

TECHNICAL MEMORANDUM

To: Mr. Mark Chandler

From: Robert A. Honsberger

Date: May 17, 2017

Subject: Management of Investigation-Derived Waste – TOC Sites: 01-176 (Mount Lake Terrace), 01-182 (Everett Highway 99), 01-309 (Auburn), 01-400 (Kirkland) and 01-817 (Snohomish)

HydroCon Environmental, LLC (HydroCon) is submitting this technical memorandum to Time Oil Holdings Company (TOC) to document the management and disposal of investigation-derived waste (IDW) from five properties referenced above. Soil and water generated during drilling and groundwater sampling were temporarily stored in drums on the respective sites until proper disposition of the IDW was determined and transportation arrangements were scheduled. A summary of the IDW removed from each property is provided below:

- 24205 56th Avenue West, Mountlake Terrace, Washington (TOC Site Number 01-176) – Purge water from groundwater monitoring.
- 11701 Highway 99, Everett, Washington (TOC Site Number 01-182) – Purge water from groundwater monitoring.
- 401 Auburn Way North, Auburn, Washington (TOC Site Number 01-309) – Purge water from groundwater monitoring.
- 804 Market St, Kirkland, Washington (TOC Site Number 01-400) – 2 drums of soil and water generated from drilling and groundwater monitoring.
- 712 Avenue D, Snohomish, Washington (TOC Site Number 01-817) – 4 drums of soil and water generated from drilling and groundwater monitoring.

On March 27, 2017, HydroCon oversaw the removal of water stored in drums from the following five sites: 01-176 (Mount Lake Terrace), 01-182 (Everett Highway 99), 01-309 (Auburn), 01-400 (Kirkland), and 01-817 (Snohomish). A Marine Vacuum Services vacuum truck pumped a total of 155 gallons of water stored in drums and transported it to their Airport Way facility for treatment and discharge under their industrial waste water discharge permit. A copy of the transport manifest is included as Attachment A.

On May 11, 2017, HydroCon loaded 6 drums of soil generated during drilling activity from 01-400 (Kirkland) and 01-817 (Snohomish) onto a truck and transported them to the CEMEX USA (CEMEX) Remediation facility in Everett, Washington. The soil was treated using thermal desorption and then landfilled. A copy of the weigh bills is included as Attachment B.

List of Attachments

Attachment A – Transport Manifest

Attachment B – CEMEX Weigh Bills

Cc: Mr. Mike Warfel – Ecology, Northwest Region

ATTACHMENT A

Marine Vacuum Services Transport Manifest

This Memorandum

is an acknowledgment that a Bill of Lading has been issued and is not Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper No. 15373

Carrier No. 223

Date 3.27.17

Page 1 of 1

Marine Vacuum Service Inc.

(Name of carrier)

(SCAC)

On Collect on Delivery shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

TO:
 Consignee Marine Vacuum Service Inc.
 Street 1516 South Graham Street
 City Seattle State WA Zip Code 98108

FROM:
 Shipper Hydrocon Enviro
 Street 510 Allen St Suite B
 City Bellevue State WA Zip Code 98006
 Chem Tel 1-800-255-3924
 Contract MIS3627926

24 hr. Emergency Contact Tel. No. _____

Route _____ Vehicle Number _____

No. of Units & Container Type	HM	BASIC DESCRIPTION UN or NA Number, Proper Shipping Name, Hazard Class, Packing Group	TOTAL QUANTITY (Weight, Volume, Gallons, etc.)	WEIGHT (Subject to Correction)	RATE	CHARGES (For Carrier Use Only)
1 TT	X	(DOT Spec Tank Required) UN1863 Fuel, Aviation, Turbin Engine, Class 3, PG I				
1 TT	X	(DOT Spec Tank Required) UN1203 Gasoline, Mixture Class 3, PG II				
1 TT	X	(DOT Spec Tank Required) UN1203 Gasoline, Class 3, PG II				
1 TT	X	NA1993 Diesel Mixture, Class 3, PG III				
1 TT	X	NA1993 Diesel, Class 3, PG III				
1 TT	X	NA1270 Petroleum Oil, Class 3, PG I				
1 TT	X	NA1270 Petroleum Oil, Mixture, Class 3, PG I				
1 TT		Oily Waste Water Non Reg by DOT	155	gallons		
1 TT		Waste Water Non Reg by DOT				
1 TT		Marine Vessel Sewage Non Reg by DOT				
1 TT		Street Waste Storm Pipe Cleaning Non Reg by DOT				

PLACARDS TENDERED: YES NO

Note — (1) Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property, as follows: "The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____."
 (2) Where the applicable tariff provisions specify a limitation of the carrier's liability absent a release or a value declaration by the shipper and the shipper does not release the carrier's liability or declare a value, the carrier's liability shall be limited to the extent provided by such provisions. See NMFC Item 172.
 (3) Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation. See Section 2(e) of item 360, Bills of Lading, Freight Bills and Statements of Charges and Section 1(a) of the Contract Terms and Conditions for a list of such articles.

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Signature _____

REMIT C.O.D. TO: ADDRESS

COD

Amt: \$ _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

C.O.D. FEE: PREPAID COLLECT \$ _____

TOTAL CHARGES \$ _____

FREIGHT CHARGES
 FREIGHT PREPAID Check box if charges are to be collect
 except when box at right is checked

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to des-

ination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER Hydrocon CARRIER Marvac
 PER [Signature] PER [Signature]
 DATE 3.27.17

4

Permanent post-office address of shipper.



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PRINTED WITH SOY INK

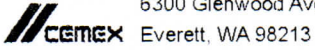
ATTACHMENT B
CEMEX Weigh Bills



Weighted At: Soil Remediation

1876091572

6300 Glenwood Ave



Everett, WA 98213

Location: 1876

Order: 41070519 Dispatch: 0 Date: 05/11/2017

Ship To: 50034200 - TIME OIL CO-01-400 KIRKLAND AGG 01-400 K

P: 01-400 KIRKLAND
804 MARKET STREET
KIRKLAND, WA 98033

Instruct: CLASS 3 TO EVERETT SOIL REMEDIATION
HYDROCON ENVIROMENTAL

Job #: 01-400 PO: 01-400 -HONSBERGER

Product: 1192517 - CLASS 3 SOIL DUMPED BY DRUM

Carrier: -

Vehicle: 2298655 - 1876-10,EVERETT SOIL GENERIC

Tractor / Trailer1 / Trailer 2 -/-

Qty: 2.00 piece --- DRIVER ON AT TARE & GROSS ---

Weighmaster:	lb	ton	tne
CEMEX	Gross: 18,540	9.27	8.41
Deputy Weighmaster:	Tare: 22,280	11.14	10.11
Regan, Angelique S	Net: -3,740	-1.87	-1.70

Scale: 0 * P. T.

In: Today Loads: 1

Out: 10:27 am Today Qty: 2.00 piece
0.00

CEMEX'S STANDARD TERMS AND
CONDITIONS INCORPORATED HEREIN.

0.00

Signature of Receiving Agent

Driver:

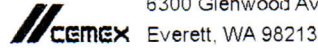
METRIC CONVERSION FORMULA: POUNDS DIVIDED BY 2204.623, ROUNDED TO 2 DECIMALS
SEE REVERSE SIDE FOR PRODUCT LABEL INFORMATION



Weighted At: Soil Remediation

1876091571

6300 Glenwood Ave



Everett, WA 98213

Location: 1876

Order: 41109059 Dispatch: 0 Date: 05/11/2017

Ship To: 50030240 - TIME OIL CO-VARIOUS VARIOUS

P:76: TOC 01-817 SNOHOMISH
712 & 714 AVE D-SNOHOMISH
EVERETT, WA 98203

Instruct: CLASS 3 TO EVERETT SOIL REMEDIATION
HYDROCON ENVIRO

Job #: 01-817 PO: 01-817

Product: 1192517 - CLASS 3 SOIL DUMPED BY DRUM

Carrier: -

Vehicle: 2298655 - 1876-10,EVERETT SOIL GENERIC

Tractor / Trailer1 / Trailer 2 -/-

Qty: 4.00 piece --- DRIVER ON AT TARE & GROSS ---

Weighmaster:	lb	ton	tne
CEMEX	Gross: 18,540	9.27	8.41
Deputy Weighmaster:	Tare: 22,280	11.14	10.11
Regan, Angelique S	Net: -3,740	-1.87	-1.70

Scale: 0 * P. T.

In: Today Loads: 1

Out: 10:25 am Today Qty: 4.00 piece
0.00

CEMEX'S STANDARD TERMS AND
CONDITIONS INCORPORATED HEREIN.

0.00

Signature of Receiving Agent

Driver:

METRIC CONVERSION FORMULA: POUNDS DIVIDED BY 2204.623, ROUNDED TO 2 DECIMALS
SEE REVERSE SIDE FOR PRODUCT LABEL INFORMATION