g-logics

April 24, 2019
G-Logics File Number 01-1239-B

Mr. David Kessler
Frick and Frack, LLC
2101 Burwell Place
Bremerton, WA 98312

SUBJECT: Workplan to Conduct a Subsurface Exploration
L&E Auto Sales Property
2101 Burwell Pl
Bremerton, WA 98312

Dear Mr. Kessler:

G-Logics is pleased to present this workplan to conduct a subsurface exploration at the subject property (Figure 1). At the request of Frick and Frack, LLC (Frick & Frack), G-Logics recently completed a review of previously completed explorations on the property. Specifically, the previously completed explorations were performed to assess releases of petroleum from underground-storage tanks formerly located on the property. The findings and opinions of our review were presented in our *Data Review and Summary* Report, dated April 8, 2019.

Background

The subject property (Property) consists of a 0.25 acre site in Bremerton, Washington, used by a taxi-cab company until 1961 and then redeveloped into a used-car lot until 2012. The site is primarily covered by asphalt and is occupied by an office building and carport used for maintenance and storage. The Property slopes west towards a drainage area that ultimately leads to Sinclair Inlet.

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During 2010, DLH Environmental Consulting (DLH) conducted a subsurface assessment at the Property. The assessment identified the presence of heavy-oil impacted soils and documented the removal of one waste-oil tank and one hydraulic lift. Additional exploration work was conducted to locate other potential underground-storage tanks (USTs). Three additional USTs were subsequently discovered and removed.

Reportedly, during the UST-removal operations, approximately 76 tons of petroleum-contaminated soil (PCS) was removed from the tank cavity and piping areas. Additional sampling (conducted by DLH) around the excavation and piping areas demonstrated that gas and diesel contaminants remained above cleanup levels (gas, diesel, motor oil, and BTEX contaminants).

In early 2013 EnviroSound Consulting (ESC) conducted additional soil sampling (from test pits) in the areas previously identified as containing residual PCS. Reportedly, EnviroSound did not encounter contaminated soils. EnviroSound concluded that no additional remedial efforts were required and requested an NFA determination from Ecology.

In response to the NFA request, Ecology issued two opinion letters. Both Ecology opinion letters determined that additional site characterization and remediation was required at the Property to meet Washington State cleanup standards. Additionally, Ecology expressed that insufficient analysis and documentation was presented (in the 2013 ESC cleanup report) to support a NFA request.

G-Logics completed a review of the previous explorations and provided a summary of our findings and opinion in are report, dated April 8, 2019. Our review found that the DLH and ESC efforts executed and documented insufficiently to successfully request a NFA from Ecology. G-Logics agreed with Ecology's findings that there are several areas that require additional characterization and possible remediation. Specifically, the completed remedial excavations should have generated more soil for offsite disposal than the 75.95 tons reported by DLH. Additionally, several data gaps were found in both the northeast and the west excavation areas.

Regulatory Background

The law that guides the soil remediation process at sites located within Washington State is the Model Toxics Control Act (MTCA). The regulations implementing MTCA are located in the Washington Administrative Code (WAC), Chapter 173-340. This regulation is administered by the Washington Department of Ecology (Ecology). MTCA "establishes administrative processes and standards to identify, investigate, and cleanup facilities where hazardous substances have come to be located" (WAC 173-340-100). MTCA regulations also list prescriptive, numerical "Method A Cleanup Levels" that "provide conservative cleanup levels for sites with relatively few hazardous substances and may be inappropriate for some sites." However, the regulations also state that Method A Cleanup Levels should not automatically be used to define cleanup levels that must be met for financial, real estate, insurance coverage, or similar purposes. Specifically, if contaminant migration to groundwater is not present, MTCA allows the use of site specific petroleum composition to calculate site-specific Method B TPH cleanup levels (Guidance for Remediation of Petroleum Contaminated Sites, revised June, 2016). Additionally, exceeding MTCA published cleanup levels does not necessarily mandate a cleanup action for a site.

Objective and Scope of Services

In order to provide cost-effective, yet technically defensible data, G-Logics recommends using direct-push drilling and sampling equipment at this site. Based on our review and understanding of site conditions, the following services will be performed.

1. Conduct a review of underground utilities in planned drilling areas.
2. Collect and analyze soil samples from 12 borings.
3. Prepare a report summarizing existing and collected data from this exploration.

Pre-Field Activities

Efforts to be performed prior to field activities include the development of a scope of work for the Property (this document), coordination of internal staff and subcontractors, and the development of a site-specific health and safety plan.

Project Management

To support the scope of work described above, certain efforts will be required which may not be directly associated with a specific task. Accordingly, these efforts to support the project are referred to as project management tasks. Examples of project management tasks typically include scope development, daily management and communication for the work being conducted, client and counsel correspondence, and interactions with contractors, vendors, and regulatory agencies.

Underground Utility Clearance

Due to the unknown location of subsurface utilities in the proposed exploration areas, G-Logics will contact public and private utility-locating services a minimum of three business days before conducting the site exploration. Subsurface utility locations will be identified by marking their inferred location on the ground surface. This information will be used to aid in identifying boring locations. Actual boring locations (described below) will be identified upon completion of the utility locate and confirmation of access availability.

Northeast Area, Soil Borings 1 through 6

As shown on Figure 2, boring GLB-1 is intended to assess the vertical extent of gasoline range organics (GRO) and benzene, toluene, ethylbenzene, and xylenes (BTEX) in soils beneath the former USTs. Our recommendation is to complete this boring to an approximate depth of 20 feet.

Borings GLB-2 through GLB-6 are intended to assess the lateral and vertical extents of GRO and BTEX in native soils, outside of the understood excavations boundaries. Our recommendation is to complete these borings to an approximate depth of 20 feet.

West Area, Soil Borings 7 through 12

Based on the interpreted data, borings GLB-7 through GLB-10 are intended to assess the lateral extent of the petroleum contamination discovered in the DLH samples B-1 and 81910-N. Borings GLB-11 and GLB-12 are intended to assess the lateral and vertical extents of the petroleum contamination discovered in the DLH samples 81910-B and 81910-B+4. Our recommendation is to complete these borings to an approximate depth of 12 feet.

Select soil samples collected in borings GLB-7 through GLB-12 should be analyzed for diesel-range organics (DRO) and heavy-oil range organic (ORO). Additionally, because these contaminants are likely related to material released from the waste-oil tank, select soil samples also should be analyzed for contaminants listed in Ecology's Model Toxics Control Act (MTCA) Table 830-1 and GRO.

Elevation Survey

With this effort, an arbitrary reference elevation will be established on the Property. Using this arbitrary elevation, each boring location will be surveyed for elevation control. With the elevation control, the depth of each collected soil sample can be plotted to provide the vertical information necessary for mapping contaminant locations. The borings will be surveyed using a LaserMark LMH laser level and graduated survey rod using standard elevation-leveling techniques.

Soil Samples

Continuous core soil samples will be collected at 5-foot intervals (where possible) using the direct-push sampling equipment. Soils will be reviewed for odors, soil staining, and/or discoloration. Additionally, samples will be periodically screened for the presence of volatile organic compounds by a photoionization detector (PID) with the readings noted on our boring logs. Representative samples from the borings will be submitted for laboratory analysis as discussed in the Regulatory Background section and presented on the Soil Analysis Table below.

Soil Analyses, *Method*	**Quantity**
Diesel / Heavy Oil Range Organics, *NWTPH-Dx/EPA 8015*	12
GRO and BTEX, *EPA 8260/624/NWTPH-Gx*	15
Diesel / Heavy Oil Range Organics Fractionation, *EPH*	5
GRO Fractionation, *VPH*	5

Report Preparation

Follow the completion of the exploration work and receipt of analytical results, G-Logics will prepare a report to present the findings of the assessment. The report will include site diagrams showing exploration locations, as well as current and identified former site features. Boring logs, laboratory analytical results, and a discussion of our findings also will be included. Analytical results will be compared to the cleanup levels (Method "A" and/or "B" Cleanup Levels) set by Ecology under the MTCA Cleanup Regulation, dated November 2007, revised in 2013.

Additionally, as stated in Ecology's March 9, 2018 Opinion Letter, G-Logics will enter existing and newly obtained analytical data into Ecology's Environmental Information Management (EIM) database.

Project Parameters

The schedule and budget estimate for the exploration, as described above, is based on the following assumptions:

- Site access will be available to G-Logics personnel and all G-Logics subcontractors.
- Drilling at off-property locations, including streets and right-of-ways, will not be conducted as part of this project.
- Concrete cores will not be necessary.
- Direct-push sampling equipment can be successfully used at this site.
- On-site drilling and soil sampling will be completed within two 13 hour days.
- Approximately 12 soil borings will be completed.
- Weekend and/or night work will not be required.
- G-Logics will provide all sampling equipment and sample containers.
- The drilling contractor will provide drums for containing soil cuttings generated during this work. Sampling-equipment decontamination-water, and purge water from the wells, also will be placed into the drums.
- Costs for the storage and disposal of drums with contaminated soil or water (discovered and generated during the field effort) **are not included** in our estimate.

Quality Assurance/Quality Control

Quality Assurance/Quality Control (QA/QC) for the presented scope of work will include generally accepted procedures for sample collection, storage, tracking, and documentation. All sampling equipment will be washed and rinsed before the collection of the samples. All samples will be labeled with a sample number, date, time, and sampler name, and will be stored in an ice chest containing ice or ice substitute. Appropriate chain-of-custody documentation will be completed.

Project Schedule

Fieldwork is anticipated to begin approximately three to four weeks following your authorization. We anticipate receipt of draft laboratory results approximately one to two weeks after sample submittal (non-rush basis), followed by a draft report within one week of analytical laboratory results. We will prepare a final report within approximately five days of receipt of your comments on the draft report.

Given this schedule, we anticipate providing a draft report within six to seven weeks of project authorization, for the described scope of services. Additionally, we will keep you informed of conditions as they develop and will provide periodic verbal summary reports during our work.

Limitations

The proposed scope of services is intended to provide an additional assessment of possible contamination of soil on the property. This assessment is not designed to identify all potential concerns or to eliminate all risk associated with the subject property. Even the most rigorous of professional assessments may fail to identify all existing conditions. This assessment will not provide a guarantee regarding site contamination and may not generate sufficient data to accurately define the lateral and vertical extent of contamination, if present. This assessment will not include other services not specifically described above.

Although risk can never be eliminated, more detailed and extensive explorations yield more information, which may help understand and manage the degree of risk. Since such detailed services involve greater expense, our clients participate in determining the level of service that provides adequate information for their purposes at an acceptable level of risk. Acceptance of this workplan will indicate that the Frick & Frack has reviewed the scope of

service and determined that it does not need or want more services than are being planned at this time.

Our assessment of the property may change as new data become available during additional exploration, remediation, or development. Additionally, property activities and regulations beyond our control could change at any time after the completion of our exploration. Therefore, our observations, findings, and opinions can be considered valid only as of the date of the exploration.

Unless otherwise identified, our report will be prepared for the sole use of our client. The scope of services performed during this assessment may not be appropriate for the needs of other users, and re-use of our findings, conclusions, or recommendations presented in our report is at the sole risk of said user(s). Any party other than our client who would like to use this report shall notify G-Logics of such intended use. Non-compliance with this requirement will release G-Logics from any liability resulting from the use of our report by any unauthorized party.

Washington law requires that we inform the state if a situation is encountered that can be considered an immediate endangerment to the environment or to the public's health or welfare. All information gathered during G-Logics review is considered confidential and will be released only upon written authorization of the client or as required by law.

No warranty, express or implied, is made.

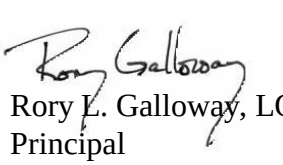
Drums/Investigation-Derived Wastes

Please note that this exploration will produce investigation-derived waste (IDW), often stored in drums. The landowner is considered the "generator" of this IDW under current law. Accordingly, G-Logics does not accept ownership or liability for generated wastes. G-Logics understands the landowner will pay for necessary IDW management and disposal. The costs and efforts associated with the disposal of these wastes/drums include profiling, analysis, coordination, and documentation, which cannot be accurately estimated until volumes and analytical data are known. These disposal costs **have not been included** as part of this workplan. Please also note that the drums will need to **remain on the property** pending results of analytical testing. Following the receipt of initial exploration data, and with additional authorization, G-Logics can assist Frick & Frack with the drum removal/waste management efforts.

Closing

We appreciate this opportunity to provide our services to you. Please contact us if you have questions regarding the scope of services, the work schedule, or costs described in this workplan.

Sincerely,
G-Logics, Inc.

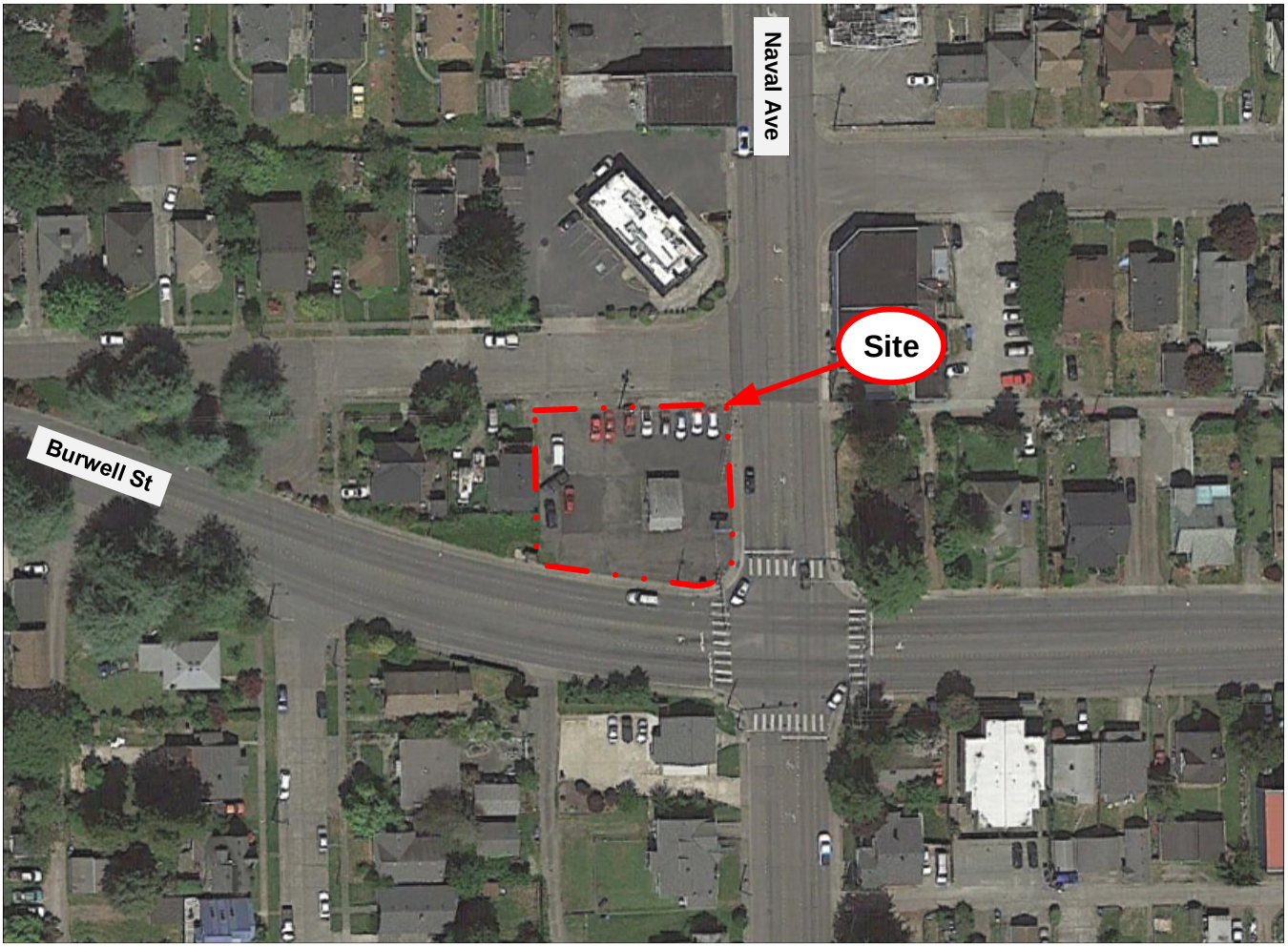


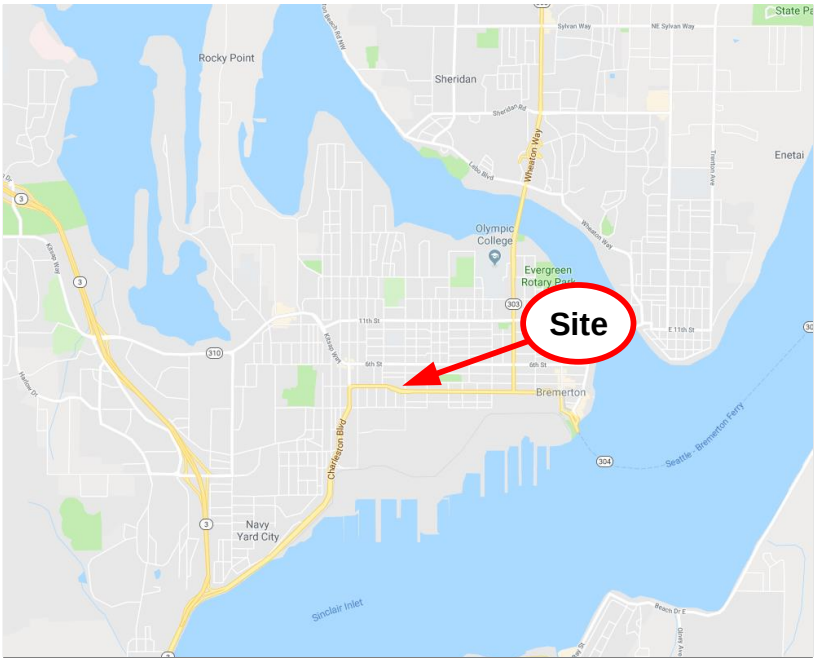
Rory L. Galloway, LG, LHG
Principal

Dan Hatch
Remediation Manager

Haley Carter
Staff Geologist

Attachments: Figure 1 – Site Location Maps
Figure 2 – Site Diagram, Proposed Exploration Locations





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Site Location Maps

L&E Auto Sales Property

2101 Burwell Pl

Bremerton, Washington

Figure 1

Project File: 01-1239-B F1.vsd

Mapping Reference: Delorme, Google Maps, and Google Earth

N

Legend

- Property Line
- G-Logics Proposed Boring Locations
- Building Outline
- Approximate Location of Former USTs
- Approximate Location of Hydraulic Lift
- Understood Location of UST System Piping
- Initial Over Excavation
- Final Over Excavation
- Understood Testpit Location
- Understood Location of Former Garage

Notes: Excavation Locations are G-Logics Interpretations Based on DLH and EnviroSound Consulting Mapping.

GLB-1
GLB-2
GLB-3
GLB-4
GLB-5
GLB-6
GLB-7
GLB-8
GLB-9
GLB-10
GLB-11
GLB-12
T1
T2
T3
101110-B 14

Project File: 01-1239-B F2.vsd

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Approximate Drawing Scale: 1" = 10'

0 ft. 6 ft. 10 ft. 20 ft.

Note: This figure contains information in color. Black & white photocopies may not be suitable for review.

Site Diagram, Proposed Exploration Locations
L&E Auto Sales Property
2101 Burwell Pl
Bremerton, Washington

Figure 2

Mapping Reference: DLH Phase II Report (June 17, 2010), DLH UST Decommissioning and Final Cleanup Report (January 12, 2011), EnviroSound Final Cleanup Report (July 21, 2013), Google Earth.