
Site Location	Former Chevron 90129 Station – 4700 Brooklyn Avenue NE, Seattle, WA 98105

Administrative Order Re:

Dear Mr. Fields:

The Department of Ecology (Ecology) has issued the enclosed Administrative Order (Order) requiring FH Brooklyn, LLC to comply with:

- Chapter 90.48 Revised Code of Washington (RCW) State of Washington Water Pollution Control Act.
- Chapter 173-201A Washington Administrative Code (WAC) Water Quality Standards ٠ for Surface Waters of the State of Washington.
- National Pollutant Discharge Elimination System (NPDES) Construction Stormwater ۰ General Permit, Permit Number WAR306191.

If you have questions please contact Evan Dobrowski at 425-649-7276 or edob461@ecy.wa.gov. Sincerely,

Rachel McCrea

Rachel McCrea Water Quality Section Manager Northwest Regional Office Washington State Department of Ecology

Administrative Order Docket No. 15705 Enclosure:

By Certified Mail No.: 9171 9690 0935 0084 1037 93



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN ADMINISTRATIVE ORDER AGAINST FH Brooklyn, LLC Mr. Eran Fields

ADMINISTRATIVE ORDER DOCKET NO. 15705

To: Eran Fields FH Brooklyn, LLC 2251 Linda Flora Drive Los Angeles, CA 90077-1410

Order Docket No.	15705
Site Location	Former Chevron 90129 Station – 4700 Brooklyn Avenue NE, Seattle, WA 98105

The Washington State Department of Ecology (Ecology) has issued this Administrative Order (Order) requiring the FH Brooklyn, LLC to comply with:

- Chapter 90.48 Revised Code of Washington (RCW) State of Washington Water Pollution Control Act.
- Chapter 173-201A Washington Administrative Code (WAC) Water Quality Standards for Surface Waters of the State of Washington.
- Construction Stormwater General Permit WAR306191: National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Construction Activity.

This is an Administrative Order in accordance with General Condition G13 (Additional Monitoring) as set forth in the Construction Stormwater General Permit. RCW 90.48.120(2) RCW authorizes Ecology to issue Administrative Orders to accomplish the purposes of Chapter 90.48 RCW.

ORDER TO COMPLY

FH Brooklyn, LLC is subject to coverage under NPDES Construction Stormwater General . Permit WAR306191 for construction activities associated with the construction site known as Former Chevron 90129 Station. FH Brooklyn, LLC reported that the site contains contaminated groundwater and soil which has the potential to discharge in stormwater and dewatering water due to the proposed construction activity. The Construction Stormwater General Permit does not have water quality sampling or benchmarks for the known constituents of concern listed in Table 1; however, the permit requires compliance with the Water Quality Standards for Surface Water of the State of Washington (Water Quality Standards).

The Order establishes Indicator Levels for the Former Chevron 90129 Station. Indicator Levels express a pollutant concentration used as a threshold, below which a pollutant is considered unlikely to cause a water quality violation, and above which it may. Indicator Levels in this Administrative Order were derived from the WAC 173-201A and the analytical method's minimum quantitation level.

For these reasons and in accordance with RCW 90.48.120(2) it is ordered that FH Brooklyn, LLC take the following actions. These actions are required at the location known as Former Chevron 90129 Station, located at 4700 Brooklyn Avenue NE, Seattle, WA 98105. In the event of a permit transfer to another Permittee, compliance with this Administrative Order and the actions listed below is required.

FH Brooklyn, LLC must take the following actions to remain in compliance with NPDES Permit WAR306191:

- Install all pre-treatment and treatment systems prior to any discharge of dewatering water or contaminated construction stormwater to Portage Bay.
- Capture, contain, and treat all contaminated dewatering or contaminated stormwater prior to discharge to the Portage Bay.
- Use an Ecology-approved treatment system and media filtration to treat any dewatering water or stormwater comingled with dewatering water (dewatering water) or contaminated stormwater.
- All captured sediment from the treatment of the dewatering or contaminated stormwater must be transported to an approved disposal facility based on the level of contamination.
- Contaminated soils excavated during construction will be immediately hauled offsite without stock piling to an approved disposal facility based on the level of contamination. When it is not feasible to immediately haul soils offsite, the soils must be placed in a covered area to minimize contact with stormwater.
- The treatment system must have enough capacity to hold the treated dewatering water or stormwater until it has been tested to determine if any of the Indicator Levels listed in Table 1 have been exceeded. No dewatering water or stormwater may be discharge before it has been tested for the parameters listed in Table 1. If any of the Indicator Levels listed in Table 1 are exceeded, you must stop the discharge of treated dewatering water or contaminated stormwater to Portage Bay, until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator the Indicator Levels are exceeded after being retested, FH Brooklyn, LLC shall install further Ecology-approved treatment systems or shall discharge to the Municipal Sewer under a separate agreement with the Municipality and provide notice to Ecology.
- Once the effectiveness of the treatment system has been determined, FH Brooklyn, LLC may revert to a flow-through treatment system after the minimum two sampling and testing events and upon written approval from Ecology. The flow-through treatment system design must be submitted to Ecology for review prior to use.
- If a flow-through treatment system is adopted, all dewatering water or contaminated stormwater must be sampled weekly while discharging and tested for the parameters listed in Table 1.
- When using a flow-through treatment system, if any of the Indicator Levels listed in Table 1 are exceeded, FH Brooklyn, LLC must stop the discharge of treated dewatering water or stormwater to Portage Bay until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator Levels are exceeded after being retested, FH Brooklyn, LLC shall modify the existing flow-through treatment system to increase its effectiveness or install an Ecology-approved treatment system or truck the contaminated stormwater or groundwater off-site for disposal in an approved manner.

Administrative Order No. 15705 – Former Chevron 90129 Station Page 3 of 6

- All dewatering water or contaminated stormwater must be batch sampled prior to discharging and tested for the parameters listed in Table 1. If any of the Indicator Levels listed in Table 1 are exceeded, you must stop the discharge of treated dewatering water or contaminated stormwater to the Portage Bay, until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator Levels are exceeded after being retested, FH Brooklyn, LLC shall install further Ecology-approved treatment systems or shall discharge to the Municipal Sewer under a separate agreement with the Municipality and provide notice to Ecology.
- Sampling for parameters listed in Table 1 must be reported on the required Discharge Monitoring Report (DMR) according to Permit conditions (S5.B Discharge Monitoring Reports).
- If sampling is conducted more frequently than required by this Order, the results of this monitoring must be included in the calculation and reporting of the data that is submitted in the Discharge Monitoring Reports (DMRs).
- Any discharge to waters of the state above the Indicator Levels for parameters listed in Table 1 must be immediately reported to the Department of Ecology.
- All monitoring data must be prepared by a laboratory registered or accredited under the provisions of, *Accreditation of Environmental Laboratories*, Chapter 137-50 WAC.
- All sampling data must be reported monthly on Discharge Monitoring Reports (DMRs) electronically using Ecology's secure online system WQWebDMR, in accordance to permit condition S5.B. If the measured concentration is below the detection level than FH Brooklyn, LLC shall report single analytical values below detection as "less than the detection level (DL)" by entering "<" followed by the numeric value of the detection level (e.g. "<0.1"). All other values above DL must be reported as the numeric value.
- Noncompliance with permit requirements or the provisions of this Order must be immediately reported to the Northwest Regional Office of the Department of Ecology in accordance with Permit Condition S5.F, Noncompliance Notification.
- The Stormwater Pollution Prevention Plan (SWPPP) prepared for FH Brooklyn, LLC shall be fully implemented and amended as needed for the duration of the project.
- If a modification of the Order is desired, a written request shall be submitted to Ecology and if approved, Ecology will issue an amendment to this Order.

Ecology retains the right to make modifications to this Order through supplemental Order, or amendment to this Order, it if appears necessary to further protect the public interest.

This Order does not exempt FH Brooklyn, LLC from any Construction Stormwater General Permit requirement.

Administrative Order No. 15705 – Former Chevron 90129 Station Page 4 of 6

Table 1.

FH Brooklyn, LLC must use the specified analytical methods, detection limits (DLs) and quantitation levels (QLs) in the following table for monitoring unless the method used produces measurable results in the sample and EPA has listed it as an EPA-approved method in 40 CFR Part 136. If the FH Brooklyn, LLC uses an alternative method, not specified in the order and as allowed above, it must report the test method, DL, and QL on the discharge monitoring report.

Pollutant & CAS No. (if available)	Sampling Frequency	Sample Type	Indicator Level, µg/L unless otherwise noted	Required Analytical Protocol	Detection Level, µg/L	Quantitation Level, µg/L
	PET	ROLEUM H	YDROCARBONS	the second second	· · · · · · · · · · · · · · · · · · ·	原 牌 图 是 专领
BTEX (benzene, toluene, ethylbezene and O,M,P xylenes)	Batch	Grab	2.0 ^a	SW 846 8021/ 8260	1.0	2.0
Gasoline-Range Hydrocarbons (NWTPH-Gx) ^b	Batch	Grab	250 ^a	NWTPH-Gx	250	250
Diesel and Oil-Range Hydrocarbons (NWTPH-Dx) ^c	Batch	Grab	250 ^a	NWTPH-Dx	250	250
	LORINATED VC	LATILE OR	GANIC COUMPOUN	IDS (cVOCs)		的意意能就推
1,2-Dichloroethane (107-06-2)	Batch	Grab	2.0 ^a	624	1.0	2.0
cis-1,2-Dichloroethene (156-59-2)	Batch	Grab	2.0 ^a	624/8260	1.0	2.0
Vinyl chloride (75-01-4)	Batch	Grab	2.0 ^a	624/SM6200B	1.0	2.0
Naphthalene (91-20-3)	Batch	Grab	0.6 ^a	625	0.3	0.6
	A Art all	MET	ALS			
Lead, Total (7439-92-1)	Batch	Grab	27.47 ^d	200.8	0.1	0.5
	Construction S	Stormwater (General Permit Bend	chmarks	(高麗) 推通3	经补偿资源 经
Parameter			Benc	hmark	Analytic	al Method
Turbidity	Weekly	Grab	25	NTU	SM2	2130 ^h
pH	Weekly	Grab	6.5 -	8.5 SU	SM45	00-H+ B
a No surface water standard, value is laborato						
b NWTPH-Gx = Northwest Total Petroleum Hy Stoddard solvent and naphtha).						
 NWTPH-Dx = Northwest Total Petroleum Hy diesel-oils, hydraulic fluids, mineral oils, lubr 	icating oils, and	fuel oils).				
d Acute – Freshwater Toxic Substances Criter Level for hardness dependent metals is exp dissolved metal values meets the water qua	ressed as a diss	01A-240) Base olved metal v	ed on Hardness of 46 alue. Meeting the Inc	6.0 mg/L for Hardness I dicator Level using ana	Depended Metal	s. The Indicator or total or

FAILURE TO COMPLY WITH THIS ORDER

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

YOUR RIGHT TO APPEAL

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do both of the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order on Ecology in paper form by mail or in person (see addresses below). Email is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320.

ADDRESS AND LOCATION INFORMATION				
Street Addresses	Mailing Addresses			
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608			
Pollution Control Hearings Board 1111 Israel Road SW Suite 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903			

CONTACT INFORMATION

Please direct all questions about this Order to:

Evan Dobrowski WA State Department of Ecology Northwest Regional Office 3190 160th Avenue SE Bellevue, WA 98008-5452

Phone: (425) 649 – 7276 Email: edob461@ecy.wa.gov

MORE INFORMATION

- Pollution Control Hearings Board Website: www.eho.wa.gov/Boards_PCHB.aspx
- Chapter 43.21B RCW Environmental Hearings Office Pollution Control Hearings Board: http://apps.leg.wa.gov/RCW/default.aspz?cite=43.21B
- Chapter 371-08 WAC Practice and Procedure: http://apps.leg.wa.gov/WAC/default.aspx?cite=371-08
- Chapter 34.05 RCW Administrative Procedure Act: http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05
- Laws: www.ecy.wa.gov/laws-rules/ecyrcw.html
- **Rules:** www.ecy.wa.gov/laws-rules/ecywac.html

SIGNATURE

Rachel McCrea Water Quality Section Manager Northwest Regional Office Washington State Department of Ecology

2-22-18

Date

APPENDIX D

Health and Safety Plan



PROJECT-SPECIFIC HEALTH AND SAFETY PLAN

Property Name:	4700 Brooklyn Ave NE		
Project Number:	160092		
Prepared By:	Bob Hanford	Date:	8/18/2017
Reviewed By:	Bob Hanford	Date:	8/18/2017

1 INTRODUCTION

This project-specific health and safety plan (HASP) establishes procedures and practices to protect employees of Aspect Consulting, LLC (Aspect) from potential hazards posed by field activities at the subject site. In this HASP, measures are provided to minimize potential exposure, accidents, and physical injuries that may occur during daily activities and adverse conditions. Contingency arrangements are also provided for emergency situations.

2 EMERGENCY CONTACT INFORMATION

PROPERTY LOCATION	4700 Brooklyn Ave NE
	Seattle, WA 98105
NEAREST HOSPITAL	UW Medical Center – Emergency Room 2180 NE Pacific St Seattle, WA 98195 Attached figure shows route to hospital .
EMERGENCY RESPONDERS	Police, Ambulance, Fire911
OTHER CONTACTS	Bob Hanford (mobile) (206) 276-9256 Aspect, Seattle Office (206) 328-7443 Client Contact (310) 903-3141
IN EVENT OF EMERGENCY, CALL FOR HELP AS SOON AS POSSIBLE	 Give the following information: ✓ Where You Are: address, cross streets, or landmarks ✓ Phone Number: you are calling from ✓ What Happened: type of accident, injury ✓ How Many Persons: need help ✓ What is Being Done: for the victims ✓ You Hang Up Last: let whomever you called hang up first

In case of serious injuries or other emergency, immediately call Bob Hanford, Aspect Corporate Safety Officer, at (206) 780-7729 or (206)-276-9256. If no response, call Doug Hillman at (206) 328-7443 or Tim Flynn at (206) 780-9370.

3 PERSONNEL ORGANIZATION AND CHAIN OF COMMAND

The Aspect Project Manager assigns the Site Safety Supervisor and other field personnel for this project, and has ultimate responsibility for developing this project-specific HASP and ensuring it is complied with during project execution. The Aspect Site Safety Supervisor has responsibility and authority for Aspect employees' safety during site activities. Other Aspect personnel on-site have the responsibility to comply with this project-specific HASP in coordination with the Site Safety Supervisor.

Aspect Personnel			
Role	Name	Office Phone	Mobile/Cell Phone
Project Manager	Adam Griffin	206-780-7746	865-696-7658
Site Safety Supervisor	Bob Hanford	206-780-7729	206-276-9256

Aspect will inform its subcontractors working on-site of potential fire, explosion, health, safety or other hazards associated with planned site activities, and can make available to them this project-specific HASP. However, all subcontractors are solely responsible for preparation of their own HASP, and for the safety of their employees.

4 SITE CONTROL PLAN

4.1 **Property Description**

Property Name:	Chevron	Chevron		
Property Location or Address:	4700 Brooklyn Ave NE, Seattle 98105			
Owner:	Eran Fields			
Current Property Use:	Commercia	l, retail		
Past Use of Property (if different):	Service station			
Designated Hazardous Waste	(yes or no)	If yes, specify federal, state, or other:		
Site?	NO			
Industrial Site?	NO			
Topography:	flat			
Surround Land Use/Nearest Population:	Residential and commercial			
Drinking Water/Sanitary Facilities:	On-site			
Site Map:	In Work Plan			

4.2 Site Access Control

Describe controls to be used to prevent entry by unauthorized persons:

- The work area will be fenced and closed to the public.
- Traffic cones, barriers, and caution tape, as needed.

Describe how exclusion zones and contamination reduction zones will be designated:

- The area immediately adjacent to the excavation will be considered an exclusion zone.
- Aspect field personnel will remain vigilant about preventing unauthorized persons from approaching the exclusion zone.

4.3 Worker Hygiene Practices

Aspect personnel will use the following hygiene practices while working on-site:

- No person will eat, drink, chew gum or tobacco in potentially contaminated areas. Drinking of replacement fluids for heat stress control will be permitted only in areas that are free from contamination, except in emergency situations.
- Smoking is prohibited except in designated areas of the site.
- Long hair will be secured away from the face so that it does not interfere with any activities.
- All personnel leaving potentially contaminated areas will wash their hands and face prior to entering any eating areas.
- Personnel leaving potentially contaminated areas will shower (including washing hair) and change to clean clothing as soon as practical after leaving the property.

4.4 **Emergency Communications**

Aspect workers on-site will have a mobile (cell) phone on-site that will be used for communications should an emergency arise. Phone numbers for Aspect site personnel are listed in Section 3: Personnel Organization and Chain of Command.

4.5 Nearest Medical Assistance

FIRST CALL 911. The route from the site to the nearest hospital is shown in the attached figure.

5 SITE WORK PLAN

Proposed Work Activities On Site:	Soil excavation, soil stockpiling. Loading truck and trailer combinations. Dewatering, water treatment and discharge to sewer. Soil sampling Excavation backfill and site grading
Objectives of Site Activities:	Remove petroleum contaminated soil, backfill and restore grade site.
Proposed Work Dates:	2018
Will On-site Personnel Potentially be Exposed to Hazardous Substances?	If yes, describe: The property has been a service station for nearly 100 years. Three former USTs have a confirmed petroleum release Petroleum hydrocarbons and aromatic volatile organic compounds (BTEX)
Do Personnel Conducting Site Activities have Training in Accordance with 296- 843-200 WAC?	Yes

6 DECONTAMINATION

Goals	Procedures
To prevent the distribution of contaminants outside the exclusion zone or cross- contamination of samples, the following procedures will be used to decontaminate sample equipment.	Decontamination process involving Alconox wash, tap water rinse, and deionized water rinse (with air dry).
To prevent the distribution of contaminants outside the exclusion zone, unnecessary vehicles will not be allowed inside the exclusion zone. For vehicles required in the exclusion zone (e.g., excavator), the following decontamination procedures will be used to prevent contamination from leaving the exclusion zone:	Contractor is responsible for cleaning all equipment prior to leaving the contamination reduction zone.
To minimize or prevent worker exposure to hazardous substances, all personnel working in the exclusion zone and contamination reduction zones will comply with the following decontamination procedures:	Wash boots and rain gear that have come into contact with soil or groundwater with Alconox/tap water and air dry. Dispose of disposable personal protective equipment (PPE such as gloves, Tyvek) into Department of Transportation (DOT) approved and appropriately labeled 55-gallon drums. To prevent distribution of contaminants outside the exclusion zone, do not allow unnecessary vehicles inside the exclusion zone.
Excavated Soil	Place soil from each location on visqueen with bermed edges, and cover with visqueen weighted to minimize chance for removal by wind; appropriate disposition of the cuttings will be based on soil quality data collected for each location.

7 HAZARD ANALYSIS

The potential hazards and corresponding control measures for planned site work activities are as follows:

Work Activity	Primary Potential Hazards	Control Measures
Remedial excavation	Getting hit by equipment, especially from overhead.	Stay back from equipment and stay alert. Modified Level D PPE (with hard hat, traffic vest, steel-toe boots).
	Excessive noise.	Wear hearing protection.
	Chemical exposure (skin contact, ingestion, inhalation).	Modified Level D PPE. Air monitoring.
Sampling	Getting hit by excavator.	Wear traffic vest. Stay back from excavator and maintain eye contact with operator.
	Falling into open excavation, engulfment.	Do not enter excavation >4 feet deep unless properly shored or sloped. Stay back from unstable slopes. Sample from excavator bucket where needed.
	Chemical exposure (skin contact, ingestion, inhalation).	Modified Level D PPE. Air monitoring.
All	Getting hit by other trucks working on the property.	Wear traffic vest. Stay back from roads and stay alert.
	Heat stress	Take breaks, seek shade, and increase fluid intake.

Potentially Hazardous Chemicals Known or Suspected at the Property and Permissible Exposure Limits (air)					,
Substance	Medium	OHSA PEL	OSHA STEL	IDLH	Carcinogen or Other Hazard
Gasoline-Range Petroleum	Soil, GW	10 ppmv	15 ppmv	250 ppmv	Т
Diesel- and Oil- Range Petroleum	Soil, GW	1 ppmv	5 ppmv	500 ppmv	Т
Benzene	Soil, GW	1 ppmv	5 ppmv	500 ppmv	С
Toluene	Soil, GW	200 ppmv		500 ppmv	Т
Ethylbenzene	Soil, GW	100 ppmv		800 ppmv	Т
Xylenes	Soil, GW	100 ppmv	150 ppmv	900 ppmv	Т
Heavy Metals, lead	Soil, GW	Pb: 0.05 mg/m ³	Pb:	Pb: 0.05 mg/m ³	

Notes:

= none established --С = carcinogen cPAH = carcinogenic polycyclic aromatic hydrocarbon GW = groundwater IDLH = immediately dangerous to life or health N/A = not applicable/not available OHSA = Occupational Safety and Health Administration = toxic Т PCB = polychlorinated biphenyl PEL = permissible exposure level (8-hour time-weighted average)

STEL = short-term exposure level

Chemicals Known or Suspected On-site (check box)			
Chemical Class	Known	Possible	Unlikely
Corrosive (if expected, specify)			x
Ignitable (if expected, specify)		x	
Reactive			x
Volatile		х	
Radioactive			x
Explosive			x
Biological Agent			x
Particulate or Fibers			x
If known or likely, describe:	·		

8 PERSONAL PROTECTIVE EQUIPMENT

Based on the hazards identified above, the following personal protective equipment (PPE) will be required for the following field activities. This section specifies both an initial level of protection and a more protective (contingency) level or protection, in the event conditions should change. The contingency defines the PPE that will be available on-site.

	Level of Protection		
Work Activity	Initial	Contingency	
Excavating	D	Mod. D or C	
Sample handling	D	Mod. D or C	
Other activities (list):			

Each level of protection will incorporate the following equipment (specify type of protective clothing, boots, gloves, respiratory cartridges or other protection, safety glasses, hardhat, and hearing protection):

Level of Protection	Specific PPE
Level D	Work clothing, traffic vest, rubber (nitrile) gloves, steel toe and shank boots, safety glasses, hearing protection, and hardhat.
Modified D	Level D plus Tyvek coveralls or rain gear, and neoprene outer gloves.
Level C	Level D plus air-purifying respirator with combination organic vapor/HEPA dust cartridges. Level C protection must be approved by Corporate Health and Safety Officer and proper training certificates in place. Medical monitoring and fit test certificates must be on site for respirator use.

NOTE: Project personnel are not permitted to deviate from the specified levels of protection without the prior approval of the Site Safety Supervisor. A traffic vest is not needed if work clothes are suitably visible (e.g., orange/yellow rain gear or white/yellow chemical protective clothing).

9 AIR MONITORING

Air monitoring will be conducted periodically to identify potentially hazardous environments and determine reference or background concentrations. Air monitoring can be used to define exclusion zones. Air monitoring can also be conducted to evaluate relative concentrations of volatile organic chemicals in samples. Aspect will make air monitoring data available to the contractor but contractor is responsible for their own monitoring and their employees safety.

The following equipment will be used to monitor air quality in the breathing zone during work activities:

Monitoring Instrument	Calibration Frequency	Parameters of Interest	Sampling Frequency
PID	Daily	Volatile organic compounds	During collection of each soil sample during drilling. During excavation if workers smell gasoline odor. During routine monitoring of remediation equipment.
Detector tube (<i>specify chemical</i>)	As required	Benzene	As needed based on PID monitoring

Use the following action levels to determine the appropriate level of personal protection to be used during field activities:

Monitoring Instrument	Reading in Breathing Zone	Action	Comments
PID	10 PID units above background for 5 minutes	Confirm with detector tube (<i>specify chemical</i>) or upgrade to Level C (air-purifying respirator with organic vapor cartridge).	Alternatively, use engineering controls (ventilation) or leave location and return at a later time.
Detector tube (<i>specify chemical</i>)	> PEL	Upgrade to Level C (air-purifying respirator with organic vapor cartridge).	Leave location pending further evaluation by Aspect Corporate Safety Officer.
PID	100 PID units above background for 5 minutes	Leave location pending further evaluation by Aspect Corporate Safety Officer.	

10 SAFETY EQUIPMENT

The following safety equipment will be on-site during the proposed field activities:

Other Required Items (check items required)	
First aid kit x	
Eyewash (e.g., bottled water)	
PID	х
Drinking water	х
Fire extinguisher	х

Other Required Items (check items required)		
Brush fan		
Wind sox		
Other:		

11 SPILL CONTAINMENT

Will the proposed field work include the handling of bulk chemicals?	Yes	No x
If yes, describe spill containment provisions for the property:		

12 CONFINED SPACE ENTRY

Will the proposed field work include confined space entry?	Yes	No x
If yes, attach to this plan the confined space entry checklist and permit.		

13 ASPECT TRAINING AND MEDICAL MONITORING

Aspect employees who perform site work are responsible for understanding potential health and safety hazards of the site. All Aspect site workers will have health and safety training for hazardous waste operations, in accordance with 296-843-200 WAC. In addition, Aspect requires medical monitoring for all employees potentially exposed to chemical hazards in concentrations in excess of the permissible exposure limit (PEL) for more than 30 days per year, as required under 296-843-210 WAC. Employees who use respirators for their work will have a respirator medical evaluation as required under Chapter 296-842-WAC.

14 DISCLAIMER

Aspect Consulting, LLC does not guarantee the health or safety of any person entering this property. Because of the potentially hazardous nature of this property and the activity occurring thereon, it is not possible to discover, evaluate, and provide protection for all possible hazards that may be encountered. Strict adherence to the health and safety guidelines set forth herein will reduce, but not eliminate, the potential for injury and illness at this property. The health and safety guidelines in this plan were prepared specifically for this site and should not be used on any other property without prior evaluation by trained health and safety personnel.



FIELD SAFETY PLAN CONSENT AGREEMENT

Aspect Consulting Employees

I have reviewed the project-specific health and safety plan, dated *August 18, 2017* for the planned remedial activities at the 4700 Brooklyn Ave. project fieldwork. I understand the purpose of the plan and I consent to adhere to its procedures and guidelines while conducting activities on site that are described in the plan.

Employee Printed Name	Signature	Date

Site Visitors

I have been briefed on the contents of the project-specific health and safety plan. I am responsible for my own health and safety.

Visitor Printed Name and Organization/Company	Signature	Date



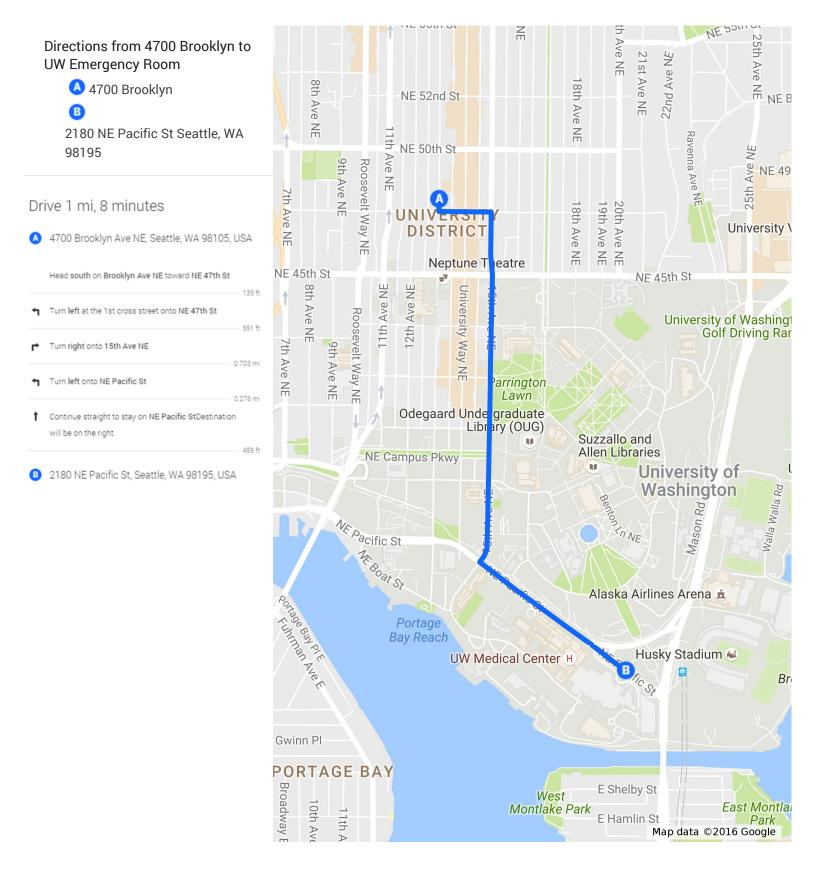
FIELD SAFETY MEETING MINUTES

Site Name		Project No	
Meeting Location			
Meeting Date	_ Time	Conducted by	
Pre-field Work Orientation_	Weekly Safety M	eetingO	ther
Subject Discussed			
Site Safety Supervisor Comm	ients		

Participants

Printed Name (and company if subcontractor)	Signature

Route to Hospital



APPENDIX E

SEPA Checklist and Determination of Non-Significance

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. <u>You may use "not applicable" or</u> <u>"does not apply" only when you can explain why it does not apply and not when the answer is unknown</u>. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to <u>all parts of your proposal</u>, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals: [help]

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the <u>SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D)</u>. Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [help]

- Name of proposed project, if applicable: [help]
 4700 Brooklyn Ave NE Interim Action
- 2. Name of applicant: [help] FH Brooklyn, LLC
- 3. Address and phone number of applicant and contact person: [help]

2251 Linda Flora Drive Los Angeles, CA 91403 310-903-3141 Contact Person: Eran Fields

- 4. Date checklist prepared: [help] Jan. 17, 2017
- 5. Agency requesting checklist: [help] State of Washington Department of Ecology (Ecology)
- 6. Proposed timing or schedule (including phasing, if applicable): [help] July 2017

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [help]

Yes. Construction of an apartment building is planned upon completion of this interim cleanup action. A separate SEPA checklist for construction of an apartment building was prepared in October 2015 for City of Seattle DPD and has received a Determination of Non-Significance. With the recent rezoning of this Site location, a SEPA checklist updated with the new building design may be submitted, if neccesary.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [help]

Remedial Investigation Work Plan, 4700 Brooklyn Avenue NE, Seattle, WA, November 4, 2016 (Preliminary Draft). This document provides a summary of previous environmental investigations and cleanup actions, and describes scope for additional remedial investigation completed in November 2016.

On-Property Remedial Investigation Data Report, 4700 Brooklyn Avenue NE, Seattle, WA, January 17, 2017 (FINAL). This document provides the results of environmental investigations described in the Work Plan and serve as the primary basis for the planned Interim Removal Action.

Interim Action Work Plan, 4700 Brooklyn Avenue NE, Seattle, WA, FINAL Expected June 2017. This document will provide design details associated with the Interim Removal Action.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. [help]

No.

10. List any government approvals or permits that will be needed for your proposal, if known. [help]

The interim cleanup action will be conducted under Agreed Order No. 13815 between Ecology and PLPs: FH Brooklyn LLC and Chevron Environmental Management Company. The Agreed Order requires that an Interim Action Work Plan (IAWP) be prepared and submitted for both Ecology and public review. Ecology must approve the IAWP before the interim cleanup action can be implemented.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.) [help]

Releases from a gasoline service station, which operated on the property for nearly 100 years, have contaminated the subsurface of this 0.38-acre property. The purpose of the interim cleanup action is to remove on-property soil and ground water contamination. Shoring walls will be installed around the property perimeter, and dewatering will lower the ground water table (typically observed at depths of 15 to 19 feet below grade) so that contaminated soils can be excavated and transported off site for treatment/disposal. Extracted ground water will be pretreated on site and discharged to sanitary sewer. The excavation will be backfilled with clean fill to the sub-grade necessary for construction.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. [help]

Northeast corner of Brooklyn Avenue NE and NE 47th Street in Seattle, Washington. PIN #8816400985 University Heights Add Plat Block: 7 Plat Lot: 16-19

B. ENVIRONMENTAL ELEMENTS [help]

- 1. Earth [help]
- a. General description of the site: [help]

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other <u>Relatively flat</u>

- b. What is the steepest slope on the site (approximate percent slope)? [help] 1.25%
- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [help]

Shallow soils consist of fine to medium sand with silt and occasional gravel, grading from loose to dense with depth. Stiff to hard gray silt has been logged at depths of 27 to 33 feet below ground surface (bgs).

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [help]

No.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. [help]

The excavation will be extended to approximately 25 ft bgs, necessary to remove all soils with contaminant concentrations exceeding Washington State Model Toxics Control Act (MTCA) Method A cleanup levels. An estimated total 25,000-30,000 tons of soil will be excavated and transported off-site. Less than 5,000 tons of soil will be imported for fill – the source of fill is not finalized at this time and is subject to geotechnical and environmental tests to verify suitability.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [help]

No. Erosion control Best Management Practices (BMPs) will be in place. Further all excavation will occur below the surrounding grade of the Site vicinity.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [help]

Zero percent after completion of the interim cleanup action. 100% after redevelopment. (Refer to Item A7.)

 h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [help] Establishing a quarry spall construction entrance. Installing siltation control fencing on the downhill side of work areas. Covering soil stockpiles with anchored plastic sheeting.

2. Air [help]

a. What types of emissions to the air would result from the proposal during construction. operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. [help]

During construction there will be emissions from standard construction equipment and from excavated contaminated soils (volatile petroleum hydrocarbons).

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. [help]

No.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any: [help] To the extent possible, excavated contaminated soils will be direct-loaded into dump trucks and immediately removed from the site. Air monitoring will be conducted, and additional measures (e.g., vapor suppression foam) will be used if needed to control volatile petroleum hydrocarbon emissions.
- 3. Water [help]
- a. Surface Water:
 - Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. [help] No.

- Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. [help] No.
- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. [help] Not applicable.
- Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [help] No.
- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. [help]
 - No.
- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. <u>[help]</u> No.
- b. Ground Water:
 - Will ground water be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to ground water? Give general description, purpose, and approximate quantities if known. [help]
 During construction, ground water will be withdrawn from perimeter well points and sump pumps for the purpose of lowering the ground water table so that soils can be excavated. The water will be pretreated onsite and discharged to sanitary sewer under a King County Industrial Waste (KCIW) discharge authorization. No water will be discharged to ground water.

An Individual Authorization KCIW permit will be used for this project. The permit requires detailed project information including the process generating the wastewater, contaminants in the water, the planned pretreatment processes, frequency of discharge, discharge point and maximum daily discharge. A maximum discharge of 65 gallons per minute (gpm) is the limit for the sanitary sewer line to be used during the project. The pre-treatment will include an oil/water separator, bag filter and activated carbon prior to discharge.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. [help] Not applicable.
- c. Water runoff (including stormwater):

- Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. [help] Any water collecting in the excavation (including storm water) will be pretreated onsite and discharged to sanitary sewer.
- 2) Could waste materials enter ground or surface waters? If so, generally describe. [help] No. The combination of perimeter well points and sump pumps in the excavation will ensure that waste liquids are captured and routed to the onsite treatment system.
- Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. [help] No.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: [help]

As noted above, the combination of perimeter well points and sump pumps in the excavation will capture contaminated ground water and storm water falling in the excavation, and route them to an onsite pre-treatment system and sanitary sewer discharge.

- 4. Plants [help]
- a. Check the types of vegetation found on the site: [help]
 - _____deciduous tree: alder, maple, aspen, other
 - ____evergreen tree: fir, cedar, pine, other
 - ____shrubs
 - ____grass
 - ____pasture
 - ____crop or grain
 - _____ Orchards, vineyards or other permanent crops.
 - wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
 - ____water plants: water lily, eelgrass, milfoil, other
 - ____other types of vegetation
- b. What kind and amount of vegetation will be removed or altered? [help] None.
- c. List threatened and endangered species known to be on or near the site. [help] Not applicable.
- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [help]

Not applicable to interim cleanup action.

e. List all noxious weeds and invasive species known to be on or near the site. [help] Not applicable.

- 5. Animals [help]
- a. <u>List</u> any birds and <u>other</u> animals which have been observed on or near the site or are known to be on or near the site. [help]

Examples include:

birds: hawk, heron, eagle, songbirds, other: mammals: deer, bear, elk, beaver, other: fish: bass, salmon, trout, herring, shellfish, other _____

Numerous bird species are present in the vicinity of the Site including songbirds, migratory birds, falcons and eagles.

- b. List any threatened and endangered species known to be on or near the site. [help] None.
- c. Is the site part of a migration route? If so, explain. [help] No.
- d. Proposed measures to preserve or enhance wildlife, if any: [help] None.
- e. List any invasive animal species known to be on or near the site. [help] None.

6. Energy and Natural Resources [help]

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. [help]

Not applicable to interim cleanup action.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. [help]
 - No.
- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: [help] Not applicable to interim cleanup action.

7. Environmental Health [help]

1. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal?

If so, describe. [help]

Potential for inhalation exposure to volatile petroleum hydrocarbons. Potential for direct contact exposure to petroleum hydrocarbons (construction workers). Risk of fire/explosion. 1) Describe any known or possible contamination at the site from present or past uses. [help]

The site operated as a retail gas station since before 1920 through October 2016. Site soil and ground water are known to be contaminated with petroleum hydrocarbons including separatephase product (e.g., weathered gasoline). The January 17, 2017 On-Property Remedial Investigation Data Report (Aspect, 2017) describes the current contamination present at the Site.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. [help]

The site operated as a retail gas station since before 1920 through October 2016. Site soil and ground water are known to be contaminated with petroleum hydrocarbons including separate-phase product (e.g., weathered gasoline). There are no other known hazardous chemicals/conditions that might affect project development and design.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. [help]

Separate-phase product (e.g., weathered gasoline) may be extracted from the perimeter well points along with ground water. The pretreatment system will be designed to segregate and safely store separate-phase product pending offsite transport and disposal/recycle.

- 4) Describe special emergency services that might be required. [help] 911 for construction-related injuries.
- 5) Proposed measures to reduce or control environmental health hazards, if any: [help] Air monitoring will be conducted to ensure protection against both unacceptable inhalation exposures and fire/explosion potential (i.e., lower explosive limit [LEL] monitoring).

All persons performing Site activities where they may contact hazardous materials, including petroleum hydrocarbon-impacted soil or ground water, will have completed Hazardous Waste Operations and Emergency Response (HAZWOPER) training in accordance with the Occupational Safety and Health Administration Part 1910.120 of Title 29 of the Code of Federal Regulations, and be in possession of a current HAZWOPER certification card.

All work will be performed in accordance with the contractor's site-specific health and safety plan (HASP). The HASP includes guidelines to reduce the potential for injury, as well as incident preparedness and response procedures, emergency response and evacuation procedures, local and project emergency contact information, appropriate precautions for potential airborne contaminants and Site hazards, and expected characteristics of generated waste. The general contractor will operate under its own HASP, as will any subcontractor performing site activities where hazardous materials may be contacted.

A safety meeting will be conducted prior to the start of each workday to inform workers of changing work conditions, and to reinforce key safety requirements.

- 1. Noise [help]
- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [help]

General traffic.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. [help]

Short-term construction noise. Construction will be limited to 7am-7pm on weekdays and between 9am and 7 pm on weekends per the City-approved Construction Management Plan.

3) Proposed measures to reduce or control noise impacts, if any: [help] Construction will be limited to 7am-7pm on weekdays and between 9am and 7 pm on weekends per the City-approved Construction Management Plan.

8. Land and Shoreline Use [help]

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. [help] The site is currently vacant. A Safeway is on adjacent property to the north, with associated surface parking and an alley.
- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? [help]
 - No.
 - Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how: [help] Not applicable.
- c. Describe any structures on the site. [help]

1-story convenience store and gas station (no longer in operation).

- d. Will any structures be demolished? If so, what? [help]
 Yes; convenience store and gas station
- e. What is the current zoning classification of the site? [help] Seattle Mixed U-District (SM-U 75-240)
- f. What is the current comprehensive plan designation of the site? [help] Mixed Residential and Commerical
- g. If applicable, what is the current shoreline master program designation of the site? [help] Not applicable.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [help]

Not applicable.

- i. Approximately how many people would reside or work in the completed project? [help] Not applicable to interim cleanup action.
- j. Approximately how many people would the completed project displace? [help] None
- k. Proposed measures to avoid or reduce displacement impacts, if any: [help] No measures neccesary
- L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [help]

Not applicable to interim cleanup action.

- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: [help] Not applicable.
- 9. Housing [help]
- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [help]

Not applicable to interim cleanup action.

 b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [help]

Not applicable to interim cleanup action.

c. Proposed measures to reduce or control housing impacts, if any: [help] Not applicable to interim cleanup action.

10. Aesthetics [help]

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? [help] Not applicable to interim cleanup action.
- b. What views in the immediate vicinity would be altered or obstructed? [help] Not applicable to interim cleanup action.
- b. Proposed measures to reduce or control aesthetic impacts, if any: [help] Not applicable to interim cleanup action.
- 11. Light and Glare [help]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [help]

Not applicable to interim cleanup action.

- b. Could light or glare from the finished project be a safety hazard or interfere with views? [help] Not applicable to interim cleanup action.
- c. What existing off-site sources of light or glare may affect your proposal? [help] Not applicable to interim cleanup action.
- d. Proposed measures to reduce or control light and glare impacts, if any: [help] Not applicable to interim cleanup action.

12. Recreation [help]

- a. What designated and informal recreational opportunities are in the immediate vicinity? [help] Not applicable to interim cleanup action.
- b. Would the proposed project displace any existing recreational uses? If so, describe. [help] Not applicable to interim cleanup action.
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [help] Not applicable to interim cleanup action.

13. Historic and cultural preservation [help]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe. [help]

No.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [help]

No.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [help]

Consultation with the State Department of archaeology and historic preservation (DAH) including a querry of the online database was performed. Historic maps and available GIS data was reviewed to determine no potential impacts to cultural and historic resources would result from this project.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required. [help] Not applicable.

14. Transportation [help]

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. [help] Site is approximately seven blocks from two separate entrances to Interstate I-5 (i.e., at NE 45th Street and NE 50th Street).
- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? [help]
 The Site is served by Seattle public buses however the project will not impact any transit stops. The sidewalks will be closed during the project; however safe pedestrian access and pathways will be maintained throughout the project.
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [help]

Not applicable to interim cleanup action.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). [help]
 Widening of the alley.
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [help]

Rail may be used to haul excavated soils from transfer station to landfill.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? [help]

Approximately 20 vehicular trips per day will be associated with the interim cleanup action. An estimated 10 of these will be trucks hauling contaminated soil from the property to the disposal locations.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe. [help] Not applicable.
- h. Proposed measures to reduce or control transportation impacts, if any: [help] A traffic control plan will be implemented to minimize transportation impacts during the interim cleanup action. The traffic control plan will be submitted to the City for review.

15. Public Services [help]

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. [help] Not applicable to interim cleanup action.
- b. Proposed measures to reduce or control direct impacts on public services, if any. [help] The Site is served by Seattle public buses however the project will not impact any transit stops. The sidewalks will be closed during the project; however safe pedestrian access and pathways will be maintained throughout the project.
- 16. Utilities [help]
- a. Circle utilities currently available at the site: [help] electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

Electricity, natural gas, water, refuse service, telephone, and sanitary sewer are currently available.

c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. [help]

Interim cleanup action will use sanitary sewer for discharge of pretreated water. An Individual Authorization KCIW permit will be used for this project. The permit requires detailed project information including the process generating the wastewater, contaminants in the water, the planned pretreatment processes, frequency of discharge, discharge point and maximum daily discharge. A maximum discharge of 65 gallons per minute (gpm) is the limit for the sanitary sewer line to be used during the project. The pre-treatment will include an oil/water separator, bag filter and activated carbon prior to discharge.

C. Signature [help]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:	Ear
Name of signee _	Eran Fields
Position and Age	ncy/Organization Managing Member /FH Brooklyn, LLC
Date Submitted:	04/05/2017 of Manager

D. supplemental sheet for nonproject actions [help]

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

- 1. How would the proposal be likely to increase discharge to water; emissions to air; pro
 - duction, storage, or release of toxic or hazardous substances; or production of noise? A short-term increase in volatile petroleum hydrocarbon emissions to air will occur as contaminated soil is excavated. There will also be diesel emissions from construction equipment and trucks, as well as the potential for dust generation.

Proposed measures to avoid or reduce such increases are:

To the extent possible, excavated contaminated soils will be direct-loaded into dump trucks and immediately removed from the site. Air monitoring will be conducted, and additional measures (e.g., vapor suppression foam) will be used if needed to control volatile petroleum hydrocarbon emissions. Dust control measures (e.g., water spraying) will also be implemented if necessary. Construction activities will comply with all rules and regulations of air emissions reduction standards.

2. How would the proposal be likely to affect plants, animals, fish, or marine life? Not applicable.

Proposed measures to protect or conserve plants, animals, fish, or marine life are: None.

3. How would the proposal be likely to deplete energy or natural resources? Not applicable.

Proposed measures to protect or conserve energy and natural resources are: None.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Not applicable.

Proposed measures to protect such resources or to avoid or reduce impacts are: None.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans? Not applicable.

Proposed measures to avoid or reduce shoreline and land use impacts are: None.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The Site is served by Seattle public buses however the project will not impact any transit stops. The sidewalks will be closed during the project; however safe pedestrian pathways will be maintained throughout the project.

Proposed measures to reduce or respond to such demand(s) are: None.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The interim cleanup action is being conducted for the express purpose of removing subsurface contamination in accordance with MTCA, thereby addressing protection of the environment.

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STATE OF WASHINGTON DEPARTMENT OF ECOLOGY Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000

STATE ENVIRONMENTAL POLICY ACT DETERMINATION OF NONSIGNIFICANCE

CHEVRON 90129 MTCA CLEANUP PROJECT

Date of Issuance: December 15, 2017

Lead agency: Department of Ecology, Toxics Cleanup Program, Northwest Regional Office

Agency Contact: Dale Myers, damy461@ecy.wa.gov, (425) 649-4446

Description of proposal:

Releases from a gasoline service station, which operated on the property for nearly 100 years, have resulted in soil and groundwater contamination at this 0.38-acre property. An interim cleanup action will be conducted under Agreed Order No. 13815 between Ecology and PLPs: FH Brooklyn LLC and Chevron. The purpose of the interim cleanup action is to clean up on-property soil and groundwater contamination. A shoring wall will be installed at the property boundary to excavate all soils exceeding MTCA method A cleanup levels. Dewatering is necessary to lower the groundwater table (observed at depths of 15 to 19 feet below grade) so that contaminated soils can be excavated. Excavated soils will be characterized and transported off site for reuse, treatment, and/or disposal. Water (groundwater and stormwater) extracted from the excavation will be pretreated on site and discharged to sanitary sewer. The excavation will be backfilled to the depth necessary for subgrade for redevelopment of the property.

Location of proposal: 4700 Brooklyn Ave NE, Seattle Washington

Applicant/Proponent:

Eran Fields FH Brooklyn, LLC 2251 Linda Flora Drive Los Angeles, CA 91403 (310) 903-3141 DETERMINATION OF NONSIGNIFICANCE Page 2 of 2 December 15, 2017

Ecology, as the lead agency, has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c).

This determination is based on a review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public upon request or at the Site web page https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=10632

The comment period for this DNS corresponds with the comment period on the Draft Interim Action Work Plan that will end on January 22, 2018.

Responsible official:

Responsible official: Robert W. Warren Section Manager Northwest Regional Office Toxics Cleanup Program (425)-649-7054

Jul Signature

Date 12,

This SEPA decision may be appealed in conjunction with an appeal on the underlying agency action.