SOUND ENVIRONMENTAL STRATEGIES
www.soundenvironmental.com

UST DECOMMISSIONING REPORT
July 26, 2007

4221 228th Avenue Southeast
Issaquah, Washington

INTRODUCTION

This Underground Storage Tank (UST) Decommissioning Report presents a summary of UST decommissioning, removal of petroleum-contaminated soil (PCS), and the results of soil sampling conducted on June 21-27, 2007, at the above-referenced property (the property) (Figure 1). Sound Environmental Strategies Corporation (SES) prepared this report on behalf of Trinity Lutheran College (Trinity). Significant property features are illustrated on Figure 2.

Remediation Objectives

The purpose of this UST Decommissioning Report is to summarize the removal of PCS associated with a UST that supplied heating oil to the campus emergency generator. The scope of the UST Decommissioning Report included the following tasks:

- Provide background information, including a description of the property, and the UST decommissioning activities;
- Describe the remediation activities;
- Summarize the results of the soil sampling; and
- Provide conclusions and a list of the supporting tables, figures, and appendices attached to this report.

SUMMARY RESULTS OF THE SOIL REMEDIATION

The following is a summary of the subsurface conditions and the nature and extent of chemicals of concern (COCs) at the property. Additional details are provided in later sections of this report.

Stratigraphy: Topographically, the property is situated at the top of a hill with elevation change gradually sloping in all directions. Soil observed during excavation of the UST consisted of moist, brown topsoil with some concrete fragments and glass (fill material) above and immediately surrounding the UST. Soil became moist, grayish-brown silty sand and gravel from approximately 8 to 12 feet below ground surface (bgs), grading to sandy gravel to a depth of 13.5 feet bgs, the maximum depth explored.

The geology of the area (Jones 1998) indicates that the property is underlain by Vashon Till, which is predominantly fine-grained deposits consisting of unsorted and unstratified glacial sediments from clay to boulder in size that vary in compaction and composition throughout the Puget Sound lowlands.

Hydrogeology: No groundwater was encountered to the depths explored (13.5 feet bgs).

Chemicals of Concern: Concentrations of COCs in soil samples collected during this investigation are summarized below.

Summary of Analytical Results

Analyte(s)	Analytical Method	COCs	Concentrations in Soil (mg/kg)	
			Minimum	Maximum
Diesel-Range Petroleum Hydrocarbons	NWTPH-Dx	DRPH	ND	3,500
Oil-Range Petroleum Hydrocarbons	NWTPH-Dx	ORPH	ND	760

Concentrations exceeding MTCA Method A Cleanup Levels are shown in red.
mg/kg = milligrams per kilogram
ND = not detected at concentrations above laboratory reporting limit

Medium of Concern: Soil

Extent of Contamination: As indicated above and in the attached Table 1, the results of laboratory testing revealed concentrations of diesel-range petroleum hydrocarbons (DRPH) in excess of the Model Toxics Control Act (MTCA) Method A Cleanup Level for unrestricted land use in the soil sample collected from beneath the former UST (Sample ID – EX01F02-10.0) (Photograph 8, Site Photographs). The soil samples collected from the southern sidewall in the vicinity of the product line (UST01S01-06.0), below the south end of the UST (EX01F01-10.0), and stockpiled soil (SP-02 and SP-03) contained detectable concentrations of DRPH. However, these concentrations did not exceed the cleanup level. Laboratory analysis revealed one sample (SP-02) contained detectable concentrations of oil-range petroleum hydrocarbons (ORPH). The concentration did not exceed the cleanup level. No other COCs were identified in the soil samples collected.

After sample collection, PCS beneath the former UST was excavated to a maximum depth of 13.5 feet bgs. Soil samples P-1, P-2, and EX01F02-10.0 were overexcavated. Final confirmation soil samples collected from the north sidewall, east sidewall, and west sidewall of the finished excavation did not have concentrations of COCs above the method reporting limits. Sample PL-01-03.0, collected in the vicinity of the product line between the generator building and UST, revealed non-detectible concentrations of DRPH and ORPH. Final confirmation data are presented in Table 1.

Nature of Release: The source of the DRPH in the soil is attributed to a release of heating oil from the former UST located adjacent to the access road on the east side of the campus.

PROPERTY LOCATION AND DESCRIPTION

The approximately 44-acre property consists of the Trinity campus property located at 4221 228th Avenue Southeast in Issaquah, Washington (Figure 1). The property was developed into a multi-building campus comprising various structures interconnected through hallways and subterranean tunnels. The property was developed in the mid-1950s by the Sisters of Providence as a teaching campus and residential facility.

The primary property grouping consists of three irregularly shaped parcels bounded by Southeast 43rd Way and 228th Avenue to the west, a residential development named Providence Pointe to the south, and single multi-family home developments to the west. The main campus

land parcel is reported to contain 28.86 acres of land. Providence Point Drive is internal to the property, separating the main campus land from a wooded and undeveloped parcel (5.8 acres) to the north. A street named 224th Lane Southeast is also internal to the property, separating the main campus land from a wooded and undeveloped parcel (6.0 acres) to the southwest.

The UST was located adjacent to the access road approximately 70 feet southeast of the pool and gym building. The UST was situated at the edge of a bluff, with a local topographic slope to the east.

PROJECT BACKGROUND

SES understands that a subsurface investigation was initiated on May 14, 2004 by Golder Associates Inc. (Golder 2004). Three bore holes were created adjacent to the UST, to depths up to 14 feet bgs. Golder observed petroleum-stained soil, discoloration, and petroleum hydrocarbon odor in two of the three borings. At least one soil sample collected from each boring contained detectible concentrations of DRPH. Sample results ranged from non-detect to 1,800 milligrams per kilogram (mg/kg), which are below cleanup level. Soil analytical results for the Golder samples are included in Table 1.

Two borings were created on either side of a buried geophysics line on the western side of the generator building. It was not evident if this was the fuel line or a water line. One sample was collected at 2 feet bgs. No observable petroleum-stained soil, discoloration, or petroleum hydrocarbon odor was present. Laboratory analysis revealed non-detectable concentrations of DRPH and ORPH.

SOIL REMEDIATION

A Washington State-certified UST Site Assessor from SES (Appendix E) arrived on property to field-screen soil and direct the removal of PCS on June 21, 25, and 27, 2007. Apparent PCS was excavated and stockpiled for off-site disposal. Soil with questionable petroleum contamination levels was stockpiled for testing. Soil samples were collected from the excavation sidewalls and floor upon completion of excavation activities (Photograph 10, Site Photographs). Additional soil samples were collected from the stockpiled soil which was later used to backfill the excavation. One soil sample was collected near the geophysics line between the generator building and UST location. Samples were placed in appropriate glass containers, which were immediately placed in an iced cooler maintained at 4°C or less, until delivered to Friedman & Bruya, Inc., a Washington State-accredited laboratory. Chain-of-custody protocol was observed throughout the project.

SES made the following observations during remediation activities:

- The emergency generator UST was orientated in a north-south direction parallel to the access road on the east side of the campus (Photograph 1, Site Photographs). The fuel oil tank had a capacity of approximately 500 gallons.

- The UST was triple-rinsed and inerted with carbon dioxide gas prior to tank removal (Appendix C).

- The UST was removed from its cavity on June 21, 2007 (Photograph 2, Site Photographs).

- UST had three observable pinholes, ranging from 1/8-inch to 1/4-inch in size (Photograph 5, Site Photographs). Petroleum leaks to the soil were evident around the pinholes and where the product line attached to the UST.

- Soils with a strong petroleum odor and with visual petroleum stains were observed directly below and to the sides of the UST (Photographs 3 and 6, Site Photographs).

- Soil was excavated to a maximum depth of 13.5 feet bgs (Photograph 9, Site Photographs).

- The apparent PCS was loaded directly into trucks for off-site disposal (Photograph 7, Site Photographs). Clean backfill was brought onsite to replace the PCS for backfilling.

- A private utility survey located a buried water line and power line running from the generator building toward the college campus building. The utility locate was unable to identify the location of the product line during the survey. The product line was observed extending to the south of the excavation where it is presumed to join the water line cavity that runs to the east into the generator building. Because of the close proximity to the buried utilities, the product line was not removed outside the UST excavation area.

- A test pit was created on the wooded slope between the generator building and UST excavation in order see if the product line showed evidence of leaking heating oil. The test pit was created approximately 3 feet to the north of the buried water line locate marker. A soil sample was collected at the south sidewall approximately 3 feet bgs. No petroleum odors or staining was observed.

- Soil suspected to be clean was removed from the excavation and stockpiled. Once characterization sampling was complete the soil was backfilled into the excavation (Photograph 12, Site Photographs).

- Oxygen Release Compound (ORC) was applied to the sidewalls and floor of the excavation upon conclusion of PCS removal and before backfilling (Photograph 11, Site Photographs).

SOIL CONFIRMATION SAMPLING RESULTS

Soil sampling and analytical reporting for this project adhered to the current *MTCA UST Site Assessment and Soil Sampling Guidelines* (Washington Administrative Code 173-340). Confirmation and performance soil samples were analyzed for DRPH by Northwest Method NWTPH-Dx (Table 1).

SES conducted soil sampling activities beneath the former tank location, around the perimeter of the excavation area, stockpiled soil, and adjacent to the product line. Sample locations are shown on Figure 2. SES collected two soil performance samples, P-1 and P-2, directly below the UST upon removing the tank. On June 25, soil samples UST01F01-10.0 and UST01F02-10.0 were collected from below each end of the former UST location. Soil samples UST01N01-06.0, UST01S01-06.0, UST01E01-05.0, and UST01W01-06 were collected from the sidewalls of the UST excavation area at approximately 5 to 6 feet bgs. Soil samples SP-01, SP-02, and SP-03 were collected from stockpiled soil located southeast of the excavation area. One sample, PL-01-03.0, was collected at 3 feet bgs adjacent to the product line between the UST

excavation and generator building. On June 27, SES collected sample EX01F03-13.5 at approximately 13.5 feet bgs (directly below sample EX01F02-10.0 location).

Performance soil samples P-1 and P-2 had concentrations of 1,900 mg/kg DRPH and 400 mg/kg DRPH, respectively. Performance sample EX01F02-10.0 had a DRPH concentration of 3,500 mg/kg, greater than the cleanup level of 2,000 mg/kg. The soil areas represented by these samples were overexcavated. Confirmation soil samples EX01S01-06.0, EX01F01-10.0, SP-02, and SP-03 had concentrations of 140 mg/kg; 1,400 mg/kg; 120 mg/kg; and 91 mg/kg respectively, all below cleanup levels. Sample SP-02 had an ORPH concentration of 760 mg/kg.

Laboratory analytical results showed concentrations below detection limits for DRPH (<50 mg/kg) and ORPH (<250 mg/kg) in soil samples EX01N01-06.0, EX01E01-05.0, EX01W01-06.0, SP-01, and PL-01-03.0. Laboratory reports are presented in Appendix A and analytical results are summarized in Table 1.

PCS TRANSPORT AND DISPOSAL

On June 25 and 27, 2007, 80.62 tons of PCS was removed from the property and transported to the Waste Management, Inc. disposal facility in Seattle, Washington (Appendix B).

CONCLUSIONS

Based on information provided by Golder, observations of subsurface conditions, and current analytical results, SES has made the following observations:

- A 500-gallon heating oil UST was decommissioned and removed from the property (Appendix D).
- PCS to the west, south, east, north, and beneath the former UST with DRPH concentrations greater than their respective cleanup levels have been removed from the property.
- Confirmation soil samples show the remaining soils are below MTCA Method A Cleanup Levels.
- Groundwater was not observed during excavation activities.
- ORC placed in the excavation cavity should cause any residual PCS to break down at a faster rate and augment the bio-degradation of the residual.

The data collected by SES suggests that PCS associated with the former 500-gallon heating oil tank release has been excavated and removed from the property. SES recommends submitting this report to the Washington State Department of Ecology under the Voluntary Cleanup Program with a request for a No Further Action designation.

REFERENCES

Golder Associates Inc. 2004. *Subsurface Investigation Report for UST, 4221 225th Avenue Southeast, Issaquah, Washington.* May 25.

Jones, M.A. 1998. *U.S. Geologic Survey, Surficial Hydrogeologic Units for the Tacoma Quadrangle, Plat 14.*

Washington State Department of Ecology. 1998. *Underground Storage Tank Statute and Regulations, Chapter 173-360 WAC.* July 14.

_____. 2001. *Model Toxics Control Act – Cleanup, Chapter 173-340 WAC.* February 12.

CLOSING

SES trusts that the information presented in this *UST Decommissioning Report* meets Trinity's objectives. If you have questions or require additional information, please do not hesitate to contact the undersigned at 206.306.1900.

Prepared by:

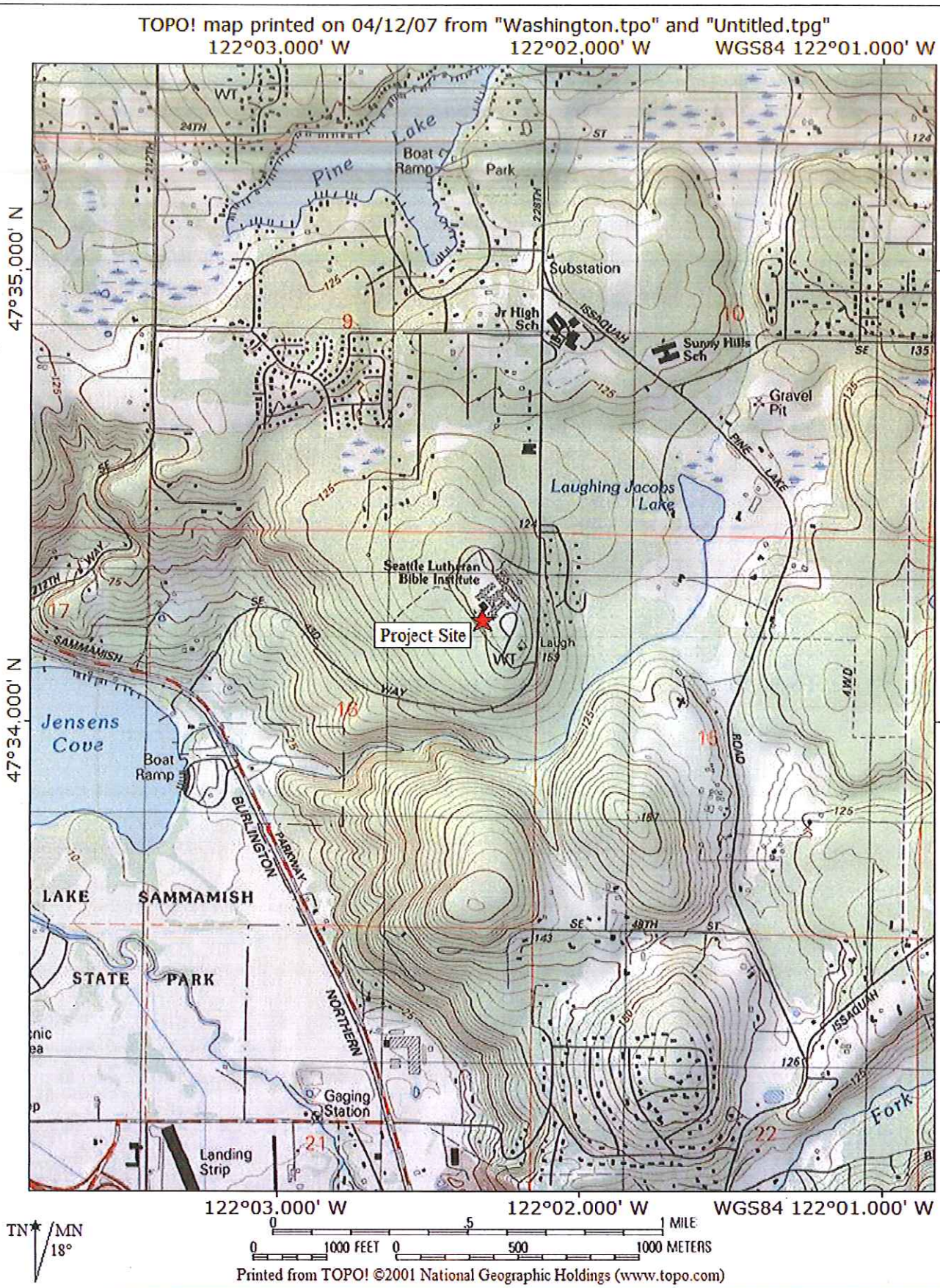
Corey League
Project Scientist
WA State Site Assessor
#5267709-U7

Reviewed by:

John R. Funderburk III, MSPH
Principal

Attachments: Figure 1, Vicinity Map
Figure 2, Exploration Location Plan
Table 1, Summary of Soil Analytical Results
Site Photographs
Appendix A, Laboratory Analytical Report
Appendix B, Waste Disposal Tickets
Appendix C, Triple Rinse Certificate
Appendix D, Tank Disposal Ticket
Appendix E, Certification

FIGURES



UR	N	Date: April 12, 2007 Drawn By: E. Rothman Chk By: J. Funderburk SES Project No.: 0583-001-01 File ID: 583-001 Figure 1 Vicinity Map.doc	Trinity Lutheran College 4221 228th Street Southeast Issaquah, Washington	**FIGURE 1** Vicinity Map

WOODED AREA

GENERATOR BUILDING

N

EX01N01-06.0
Dx<50

EX01E01-05.0
Dx<50

EX01F03-13.5
Dx < 50

EX01F01-10.0
Dx 1,400

PRODUCT LINE

PL-01-03.0
Dx<50

TEST PIT

ASPHALT

EX01W01-06.0
Dx < 50

EX01S01-06.0
Dx 140

SP-03
Dx 91

SOIL STOCKPILE

SP-01
Dx<50

SP-02
Dx 120
Ox 760

LEGEND

▲ SP-01 Dx<50	CONFIRMATION SAMPLE
—E—	UNDERGROUND ELECTRIC POWER LINE
—W—	UNDERGROUND WATER LINE
SP-01 Dx<50	CONCENTRATION OF DIESEL-RANGE PETROLEUM HYDROCARBONS (mg/kg)
SP-02 Ox<760	CONCENTRATION OF OIL-RANGE PETROLEUM HYDROCARBONS (mg/kg)

SOUND ENVIRONMENTAL STRATEGIES
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DATE: 07/19/07
DRAWN BY: BAD
CHECKED BY: HCL
CAD FILE: 0583-001 EXCAV LOC

PROJECT NAME: TRINITY LUTHERAN COLLEGE
SES PROJECT NUMBER: 0583-001-01
STREET ADDRESS: 4221 228TH AVENUE SOUTHEAST
CITY, STATE: ISSAQUAH, WASHINGTON

REGION:

0 5 10 20
APPROXIMATE SCALE IN FEET 1" = 10'

FIGURE 2
EXCAVATION LOCATION MAP

7/19/2007

F:\SES CURRENT PROJECTS\0583-001-01 Trinity Lutheran\Figures\0583-001 EXCAV LOC.dwg

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SITE PHOTOGRAPHS

Photograph 1. Overview of excavation area, looking east (June 21, 2007).

Photograph 2. Removal of UST, facing north (June 21, 2007).

Photograph 3. Gray petroleum staining evident in soil directly below and surrounding UST (June 21, 2007).

Photograph 4. North side of UST (June 21, 2007).

Photograph 5. Holes visible on bottom and west end of UST (June 21, 2007).

Photograph 6. Removing gray petroleum stained soil from excavation floor (June 25, 2007).

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SES Project No.:	0583-001-01
Date:	July 18, 2007
Drawn By:	HCL
Chk By:	JRF
File ID:	0583 Site Photographs

SITE PHOTOGRAPHS
Trinity Lutheran College
4221 228th Avenue SE
Issaquah, Washington

Photograph 7. Petroleum contaminated soil directly loaded onto truck for offsite disposal (June 25, 2007).

Photograph 8. Over-excavation soil sample EX01F02-10.0 location (June 27, 2007).

Photograph 9. View of soil conditions at maximum excavation depth of 13.5 feet (June 27, 2007).

Photograph 10. Looking west at excavation area upon completion of soil removal (June 27th, 2007).

Photograph 11. White Oxygen Release Compound applied to excavation before backfilling (June 27, 2007).

Photograph 12. Looking east at stockpiled soil (June 27, 2007).

TABLE

SOUND ENVIRONMENTAL STRATEGIES
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Table 1
Summary of Soil Analytical Results
Trinity Lutheran College
4221 228th Avenue SE
Issaquah, Washington

Sample ID	Date	Depth (feet)	Sample Location	DRPH[1] (mg/kg)	ORPH[1] (mg/kg)
Golder Associates Soil Boring Samples					
B1-7	5/14/04	7	4 Feet NW of Fillport	550	ND
B1-10	5/14/04	10	4 Feet NW of Fillport	ND	ND
B1-13	5/14/04	13	4 Feet NW of Fillport	500	ND
B2-7	5/14/04	7	5 Feet SW of UST	1,800[oe]	630
B2-13	5/14/04	13.0	5 Feet SW of UST	85	ND
B3-7	5/14/04	7.0	5 Feet SE of UST	77	ND
B3-13	5/14/04	13	5 Feet SE of UST	ND	ND
B4-2	5/14/04	2	Adjacent Generator Building, West Side	ND	ND
Sound Environmental Strategies Performance Samples					
P-1	6/21/07	8	Below UST	1,900[oe]	<250
P-2	6/21/07	13.5	Below UST	440[oe]	<250
EX01F02-10.0	6/25/07	10	Below North End of UST	**3,500**[oe]	<250
Sound Environmental Strategies Compliance Samples					
EX01N01-06.0	6/25/07	6	North Sidewall	<50	<250
EX01S01-06.0	6/25/07	6	South Sidewall	140	<250
EX01E01-05.0	6/25/07	5	East Sidewall	<50	<250
EX01W01-06.0	6/25/07	6	West Sidewall	<50	<250
EX01F01-10.0	6/25/07	10	Below South End of UST	1,400	<250
EX01F03-13.5	6/27/07	13.5	Below North End of UST	<50	<250
SP-01	6/25/07	NA	Stockpiled Soil	<50	<250
SP-02	6/25/07	NA	Stockpiled Soil	120	760
SP-03	6/25/07	NA	Stockpiled Soil	91	<250
PL-01-03.0	6/25/07	3	Product Line, SE of UST	<50	<250
MTCA Method A Cleanup Levels for Unrestricted Land Uses[2]				2,000	2,000

NOTES:

Red indicates concentration exceeds MTCA Method A Cleanup Level.

[1]Analyzed by Northwest Method NWTPH-Dx.

[2]MTCA Cleanup Regulation, Chapter 173-340-900, Table 740-1 Method A Soil Cleanup Levels for Unrestricted Land Uses.

[oe] = soil sample location subsequently overexcavated

DRPH = diesel-range petroleum hydrocarbons
ORPH= oil-range petroleum hydrocarbons
mg/kg = milligrams per kilogram
MTCA = Model Toxics Control Act
SP = Stockpile Sample
UST = underground storage tank
ND = not detected at or above the practical quantitation limit

APPENDIX A

Laboratory Analytical Report

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.
Charlene Morrow, M.S.
Yelena Aravkina, M.S.
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3012 16th Avenue West
Seattle, WA 98119-2029
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June 28, 2007

Corey League, Project Manager
Sound Environmental Strategies Corporation
2400 Airport Way S., Suite 200
Seattle, WA 98134-2020

Dear Mr. League:

Included are the results from the testing of material submitted on June 21, 2007 from the SOU_0583-001-01_20070621, F&BI 706262 project. There are 3 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl
Project Manager

Enclosures
SOU0628R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 06/28/07
Date Received: 06/21/07
Project: SOU_0583-001-01_20070621, F&BI 706262
Date Extracted: 06/21/07
Date Analyzed: 06/21/07

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 53-144)
P-1 706262-01	1,900	<250	114
P-2 706262-02	440	<250	112
Method Blank	<50	<250	120

Date of Report: 06/28/07
Date Received: 06/21/07
Project: SOU_0583-001-01_20070621, F&BI 706262

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL EXTENDED USING METHOD NWTPH-Dx

Laboratory Code: 706249-09 (Matrix Spike)

Analyte	Reporting Units	Spike Level	Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	104	101	71-137	3

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Diesel Extended	mg/kg (ppm)	5,000	89	70-129

Data Qualifiers & Definitions

a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.

A1 – More than one compound of similar molecule structure was identified with equal probablility.

b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

c - The presence of the analyte indicated may be due to carryover from previous sample injections.

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - The sample was diluted due to insufficient sample volume. Detection limits are raised due to dilution

fb - The analyte indicated was found in the method blank. The result should be considered an estimate.

fc – The compound is a common laboratory and field contaminant.

fp – Compounds in the sample matrix interfered with quantitation of the analyte. The reported concentration may be a false positive.

hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. The variability is attributed to sample inhomogeneity.

ht - The sample was extracted outside of holding time. Results should be considered estimates.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j – The result is below normal reporting limits. The value reported is an estimate.

J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

lc - The presence of the compound indicated is likely due to laboratory contamination.

L - The reported concentration was generated from a library search.

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The pattern of peaks present is not indicative of diesel.

y - The pattern of peaks present is not indicative of motor oil.

706262

SAMPLE CHAIN OF CUSTODY

ME 06-21-07 1107

Page # 1 of 1

Send Report To: Corey League

Company: SES

Address: 2460 Airport Way S. Suite 200

City, State, ZIP: Seattle, WA 98134

Phone #: 206-306-1903 Fax #: 206-306-1907

SAMPLERS (signature):

PROJECT NAME/NO.: Trinity Lutheran 0583-001-01

PO #:

REMARKS:

GEMS Y (N)

TURNAROUND TIME
- ☐ Standard (2 Weeks)
- ☒ RUSH today PM
- Rush charges authorized by:

SAMPLE DISPOSAL
- ☒ Dispose after 30 days
- ☐ Return samples
- ☐ Will call with instructions

Sample ID	Sample Location	Sample Depth	Lab ID	Date Sampled	Time Sampled	Matrix	# of jars	NWTPH-Dx	NWTPH-Gx	BTEX by 8021B	VOC's by 8260	SVOC's by 8270	RCRA-8 Metals			Notes
		8.0 per AL 6/21/07 mk						ANALYSES REQUESTED								
P-1		14.6	01	6/21/07	1055	Soil	1	X								
P-2		15.5	02	"	1135	"	1	X								
P-3		15.5	03	"	1145	"	1									Hold

	SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by:		Andrea Liljegren	SES	6/21/07	1:05P
Received by:		S. Dixon	F+B, Inc	6/21/07	
Relinquished by:					
Received by:					

Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029
Ph. (206) 285-8282
Fax (206) 283-5044

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

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e-mail: fbi@isomedia.com

June 28, 2007

Corey League, Project Manager
Sound Environmental Strategies Corporation
2400 Airport Way S., Suite 200
Seattle, WA 98134-2020

Dear Mr. League:

Included are the results from the testing of material submitted on June 25, 2007 from the SOU_0583-001-01_20070625, F&BI 706300 project. There are 6 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl
Project Manager

Enclosures
SOU0628R.DOC

CASE NARRATIVE

This case narrative encompasses samples received on June 25, 2007 by Friedman & Bruya, Inc. from the Sound Environmental Strategies SOU_0583-001-01_20070625, F&BI 706300 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Sound Environmental Strategies
706300-01	EX01N01-06.0
706300-02	EX01S01-06.0
706300-03	EX01E01-05.0
706300-04	EX01W01-06.0
706300-05	EX01F01-10.0
706300-06	EX01F02-10.0
706300-07	SP-01
706300-08	SP-02
706300-09	SP-03
706300-10	PL-01-03.0

All quality control requirements were acceptable.

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 06/28/07
Date Received: 06/25/07
Project: SOU_0583-001-01_20070625, F&BI 706300
Date Extracted: 06/25/07
Date Analyzed: 06/25/07

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLE FOR TOTAL PETROLEUM HYDROCARBONS AS IR SCAN USING METHOD 418 MODIFIED

Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	IR Result
EX01N01-06.0 706300-01	<500
EX01S01-06.0 706300-02	<500
EX01E01-05.0 706300-03	<500
EX01W01-06.0 706300-04	<500
EX01F01-10.0 706300-05	900
EX01F02-10.0 706300-06	1,600
SP-01 706300-07	<500
SP-02 706300-08	<500
SP-03 706300-09	<500
PL-01-03.0 706300-10	<500
Method Blank	<500

Date of Report: 06/28/07
Date Received: 06/25/07
Project: SOU_0583-001-01_20070625, F&BI 706300
Date Extracted: 06/25/07
Date Analyzed: 06/26/07

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 53-144)
EX01N01-06.0 706300-01	<50	<250	106
EX01S01-06.0 706300-02	140	<250	108
EX01E01-05.0 706300-03	<50	<250	107
EX01W01-06.0 706300-04	<50	<250	104
EX01F01-10.0 706300-05	1,400	<250	108
EX01F02-10.0 706300-06	3,500	<250	111
SP-01 706300-07	<50	<250	107
SP-02 706300-08	120	760	106
SP-03 706300-09	91	<250	107

Date of Report: 06/28/07
Date Received: 06/25/07
Project: SOU_0583-001-01_20070625, F&BI 706300
Date Extracted: 06/25/07
Date Analyzed: 06/26/07

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 53-144)
PL-01-03.0 706300-10	<50	<250	101
Method Blank	<50	<250	102

Date of Report: 06/28/07
Date Received: 06/25/07
Project: SOU_0583-001-01_20070625, F&BI 706300

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL EXTENDED USING METHOD NWTPH-Dx

Laboratory Code: 706300-10 (Matrix Spike)

Analyte	Reporting Units	Spike Level	Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	98	102	71-137	4

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Diesel Extended	mg/kg (ppm)	5,000	98	70-129

Data Qualifiers & Definitions

a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.

A1 – More than one compound of similar molecule structure was identified with equal probablility.

b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

c - The presence of the analyte indicated may be due to carryover from previous sample injections.

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - The sample was diluted due to insufficient sample volume. Detection limits are raised due to dilution

fb - The analyte indicated was found in the method blank. The result should be considered an estimate.

fc – The compound is a common laboratory and field contaminant.

fp – Compounds in the sample matrix interfered with quantitation of the analyte. The reported concentration may be a false positive.

hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. The variability is attributed to sample inhomogeneity.

ht - The sample was extracted outside of holding time. Results should be considered estimates.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j – The result is below normal reporting limits. The value reported is an estimate.

J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

lc - The presence of the compound indicated is likely due to laboratory contamination.

L - The reported concentration was generated from a library search.

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The pattern of peaks present is not indicative of diesel.

y - The pattern of peaks present is not indicative of motor oil.

706300

SAMPLE CHAIN OF CUSTODY

ME 06/25/07

Page # 1 of 1

Send Report To Corey League

Company SES

Address 2400 Airport Way S. Suite 200

City, State, ZIP Seattle, WA 98134

Phone # 206-306-1900 Fax # 206-306-1907

SAMPLERS (signature)

PROJECT NAME/NO. Trinity Lutheran College 0583-001-01

PO #

REMARKS Please call w/ results 253-722-9693 and email

GEMS Y (N)

TURNAROUND TIME
- ☐ Standard (2 Weeks)
- ☒ RUSH 6/26/07 AM

Rush charges authorized by: Cory League

SAMPLE DISPOSAL
- ☒ Dispose after 30 days
- ☐ Return samples
- ☐ Will call with instructions

Sample ID	Sample Location	Sample Depth	Lab ID	Date Sampled	Time Sampled	Matrix	# of jars	ANALYSES REQUESTED: NWTPH-Dx	NWTPH-Gx	BTEX by 8021B	VOC's by 8260	SVOC's by 8270	RCRA-8 Metals			Notes
EX01N01-06.0		6	01	6/25/07	1310	Soil	1	X								Run IR
EX01S01-06.0		6	02		1355			X								
EX01E01-05.0		5	03		1320			X								
EX01W01-06.0		6	04		1305			X								
EX01F01-10.0		10	05		1335			X								
EX01F02-10.0		10	06		1330			X								
SP-01		-	07		1255			X								
SP-02		-	08		1300			X								
SP-03		-	09		1310			X								
PL-01-03.0		3	10		1410			X								

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by:	Cory League	SES	6/25/07	1430
Received by:	Andrea Lilegren	SES	6/25/07	1430
Relinquished by:	"	"	"	15:20
Received by:	Nhan Pham	FEBT	6/25/07	15:20

Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029
Ph. (206) 285-8282
Fax (206) 283-5044

FORMS\COC\SESGEMSR1.DOC (Revision 1)

Samples received at 4 °C

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.
Charlene Morrow, M.S.
Yelena Aravkina, M.S.
Bradley T. Benson, B.S.
Kurt Johnson, B.S.

3012 16th Avenue West
Seattle, WA 98119-2029
TEL: (206) 285-8282
FAX: (206) 283-5044
e-mail: fbi@isomedia.com

July 6, 2007

Corey League, Project Manager
Sound Environmental Strategies Corporation
2400 Airport Way S., Suite 200
Seattle, WA 98134-2020

Dear Mr. League:

Included are the results from the testing of material submitted on June 27, 2007 from the SOU_0583-001-01_20070627, F&BI 706339 project. There are 5 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl
Project Manager

Enclosures
SOU0706R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on June 27, 2007 by Friedman & Bruya, Inc. from the Sound Environmental Strategies SOU_0583-001-01_20070627, F&BI 706339 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Sound Environmental Strategies
706339-01	EX01F03-13.5

All quality control requirements were acceptable.

Date of Report: 07/06/07
Date Received: 06/27/07
Project: SOU_0583-001-01_20070627, F&BI 706339
Date Extracted: 06/27/07
Date Analyzed: 06/27/07

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLE FOR TOTAL PETROLEUM HYDROCARBONS AS IR SCAN USING METHOD 418 MODIFIED

Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	IR Result
EX01F03-13.5 706339-01	<500
Method Blank	<500

Date of Report: 07/06/07
Date Received: 06/27/07
Project: SOU_0583-001-01_20070627, F&BI 706339
Date Extracted: 06/27/07
Date Analyzed: 06/28/07

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 50-150)
EX01F03-13.5 706339-01	<50	<250	117
Method Blank	<50	<250	97

Date of Report: 07/06/07
Date Received: 06/27/07
Project: SOU_0583-001-01_20070627, F&BI 706339

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL EXTENDED USING METHOD NWTPH-Dx

Laboratory Code: 706328-07 (Matrix Spike)

Analyte	Reporting Units	Spike Level	Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	129	128	50-150	1

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Diesel Extended	mg/kg (ppm)	5,000	111	70-130

Data Qualifiers & Definitions

a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.

A1 – More than one compound of similar molecule structure was identified with equal probablility.

b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

c - The presence of the analyte indicated may be due to carryover from previous sample injections.

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - The sample was diluted due to insufficient sample volume. Detection limits are raised due to dilution

fb - The analyte indicated was found in the method blank. The result should be considered an estimate.

fc – The compound is a common laboratory and field contaminant.

fp – Compounds in the sample matrix interfered with quantitation of the analyte. The reported concentration may be a false positive.

hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. The variability is attributed to sample inhomogeneity.

ht - The sample was extracted outside of holding time. Results should be considered estimates.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j – The result is below normal reporting limits. The value reported is an estimate.

JL - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

lc - The presence of the compound indicated is likely due to laboratory contamination.

L - The reported concentration was generated from a library search.

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The pattern of peaks present is not indicative of diesel.

y - The pattern of peaks present is not indicative of motor oil.

706339

SAMPLE CHAIN OF CUSTODY

ME 06/27/07

D01

Page # 1 of 1

Send Report To Cory League

Company SES

Address 2400 Airport Way S, Suite 200

City, State, ZIP Seattle, WA 98134

Phone # 206.306.1900 Fax # 206.306.1907

SAMPLERS (signature)

PROJECT NAME/NO. 0583-001-01

PO #

REMARKS Please call and email results.

GEMS Y / (N)

TURNAROUND TIME
- ☐ Standard (2 Weeks)
- ☒ RUSH 6/28/07 AM

Rush charges authorized by: HCL

SAMPLE DISPOSAL
- ☒ Dispose after 30 days
- ☐ Return samples
- ☐ Will call with instructions

Sample ID	Sample Location	Sample Depth	Lab ID	Date Sampled	Time Sampled	Matrix	# of jars	ANALYSES REQUESTED: NWTPH-Dx	NWTPH-Gx	BTEX by 8021B	VOC's by 8260	SVOC's by 8270	RCRA-8 Metals			Notes
EX01F03-13.5	Below EX01F07	13.5'	01	6/27/07	1155	Soil	1	X								TR - 6/27/07 AM
											Samples received at 28 °C					

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by:	Cory League	SES	6/27/07	1155
Received by:	Andrea Lijegren	SES	6/27/07	1500
Relinquished by:				
Received by:	Nhan Phan	FEBI	6/27/07	15:30

Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029
Ph. (206) 285-8282
Fax (206) 283-5044

APPENDIX B

Waste Disposal Tickets

BILL OF LADING/SCALE TICKET

WASTE MANAGEMENT, INC.

Generators Name & Address:
TRINITY LUTHERAN COLLEGE

Billing: SOUND ENVIRONMENTAL STRATEGIES
Contact Person: COREY LEAGUE
Contact Number: 206-306-1900
Fax Number: 206-306-1907

TICKET 42829
WMI ARRF
70 S. ALASKA ST.
SEATTLE WA.
TRUCK ID E104
TIME 10:34 AM 25 JUN 2007

GROSS	96660	LB
K TARE	41800	LB
NET	54860	LB
NET	27.43	TON
TIME 10:34 AM	25 JUN 2007	

Acknowledgement of Loading

Name (Please Print) _____ Company _____

Signature _____ Date _____

Deliver To:

ALASKA RELOAD & RECYCLING FACILITY
70 SOUTH ALASKA STREET
SEATTLE, WASHINGTON 98134
TELEPHONE #: (206) 763-5025
MONDAY-FRIDAY 7:00AM-4:00PM

Disposal Facility:

COLUMBIA RIDGE LANDFILL AND
RECYCLING FACILITY
18177 CEDAR SPRINGS LANE
ARLINGTON, OREGON 97812
TELEPHONE: (541) 454-2030

Transporter Name:

Truck #: E104

Waste Profile # 100310WA

Waste Type: ADC

Expiration Date: 06/22/08

Woody Driver
Driver's Name (Please Print)

Woody Drivers
SIGNATURE

DATE

Remarks:

BILL OF LADING/SCALE TICKET

WASTE MANAGEMENT, INC.

TICKET 42840
WMI ARRF
70 S. ALASKA ST.
SEATTLE WA.
TRUCK ID E104
TIME 01:29 PM 25 JUN 2007

GROSS	99680	LB
K TARE	41800	LB
NET	57880	LB
NET	28.94	TON

TIME 01:29 PM 25 JUN 2007

Generators Name & Address:
TRINITY LUTHERAN COLLEGE

Billing: SOUND ENVIRONMENTAL STRATEGIES
Contact Person: COREY LEAGUE
Contact Number: 206-306-1900
Fax Number: 206-306-1907

Acknowledgement of Loading

Name (Please Print) _____ Company _____

Signature _____ Date _____

Deliver To:

ALASKA RELOAD & RECYCLING FACILITY
70 SOUTH ALASKA STREET
SEATTLE, WASHINGTON 98134
TELEPHONE #: (206) 763-5025
MONDAY-FRIDAY 7:00AM-4:00PM

Disposal Facility:

COLUMBIA RIDGE LANDFILL AND
RECYCLING FACILITY
18177 CEDAR SPRINGS LANE
ARLINGTON, OREGON 97812
TELEPHONE: (541) 454-2030

Transporter Name:

Truck #: E104

Waste Profile # 100310WA

Waste Type: ADC

Expiration Date: 06/22/08

Woody Driver
Driver's Name (Please Print)

Woody Driver
SIGNATURE

DATE _____

Remarks:

BILL OF LADING/SCALE TICKET

WASTE MANAGEMENT, INC.

Generators Name & Address:
TRINITY LUTHERAN COLLEGE

Billing: SOUND ENVIRONMENTAL STRATEGIES
Contact Person: COREY LEAGUE
Contact Number: 206-306-1900
Fax Number: 206-306-1907

TICKET 42934
WMI ARRF
70 S. ALASKA ST.
SEATTLE WA.
TRUCK ID E3
TIME 12:47 PM 27 JUN 2007

GROSS	90300	LB
K TARE	41800	LB
NET	48500	LB
NET	24.25	TON

TIME 12:47 PM 27 JUN 2007

Acknowledgement of Loading

Name (Please Print) _____ Company _____

Signature _____ Date _____

Deliver To:

ALASKA RELOAD & RECYCLING FACILITY
70 SOUTH ALASKA STREET
SEATTLE, WASHINGTON 98134
TELEPHONE #: (206) 763-5025
MONDAY-FRIDAY 7:00AM-4.00PM

Disposal Facility:

COLUMBIA RIDGE LANDFILL AND
RECYCLING FACILITY
18177 CEDAR SPRINGS LANE
ARLINGTON, OREGON 97812
TELEPHONE: (541) 454-2030

Transporter Name:

Truck #: E3

Waste Profile # 100310WA

Waste Type: ADC

Expiration Date: 06/22/08

Woody Driver
Driver's Name (Please Print)

Woody Driver
SIGNATURE

DATE

Remarks:

APPENDIX C

Triple Rinse Certificate

MARINE VACUUM SERVICE, INC.

UNDERGROUND STORAGE TANK TRIPLE RINSE CERTIFICATE

Tank Size: 500 gal

Tank Location: Trinity Community College.
9221 228D St E.
Ess. WA

Marine Vacuum Service, Inc. certifies that the above mentioned tank(s) have been triple rinsed in accordance with the industry standard and that all rinsate has been disposed of in accordance with Federal, State and Local regulations.

Tank Owner: Trinity Luthern College

Sub-Contractor: Spooner Contracting LLC

M.V.S. Representative: TM

Date: 6/24/09

Notes: Pump & Wash UST

APPENDIX D

Tank Disposal Ticket

MARINE VACUUM SERVICE
PO Box 24263
Seattle, WA 98124

Attn Cory League Sound
206-306-1907 151 A

Invoice

Invoice Number: 35961

Invoice Date: Jun 30, 2007

Page: 1

Voice: 206.762.0240 Fax: 206.763.8084

Bill To: SPOONER CONTRACTING, LLC
17807 SE 346TH ST.
AUBURN, WA 98092

SPOONER CONTRACTING, LLC
DISPOSAL @ MVS
628004/06.21.07
AUBURN, WA 98092

Customer ID	Customer PO	Payment Terms	SIC
SPOONER		Net 30 Days	1953

Description	Quantity	Unit Price	Extension
****** 06/21/07 DISPOSAL @ MVS			
TANK DISPOSAL	1.00 EA	[redacted]	[redacted]

Subtotal [redacted]

Sales Tax

Total Invoice Amount [redacted]

Invoice Due: Jul 30, 2007

Overdue invoices are subject to finance charges.

APPENDIX E

Certification

INTERNATIONAL CODE COUNCIL

COREY LEAGUE

The International Code Council attests that the individual named on this certificate has satisfactorily demonstrated knowledge as required by the International Code Council by successfully completing the prescribed written examination based on codes and standards then in effect, and is hereby issued this certification as:

WASHINGTON STATE SITE ASSESSMENT

given this day of August 23, 2005

Frank P. Hodge Jr.

Frank P. Hodge Jr.
President, ICC Board of Directors

James R. Witt

James L. Witt
ICC Chief Executive Officer

5267709-U7
Certificate Number

ICC
INTERNATIONAL CODE COUNCIL®