UNDERGROUND STORAGE TANK & CONTAMINATED SOIL REMOVAL

WD FOODS
9029 CHUCKANUT DRIVE
SKAGIT COUNTY PARCEL P34734
BOW, WASHINGTON 98232

For:

Doug Armstrong
17090 Sam Bell Road
Bow, WA 98232

By:

STRATUM GROUP

PO Box 2546
Bellingham, WA 98227
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February 10, 2020

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February 10, 2020

PO Box 2546
Bellingham, Washington 98227
Phone: (360) 714-9409

Doug Armstrong
7090 Sam Bell Road
Bow, WA 98232

Re: **Underground Storage Tank & Contaminated Soil Removal**
WD Foods
9029 Chuckanut Drive
Skagit County Parcel P34734
Bow, Washington 98232
UST ID: 620467

Dear Mr. Armstrong:

We herein present the results of our tank removal and soil cleanup activities completed in November 2019 at the WD Foods property at 9029 Chuckanut Drive in Bow, Washington.

Three inactive underground storage tanks (USTs) were identified and removed from the northwest corner of the subject property on November 11, 2019. Petroleum contaminated soil was identified in the former UST pit and in the vicinity of the former pump island. A total of 180.1 tons of petroleum-impacted soil was removed from the UST pit area on November 25, 2019. No soil was removed from the former pump island area. In addition, an approximately 600-gallon heating oil tank was pumped clean and closed-in-place.

Confirmation soil samples from the north, east, and west sidewalls of the UST excavation meet the Washington State Model Toxics Control Act (MTCA) Method A cleanup standard for unrestricted land use. Soil samples collected from the south sidewall and bottom of the UST pit indicate that petroleum-impacted soil remains on the site and appears to extend below the groundwater table. Contaminated soil remains present around the former pump island. No groundwater samples were collected during this remedial action.

Based on these sampling results and results from a prior Phase II environmental sampling investigation in July 2019, site soil and groundwater remain contaminated with levels of gasoline, benzene, ethylbenzene and/or xylenes above their respective cleanup standards. Further investigation would be required to establish the extent of soil and groundwater contamination and determine appropriate remedial actions.

Should you have any questions concerning this Environmental Site Assessment, please do not hesitate to contact us at (360) 714-9409.

Sincerely,
Stratum Group

Ben Carlson, M.Sc, G.I.T
Geologist-in-training

Kim Ninnemann, B.S., L.G.
Licensed Geologist

State of Washington
2690
Licensed Geologist
KIM N NINNEMANN

1.0 EXECUTIVE SUMMARY

Environmental cleanup activities were completed at 9029 Chuckanut Drive in Bow, Washington to remove former underground storage tanks (USTs) and petroleum-impacted soils in the vicinity of the USTs.

The subject property is currently operated as a grocery store known as WD Foods and an espresso stand.

Previous environmental work on the site had identified a fill and vent pipe for a heating oil tank on the property, as well as accounts that the site had previously sold gasoline prior to and possibly up to the 1960s. A Phase II investigation was performed by Stratum Group in July 2019, which included a ground penetrating radar (GPR) survey and environmental sampling. The GPR survey identified what were believed to be up to three USTs in the parking area southwest of the market and espresso buildings. Soil and groundwater samples collected from five environmental borings across the northern and western portions of the property identified petroleum contamination in site soil and groundwater in only one boring north of the espresso stand.

Excavation activities commenced on November 11, 2019 to remove the suspected USTs. No USTs were encountered in the area identified by GPR. Multiple capped pipes and other equipment consistent with a former pump island was identified immediately southwest of the espresso stand. The excavation was expanded to the north, following what was believed to be former product lines from the pump island, until three fuel USTs were encountered. The tanks were located in the northwest corner of the site beneath a gravel parking area, northwest of the espresso stand. The tanks were 400, 700 and 1,000-gallons in size. Fuel and/or fuel-water were pumped from the tanks prior to removal. All three tanks were in poor conditions upon removal. Field indicators and initial soil sampling confirmed the presence of petroleum-impacted soil around the USTs and beneath the former pump island.

Excavation and soil removal occurred on the property on November 25, 2019. A total of approximately 180.1 tons of petroleum-impacted soil was removed from the vicinity of the former UST pit and transported to the Greater Wenatchee Regional Landfill for disposal. Excavation and soil removal volumes were based upon available funding. Excavation was completed to a maximum depth of 10.5 feet below the ground surface (bgs), where groundwater was encountered. No soil was not removed from the vicinity of the former pump island.

Soil samples were collected from the sidewalls and base of the final UST pit excavation. Sampling results were compared to Washington State Model Toxics Control Act (MTCA) Method A cleanup standards for unrestricted land use. Residual soil from the north, east and west sidewalls met the cleanup standard. However, residual soil from the base of the excavation and south sidewall of the UST excavation, as well as beneath the former pump island, continued to have elevated concentrations of gasoline, benzene, ethylbenzene and/or xylenes.

An approximately 600-gallon heating oil UST, located beneath the market building, was pumped clean and then backfilled with low density concrete for closure-in-place.

A significant amount of contaminated soil was removed from around the former USTs; however, based on our field testing and sample results, petroleum-impacted soil remains present on the subject property. Sampling indicates that the impacted soil likely extends beneath the groundwater table. Further investigation would be required to establish the extent of remaining soil and groundwater contamination on the property and determine the most effective method(s) of remediation.

2.0 GENERAL PROJECT INFORMATION

The initial goal of the cleanup activity was to remove the tank(s) associated with the former fuel operations and close-in-place an out of use heating oil tank. Upon discovery of contaminated soils around the former fuel tanks, the project was expanded to include removal of impacted soil.

Site Information

9029 Chuckanut Drive
Skagit County Parcel P34734
Bow, Washington 98232

Contact information about the project operations including property owner and environmental consultant are provided below:

Property Owner and Project Requestor

Doug Armstrong
17090 Sam Bell Road
Bow, WA 98232

Environmental Consultant

Stratum Group
PO Box 2546
Bellingham, WA 98227
Contacts: Kim Ninnemann
360-714-9409
kim@stratumgroup.net

3.0 SITE LOCATION & PHYSICAL CHARACTERISTICS

3.1 Location

The subject property is located in the unincorporated community of Bow, Washington. The property is located approximately 1.5 miles west of Interstate 5 and approximately 3.5 miles north-northwest of the city of Burlington, Washington. The property is located on the southwest corner of the four-way intersection of Chuckanut Drive, Sam Bell Road and Allan West Road.

The location of the property is provided in Figure 1.

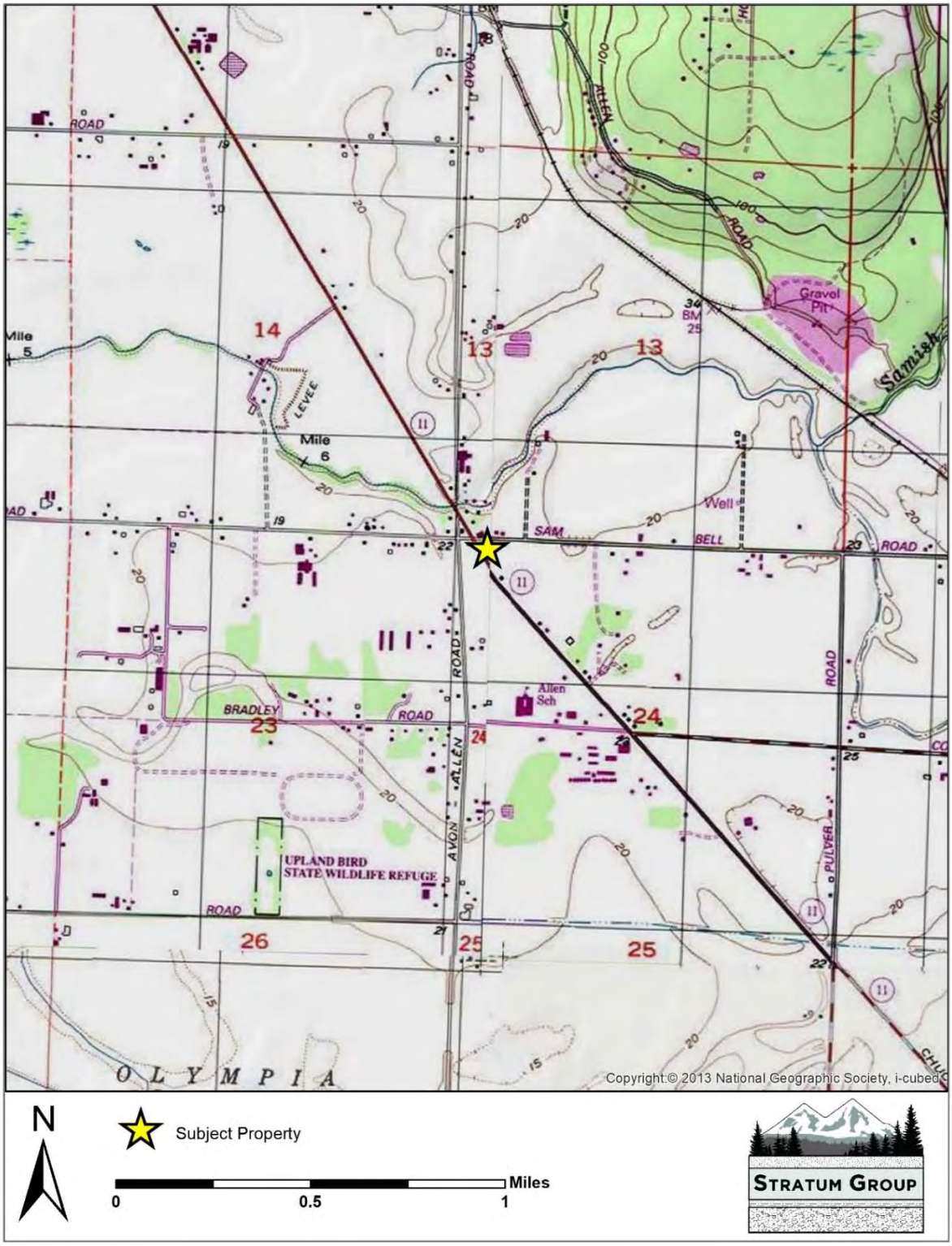

Figure 1. Map of site and vicinity

3.2 Site and Vicinity General Characteristics

The subject property is located in a predominantly rural farming area in northwest Skagit County. The property occupies a single, irregularly shaped tax parcel (Skagit County parcel P34734) that covers approximately 0.37 acres.

The site is developed with two structures that front Chuckanut Drive. A 3,200 square foot grocery market is located on the southern portion of the property. A small espresso stand operates in a trailer-like structure located just north of the market building. A gravel parking lot and drive through for the espresso stand occupy the northwestern portion of the property. The site is connected to an on-site septic system and a public water utility.

An aerial photograph of the site and vicinity is provided in Figure 2. The aerial includes the approximate footprint of a former building that was present onsite from approximately the 1930s to the 1960s.

Figure 2. Aerial photograph of site and vicinity (GoogleEarth, 2018)

3.3 Physical Characteristics of Site

The subject property is irregular in shape. The site is located on relatively flat topography at approximately 22 feet elevation above mean sea level.

3.3.1 Site Geology and Soils

The following description of the surficial deposits in the vicinity of the subject property was interpreted from the *Geologic Map of the Bow and Alger 7.5-minute Quadrangles, Western Skagit County, Washington* (Dragovich et al., 1998). Dragovich et at. (1998) maps the subject property as being underlain by alluvium of the Skagit River valley (Qa). Alluvium deposits consist of clay, silt, and fine sand with lesser sand and gravel deposited in the Skagit River and Samish River delta/floodplain.

Observations of environmental borings conducted in July 2019 identified general subsurface conditions to consist of silty gravel with sand to approximately 1.5 feet below ground surface (bgs), underlain by gray and brown-mottled silt with sand to 3 feet bgs, and silty sand to sand with silt to 15 feet bgs. The upper 1 to 1.5 feet of gravel is interpreted to be fill material with all soils below interpreted to be native silt and sand alluvium deposits.

3.3.2 Site Hydrology

No surface water features are located on or adjacent to the subject property. The property is located approximately 400 feet south of the Samish River.

The direction of shallow groundwater flow is typically a function of topography and drainages. The topography near the subject property is relatively flat but broadly slopes very gently to the north towards the Samish River. Based on topography, shallow groundwater is expected to flow to the north toward the Samish River.

Stormwater flows into one of two stormwater drains located along the western edge of the property or sheet flows off the property.

Groundwater was encountered at between 7 and 11 feet bgs during environmental borings in July 2019 and at 10.5 feet bgs during November 2019 excavation work. We interpret this groundwater to represent the shallow regional groundwater table.

4.0 ENVIRONMENTAL HISTORY

An environmental transaction screen and phase II environmental sampling event were completed in 2019. A summary of these documents are provided below. Copies of the documents are provided in Appendix II.

An historical review was conducted for the property as part of an Environmental Site

Assessment: Transaction Screen completed by Stratum Group in June 2019, which included a review of historical aerial photographs, assessor records and interviews.

A structure existed on the northern portion of the subject property by the late 1930s. Assessor records indicate the building was utilized as a grocery store. The building included a canopy that extended toward Chuckanut Drive. Conversations with local residents suggest the property did sell gasoline for a period of time. Assessor records and photographs indicate that fueling would have ceased by sometime in the 1960s or possibly early 1970s.

A new structure (the current building) was built abutting the south side of the previously existing building in 1960. The old building on the north side of the property was torn down in 1967. The remaining building operated as an electronics store and warehouse in the 1970s and has operated as a grocery store since the 1980s. Fill and vent pipes consistent with a heating oil tank are present on the north side of the front of the building, indicating that a heating oil tank is present on the property.

At the time of the transaction screen, the site was not listed as a UST or contaminated site with Ecology.

Based on the findings of the Transaction Screen, a Phase II subsurface investigation was completed by Stratum Group in July 2019, which involved a ground penetrating radar (GPR) and completion of five environmental borings. The GPR survey identified three anomalies located in the parking area immediately west of the existing market, which were suspected to be 10,000-gallon underground USTs.

Five environmental borings were advanced on the north side of the subject property, adjacent to and down gradient of the inferred buried USTs. Soil and grab groundwater samples were collected from each sampling location. Groundwater was encountered between 7 and 11 feet bgs. Petroleum contamination was identified in the soil and groundwater of one of the five borings (B4). Boring 4 was located just north of the espresso stand. No other exceedences were identified. Contamination was suspected to have extended north-northeast from the inferred USTs [subsequent work indicated that the tanks were not located where GPR identified them]. The report concluded that further investigation would be required to characterize the extent of contamination.

5.0 CLEANUP ACTIVITIES

All tank removal and contaminated soil excavation took place in November 2019. Details of tank conditions, soil quality and maps of sampling locations are provided below. A few photographs of the tank removal and cleanup activities are provided in the text. The site's UST summary and UST site check/site assessment checklist are provided in Appendix I.

5.1 Underground Storage Tank Removal

Anderson Environmental Contracting (AEC) was on site on November 11, 2019 to excavate around and remove the USTs previously identified in the GPR survey. Stratum Group personnel were present during the excavation and UST removal activities.

AEC began excavation to the west of the grocery building, where the previous GPR survey had identified three anomalies. Initial excavations did not identify any buried USTs, underground equipment, or field evidence of contamination such as discoloration, petroleum odors, or sheens. The excavation was therefore extended to the northwest, parallel to Chuckanut Drive, to identify USTs, if present.

Excavation continued to the northwest until multiple capped steel pipes, interpreted to represent a former pump island location was identified approximately 19 feet southwest of the south corner of the espresso stand. Soil in the vicinity of the pump island was grey and discolored with a strong petroleum odor. Three pipes extended from the inferred pump island to the southeast toward the northwest corner of the grocery building. The pipes were suspected to be associated with conduits for electricity to the pump island, but uses were not confirmed. Three steel pipes, likely product lines, extended northwest from the pump island. AEC expanded the excavation to the northwest following the inferred product line approximately 23 feet northwest of the west corner of the espresso stand.

No USTs or underground equipment, except for the pump island and suspected electrical conduit piping, were encountered in the inferred UST anomaly area identified in the July 2019 GPR survey. Therefore, we conclude that the results of the GPR survey were incorrect and did not successfully identify critical buried objects on the property.

Three USTs were encountered by following the suspected product lines. One product line lead to each tank: one 1,000-gallon (Tank 1), 400-gallon (Tank 2), and one 700-gallon (Tank 3). Piping suggested that all three tanks dispensed fuel to the pump island. All three tanks were single-walled steel and were buried approximately 2.5 to three feet bgs.

Tank 1 was located furthest to the north and was oriented northwest-southeast. Tank 1 was approximately ½ full of fluid. Tank 1 was approximately 143" long x 45" wide.

Tanks 2 and 3 were located approximately 4 feet southwest of Tank 1 and were positioned adjacent to one another and perpendicular to Tank1. Tank 2 was full of fluid. Tank 2 was

approximately 48” long x 42” wide. Tank 3 was approximately 1/2 full of fluid. Tank 3 was approximately 89” long x 42” wide.

Visual inspection of the tanks identified significant rust and pitting of the tank walls in each tank, with holes up to 1/2-inch in diameter. Tank degradation was particularly severe in Tanks 2 and 3, while the surface of Tank 1 was significantly less rusted. The unusual layout of the tanks and their varied weathering indicates that they may have been installed as multiple generations.

Strong odors of weathered gasoline, assumed to be a mix of fuel and water, were pumped out of the tanks and into a vacuum truck operated by AEC. The fuel/water mixture was removed from the site for disposal by AEC.

A map showing the location of the identified USTs and fueling equipment is shown in Figure 3. Photos of the tanks before and after removal are provided in Figure 4.

Figure 3. Map of USTs and former fueling equipment

Figure 4. A) Photo of Tank 3 with a significantly rusted exterior. B) Photo of Tank 1 being removed. C) Photo of all three tanks after being removed from the subsurface.

Soil excavated from the UST pit to access the USTs was stockpiled on site and covered with plastic sheeting to prevent interaction with surface water (i.e. rainfall). No groundwater was encountered in the UST pit during tank removal activities.

5.2 Initial Soil Sampling and Characterization

Initial soil samples were collected on the day of the tank removal. A strong petroleum odor was identified around the USTs and beneath the former pump island.

Three soil samples were collected from the site on November 11, 2019 to characterize the impacted soil. One sample (tank 1- bottom) was collected from approximately 2 feet beneath Tank 1, at approximately 8.5 foot bgs. The sample was collected within dark gray silt with a minor sheen. A second sample (tank2 – w overfill) was collected adjacent to Tank 2 within dark gray silt. The sample was collected at approximately two foot depth and had a moderate to heavy sheen. A third sample (pumpisland – 4') was collected from approximately 4 feet bgs, beneath the former pump island. The sample consisted of gray silty sand with a strong petroleum odor and sheen.

All three samples were analyzed for gasoline-, diesel-, and oil-range organics, BTEX (benzene, toluene, ethylbenzene, xylenes), MTBE, and MTCA metals (mercury, arsenic, cadmium, chromium, lead). Results were compared to Model Toxics Control Act (MTCA) Method A cleanup standards for unrestricted land use for screening purposes.

The results of the analyses are summarized in Table 1 and 2. The complete laboratory report is provided in Appendix II. A map of the sample locations is provided in Figure 5.

Table 1. Initial soil sample analytical results - Petroleum

Map ID	Sample Date	Sample Number	Sample Depth (ft)	PID (mg/kg)	Contaminant Results (mg/kg)							
					Gas	Diesel	Oil	B	T	E	X	MTBE
Tank 1	11/25/19	Tank1-bottom	8.5	96	46	U	U	U	U	0.10	U	U<0.1
Tank 2	11/25/19	Tank2-woverfill	2	1,427	**3,400**	160	U	U	U	**7.2**	7.9	U<0.1
Pump Island	11/25/19	Pumpisland-4'	4	Not collected	**16,000**	1,800	U	U	U	**86**	**460**	U<0.1
MTCA Method A Cleanup Standards (mg/kg)					***100[a]***	***2,000[b]***		***0.03***	***7***	***6***	***9***	***0.1***

B = benzene; T = toluene; E = ethylbenzene; X = xylenes; U = parameter not detected at reporting limits listed in lab report. a = cleanup standard for gasoline is 30 mg/kg if benzene is detected or if the total of BTEX constituents is greater than 1% of gasoline concentration; b = the total concentration of diesel and oil combined must be below 2,000 mg/kg to meet the cleanup standard. **Bold** and gray shaded cells represent exceedences of screening level/cleanup standard.

Table 2. Initial soil sample analytical results - Metals

Map ID	Sample Date	Sample Number	Sample Depth (ft)	Contaminant Results (mg/kg)				
				Mercury	Arsenic	Cadmium	Chromium	Lead
Tank 1	11/25/19	Tank1-bottom	8.5	0.031	4.2	0.12	52	6.8
Tank 2	11/25/19	Tank2-woverfill	2	0.021	11	0.11	34	4.3
Pump Island	11/25/19	Pumpisland-4’	4	0.051	3.7	0.21	45	67
MTCA Method A Cleanup Standards (mg/kg)				***2***	***20***	***2***	***2,000***	***250***

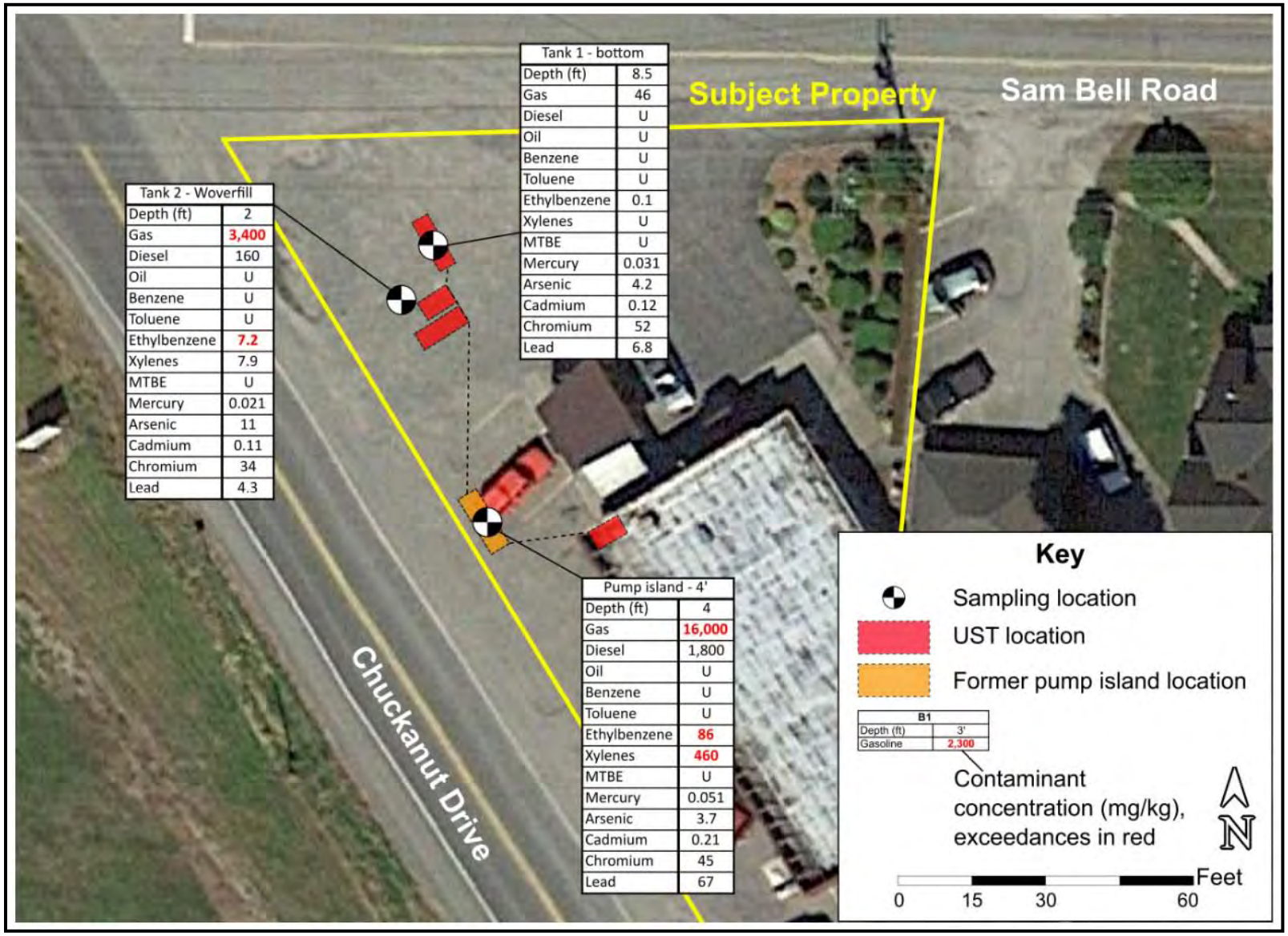

Figure 5. Site map with initial sampling results

Analysis indicates that soil sampled beneath Tank 1 met MTCA Method A standards.

Samples collected from beneath Tank 2 and in the vicinity of the former pump island significantly exceeded MTCA Method A cleanup standard for gasoline. Gasoline was detected at 3,400 mg/kg adjacent to Tank 2 and at 16,000 mg/kg beneath the former pump island, which greatly exceeds the MTCA Method A cleanup standard of 30 or 100 mg/kg. Concentrations of ethylbenzene also exceeded the cleanup standard of 6 mg/kg in both samples at approximately 2.5 to 28 times the screening level. Xylenes exceeded its respective cleanup standards in the pump island sample.

No benzene was detected in any of the samples. Metals were detected in all three samples, but were well below the cleanup standards.

Based upon the results of the soil samples, petroleum contamination was confirmed in site soils in association with the USTs and former pump island.

5.3 Heating Oil UST Closure-in-Place

A fill pipe was observed along the northwest side of the WD Foods grocery building. Previous GPR readings did not identify the tank location, so the tank is assumed to be largely located beneath the store building (orientation unknown).

AEC pumped all residual fluid out of the tank into a vacuum truck for off-site disposal on November 11, 2019.

Approximately 3 cubic yards of controlled density fill was pumped into the tank for closure-in-place on November 12, 2019. The tank is estimated to be 600-gallons.

No sampling was completed around the heating oil UST; however, soil and groundwater were sampled from adjacent to the UST during the July 2019 investigation (Boring 1). One soil sample was analyzed from 13.5-foot bgs. No diesel or oil was detected in the soil sample. Gasoline was detected in the soil, but at a concentration well below the cleanup standards. Gasoline, diesel, benzene, ethylbenzene and xylenes were detected in the groundwater, but all analytes met the cleanup standards. Based upon this nearby sample, no release is suspected in connection with the heating oil UST.

5.4 Soil Excavation

AEC and Stratum Group returned to the site on November 25, 2019 to excavate and remove contaminated soil. Based upon owner's financial capacity, the cleanup was capped at 200 cubic yards (estimated to be approximately seven truck loads). Stratum Group directed excavation activities using environmental field indicators such as hydrocarbon odors, soil discoloration and readings from a field PID to focus the soil excavation.

The final excavation pit measured approximately 12 feet wide by 29 feet long and 10.5 feet deep in the vicinity of the former USTs. Soil at the site consisted of predominately brown to gray silt,

sandy silt, and silty sand. Readings from the PID suggested that soil was beginning to clean up by approximately 8 feet bgs, isolated deeper zones of more heavily contaminated soil extended into the capillary fringe zone. Groundwater was encountered at approximately 10.5 feet bgs and the entire UST pit area excavation was extended to 10.5 feet bgs. Excavation did not proceed below the top of the water table, due to potential cave-in of sidewalls. Approximately 180.1 tons of impacted soil was removed from the former UST pit area and trucked to Waste Management's Greater Wenatchee Regional Landfill by R Transport. Copies of the disposal tickets are provided in Appendix I.

After cessation of excavation activities, soil from the excavation base and two sidewalls (east and south) still possessed a petroleum sheen. PID readings indicated the lowest levels of residual contamination in the north sidewall, with progressively higher readings present in the east, west, and south sidewalls, in that order. The highest PID readings were measured from the excavation base.

The UST pit was then backfilled by AEC with pit run gravel sourced from a Skagit County gravel pit trucked to the site by Miles Sand & Gravel.

Figure 6. Photo of the UST pit excavation, near completion

Petroleum-impacted soil excavation was also initiated in the vicinity of the former pump island where initial sampling and field indications suggested the presence of petroleum contamination (Figure 8). A pit was excavated approximately 12 feet long by 6 feet wide that reached a maximum depth of 10 feet bgs, just above the local water table. Although impacted soils appeared largely gone from the southern edge of the excavation, field indications suggested impacted soil remained in the base of the excavation as well as the north, east and west sidewalls. No soil samples were collected from the former pump island area.

Based upon the extent of impacted soil around the former pump island and limited available funding, soil that was initially excavated from the vicinity of the former pump island was placed back in the excavation and compacted by the excavator bucket.

Figure 7. Photo of the former pump island excavation. Grey discolored soil had strong petroleum odors.

Figure 8. Photo of final site conditions after backfill

5.5 Final Soil Samples

Soil samples collected from the site were placed into 4-ounce soil sample jars. The sampling equipment was cleaned with Alconox (a laboratory grade soap) and triple rinsed prior to collection of each sample. The samples were immediately placed into an ice-chilled cooler and delivered to ALS Laboratory in Everett, Washington the same day. No groundwater samples were collected during excavation activities.

Five soil samples were collected from the base and four sidewalls of the UST pit excavation once excavation was complete. Since no soil was removed from the former pump island area, no soil samples were collected from that location. Sampling results were compared to MTCA Method A cleanup standards for unrestricted land use.

A summary of the analytical results is provided in Table 3. The location of soil samples showing residual soil conditions on the site (including final sampling in the UST pit and initial sampling at the former pump island) is shown in Figure 10. Copies of the laboratory reports and chain-of-custody sheets are provided in Appendix I.

Table 3. Final soil sample analytical results

Map ID	Sample Date	Sample Number	Sample Location	Sample Depth (ft)	PID readings (ppm)	Contaminant Results (mg/kg)					
						Gas	B	T	E	X	MTBE
1	11/25/19	112519-1	Base, middle	10.5	1,424	**1,800**	**3.6**	U	**15**	**23**	U
2	11/25/19	112519-2	N sidewall	8	36.3	26	U	U	0.098	U	U
3	11/25/19	112519-3	E sidewall	8	165.8	32	U	U	U	U	U
4	11/25/19	112519-4	W sidewall	6.5	144.1	10	U	U	U	U	U
5	11/25/19	112519-5	S sidewall	5.5	384.7	**690**	U	U	U	U	U
MTCA Method A Cleanup Standards (mg/kg)						**100[a]**	**0.03**	**7**	**6**	**9**	**0.1**

B = benzene; T = toluene; E = ethylbenzene; X = xylenes; U = parameter not detected at reporting limits listed in lab report. a = cleanup standard for gasoline is 30 mg/kg if benzene is detected or if the total of BTEX constituents is greater than 1% of gasoline concentration. Bold and shaded cells indicate exceedances.

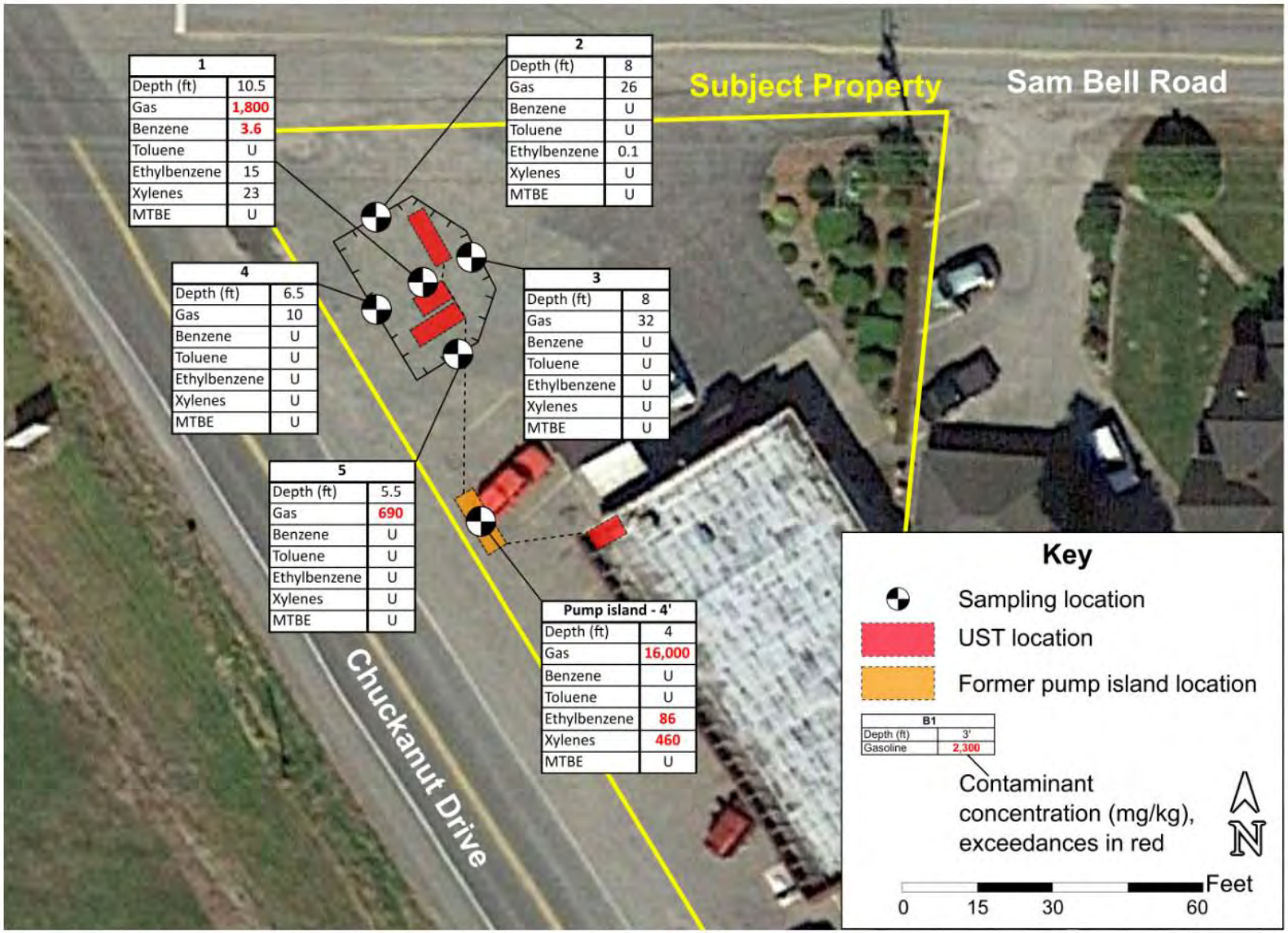

Figure 9. Site map with final soil sample results

5.6 Evaluation of Sample Results

Soil samples from the north, east and west sidewalls of the UST pit did not contain exceedances for any of the analytes and met MTCA Method A cleanup standards. These sidewall samples ranged in depth between 6.5 and 8 feet bgs.

Samples from the base south sidewall of the excavation contained elevated concentrations of gasoline at 690 mg/kg, which indicates additional shallow contaminated soil extends south of the former USTs.

The pit bottom sample had a detection of 1,800 mg/kg of gasoline and exceeded cleanup standards for benzene, ethylbenzene and xylenes. This pit bottom sample was collected within the smear zone of the shallow groundwater table. The horizontal and vertical extent of this deeper impacted soil was not determined.

The soil sample collected on November 11, 2019 identified concentrations of gasoline, ethylbenzene and xylenes well above their respective cleanup standards beneath the former pump island. Since none of the soil excavated from the former pump island area was removed from the site, this initial sampling indicates that petroleum-impacted soil remains on the subject property in the vicinity of the former pump island.

Groundwater is suspected to have been impacted around the USTs and former pump island area, based upon the depth of the impacted soil.

6.0 REPORTING

The confirmed petroleum release was reported to Department of Ecology on November 11, 2019. The environmental report tracking number for the release report is #694351. A copy of the report is provided in Appendix II.

7.0 CONCLUSIONS

Three underground fuel storage tanks, as well as piping and equipment associated with a former pump island, were removed from the site at 9029 Chuckanut Drive in Bow, Washington on November 11, 2019. The tanks were 400, 700, and 1,000-gallons in size. Soil contamination was confirmed around both the former pump island and around the USTs .

A total of 180.1 tons of petroleum-impacted soil was removed from the vicinity of the USTs. No soil was removed from around the former pump island.

Soil samples collected after the cessation of excavation activities confirmed that residual soils on the north, east and west sides of the excavation met MTCA Method A cleanup standards for unrestricted land use. However, soil along the south sidewall and base of the UST pit excavation continued to exceed cleanup standards for gasoline, benzene, ethylbenzene, and/or xylenes.

Groundwater was encountered at approximately 10.5 feet bgs during November 2019 excavation activities.

Based on the sampling results, residual petroleum-impacted soil remains present on the subject property in the vicinity of the former USTs and the former pump island. No groundwater samples were collected during this remedial action; however based upon the depth of impacted soil and results from a July 2019 sampling event, groundwater has been impacted by the petroleum releases.

Further investigation would be required to establish the vertical extent of soil contamination and the lateral extent of groundwater contamination on the site before additional remedial actions can be undertaken to address and remediate this contamination.

APPENDIX I

UST Summary

UST Site Check/Site Assessment Checklist

ERTS Incident Report

Underground Storage Tank System Summary

UST ID: 620467

Site Name: WD Foods

Glossary

UST ID:	620467	**Facility/Site ID:**	32795	**Latitude:**	48.51526	**Active Tag(s):**	N/A
Address:	9029 CHUCKANUT DR BOW, WA 98232			**Longitude:**	-122.37670	**Responsible Unit:**	Northwest
				County:	Skagit		

Tank Summary

Tank Name	Tank Status	Tank Install Date
3	Closure in Process	1/1/0001
1	Closure in Process	1/1/0001
2	Closure in Process	1/1/0001

Tank Name: 3 — Tank Status: Closure in Process

Tank Installation:	1/1/0001	**Tank Upgrade:**		**Business License Endorsement Expiration:**	
Tank Status Date:	11/11/2019	**Piping Installation:**		**Tank Permanently Closed Date:**	1/7/2020

Tank Information		Piping Information	
Material:		**Material:**	
Construction:		**Construction:**	
Corrosion Protection:		**Corrosion Protection:**	
Manifolded Tank:		**SFC* at Tank:**	
Release Detection:		**SFC* at Dispenser/Pump:**	
Tightness Test:		**Primary Release Detection:**	
Spill Prevention:		**Secondary Release Detection:**	
Overfill Prevention:		**Pumping System:**	
Actual Capacity:	400 Gallons	**Turbine Sump Construction:**	
Capacity Range:		*SFC = Steel Flex Connector	

Compartment	Substance Stored	Substance Used	Capacity
1	Unknown	Motor Fuel for Vehicles	400 Gallons

Tank Name: 1			**Tank Status:** Closure in Process	
Tank Installation:	1/1/0001	**Tank Upgrade:**	**Business License Endorsement Expiration:**	
Tank Status Date:	11/11/2019	**Piping Installation:**	**Tank Permanently Closed Date:**	1/7/2020

Tank Information		**Piping Information**	
Material:		**Material:**	
Construction:		**Construction:**	
Corrosion Protection:		**Corrosion Protection:**	
Manifolded Tank:		**SFC* at Tank:**	
Release Detection:		**SFC* at Dispenser/Pump:**	
Tightness Test:		**Primary Release Detection:**	
Spill Prevention:		**Secondary Release Detection:**	
Overfill Prevention:		**Pumping System:**	
Actual Capacity:	1,000 Gallons	**Turbine Sump Construction:**	
Capacity Range:		*SFC = Steel Flex Connector	

Compartment	**Substance Stored**	**Substance Used**	**Capacity**
1	Unknown	Motor Fuel for Vehicles	1,000 Gallons

Tank Name: 2			**Tank Status:** Closure in Process	
Tank Installation:	1/1/0001	**Tank Upgrade:**	**Business License Endorsement Expiration:**	
Tank Status Date:	11/11/2019	**Piping Installation:**	**Tank Permanently Closed Date:**	1/7/2020

Tank Information		**Piping Information**	
Material:		**Material:**	
Construction:		**Construction:**	
Corrosion Protection:		**Corrosion Protection:**	
Manifolded Tank:		**SFC* at Tank:**	
Release Detection:		**SFC* at Dispenser/Pump:**	
Tightness Test:		**Primary Release Detection:**	
Spill Prevention:		**Secondary Release Detection:**	
Overfill Prevention:		**Pumping System:**	
Actual Capacity:	700 Gallons	**Turbine Sump Construction:**	
Capacity Range:		*SFC = Steel Flex Connector	

Compartment	**Substance Stored**	**Substance Used**	**Capacity**
1	Unknown	Motor Fuel for Vehicles	700 Gallons

DEPARTMENT OF ECOLOGY
State of Washington

SITE CHECK/SITE ASSESSMENT CHECKLIST
FOR UNDERGROUND STORAGE TANKS

UST ID #: 620467
County: Skagit

This checklist certifies that site check or site assessment activities were performed in accordance with Chapter 173-360A WAC. Instructions are found on the last page.

I. UST FACILITY		II. OWNER/OPERATOR INFORMATION	
Facility Compliance Tag #:		Owner/Operator Name: Doug Armstrong	
UST ID #: 620467		Business Name: 9029 Chuckanut LLC	
Site Name: WD Foods		Address: 9029 Chuckanut Drive	
Site Address: 9029 Chuckanut Dr		City: Bow	State: WA Zip: 98232
City: Bow, WA 98232		Phone: 425-766-1869	
Phone:		Email: wdfoods.doug@gmail.com	

III. CERTIFIED SITE ASSESSOR			
Service Provider Name: Kim Ninnemann		Company Name: Stratum Group	
Cell Phone:3609200468 Email: kim@stratumgroup.net		Address: PO Box 2546	
Certification #: ICC32025567	Exp. Date: 02/27/2021	City: Bellingham	State: WA Zip: 98227

IV. TANK INFORMATION

TANK ID	TANK CAPACITY	LAST SUBSTANCE STORED	DATE SITE CHECK OR ASSESSMENT CONDUCTED
1	1,000	suspected gasoline	11/11/2019
2	700	suspected gasoline	11/11/2019
3	400	suspected gasoline	11/11/2019

V. REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT (check one)

- [X] Release investigation following permanent UST system closure (i.e. tank removal or closure-in-place).
- [ ] Release investigation following a failed tank and/or line tightness test.
- [ ] Release investigation following discovery of contaminated soil and/or groundwater.
- [ ] Release investigation directed by Ecology to determine if the UST system is the source of offsite impacts.
- [ ] UST system is undergoing a "change-in-service", which is changing from storing a regulated substance (e.g. gasoline) to storing a non-regulated substance (e.g. water).
- [ ] Directed by Ecology for UST system permanently closed or abandoned before 12/22/1988.
- [ ] Other (describe):

VI. Checklist

The site assessor must check each of the following items and include it in the report. Sections referenced below can be found in the Ecology publication *Guidance for Site Checks and Site Assessments for Underground Storage Tanks.*	YES	NO
1. The location of the UST site is shown on a vicinity map.	☒	☐
2. A brief summary of information obtained during the site inspection is provided (Section 3.2)	☒	☐
3. A summary of UST system data is provided (Section 3.1)	☒	☐
4. The soils characteristics at the UST site are described. (Section 5.2)	☒	☐
5. Is there any apparent groundwater in the tank excavation?	☒	☐
6. A brief description of the surrounding land use is provided. (Section 3.1)	☒	☐
7. The name and address of the laboratory used to perform analyses is provided. The methods used to collect and analyze the samples, including the number and types of samples collected, are also documented in the report. The data from the laboratory is appended to the report.	☒	☐
8. The following items are provided in one or more sketches:		
• Location and ID number for all field samples collected	☒	☐
• If applicable, groundwater samples are distinguished from soil samples n/a	☐	☐
• Location of samples collected from stockpiled excavated soil n/a	☐	☐
• Tank and piping locations and limits of excavation pit	☒	☐
• Adjacent structures and streets	☒	☐
• Approximate locations of any on-site and nearby utilities	☒	☐
9. If sampling procedures are different from those specified in the guidance, has justification for using these alternative sampling procedures been provided? (Section 3.4) n/a	☐	☐
10. A table is provided showing laboratory results for each sample collected including; sample ID number, constituents analyzed for and corresponding concentration, analytical method, and detection limit for that method. Any sample exceeding MTCA Method A cleanup standards are highlighted or bolded.	☒	☐
11. Any factors that may have compromised the quality of the data or validity of the results are described.	☒	☐
12. The results of this site check/site assessment indicate that a confirmed release of a regulated substance has occurred. The requirements for reporting confirmed releases can be found in WAC 173-360-372.	☒	☐

VII. Required Signatures

Signature acknowledges the Site Check or Site Assessment complies with UST regulations WAC 173-360A-0730 through 0750.

Kim Ninnemann		12-10-2019
Print or Type Name	Signature of Certified Site Assessor	Date

ERTS Incident #694351

Environmental Report Tracking - *Generated 11/13/2019, 12:41 PM*

Incident details

Life cycle status:	Program referral pending
Incident Date	11/11/19
Was it self-reported? :	No
Show to public?:	No

Program owners

NWRO - Toxics Cleanup

Location

Location name:	
Physical Address	9029 Chuckanut Dr Bow WA 98232 US
County:	Skagit
Ecology region:	NWRO
Lat, long:	48.51526 , -122.3767
Directions/Landmarks:	Known as "WD Foods"

Primary Initial Report - Reported: 11/13/19 12:13

Where did it happen?

Location name:	
Physical address:	9029 Chuckanut Dr Bow WA 98232 US
County:	Skagit
Ecology region:	NWRO
Lat, long:	48.51526 , -122.3767

How was it reported?

Intake type:	Call
Reported date:	11/13/19 12:13
Entered by:	Katelynn Piazza
Entered at:	11/13/19 12:40

Who reported it?

Directions/Landmarks:

Known as "WD Foods"

What happened?

Incident date: 11/11/19

Activity: Not operating or not performing designed function

Cause: Equipment failure - Structural failure

Medium
Ground - Soil

Source
Facility - Commercial/Industrial facility

Substance
Oil - Gasoline

Substance amount:

Who might be responsible?

Name:

Organization:

Email:

Phone number(s):

Mailing address:

Reporter type:
Consultant

Name:
Kim Ninnemann

Organization:
Stratum

Email:
Kim@stratumgroup.net

Phone number(s):
(360) 714-9409

Mailing address:

Are they anonymous? No
Do they want this to be confidential? No
Are they self-reporting? No
External reference number:

Comments/notes

Three USTs were removed on Monday, November 11th. The tanks were sized: 1,000, 700, and 400 gallons.

Gasoline release around the tanks and under the formally existing pump island was confirmed. It's suspected that the overfill and structural failure of the tanks contributed to the contamination.

No known ID associated with the tanks or site, but a 30-day notice was submitted for the tank removal. Annette Ademasu has been working with the site.

APPENDIX II

Soil Disposal Tickets

Laboratory Reports and Chain-of-Custodies

- November 11, 2019 soil samples
- November 25, 2019 soil samples

Greater Wenatchee Regional Landfill
191 Webb Road
Wenatchee, WA, 98802 Ph: (509) 884-2802

Reprint
Ticket# 854817

Customer Name ANDERSON ENVIRONMENTAL A
Ticket Date 11/25/2019
Payment Type Credit Account
Manual Ticket#
Route
Hauling Ticket#
Destination
Manifest 114881wa
Profile 114881WA (LF02 Petroleum Contaminated Soils)
Generator WA-WD FOODS INC WD FOODS INC 9029 CHUCKANUT DR BOW WA 98232
PO#

Carrier KISSLER
Vehicle# 17
Container
Driver
Check#
Billing# 0508083
Grid

	Time	Scale	Operator	Inbound	Gross	113340 lb
In	11/25/2019 13:26:14	Inbound	Janelle		Tare	42560 lb
Out	11/25/2019 13:54:02	Outbound	Janelle		Net	70780 lb
					Tons	35.39

Comments

	Product	LD%	Qty	UOM	Rate	Tax/Fee	Amount	Origin
1	Cont Soil Pet-RGC-Tons-	100	35.39	Tons				Skagit
2	EVF-P10-Environmental F	100		%				Skagit
3	CDHD FEE-Chelan Douglas	100	35.39	Tons				Skagit
4	TF-TRANSPORTATION FEE	100	35.39	Tons				Skagit

Total Tax/Fees
Total Ticket

Driver`s Signature

The total amount includes fees and taxes that may not all be listed on this ticket due to technical limitation.

Greater Wenatchee Regional Landfill
191 Webb Road
Wenatchee, WA, 98802 Ph: (509) 884-2802

Reprint
Ticket# 854814

Customer Name ANDERSON ENVIRONMENTAL A
Ticket Date 11/25/2019
Payment Type Credit Account
Manual Ticket#
Route
Hauling Ticket#
Destination
Manifest 114881wa
Profile 114881WA (LF02 Petroleum Contaminated Soils)
Generator WA-WD FOODS INC WD FOODS INC 9029 CHUCKANUT DR BOW WA 98232
PO#

Carrier KISSLER
Vehicle# 18
Container
Driver
Check#
Billing# 0508083
Grid

	Time	Scale	Operator	Inbound		
In	11/25/2019 13:09:52	Inbound	Janelle		Gross	107900 lb
Out	11/25/2019 13:45:22	Outbound	Janelle		Tare	42760 lb
					Net	65140 lb
					Tons	32.57

Comments

	Product	LD%	Qty	UOM	Rate	Tax/Fee	Amount	Origin
1	Cont Soil Pet-RGC-Tons-	100	32.57	Tons				Skagit
2	EVF-P10-Environmental F	100		%				Skagit
3	CDHD FEE-Chelan Douglas	100	32.57	Tons				Skagit
4	TF-TRANSPORTATION FEE	100	32.57	Tons				Skagit

Total Tax/Fees
Total Ticket

Driver`s Signature

The total amount includes fees and taxes that may not all be listed on this ticket due to technical limitation.

Greater Wenatchee Regional Landfill
191 Webb Road
Wenatchee, WA, 98802 Ph: (509) 884-2802

Reprint
Ticket# 854805

Customer Name ANDERSON ENVIRONMENTAL A
Ticket Date 11/25/2019
Payment Type Credit Account
Manual Ticket#
Route
Hauling Ticket#
Destination
Manifest 114881wa
Profile 114881WA (LF02 Petroleum Contaminated Soils)
Generator WA-WD FOODS INC WD FOODS INC 9029 CHUCKANUT DR BOW WA 98232
PO#

Carrier ROCK BLINSKY TRUCKIN ROCK BLINSKY TR
Vehicle# 0
Container
Driver
Check#
Billing# 0508083
Grid

	Time	Scale	Operator	Inbound		
In	11/25/2019 12:37:14	Inbound	Janelle		Gross	91640 lb
Out	11/25/2019 12:59:29	Outbound	Janelle		Tare	40060 lb
					Net	51580 lb
					Tons	25.79

Comments

	Product	LD%	Qty	UOM	Rate	Tax/Fee	Amount	Origin
1	Cont Soil Pet-RGC-Tons-	100	25.79	Tons				Skagit
2	EVF-P10-Environmental F	100		%				Skagit
3	CDHD FEE-Chelan Douglas	100	25.79	Tons				Skagit
4	TF-TRANSPORTATION FEE	100	25.79	Tons				Skagit

Total Tax/Fees
Total Ticket

Driver`s Signature

The total amount includes fees and taxes that may not all be listed on this ticket due to technical limitation.

Greater Wenatchee Regional Landfill
191 Webb Road
Wenatchee, WA, 98802 Ph: (509) 884-2802

Reprint
Ticket# 854794

Customer Name ANDERSON ENVIRONMENTAL A
Ticket Date 11/25/2019
Payment Type Credit Account
Manual Ticket#
Route
Hauling Ticket#
Destination
Manifest 114881wa
Profile 114881WA (LF02 Petroleum Contaminated Soils)
Generator WA-WD FOODS INC WD FOODS INC 9029 CHUCKANUT DR BOW WA 98232
PO#

Carrier mark hunt
Vehicle# 2
Container
Driver
Check#
Billing# 0508083
Grid

	Time	Scale	Operator	Inbound		
In	11/25/2019 11:29:08	Inbound	Janelle		Gross	100020 lb
Out	11/25/2019 12:01:23	Outbound	Janelle		Tare	41500 lb
					Net	58520 lb
					Tons	29.26

Comments

	Product	LD%	Qty	UOM	Rate	Tax/Fee	Amount	Origin
1	Cont Soil Pet-RGC-Tons-	100	29.26	Tons				Skagit
2	EVF-P10-Environmental F	100		%				Skagit
3	CDHD FEE-Chelan Douglas	100	29.26	Tons				Skagit
4	TF-TRANSPORTATION FEE	100	29.26	Tons				Skagit

Total Tax/Fees
Total Ticket

Driver`s Signature

The total amount includes fees and taxes that may not all be listed on this ticket due to technical limitation.

Greater Wenatchee Regional Landfill
191 Webb Road
Wenatchee, WA, 98802 Ph: (509) 884-2802

Reprint
Ticket# 854793

Customer Name ANDERSON ENVIRONMENTAL A
Ticket Date 11/25/2019
Payment Type Credit Account
Manual Ticket#
Route
Hauling Ticket#
Destination
Manifest 114881wa
Profile 114881WA (LF02 Petroleum Contaminated Soils)
Generator WA-WD FOODS INC WD FOODS INC 9029 CHUCKANUT DR BOW WA 98232
PO#

Carrier mark hunt
Vehicle# 7
Container
Driver
Check#
Billing# 0508083
Grid

	Time	Scale	Operator	Inbound		
In	11/25/2019 11:27:56	Inbound	Janelle		Gross	107240 lb
Out	11/25/2019 12:00:23	Outbound	Janelle		Tare	42300 lb
					Net	64940 lb
					Tons	32.47

Comments

	Product	LD%	Qty	UOM	Rate	Tax/Fee	Amount	Origin
1	Cont Soil Pet-RGC-Tons-	100	32.47	Tons				Skagit
2	EVF-P10-Environmental F	100		%				Skagit
3	CDHD FEE-Chelan Douglas	100	32.47	Tons				Skagit
4	TF-TRANSPORTATION FEE	100	32.47	Tons				Skagit

Total Tax/Fees
Total Ticket

Driver`s Signature

The total amount includes fees and taxes that may not all be listed on this ticket due to technical limitation.

Greater Wenatchee Regional Landfill
191 Webb Road
Wenatchee, WA, 98802 Ph: (509) 884-2802

Reprint
Ticket# 854789

Customer Name ANDERSON ENVIRONMENTAL A
Ticket Date 11/25/2019
Payment Type Credit Account
Manual Ticket#
Route
Hauling Ticket#
Destination
Manifest 114881wa
Profile 114881WA (LF02 Petroleum Contaminated Soils)
Generator WA-WD FOODS INC WD FOODS INC 9029 CHUCKANUT DR BOW WA 98232
PO#

Carrier r transport
Vehicle# 79
Container
Driver
Check#
Billing# 0508083
Grid

	Time	Scale	Operator	Inbound		
In	11/25/2019 11:12:04	Inbound	Janelle		Gross	88100 lb
Out	11/25/2019 11:41:14	Outbound	Janelle		Tare	38860 lb
					Net	49240 lb
					Tons	24.62

Comments

	Product	LD%	Qty	UOM	Rate	Tax/Fee	Amount	Origin
1	Cont Soil Pet-RGC-Tons-	100	24.62	Tons				Skagit
2	EVF-P10-Environmental F	100		%				
3	CDHD FEE-Chelan Douglas	100	24.62	Tons				
4	TF-TRANSPORTATION FEE	100	24.62	Tons				

Total Tax/Fees
Total Ticket

Driver`s Signature

The total amount includes fees and taxes that may not all be listed on this ticket due to technical limitation.

November 12, 2019

Ms. Kim Ninnemann
Stratum Group
P.O. Box 2546
Bellingham, WA 98227

Dear Ms. Ninnemann,

On November 11th, 3 samples were received by our laboratory and assigned our laboratory project number EV19110067. The project was identified as your WD Foods. The sample identification and requested analyses are outlined on the attached chain of custody record.

No abnormalities or nonconformances were observed during the analyses of the project samples.

Please do not hesitate to call me if you have any questions or if I can be of further assistance.

Sincerely,

ALS Laboratory Group

Rick Bagan
Laboratory Director

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	11/12/2019 EV19110067 EV19110067-01
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	11/11/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	11/11/2019 12:20:00 PM
CLIENT SAMPLE ID	Tank 1 - bottom	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**46**	3.0	1	MG/KG	11/12/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	11/12/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	11/12/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	11/12/2019	KLS
Ethylbenzene	EPA-8021	**0.10**	0.050	1	MG/KG	11/12/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	11/12/2019	KLS
TPH-Diesel Range	NWTPH-DX	U, F2	28	1	MG/KG	11/12/2019	EBS
TPH-Oil Range	NWTPH-DX	U, F2	56	1	MG/KG	11/12/2019	EBS
Mercury	EPA-7471	**0.031**	0.020	1	MG/KG	11/12/2019	RAL
Arsenic	EPA-6020	**4.2**	0.20	1	MG/KG	11/12/2019	RAL
Cadmium	EPA-6020	**0.12**	0.10	1	MG/KG	11/12/2019	RAL
Chromium	EPA-6020	**52**	0.10	1	MG/KG	11/12/2019	RAL
Lead	EPA-6020	**6.8**	0.10	1	MG/KG	11/12/2019	RAL

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**62.8**	11/12/2019	KLS
TFT	EPA-8021	**63.6**	11/12/2019	KLS
C25	NWTPH-DX	**80.7**	11/12/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
F2 - Reporting limit for compound raised due to low percent solids.
Chromatogram indicates that it is likely that sample contains weathered gasoline.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	11/12/2019 EV19110067 EV19110067-02
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	11/11/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	11/11/2019 12:40:00 PM
CLIENT SAMPLE ID	Tank 2 - W overfill	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**3400**	1200	400	MG/KG	11/12/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	1.0	10	MG/KG	11/12/2019	KLS
Benzene	EPA-8021	U	0.30	10	MG/KG	11/12/2019	KLS
Toluene	EPA-8021	U	0.50	10	MG/KG	11/12/2019	KLS
Ethylbenzene	EPA-8021	**7.2**	0.50	10	MG/KG	11/12/2019	KLS
Xylenes	EPA-8021	**7.9**	2.0	10	MG/KG	11/12/2019	KLS
TPH-Diesel Range	NWTPH-DX	**160**	25	1	MG/KG	11/12/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	11/12/2019	EBS
Mercury	EPA-7471	**0.021**	0.020	1	MG/KG	11/12/2019	RAL
Arsenic	EPA-6020	**11**	0.20	1	MG/KG	11/12/2019	RAL
Cadmium	EPA-6020	**0.11**	0.10	1	MG/KG	11/12/2019	RAL
Chromium	EPA-6020	**34**	0.10	1	MG/KG	11/12/2019	RAL
Lead	EPA-6020	**4.3**	0.10	1	MG/KG	11/12/2019	RAL

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT 400X Dilution	NWTPH-GX	U, SUR07	11/12/2019	KLS
TFT 10X Dilution	EPA-8021	U, SUR07	11/12/2019	KLS
C25	NWTPH-DX	**67.4**	11/12/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
SUR07 -The surrogate recoveries could not be determined due to dilution below the calibration range.
Chromatogram indicates that it is likely that sample contains weathered gasoline and an unidentified diesel range product.
Diesel range product results biased high due to gasoline range product overlap.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	11/12/2019 EV19110067 EV19110067-03
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	11/11/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	11/11/2019 2:15:00 PM
CLIENT SAMPLE ID	Pump island - 4'	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**16000**	1200	400	MG/KG	11/12/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	1.0	10	MG/KG	11/12/2019	KLS
Benzene	EPA-8021	U	0.30	10	MG/KG	11/12/2019	KLS
Toluene	EPA-8021	U	0.50	10	MG/KG	11/12/2019	KLS
Ethylbenzene	EPA-8021	**86**	0.50	10	MG/KG	11/12/2019	KLS
Xylenes	EPA-8021	**460**	80	400	MG/KG	11/12/2019	KLS
TPH-Diesel Range	NWTPH-DX	**1800**	25	1	MG/KG	11/12/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	11/12/2019	EBS
Mercury	EPA-7471	**0.051**	0.020	1	MG/KG	11/12/2019	RAL
Arsenic	EPA-6020	**3.7**	0.20	1	MG/KG	11/12/2019	RAL
Cadmium	EPA-6020	**0.21**	0.10	1	MG/KG	11/12/2019	RAL
Chromium	EPA-6020	**45**	0.10	1	MG/KG	11/12/2019	RAL
Lead	EPA-6020	**67**	0.10	1	MG/KG	11/12/2019	RAL

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT 400X Dilution	NWTPH-GX	**4140 SUR07**	11/12/2019	KLS
TFT 10X Dilution	EPA-8021	**2290 SUR07**	11/12/2019	KLS
TFT 400X Dilution	EPA-8021	**3740 SUR07**	11/12/2019	KLS
C25	NWTPH-DX	**71.1**	11/12/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
SUR07 -The surrogate recoveries could not be determined due to dilution below the calibration range.
Chromatogram indicates that it is likely that sample contains weathered gasoline and an unidentified diesel range product.
Diesel range product results biased high due to gasoline range product overlap.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE:	11/12/2019
		ALS SDG#:	EV19110067
		WDOE ACCREDITATION:	C601
CLIENT CONTACT:	Kim Ninnemann		
CLIENT PROJECT:	WD Foods		

LABORATORY BLANK RESULTS

MBG-111219S - Batch 147453 - Soil by NWTPH-GX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	MG/KG	3.0	11/12/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.

MB-111219S - Batch 147453 - Soil by EPA-8021

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
Methyl T-Butyl Ether	EPA-8021	U	MG/KG	0.10	11/12/2019	KLS
Benzene	EPA-8021	U	MG/KG	0.030	11/12/2019	KLS
Toluene	EPA-8021	U	MG/KG	0.050	11/12/2019	KLS
Ethylbenzene	EPA-8021	U	MG/KG	0.050	11/12/2019	KLS
Xylenes	EPA-8021	U	MG/KG	0.20	11/12/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.

MB-111219S - Batch 147454 - Soil by NWTPH-DX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	MG/KG	25	11/12/2019	EBS
TPH-Oil Range	NWTPH-DX	U	MG/KG	50	11/12/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

MBLK-350311 - Batch R350311 - Soil by EPA-7471

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
Mercury	EPA-7471	U	MG/KG	0.020	11/12/2019	RAL

U - Analyte analyzed for but not detected at level above reporting limit.

MB-111219S - Batch 147462 - Soil by EPA-6020

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
Arsenic	EPA-6020	U	MG/KG	0.20	11/12/2019	RAL
Cadmium	EPA-6020	U	MG/KG	0.10	11/12/2019	RAL
Chromium	EPA-6020	U	MG/KG	0.10	11/12/2019	RAL
Lead	EPA-6020	U	MG/KG	0.10	11/12/2019	RAL

U - Analyte analyzed for but not detected at level above reporting limit.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE:	11/12/2019
		ALS SDG#:	EV19110067
		WDOE ACCREDITATION:	C601
CLIENT CONTACT:	Kim Ninnemann		
CLIENT PROJECT:	WD Foods		

LABORATORY CONTROL SAMPLE RESULTS

ALS Test Batch ID: 147453 - Soil by NWTPH-GX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range - BS	NWTPH-GX	**81.8**			66.5	122.7	11/12/2019	KLS
TPH-Volatile Range - BSD	NWTPH-GX	**83.2**	**2**		66.5	122.7	11/12/2019	KLS

ALS Test Batch ID: 147453 - Soil by EPA-8021

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
Methyl T-Butyl Ether - BS	EPA-8021	**100**			66	116	11/12/2019	KLS
Methyl T-Butyl Ether - BSD	EPA-8021	**103**	**3**		66	116	11/12/2019	KLS
Benzene - BS	EPA-8021	**91.0**			67.7	124	11/12/2019	KLS
Benzene - BSD	EPA-8021	**91.9**	**1**		67.7	124	11/12/2019	KLS
Toluene - BS	EPA-8021	**84.8**			71	123	11/12/2019	KLS
Toluene - BSD	EPA-8021	**87.0**	**3**		71	123	11/12/2019	KLS
Ethylbenzene - BS	EPA-8021	**87.5**			69.8	117	11/12/2019	KLS
Ethylbenzene - BSD	EPA-8021	**89.6**	**2**		69.8	117	11/12/2019	KLS
Xylenes - BS	EPA-8021	**88.5**			70	119	11/12/2019	KLS
Xylenes - BSD	EPA-8021	**90.8**	**3**		70	119	11/12/2019	KLS

ALS Test Batch ID: 147454 - Soil by NWTPH-DX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range - BS	NWTPH-DX	**91.8**			75.5	122.1	11/12/2019	EBS
TPH-Diesel Range - BSD	NWTPH-DX	**89.9**	**2**		75.5	122.1	11/12/2019	EBS

ALS Test Batch ID: R350311 - Soil by EPA-7471

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
Mercury - BS	EPA-7471	**101**			81.8	117	11/12/2019	RAL
Mercury - BSD	EPA-7471	**102**	**1**		81.8	117	11/12/2019	RAL

ALS Test Batch ID: 147462 - Soil by EPA-6020

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
Arsenic - BS	EPA-6020	**103**			80	120	11/12/2019	RAL
Arsenic - BSD	EPA-6020	**105**	**2**		80	120	11/12/2019	RAL
Cadmium - BS	EPA-6020	**110**			80	120	11/12/2019	RAL
Cadmium - BSD	EPA-6020	**113**	**3**		80	120	11/12/2019	RAL
Chromium - BS	EPA-6020	**101**			80	120	11/12/2019	RAL
Chromium - BSD	EPA-6020	**104**	**3**		80	120	11/12/2019	RAL
Lead - BS	EPA-6020	**103**			80	120	11/12/2019	RAL

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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS SDG#: WDOE ACCREDITATION:	11/12/2019 EV19110067 C601
CLIENT CONTACT:	Kim Ninnemann		
CLIENT PROJECT:	WD Foods		

LABORATORY CONTROL SAMPLE RESULTS

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
Lead - BSD	EPA-6020	**105**	**2**		80	120	11/12/2019	RAL

APPROVED BY

Laboratory Director

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http://www.alsglobal.com

Chain Of Custody/ Laboratory Analysis Request

ALS Job# (Laboratory Use Only): EV1911006 7

Date 11/11/19 Page 1 Of 1

PROJECT ID: WD Foods
REPORT TO COMPANY: Stratum Group
PROJECT MANAGER: Kim Kinnemann
ADDRESS: P.O. Box 2546
Bellingham WA 98229
PHONE: 360 714-9489 P.O. #: WD Foods
E-MAIL: kim@stratumgroup.net
INVOICE TO COMPANY:
ATTENTION: Same as above
ADDRESS:

SAMPLE I.D.	DATE	TIME	TYPE	LAB#
1. Tank 1 - bottom	11/11/19	12:20	soil	1
2. Tank 2 - overfill	"	12:40	"	2
3. pump island - 4'	"	14:15	"	3
4.				
5.				
6.				
7.				
8.				
9.				
10.				

ANALYSIS REQUESTED

NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA 8260 ☐ / BTEX by EPA 8021 ☒	MTBE by EPA 8260 ☐ / MTBE by EPA 8021 ☒	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	EDB / EDC by EPA 8260 SIM (water)	EDB / EDC by EPA 8260 (soil)	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA 8270 SIM	PCB by EPA 8082 ☐ Pesticides by EPA 8081 ☐	Metals-MTCA-5 ☐ RCRA-8 ☐ Pri Pol ☐ TAL ☐	Metals Other (Specify)	TCLP-Metals ☐ VOA ☐ Semi-Vol ☐ Pest ☐ Herbs ☐
	X	X	X	X										
	X	X	X	X										
	X	X	X	X										

OTHER (Specify): Heat MTCA 5

OTHER (Specify)	NUMBER OF CONTAINERS	RECEIVED IN GOOD CONDITION?
X	2	
X	2	
X	2	

SPECIAL INSTRUCTIONS

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By: Kim Stratum Group 11/11/19 3:46p
   Received By: [signature] ALS 11/11/19 3:46
2. Relinquished By:
   Received By:

TURNAROUND REQUESTED in Business Days*

Organic, Metals & Inorganic Analysis: 10 Standard | 5 | 3 | 2 | 1 X | SAME DAY

Fuels & Hydrocarbon Analysis: 5 Standard | 3 | 1 X | SAME DAY

OTHER: Specify:

*Turnaround request less than standard may incur Rush Charges

December 3, 2019

Ms. Kim Ninnemann
Stratum Group
P.O. Box 2546
Bellingham, WA 98227

Dear Ms. Ninnemann,

On November 25th, 5 samples were received by our laboratory and assigned our laboratory project number EV19110185. The project was identified as your WD Foods. The sample identification and requested analyses are outlined on the attached chain of custody record.

No abnormalities or nonconformances were observed during the analyses of the project samples.

Please do not hesitate to call me if you have any questions or if I can be of further assistance.

Sincerely,

ALS Laboratory Group

Rick Bagan
Laboratory Director

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	12/3/2019 EV19110185 EV19110185-01
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	11/25/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	11/25/2019 9:33:00 AM
CLIENT SAMPLE ID	112519-1	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**1800**	300	100	MG/KG	12/03/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	11/28/2019	KLS
Benzene	EPA-8021	**3.6**	0.030	1	MG/KG	11/28/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	11/28/2019	KLS
Ethylbenzene	EPA-8021	**15**	5.0	100	MG/KG	12/03/2019	KLS
Xylenes	EPA-8021	**23**	0.20	1	MG/KG	11/28/2019	KLS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT 100X Dilution	NWTPH-GX	**1780 SUR07**	12/03/2019	KLS
TFT	EPA-8021	**443 SUR12**	11/28/2019	KLS
TFT 100X Dilution	EPA-8021	U, SUR07	12/03/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.
SUR12 -Surrogate recoveries were outside of the control limits due to matrix interference.
SUR07 -The surrogate recoveries could not be determined due to dilution below the calibration range.
Chromatogram indicates that it is likely that sample contains an unidentified gasoline range product.

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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	12/3/2019 EV19110185 EV19110185-02
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	11/25/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	11/25/2019 9:42:00 AM
CLIENT SAMPLE ID	112519-2	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**26**	3.0	1	MG/KG	11/28/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	11/28/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	11/28/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	11/28/2019	KLS
Ethylbenzene	EPA-8021	**0.098**	0.050	1	MG/KG	11/28/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	11/28/2019	KLS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**66.7**	11/28/2019	KLS
TFT	EPA-8021	**68.6**	11/28/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains extremely weathered gasoline.

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ALS Group USA, Corp dba ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	12/3/2019 EV19110185 EV19110185-03
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	11/25/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	11/25/2019 9:48:00 AM
CLIENT SAMPLE ID	112519-3	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**32**	3.0	1	MG/KG	11/28/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	11/28/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	11/28/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	11/28/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	11/28/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	11/28/2019	KLS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**60.2**	11/28/2019	KLS
TFT	EPA-8021	**67.5**	11/28/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains extremely weathered gasoline.
Gasoline range product results biased high due to semivolatile range product overlap.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	12/3/2019 EV19110185 EV19110185-04
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	11/25/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	11/25/2019 9:58:00 AM
CLIENT SAMPLE ID	112519-4	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**10**	3.0	1	MG/KG	11/28/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	11/28/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	11/28/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	11/28/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	11/28/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	11/28/2019	KLS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**69.6**	11/28/2019	KLS
TFT	EPA-8021	**76.1**	11/28/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains extremely weathered gasoline.

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ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	12/3/2019 EV19110185 EV19110185-05
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	11/25/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	11/25/2019 10:06:00 AM
CLIENT SAMPLE ID	112519-5	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**690**	60	20	MG/KG	12/03/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	11/28/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	11/28/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	11/28/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	11/28/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	11/28/2019	KLS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT 20X Dilution	NWTPH-GX	**64.6**	12/03/2019	KLS
TFT	EPA-8021	**107**	11/28/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains an unidentified gasoline range product.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE:	12/3/2019
		ALS SDG#:	EV19110185
		WDOE ACCREDITATION:	C601
CLIENT CONTACT:	Kim Ninnemann		
CLIENT PROJECT:	WD Foods		

LABORATORY BLANK RESULTS

MBG-112719S - Batch 148158 - Soil by NWTPH-GX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	MG/KG	3.0	11/28/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.

MB-112719S - Batch 148158 - Soil by EPA-8021

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
Methyl T-Butyl Ether	EPA-8021	U	MG/KG	0.10	11/28/2019	KLS
Benzene	EPA-8021	U	MG/KG	0.030	11/28/2019	KLS
Toluene	EPA-8021	U	MG/KG	0.050	11/28/2019	KLS
Ethylbenzene	EPA-8021	U	MG/KG	0.050	11/28/2019	KLS
Xylenes	EPA-8021	U	MG/KG	0.20	11/28/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.

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ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE:	12/3/2019
		ALS SDG#:	EV19110185
		WDOE ACCREDITATION:	C601
CLIENT CONTACT:	Kim Ninnemann		
CLIENT PROJECT:	WD Foods		

LABORATORY CONTROL SAMPLE RESULTS

ALS Test Batch ID: 148158 - Soil by NWTPH-GX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range - BS	NWTPH-GX	**81.1**			66.5	122.7	11/28/2019	KLS
TPH-Volatile Range - BSD	NWTPH-GX	**80.4**	**1**		66.5	122.7	11/28/2019	KLS

ALS Test Batch ID: 148158 - Soil by EPA-8021

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
Methyl T-Butyl Ether - BS	EPA-8021	**89.2**			66	116	11/28/2019	KLS
Methyl T-Butyl Ether - BSD	EPA-8021	**91.0**	**2**		66	116	11/28/2019	KLS
Benzene - BS	EPA-8021	**86.2**			67.7	124	11/28/2019	KLS
Benzene - BSD	EPA-8021	**86.3**	**0**		67.7	124	11/28/2019	KLS
Toluene - BS	EPA-8021	**81.5**			71	123	11/28/2019	KLS
Toluene - BSD	EPA-8021	**81.9**	**1**		71	123	11/28/2019	KLS
Ethylbenzene - BS	EPA-8021	**81.0**			69.8	117	11/28/2019	KLS
Ethylbenzene - BSD	EPA-8021	**82.0**	**1**		69.8	117	11/28/2019	KLS
Xylenes - BS	EPA-8021	**81.1**			70	119	11/28/2019	KLS
Xylenes - BSD	EPA-8021	**81.7**	**1**		70	119	11/28/2019	KLS

APPROVED BY

Laboratory Director

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental
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Everett, WA 98208
Phone (425) 356-2600
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http://www.alsglobal.com

Chain Of Custody/ Laboratory Analysis Request

ALS Job# (Laboratory Use Only): EV9110185

Date 11/25/19 Page 1 Of 1

PROJECT ID:	WD Foods
REPORT TO COMPANY:	Stratum Group
PROJECT MANAGER:	Kim Nienmann
ADDRESS:	P.O. Box 2546
	Bellingham WA 98227
PHONE:	360 7149439 FAX:
P.O. #:	WD Foods E-MAIL: Kim@stratumgroup.net
INVOICE TO COMPANY:	
ATTENTION:	Same as above
ADDRESS:	

ANALYSIS REQUESTED

OTHER (Specify)

SAMPLE I.D.	DATE	TIME	TYPE	LAB#	NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA 8021 ☐	BTEX by EPA 8260 ☐	MTBE by EPA 8021 ☐	MTBE by EPA 8260 ☐	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	EDB / EDC by EPA 8260 SIM (water)	EDB / EDC by EPA 8260 (soil)	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA 8270 SIM	PCB by EPA 8082 ☐ Pesticides by EPA 8081 ☐	Metals-MTCA-5 ☐ RCRA-8 ☐ Pri Pol ☐ TAL ☐	Metals Other (Specify)	TCLP-Metals ☐ VOA ☐ Semi-Vol ☐ Pest ☐ Herbs ☐	NUMBER OF CONTAINERS	RECEIVED IN GOOD CONDITION?
1. 112519-1	11/25/19	9:33	Soil	1			X		X		X											2	
2. 112519-2		9:42		2			X		X		X											2	
3. 112519-3		9:48		3			X		X		X											2	
4. 112519-4		9:58		4			X		X		X											2	
5. 112519-5		10:06		5			X		X		X											2	
6.																							
7.																							
8.																							
9.																							
10.																							

SPECIAL INSTRUCTIONS

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By: Kim Stratum Group 11/25/19 2:15
   Received By: Ellen Perry ALS 11/25/19 2:15PM
2. Relinquished By: _____
   Received By: _____

TURNAROUND REQUESTED in Business Days*

Organic, Metals & Inorganic Analysis: 10 Standard | 5 | 3 | 2 | 1 | SAME DAY

Fuels & Hydrocarbon Analysis: ~~5~~ Standard | 3 | 1 | SAME DAY

OTHER: Specify: _____

*Turnaround request less than standard may incur Rush Charges

APPENDIX II

Environmental Site Assessment: Transaction Screen (Stratum Group, 2019)

Phase II Environmental Sampling Investigation (Stratum Group, 2019)

REPORT
ENVIRONMENTAL SITE ASSESSMENT:
TRANSACTION SCREEN

9029 Chuckanut Drive
Bow, Washington

For:

UniBank
19315 Highway 99
Lynnwood, WA 98036

U.S. Small Business Administration

And

JOF Corporation

By:

STRATUM GROUP
PO Box 2546, Bellingham, Washington 98227
Phone: (360) 714-9409

June 11, 2019

PO Box 2546, Bellingham, Washington 98227
Phone: (360) 714-9409

June 11, 2019

Sanghoon Kim
UniBank
19315 Highway 99
Lynnwood, WA 98036

U.S. Small Business Administration

And

JOF Corporation

Environmental Site Assessment: Transaction Screen
9029 Chuckanut Drive
Bow, Washington

Dear Mr. Kim:

We herein present the results of an Environmental Site Assessment: Transaction Screen for the above referenced property in Bow, Washington. This report was completed in general conformance with the American Society for Testing and Materials (ASTM) Standard Practice E 1528-14.

The property is currently used as a grocery store with an espresso stand.

Our historical review indicates that he existing building was built as grocery store in 1960. For an interval of time the building was used as a warehouse/electronic shop for a few years between long periods as a grocery store. Prior to 1960 an older grocery store had been located on the site. The building had a canopy in front. The canopy may have covered gasoline pumps. A former owner indicated that gasoline was sold at the store site in the past. Based on historical records we reviewed, the gasoline sales were likely associated with the older store building on the site; however, we were unable to directly confirm the past sale of gasoline at the site.

No potential off-site contamination sources were identified in the databases that pose a risk of contamination to the subject property.

PURPOSE AND SCOPE

The purpose of this Environmental Site Assessment: Transaction Screen is to identify, to the extent feasible pursuant to the processes prescribed within the ASTM Standard Practice E 1528-14, recognized environmental conditions in connection with the subject property, and to determine if, in the opinion of Stratum Group, an Environmental Site Assessment: Phase I or additional further inquiry is warranted for the subject property. A recognized environmental condition is defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property, even under conditions in compliance with existing laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The scope of our services included:

1. Conducted a site visit to the subject property. The property was inspected for indication of hazardous substances, petroleum products, stained soil, stressed vegetation, solid waste disposal, or careless manufacturing or industrial practices which may be present.
2. Completed the attached "Transaction Screen Questionnaire"
3. Interviewed people familiar with the site and its use.
4. Reviewed Federal, State, and local records as to locations of nearby hazardous waste sites, leaking underground storage tanks, and landfills.
5. Conducted a historic review including a review of historic aerial photographs, historic topographic maps, Sanborn Fire Insurance Maps, and information available from the county assessor's office. The aerial photograph review is beyond the scope of a Transaction Screen as defined by the ASTM, but allows a more thorough assessment of environmental risk at the subject property.
6. Prepared this report describing the results of our findings.

Report Methodology and Limiting Conditions

The methodology used during the production of this report is as generally prescribed in the ASTM E 1528-14 standard. Stratum Group has prepared this report using reasonable efforts in each phase of its work to estimate the liabilities associated with recognized environmental conditions on the subject property and in the vicinity of the subject property. No limiting conditions were encountered during the conduct of this Environmental Site Assessment Transaction Screen.

SITE INSPECTION

A representative of Stratum Group inspected the subject property on June 2, 2019. The property is currently used as a grocery store with a separate small building on site used as an espresso stand. Paved and gravel parking areas are located on the north, west and south sides of the building. A strip of brush and trees is located on the east side of the building.

A fill pipe and vent for an underground tank is located on the west side of the building. The fill pipe and vent pipe are consistent with an underground heating oil tank. The tank is not in use and has not been used for many years. The condition of the tank is not known.

Adjacent Properties

Sam Bell Road bounds the site to the north. A warehouse building that is used to store and distribute agricultural supplies is located across the road to the north. Chuckanut Drive bounds the site to the west. A home and grass fields associated with a park are located across the road to the west. Homes are located on the properties to the south and east.

HISTORIC INVESTIGATION

Historic aerial photographs dated back to 1937, historical maps dating back to 1918, Skagit County assessor's information, and our interviews provided our historic review of the site. Historic fire insurance maps and reverse directories do not cover the subject property. A list of the references used to evaluate the history of the site and vicinity is attached to this report.

Subject Property: The property had a building located on it by the 1930s. The existing store building was built as a grocery store in 1960. The previous building on the northern portion of the property had been a grocery store and was removed in 1967. The building was used as an electronic warehouse/shop in the 1970s and then began use as a grocery store again in the 1980s.

North: The property to the north across Sam Bell Road was developed with the existing warehouse building in 1945 and has been used as a agricultural materials supply since that time.

East: A homes as been located to the east since 1937.

South: The property to the south was a home site since at least the 1950s, the existing mobile home was placed on the site in 1972.

West: A rail line primarily used for passenger service was built just to the west of the site in the late

1890s. The rail line was removed by the late 1920s and the existing road was built. A gasoline station was built across the road from the subject property in 1946. The gasoline station was closed by the 1960s. The building was converted to a snack shop in the 1990s and has been a home since the 2000s.

PUBLIC RECORDS REVIEW

Potential Off-Site Contamination Source Identification

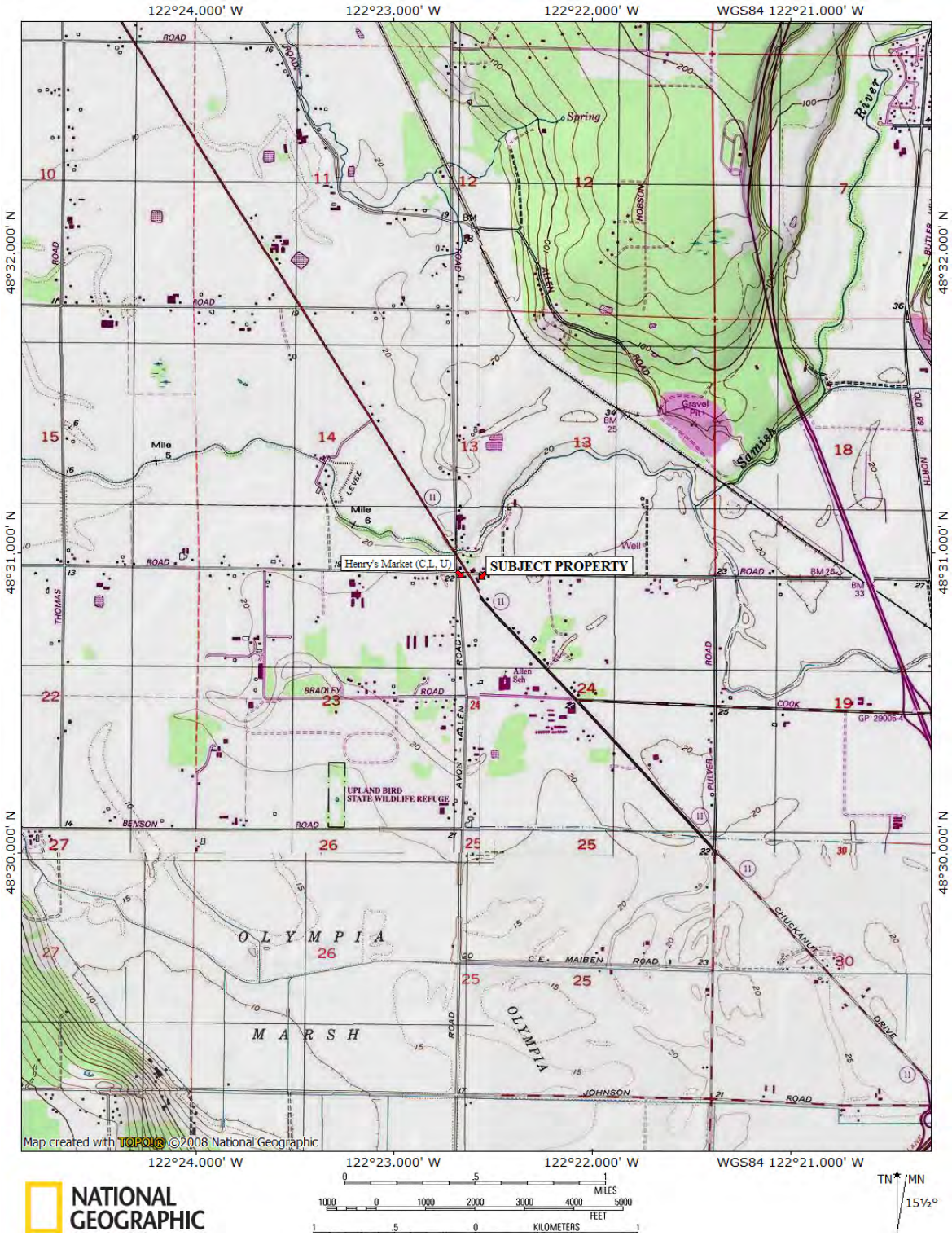
The public documents, listed in Table 1, have been reviewed to identify potential off-site contamination sources in the vicinity of the subject property consistent with the ASTM standard. The records were reviewed by Stratum Group based on records retrieved on June 2019. Public databases were searched for the Bow and/or Skagit County, based upon the location of the property.

One potential off-site contamination sources were identified in the public databases within the ASTM search radius. The locations of the sites and the subject property are indicated on the Figure 1 – Site Vicinity Map.

A list of the references used to determine the potential off-site contamination sites is attached to this report.

TABLE 1
Environmental Records Review

AGENCY	DOCUMENT	SEARCH RADIUS	IDENTIFIED SITES
Federal Environmental Protection Agency	National Priorities List (NPL or SUPERFUND)	1 Mile	0
	De-listed NPL Site	½ Mile	0
	Resource Conservation and Recovery Act Transfer, Storage, and/or Disposal Facility with no corrective action (RCRA TSD, non-CORRACTS)	½ Mile	0
	RCRA CORRACTS TSD (corrective action underway)	1 Mile	0
	RCRA Hazardous Waste Handler or Generator records and permits (HWG)	Adjacent	0
	CERCLIS (Active) and De-listed CERCLIS Sites (NFRAP)	½ Mile	0
	Emergency Response Notification System (ERNS) / National Response Center Database (NRC)	Subject Property	0
	Institutional or Engineering Control Registry	Subject Property	0
Washington State Department of Ecology	Confirmed and Suspected Contaminated Sites (CSCS)	1 Mile	1
	Leaking Underground Storage Tank List (LUST)	½ Mile	1
	Underground Storage Tank List (UST)	Adjacent	1
	State Brownfield Site	½ Mile	0
	Institutional or Engineering Control Registry	Subject Property	0
Skagit County	Solid Waste Landfill Sites (SW)	½ Mile	0


122°24.000' W
122°23.000' W
122°22.000' W
WGS84 122°21.000' W
48°32.000' N
48°31.000' N
48°30.000' N
SUBJECT PROPERTY
Henry's Market (C.L. U)
Spring
Gravel Pit
Well
Mile 5
Mile 6
UPLAND BIRD STATE WILDLIFE REFUGE
O L Y M P I A
M A R S H
C E. MAIBEN ROAD
JOHNSON ROAD
CHUCKANUT DRIVE
Samish River
Map created with TOPO!® ©2008 National Geographic
NATIONAL GEOGRAPHIC
MILES
FEET
KILOMETERS
TN / MN
15½°

Risk Evaluation of Off-Site Potential Contamination Sources

The sites found within the search radius, as identified by the ASTM standard, were evaluated to determine the potential risk to the subject property. Factors such as location, topography, groundwater flow direction, hydrologic barriers, type of contamination, and the actions taken to remove the contamination are all considered to determine the potential off-site contamination source's potential impacts on the subject property.

The property across Chuckanut Drive to the west was formerly a gasoline station. The tanks were removed in 1991. Contaminated soil encountered during tank was removed from the site. However, the site remains as a listed contaminated. In 2014 contaminated soil was encountered along Highway 11 right-of-way by the Washington State Department of Transportation. The DOT removed approximately 19 tons of contaminated soil. The DOT noted that there had been a gasoline station at the intersection, but did not provide any specofic information

removal was d contamineted soil was removed and treated a mmmmmmmmmmmmmm ContaminationSnelson site is located across the street on the property to the north. Groundwater monitoring wells indicate groundwater flow is towards the north and northeast away from the subject property. Hence, groundwater flow in the area is such that none of the identified potential off-site sources of contamination are upgradient to the subject property.

Risk Evaluation of On-Site Potential Contamination Sources

No contamination is suspected at the site based upon our site observations of May 29, 2018 and our review of the historic use of the site.

CONCLUSIONS

Our site inspection of the subject property at 613 – 615 Sunset Park Drive in Sedro-Woolley, Washington revealed no evidence of recognized environmental conditions that pose a risk of contamination to the subject property as of May 29, 2018.

No recognized environmental conditions were identified during our site visit.

Our historic review of the site indicates that the site was a farm field from at least 1937 until the existing building was built on the site in 1995 and the site has been used as an electrical contracting business with offices and warehouse storage as well as an outdoor storage yard. No recognized environmental conditions are suspected in connection with the former uses of the site.

Twelve potential off-site sources of contamination were identified in our public records search within the search radius. Based on groundwater flow direction and the distance separating the sites from the subject property and/or the sites being located in down gradient positions, it is our opinion that none of the identified sites pose a risk of contamination to the subject property.

Based on our historical review, site visit, and evaluation of potential off-site contamination sources, it is reasonable and prudent to believe that the risk of contamination at the site is minimal and that no further investigation is warranted.

Sincerely,
Stratum Group

Dan McShane, L.E.G., M.Sc.
Licensed Engineering Geologist

Attachments:
Transaction Screen Questionnaire
Historical Use and Public Records Search References
Stratum Group Indemnity

ASTM STANDARD E 1528
STANDARD PRACTICE FOR ENVIRONMENTAL SITE ASSESSMENTS: TRANSACTION SCREEN PROCESS
TRANSACTION SCREEN QUESTIONNAIRE

Description of Site and Address:

613 - 615 Sunset Park Drive
Sedo-Woolley, WA

Question	Owner			Occupants (if applicable)			Observed During Site Visit		
1. Is the property or any adjoining property used for an industrial use?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
2. To the best of your knowledge, has the property or any adjoining property been used for an industrial use in the past?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
3. Is the property or any adjoining property used as a gasoline station, motor repair facility, commercial printing facility, dry cleaners, photo developing laboratory, junkyard or landfill, or as a waste treatment, storage, disposal, processing, or recycling facility?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
4. To the best of your knowledge has the property or any adjoining property been used as a gasoline station, motor repair facility, commercial printing facility, dry cleaners, photo developing laboratory, junkyard or landfill, or as a waste treatment, storage, disposal, processing, or recycling facility?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
5. Are there currently, or to the best of your knowledge have there been previously, any damaged or discarded automotive or industrial batteries, or pesticides, paints, or other chemicals in individual containers of greater than 5 gal (19 L) in volume or 50 gal (190 L) in the aggregate, stored on or used at the property or at the facility?	Yes	No	Unk	Yes	No	Unk	Yes.	(No)	Unk
6. Are there currently, or to the best of your knowledge have there been previously, any industrial drums (typically 55 gal (208 L)) or sacks of chemicals located on the property or at the facility?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
7. Has fill dirt been brought onto the property that originated from a contaminated site or that is of an unknown origin?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
8. Are there currently, or to the best of your knowledge have there been previously, any pits, ponds, or lagoons located on the property in connection with waste treatment or waste disposal?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
9. Is there currently, or to the best of your knowledge has there been previously, any stained soil on the property?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
10. Are there currently, or to the best of your knowledge have there been previously, any registered or unregistered storage tanks (above or underground) located on the property?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk

Question	Owner			Occupants (if applicable)			Observed During Site Visit		
11. Are there currently, or to the best of your knowledge have there been previously, any vent pipes, fill pipes, or access ways indicating a fill pipe protruding from the ground on the property or adjacent to any structure located on the property?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
12. Are there currently, or to the best or your knowledge have there been previously, any flooring, drains, or walls located within the facility that are stained by substances other than water or are emitting foul odors?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
13. If the property is served by a private well or non-public water system, have contaminants been identified in the well or system that exceed guidelines applicable to the water system or has the well been designated as contaminated by any government environmental/health agency?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
14. Does the owner or occupant of the property have any knowledge of environmental liens or governmental notification relating to past or recurrent violations of environmental laws with respect to the property or any facility located on the property?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
15. Has the owner or occupant of the property been informed of the past or current existence of hazardous substances or petroleum products or environmental violations with respect to the property or any facility located on the property?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
16. Does the owner or occupant of the property have any knowledge of any environmental site assessment of the property or facility that indicated the presence of hazardous substances or petroleum products on, or contamination of, the property or recommended further assessment of the property?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
17. Does the owner or occupant of the property know of any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of any hazardous substance or petroleum products involving the property by any owner or occupant of the property?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
18. Does the property discharge waste water on or adjacent to the property other than storm water into a sanitary sewer system?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
19. To the best of your knowledge, have any hazardous substances or petroleum products, unidentified waste materials, tires, automotive or industrial batteries or any other waste materials been dumped above grade, buried and/or burned on the property?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk
20. Is there a transformer, capacitor, or any hydraulic equipment for which there are any records indicating the presence of PCBs?	Yes	No	Unk	Yes	No	Unk	Yes	(No)	Unk

QUESTIONS 21-23 TO BE FILLED OUT BY ENVIRONMENTAL CONSULTANT AFTER REVIEW OF PUBLIC RECORDS:

21. Do any of the following federal government record systems list the property or any property within the circumference of the area noted below:

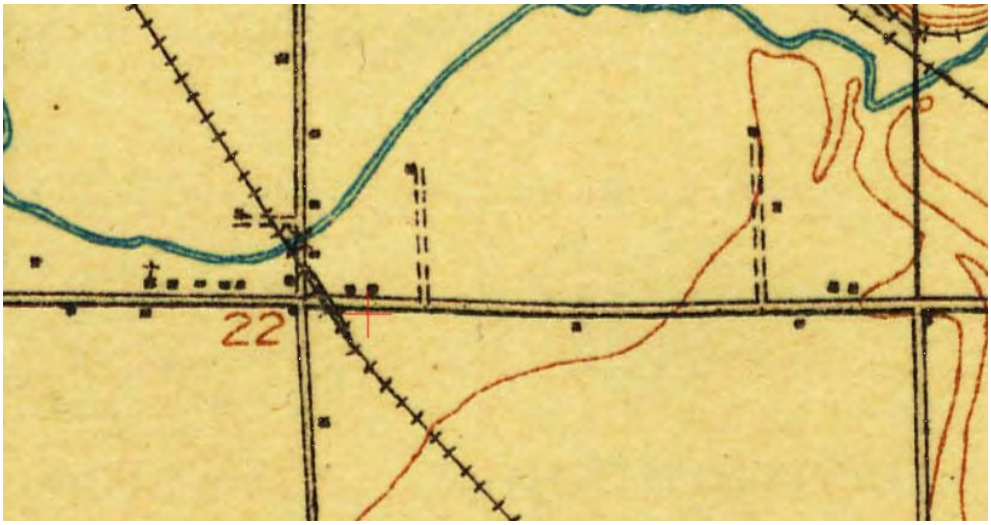
Federal *NPL* site list (1.0 mile)?	Yes	(No)
Federal De-listed *NPL* site list (0.5 mile)?	Yes	(No)
Federal CERCLIS list (0.5 mile)?	Yes	(No)
Federal CERCLIS NFRAP site list (0.5 mile)?	Yes	(No)
Federal RCRA CORRACTS facilities list (1.0 mile)?	Yes	(No)
Federal RCRA non-CORRACTS TSD Facilities list (0.5 mile)?	Yes	(No)
Federal *RCRA generators list* (property or adjoining property)?	Yes	(No)
Federal institutional control/engineering control registries (property only)?	Yes	(No)
Federal *ERNS list* (property only)?	Yes	(No)

22. Do any of the following state and tribal lists of *hazardous waste sites* list the property or any property within the circumference of the area noted below:

Confirmed and Suspected Contaminated Site List or tribal-equivalent *NPL or CERCLIS* (1.0 mile)?	(Yes)	No	
State-and tribal-*landfill* and/or *solid waste disposal site lists* (0.5 mile)?	Yes	(No)	
Leaking Underground Storage Tank Site and tribal-leaking storage tank lists (0.5 mile)?	(Yes)	No	
Underground Storage Tank site and tribal registered storage tank lists (property or adjoining property)?	Yes	(No)	
State and tribal *institutional control*/engineering control registries (property only)?	Yes	(No)	
23. Based on a review of fire insurance maps or consultation with the local fire department serving the property, all as specified in the guide, are any buildings or other improvements on the property or an adjoining property identified as having been used for an industrial use or uses likely to lead to contamination of the property?	Yes	(No)	N/A

Preparer represents that to the best of the preparer's knowledge the above statements and facts are true and correct and to the best of the preparer's actual knowledge no material facts have been suppressed or misstated. This questionnaire was prepared by:

Observed During Site Visit:		**Owner:**	**Occupant:**
Name:	Dan McShane	Name:	Name:
Firm:	Stratum Group		
Title:	Licensed Geologist	Address:	Address:
Address:	PO Box 2546 Bellingham, Washington 98227	Phone:	Phone:
Phone:	360-714-9409		
Signature/ Date:	Dan McShane 6/19/18	Signature/ Date:	Signature/ Date:



1918 Samish Lake Quadrangle

1954 Samish Lake Quadrangle

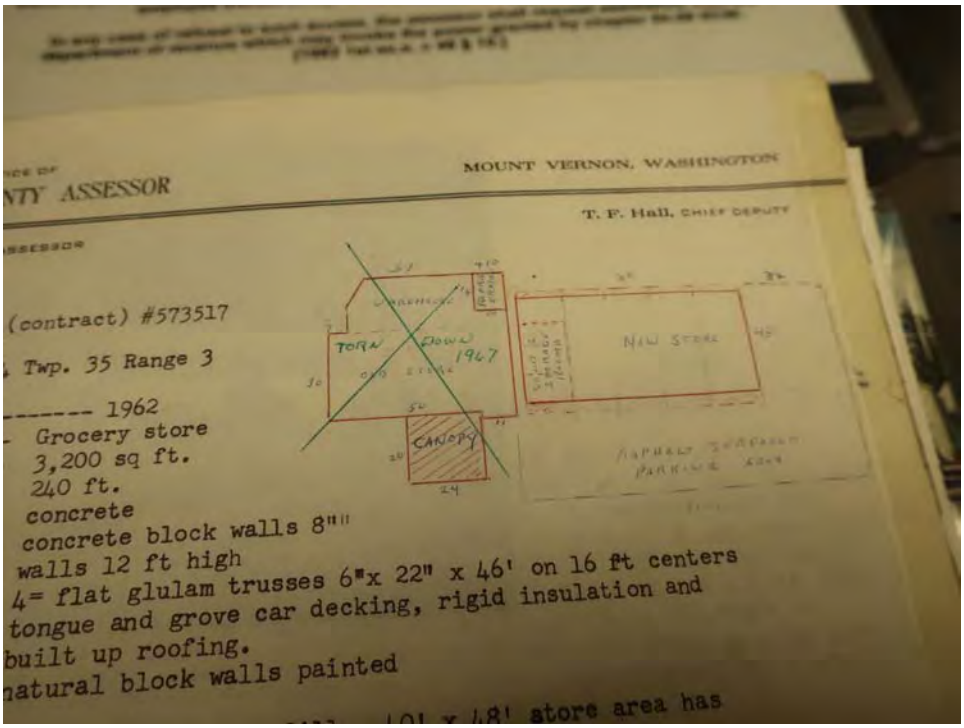
1937

1969

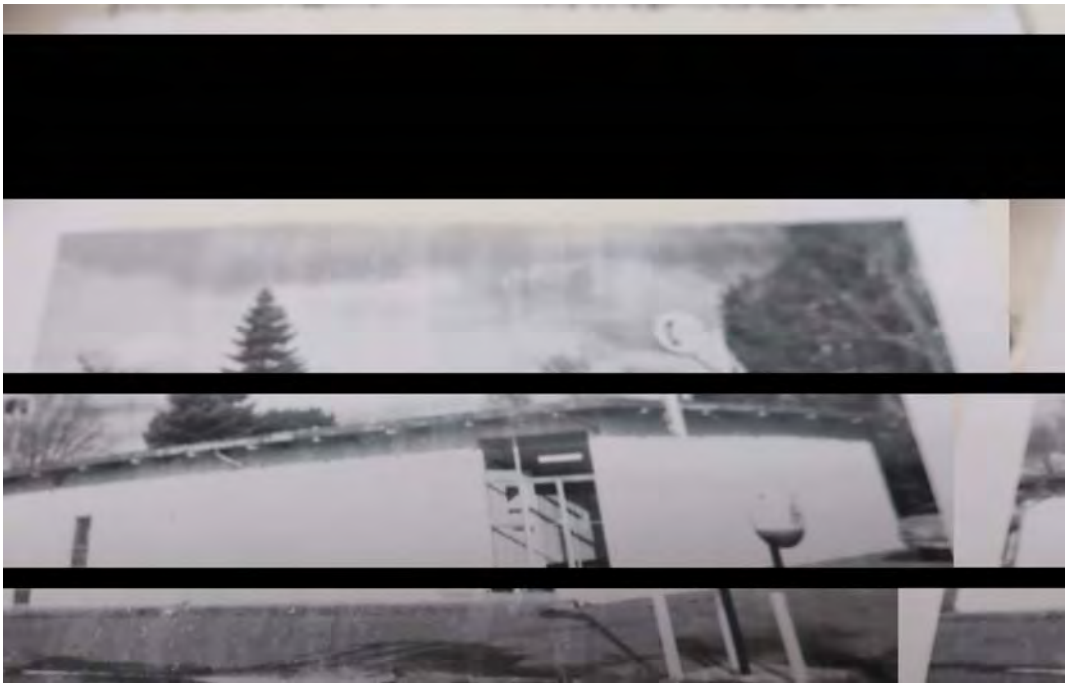
1998

2009

2015



Assessor notes and follow up notes showing former store on left and new store on right



December 1976

1990s

Historical Use and Public Records Search References

Historic Use Source References

1. Historical aerial photos dated 1937, 1969, 1978 and 1993 as maintained by the Skagit County Public Works Department in Mount Vernon, Washington
2. Property assessor records maintained by the Skagit County Assessor's Office in Mount Vernon, Washington.
3. Historical aerial photographs dated 1941, 1951, 1956, 1974 and 1984 from USGS
4. Samish Lake Quadrangle topographic maps 1918 and 1954

Public Records Database Search References

Public Records search was completed through internet research. Each database is searched by city, county, zip code or through mapping programs. Each site is then mapped to determine if it is located with the appropriate ASTM search radius. Please note that the databases contain many more sites than are mapped because they are outside the search radius. Copies of the databases can be provided in pdf form, upon request.

"Envirofacts Data Warehouse." U.S. Environmental Protection Agency.
< http://www.epa.gov/enviro>.

"National Response Center." U.S. Environmental Protection Agency.
< http://www.nrc.uscg.mil/foia.html>

"Superfund Site Information" U.S. Environmental Protection Agency., updated monthly
<http://www.epa.gov/superfund/sites/cursites/index.htm>

"Integrated Site Information System (Web Reporting)." Washington State Department of Ecology, updated weekly
< https://fortress.wa.gov/ecy/tcpwebreporting/Default.aspx>.

"Washington Facility/Site Atlas" Washington State Department of Ecology – Geographic Information System
< http://apps.ecy.wa.gov/website/facsite/viewer.htm>.

"List of Current Abandoned and Closed Landfill Sites in Skagit County" Skagit County Environmental Health Department, September 2004

"Closed and Abandoned County Landfills" – Draft Map. Skagit County GIS Division, December 2003

"Closed and Abandoned Disposal Sites in Skagit County. Skagit County, Environmental Health Department, June 1998

Stratum Group Indemnity

Stratum Group has prepared this report using reasonable efforts in each phase of its work to estimate the liabilities associated with recognized environmental conditions on the subject property and in the vicinity of the subject property. No environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. This report is intended to reduce, but not eliminate, uncertainty regarding the existence of recognized environmental conditions in connection with the subject property, in recognition of reasonable limits of time and cost.

The attached questionnaire comprises portions that are based on public records. Stratum Group makes no warranty, expressed or implied, as to the accuracy of information contained in public records.

This report is not definitive and should not be considered a complete or specific definition of all conditions above or below grade. Subsurface exploration of the site was not within the scope of this study. Recognized environmental conditions in the subsurface, if present, could only be identified by a subsurface investigation. An evaluation of area-wide atmospheric deposition of contaminants is not evaluated within this report. Evaluation for the presence of asbestos and/or lead based paint was not conducted as part of this report.

As is now common in the industry, it is understood that, to the fullest extent permitted by law, our clients agree to defend, indemnify and hold harmless Stratum Group, its owners, employees, subcontractors and agents, from any (past, present, or future) pollution-related claims or damages at the site, including potential claims from third parties that may name Stratum Group as a claimant.

ENVIRONMENTAL SITE ASSESSMENT:
PHASE II SAMPLING INVESTIGATION

WD FOODS
9029 CHUCKANUT DRIVE
SKAGIT COUNTY PARCEL P34734
BOW, WASHINGTON 98055

For:

Doug Armstrong
17090 Sam Bell Road
Bow, WA 98232

By:

PO Box 2546
Bellingham, WA 98227
(360) 714-9409

July 19, 2019

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Boring Logs
Laboratory Results with Chain-of-Custody

Stratum Group

PO Box 2546, Bellingham, Washington 98227
Phone: (360) 714-9409

July 19, 2019

Doug Armstrong
17090 Sam Bell Road
Bow, WA 98232

Re: Phase II Environmental Sampling Investigation
WD Foods
9029 Chuckanut Drive
Skagit County Parcel P34734
Bow, Washington 98055

Dear Mr. Armstrong:

We herein present the results of our soil and groundwater sampling investigation for the WD Foods property at 9029 Chuckanut Drive in Bow, Washington. The purpose of the investigation was to evaluate whether the property has been impacted by its possible historical use as a fueling station.

The subject property is currently operated as a food market with an attached espresso stand. The site is not a listed contaminated site with the Department of Ecology; however, our historical research indicates the site was likely operated as a gas station in and prior to the 1960s. A site visit also identified a disused heating oil UST located on the property. No environmental sampling has occurred on the site to the best of our knowledge.

To evaluate the site for potential unrecognized fuel USTs related to the historical fueling operations, and for potential petroleum contamination, a ground penetrating radar (GPR) survey and five environmental borings were completed on the site on July 9, 2019. GPR confirmed the presence of the heating oil UST and identified anomalies consistent with up to three potential fuel USTs beneath the parking area west of the market and espresso stand. Environmental borings were completed down gradient of the known and potential USTs.

Soil sample results indicate that gasoline-range petroleum and benzene are present at concentrations above Model Toxics Control Act (MTCA) Method A cleanup standards for unrestricted land use in one of the borings (B4). In addition to gasoline and benzene, diesel-range petroleum and methyl tert-butyl ether (MTBE) were also identified in groundwater above state cleanup standards in the same boring (B4). Some of these contaminants were also identified in other borings, but at concentrations below state cleanup standards.

Based on these results contamination above cleanup levels appears to be limited to a narrow area of the site. Further investigation would be needed to fully delineate the extent of contamination, particularly towards the northeast of Boring 4.

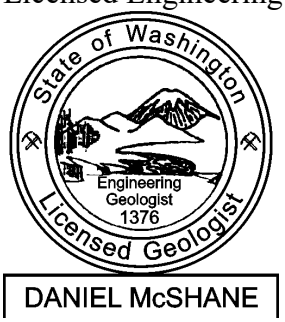
The continued presence of fuel tanks on the site may be acting as a source of residual contamination. Excavation of the tank area and removal of the tanks and any contaminated soil immediately adjacent to the tanks should be done to remove the source of contamination.

Should you have any questions concerning this Environmental Site Assessment, please do not hesitate to contact us at (360) 714-9409.

Sincerely,
Stratum Group

Dan McShane, L.E.G.
Licensed Engineering Geologist

Ben Carlson, M.Sc.
Geologist-in-Training



1.0 EXECUTIVE SUMMARY

This phase II environmental investigation was completed at 9029 Chuckanut Drive in Bow, Washington to evaluate for the presence of underground tanks and to determine if the site had been negatively impacted by the site's past use as a gasoline station.

The subject property is currently operated as a food market with an espresso located to the north edge of the market building. A site visit, conducted as part of an environmental transaction screen, identified a fill pipe and vent pipe for a no longer in use heating oil tank on the property. In addition, our historical research identified records and accounts that suggested that the site had previously had sold gasoline prior to and possibly up to the 1960s. The site is not a listed with the Washington State Department of Ecology as an underground storage tank (UST) site. No other information was available regarding the past fuel operations on the site or the USTs on the site.

To evaluate for underground utility and potential UST locations, a ground penetrating radar (GPR) survey was completed prior to environmental sampling. In addition to underground utility lines, GPR identified a set of three anomalies located in the parking area immediately west of the existing market and espresso stand. The anomalies are suspected to be due to the presence of USTs.

A total of five (5) borings were completed on July 9, 2019 in locations adjacent to or down gradient of the existing heating oil tank and the potential fuel USTs. Soil and groundwater samples were collected from each of the boring locations. Groundwater was encountered between 7 and 11 feet below ground surface (bgs).

Gasoline-range petroleum and benzene were identified in concentrations above the Model Toxics Control Act (MTCA) Method A cleanup standard for unrestricted land use in soil from one boring (B4). In addition to gasoline and benzene, diesel-range petroleum and MTBE concentrations in groundwater also exceeded MTCA Method A cleanup standards in boring (B4). Detections were identified for gasoline, diesel, and BTEX constituents in various other samples but did not exceed their respective cleanup standards. Contamination appears primarily limited to the soils between 7 and 11 feet below ground surface (bgs). The highest concentrations of analytes appear limited to a plume that extends north-northeast from the potential fuel UST(s). The extent of the narrow area of contamination towards the northeast was not delineated by the sampling completed.

Based upon these sampling results, a release of petroleum was confirmed on the site. Further investigation would be needed to fully characterize the extent of contamination and soil conditions and UST conditions within the area identified as the locations of the USTs has not been completed.

2.0 GENERAL PROJECT INFORMATION

This phase II investigation was conducted after an environmental transaction screen of the property identified the potential past use of the site as a fueling site associated with the former store building on the site.

The investigation was to evaluate the site's subsurface conditions to determine if the potential location of USTs and if petroleum contamination was present in association with the site's past use as a fueling station.

Site Information

9029 Chuckanut Drive
Skagit County Parcel P34734
Bow, Washington 98055

Contact information about the project operations including property owner and environmental consultant are provided below.

Property Owner and Project Requestor

Doug Armstrong
17090 Sam Bell Road
Bow, WA 98232
wdfoods.doug@gmail.com

Environmental Consultant

Stratum Group
PO Box 2546
Bellingham, WA 98227
Contact: Dan McShane or Ben Carlson
360-714-9409
mcshanedan@gmail.com
ben@stratumgroup.net

3.0 SITE DESCRIPTION

3.1 Site Location

The subject property is located in the unincorporated community of Bow, Washington. The property is located approximately 1.5 miles west of Interstate 5 and approximately 3.5 miles north-northwest of the city of Burlington, Washington. The property is located on the southeast corner of the four-way intersection of Chuckanut Drive, Sam Bell Road, and Allan West Road. The location of the subject property is presented in Figure 1, below.

Figure 1. Site vicinity map

3.2 Site and Vicinity General Characteristics

The subject property is located in a predominantly rural farming area in northwest Skagit County. The property occupies a single, irregularly-shaped tax parcel (Skagit County parcel P34734) and covers approximately 0.37 acres.

The site is developed with two structures that front Chuckanut Drive. A 3,200 square foot food market and convenience store is located on the southern portion of the property. A small espresso stand operates in a ~15' by 15' shack off the north side of the market building. A gravel parking lot and drive through for the espresso stand occupy the northern portion of the property. The site is connected to an on-site septic system and a public water utility.

A fill pipe and vent for an underground tank is located on the west side of the building. The fill pipe and vent pipe are consistent with an underground heating oil tank. The tank is not in use and has not been used for many years. The condition of the tank is not known.

An aerial photograph of the site and vicinity is provided in Figure 2, below.

Figure 2. Aerial photograph of site and vicinity (GoogleEarth, 2018)

3.3 Physical Characteristics of Site

The subject property is irregular in shape. The south edge of the property is located on relatively flat topography at approximately 22 feet elevation above mean sea level.

3.3.1 Site Geology and Soils

The following description of the surficial deposits in the vicinity of the subject property was interpreted from the *Geologic Map of the Bow and Alger 7.5-minute Quadrangles, Western Skagit County, Washington* (Dragovich et al., 1998). Dragovich et at. (1998) maps the subject property as being underlain by alluvium of the Skagit River valley (Qa). Alluvium deposits consists of clay, silt, and fine sand with lesser sand and gravel deposited in the Skagit River and Samish River delta/floodplain.

In general, subsurface conditions consist of silty gravel with sand to approximately 1.5 feet bgs, underlain by gray and brown-mottled silt with sand to 3 feet bgs, and silty sand to sand with silt to 15 feet bgs. Upper 1 to 1.5 feet of gravel is interpreted to be fill material with all soils below interpreted to be native silt and sand alluvium deposits. Representative boring logs for the site are provided in Appendix II.

3.3.2 Site Hydrology

No surface water features are located on or adjacent to the subject property. The property is located approximately 400 feet south of the Samish River.

The direction of shallow groundwater flow is typically a function of topography and drainages. The topography in the vicinity of the subject property is nearly flat but broadly slopes very gently to the north towards the Samish River. Based on topography, shallow groundwater is expected to flow to the north toward the Samish River.

Stormwater flows into one of two stormwater drains located along the western edge of the property or sheet flows off the property.

Groundwater was encountered in all borings at between 7 and 11 feet bgs. We interpret this groundwater to represent the groundwater table.

4.0 ENVIRONMENTAL HISTORY

Our historical review of the property included a review of historical aerial photographs, assessor records, and interviews. Copies of the historical aerial photographs are provided in Appendix III.

A structure existed on the northern portion of the subject property by the late 1930s. Assessor records indicate the building was utilized as a grocery store. The building included a canopy over a portion of the front of the building consistent with a gas station and anecdotal conversations with local residents suggest the property did sell gasoline for a period of time. Assessor records

and photographs indicate that fueling would have ceased by sometime in the 1960s or possibly early 1970s at the latest.

No information about previous or remaining fuel USTs is known. A new structure (the current building) was built abutting the south side of the previous existing building in 1960. The old building on the north side of the property was torn down in 1967. The remaining building operated as an electronics store and warehouse in the 1970s and has operated as a grocery store since the 1980s. Fill and vent pipes consistent with a heating oil tank are present on the north side of the front of the building, indicating that a heating oil tank may also be present on the property. The tank's condition and closure status are unknown.

The subject property is not listed in the public databases and contains no registered USTs.

No prior subsurface testing has taken place on the site, to the best of our knowledge.

5.0 SUBSURFACE INVESTIGATION

A ground penetrating radar survey and environmental borings were completed on the site on July 9, 2019. Prior to completion of the borings, a public and private locate were conducted to determine locations of underground utility lines.

5.1 Ground Penetrating Radar

A ground penetrating radar (GPR) survey was conducted throughout the site by CNI Locates of Bonney Lake, Washington. The survey was completed throughout exterior portions of the site, with particular focus on the approximate area of former fueling operations and the area around the previously discussed fill and vent pipes.

GPR provides non-destructive, detailed, cross-sectional imagery of underground conditions and can be used to detect utility lines, tanks, changes in subsurface materials, or buried objects. The GPR unit consists of a sending antenna which sends out pulses of radio waves (electromagnetic radiation) and a receiving antenna which picks up those pulses as they reflect off of underground objects. CNI Locates conducted the survey using a Sensors & Software LMX 100 portable GPR unit.

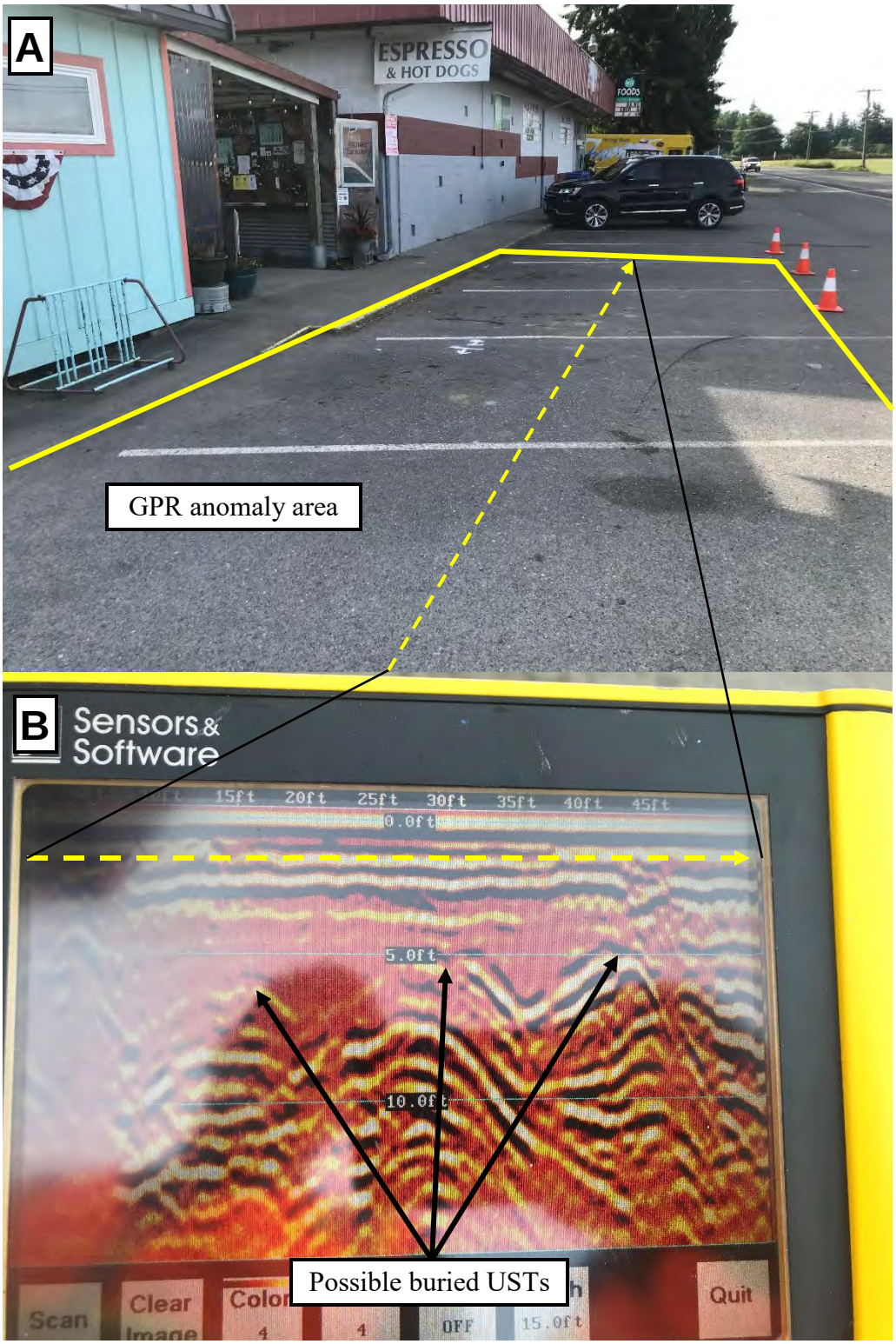


Figure 3. A) View of the parking area west of the market building where anomalies were identified. B) View of the radar profile showing three potential buried objects.

GPR identified one area with three prominent anomalies. The area is located west of the existing market and espresso stand and measures approximately 55 feet long by 25 feet wide, extending west from the edge of the existing sidewalk. The tops of the anomalies were located approximately 5 feet bgs and the soils above the observed anomalies appeared disturbed and unlike the shallow soils outside the anomaly area. These three anomalies may represent previously unrecognized USTs that are still buried on the subject property. The GPR signature suggests the tanks are likely oriented east-west.

GPR also identified an anomaly near the northwest corner of the market building. The size and location of this anomaly is consistent with the known heating oil UST. The anomaly did not extend west of the concrete walkway edge but may extend beneath the market building.

CNI also identified a linear anomaly along the western edge of the subject property that was consistent with a storm drain pipe between two visible drain grates, as well as a set of linear anomalies along the north edge of the property consistent with buried telephone lines.

No additional anomalies were detected on the property.

5.2 Boring Locations and Identification

The environmental drilling was completed by ESN Northwest of Olympia, Washington on July 9, 2019. The borings were completed using a truck-mounted GeoProbe 7800 push probe.

Five borings were completed on the site. The borings were labeled Boring B1 through B5, for reference. Boring B1 was completed down gradient of the existing heating oil tank. Borings B2, B3, B4, and B5 were completed down gradient of the suspected fuel USTs to the northwest, north, and northeast. Photographs of the drilling and sampling activities are provided in Appendix I.

The locations of the borings are indicated on Figure 4, below.

Figure 4. Environmental boring locations

5.3 Contaminants of Concern

Based upon the site's potential historical use as a gasoline station, petroleum products were identified as the most likely contaminants at the site:

- Gasoline
- Diesel
- Oil
- Benzene
- Toluene
- Ethylbenzene
- Xylenes

BTEX

- Methyl Tertiary-Butyl Ether (MTBE)

5.4 Sample Screening Levels and Laboratory Methodology

The method used by the laboratory to evaluate each contaminant and the cleanup screening levels for each potential contaminant are presented in Table 1 for soil and groundwater values.

Table 1. Laboratory Analysis Method and Screening Levels

Analytes	Laboratory Analysis Method	Soil Screening Level (mg/kg)	Groundwater Screening Level (µg/L)
Gasoline	NWTPH-GX	30/100[a]	800/1,000[a]
Diesel	NWTPH-DX	2,000[b]	500
Oil			500
Benzene	EPA - 8021	0.03	5
Toluene		7	1,000
Ethylbenzene		6	700
Xylenes		9	1,000
MTBE		0.1	20

a = The lower clean up value is used if benzene is present or the combined concentration of toluene, ethylbenzene, and xylenes is greater than 1% of the gasoline concentration. Otherwise, the higher clean up number is used.; b = the total concentration of diesel and oil combined must be below 2,000 mg/kg to meet the cleanup standard.

The screening levels, based upon the MTCA Method A cleanup standards (Chapter 173-340 WAC), were used to evaluate the sample results. These levels are set to protect human health for direct contact with soil and to protect drinking water quality. Soil cleanup standards are measured in parts per million (mg/kg) and groundwater standards are measured in parts per billion (µg/L). Please note that if cleanup levels are exceeded, additional factors may be needed to determine final site-specific cleanup values, including potential impacts to wildlife.

5.5 Soil Samples

5.5.1 Soil Sampling Methods

Soil samples were using the direct push probe with a clean plastic tube within the probe. One the plastic tube of soil was removed from the probe, the soil was examined and field screened for odor, hydrocarbon sheen, and soil discoloration at each sample location. Sampling equipment was disposable and/or was cleaned with Alconox and triple rinsed between each use.

Samples were collected for analyses where contaminants were determined to be most likely, such as where discoloration or odors were noted, the top of the groundwater table, or at depths associated with suspected base of tank and fuel lines. Soil samples were labeled with the boring number followed by the depth of the sample. For example, sample B1-10 was collected from Boring B1 at 10 feet bgs.

Soil samples were placed into labeled, laboratory supplied four-ounce glass jars with a Teflon

lined lid. A 10-gram soil sample was also collected from each sample depth with a syringe tube sampler and placed in a VOA container with methanol preservative. Samples were placed into an ice-chilled cooler immediately after sampling.

A total of 11 soil samples were collected. Seven of the soil samples, at least one from each boring, were collected and analyzed by the laboratory. Four of the soil samples were archived with the laboratory for later analysis, if needed. The samples were delivered to ALS Laboratory Group in Everett, Washington the day of the sample collection.

5.5.2 Soil Sample Descriptions

Descriptions of the borings and soil samples collected from each boring are described below.

Boring B1 was completed approximately 5 feet north and down gradient of the existing heating oil tank. The soil in the boring consisted of 0.5 feet of asphalt underlain by brown, moist, sand with silt and gravel to 1.5 feet bgs; gray-brown, mottled, moist, silt with sand to 2.5 feet bgs; and brown, sand with silt to 15 feet bgs that became wet at approximately 7.5 feet bgs and gray in color at approximately 13 feet bgs. A moderate hydrocarbon odor was detected below 13 feet bgs. Soil sample B1-7.5 was collected in a zone of brown sand with silt near the top of the water table that contained no evidence of contamination. Soil sample B1-13.5 was collected in a zone of discolored sand with silt that emitted a moderate hydrocarbon odor but produced no sheen. The boring was terminated at 15 feet bgs.

Boring B2 was completed immediately south and down gradient of the GPR anomaly area in the gravel parking area on the north side of the subject property. The soil in the boring consisted of gray, moist, silty gravel with sand to 1.5 feet bgs, underlain by gray, moist, silt with sand to 3.5 feet bgs, and brown, moist, silty sand to 15 feet bgs that became gray at 4.5 feet and wet at ~7 feet bgs. A moderate hydrocarbon odor was detected in the soil column below ~2.5 feet bgs. Soil sample B2-2.5 was collected in a zone of discolored silt with sand that emitted a moderate hydrocarbon odor. Soil sample B2-7 was collected in a zone of discolored silty sand at the top of the water table that emitted a moderate hydrocarbon odor. Soil sample B2-15 was collected in a zone of discolored, wet, silty sand that emitted a slight hydrocarbon odor. Neither sample produced a petroleum sheen. The boring was terminated at 15 feet bgs.

Boring B3 was completed approximately 30 feet northwest of boring B2, near the northwest corner of the subject property. The soil in the boring consisted of gray, dry, silty sand with gravel to 1.5 feet bgs, underlain by gray and red-brown, mottled, moist, clayey silt to 2.5 feet bgs, and brown, moist, silt with sand to 15 feet bgs that became gray at ~7 feet bgs and wet at ~8 feet bgs. A slight hydrocarbon odor was observed in the soil column below ~7 feet bgs. Soil sample B3-8.5 was collected in a zone of discolored, wet, sand with silt near the top of the water table that emitted a slight hydrocarbon odor. Soil sample B3-15 was collected in a zone of discolored, wet sand with silt that emitted a very slight hydrocarbon odor. Neither sample produced a petroleum sheen. The boring was terminated at 15 feet bgs.

Boring B4 was completed approximately 10 feet north-northwest of the espresso stand. The soil

in the boring consisted of gray, dry, silty gravel with sand to 1.5 feet bgs, underlain by dark brown to yellow brown, moist, clayey silt to 4 feet bgs, and brown, moist, sand with silt to 15 feet bgs that became gray at ~8.5 feet bgs and wet at ~9 feet bgs. A moderate hydrocarbon odor was observed in the soil column below ~8.5 feet bgs. Soil sample B4-9.5 was collected in a zone of discolored, wet, sand with silt near the top of the water table that emitted a moderate hydrocarbon odor. Soil sample B4-15 was collected in a zone of discolored, wet, sand with silt that emitted a slight hydrocarbon odor. Neither sample produced a petroleum sheen. The boring was terminated at 15 feet bgs.

Boring B5 was completed approximately 10 feet east of the northeast corner of the espresso stand. The soil in the boring consisted of gray, dry, silty gravel with sand to 1 foot bgs, underlain by dark brown, moist, sandy silt to 2 feet bgs; gray-brown, moist, sand with silt to 5 feet bgs; and brown, moist, silty sand to 15 feet bgs that became wet at ~11 feet bgs and gray at ~12 feet bgs. Soil sample B5-11.5 was collected in a zone of gray and brown, wet, silty sand near the top of the water table that contained no evidence of contamination. Soil sample B5-15 was collected in a zone of gray, wet, silty sand that contained no evidence of contamination. The boring was terminated at 15 feet bgs.

5.6 Soil Sample Results

Samples were delivered to ALS Laboratory Group in Everett, Washington for analysis. A complete copy of the analytical laboratory report and chain-of-custody is provided in Appendix II.

Seven soil samples were analyzed by the laboratory. At least one sample was analyzed from each boring and a deeper sample was analyzed to help define the vertical extent of the contamination in some of the borings. Each sample was analyzed for gasoline-, diesel-, and oil-range petroleum, benzene, toluene, ethylbenzene, xylenes, and MTBE. A summary of the soil sample results is presented in Table 2 and a map with the soil sample results is provided in Figure 5.

The laboratory notes indicate that the gasoline detected in the soil samples is weathered to highly weathered.

Table 2. Soil Sample Results

Boring ID	Sample ID[a]	Concentration of Contaminants in mg/kg							
		Gasoline	**Diesel**	**Oil**	**Benzene**	**Toluene**	**Ethyl-benzene**	**Xylenes**	**MTBE**
B1	**B1-13.5**	9.4	U<25	U<50	U<0.030	U<0.050	U<0.050	U<0.20	U<0.10
B2	**B2-2.5**	3.2	U<25	U<50	U<0.030	U<0.050	U<0.050	U<0.20	U<0.10
	B2-7	8.8	U<25	U<50	U<0.030	U<0.050	U<0.050	U<0.20	U<0.10
	B2-15	U<3.0	U<25	U<50	U<0.030	U<0.050	U<0.050	U<0.20	U<0.10
B3	**B3-8.5**	U<3.0	U<25	U<50	U<0.030	U<0.050	U<0.050	U<0.20	U<0.10
B4	**B4-9.5**	**1,100**	U<25	U<50	**1.1**	U<0.050	5.3	2.2	U<0.10
B5	**B5-11.5**	U<3.0	U<25	U<50	U<0.030	U<0.050	U<0.050	U<0.20	U<0.10
MTCA Method A Screening Standards		***30[b]***	***2000[c]***		***0.03***	***7***	***6***	***9***	***0.1***

U= contaminant not detected at level indicated; a = sample ID consists of the boring number followed by the depth of the sample (i.e. B4-17 was collected from Boring 4 location at 17 feet depth); b = cleanup standard is 100 mg/kg if benzene is not present or total of BTEX constituents is less than 1% of gasoline concentration; c = the total concentration of diesel and oil combined must be below 2,000 mg/kg to meet the cleanup standard

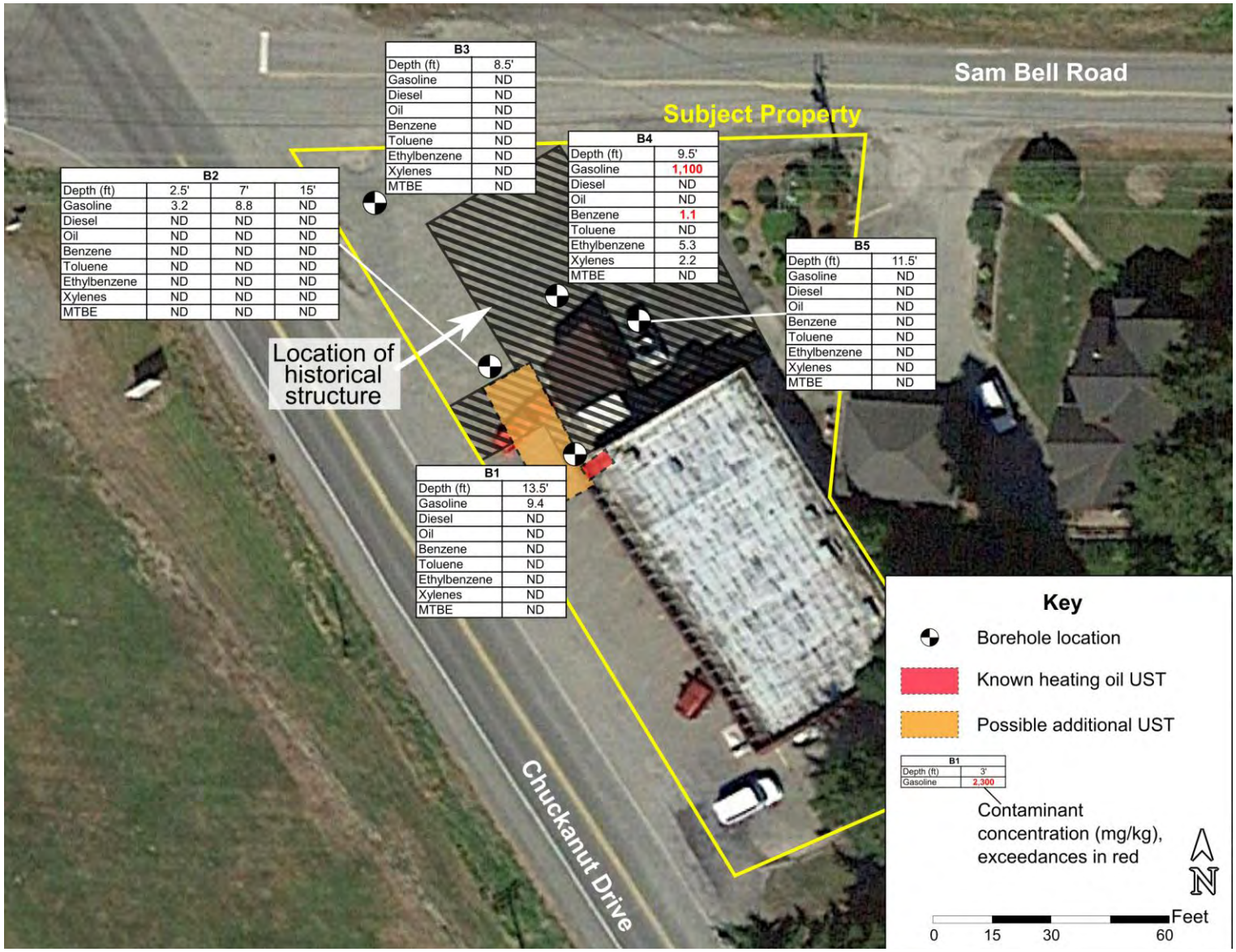


Figure 5. Soil sample results. ND = non-detect

5.7 Groundwater Samples

5.7.1 Groundwater Sampling Methods

Following collection of the soil samples, a slotted PVC pipe was temporarily set in the borehole to allow groundwater to be collected. The screen was four feet long and placed to capture the top of the groundwater table. Disposable plastic tubing was placed in the boring and water was purged using a low flow peristaltic water pump until turbidity in the water was greatly reduced.

Water samples were placed into labeled, laboratory supplied containers. Two 40 mL VOAs with hydrochloric acid preservative and one 500 mL amber glass container were filled with water at each boring. One water sample from each boring was collected and all of the water samples were analyzed.

Samples were immediately placed into an ice-chilled cooler for storage. The samples were delivered to ALS Laboratory Group in Everett, Washington the same day they were collected.

5.7.2 Groundwater Sample Descriptions

One groundwater sample was collected from each of the four borings.

Groundwater was consistently encountered between 7 and 11 feet bgs at the site in a unit of silty sand to sand with silt, which was interpreted to be the regional groundwater table. Water samples were collected after completion of the boring and the screen was set to capture the upper four feet of the groundwater table.

Water encountered in borings B1, B2, and B4 possessed a slight to moderate hydrocarbon odor but no sheen was visible. Water sampled from borings B3 and B5 did not possess a hydrocarbon odor or sheen. All water sampled was clear with negligible turbidity.

5.7.3 Groundwater Sample Results

All groundwater samples were analyzed by ALS Laboratory for gasoline-range petroleum, benzene, toluene, ethylbenzene, xylenes, and MTBE.

A summary of the groundwater sample results is presented in Table 3 and Figure 6. A complete analytical laboratory report and chain-of-custody are presented in Appendix II.

The laboratory notes indicate that gasoline detected in the groundwater samples was weathered.

Table 3. Groundwater Sample Results

Sample ID	Concentration of Contaminants in µg/L							
	Gasoline	**Diesel**	**Oil**	**Benzene**	**Toluene**	**Ethyl-benzene**	**Xylenes**	**MTBE**
B1-W	680	220	U<250	2.1	U<1.0	3.1	6.8	U<3.0
B2-W	470	150	U<250	2.5	U<1.0	U<1.0	U<3.0	U<3.0
B3-W	U<50	220	U<250	U<1.0	U<1.0	U<1.0	U<3.0	U<3.0
B4-W	**9,600**	**2,900**	U<250	**140**	40	280	630	**110**
B5-W	U<50	U<130	U<250	U<1.0	U<1.0	U<1.0	U<3.0	U<3.0
MTCA Method A Screening Standards	***800_b***	***500***	***500***	***5***	***1,000***	***700***	***1,000***	***20***

U= contaminant not detected at level indicated; b = cleanup standard is 1000 µ/L if benzene is not present or total of BTEX constituents is less than 1% of gasoline concentration;

Figure 6. Groundwater sample locations. ND = non-detect

5.8 Laboratory Quality Assurance

ALS Laboratory of Everett, Washington was responsible for completion of the analytical assessment of the samples. The laboratory is accredited with the Department of Ecology (accreditation number C601). The laboratory reporting limits were below the cleanup standards for all analytes, which indicates that non-detect results are below the cleanup screening standards.

The following quality assurance procedures were completed by the laboratory: surrogate recovery, method blank, and laboratory blank and blank spike duplicates. Surrogate recovery values for one of the soil samples was outside of the control limits due to dilution of the sample below the calibration range. Surrogate recovery values for one of the soil samples was outside of the control limits due to matrix interference.

The laboratory quality control is sufficient in our evaluation and does not affect our ability to interpret the soil and groundwater sample results for this report.

5.9 Sample Results Discussion

Gasoline-range petroleum and benzene concentrations in soil exceeded MTCA Method A cleanup standards/screening levels in the sample analyzed from boring B4, collected at 9.5 feet bgs. Gasoline was detected at 1,100 mg/kg and benzene was detected at 1.1 mg/kg. These concentrations exceed the MTCA Method A cleanup standard for unrestricted land use of 30 mg/kg for gasoline-range hydrocarbons and 0.03 mg/kg for benzene. The B4 sample also had detections of ethylbenzene and xylenes; however, those concentrations were below state cleanup standards. The soil sample from boring B1 at 13.5 feet bgs and two of the soil samples from boring B2, at 2.5 and 7 feet bgs, also had detections of gasoline. However, gasoline concentrations in these samples were well below state cleanup standards. Diesel, oil, and MTBE were non-detect in all soil samples. BTEX constituents were non-detect in all borings other than B4.

Gasoline-range petroleum, benzene, MTBE, and diesel-range petroleum concentrations in groundwater exceeded MTCA Method A cleanup standards in the groundwater sample from boring B4. Gasoline was detected at 9,600 µg/L, which exceeds the cleanup standard of 800 µg/L. Benzene was detected at 140 µg/L, which exceeds the cleanup standard of 5 µg/L. Diesel and MTBE were detected at 2,900 µg/L which exceeds the cleanup standard of 500 µg/L. MTBE was detected at a concentration of 110 µg/L which exceeds the cleanup standard of 20 µg/L. Other BTEX constituents were also detected in the groundwater from boring B4 but at concentrations well below their respective cleanup standards.

Groundwater from boring B1 contained detections of gasoline, benzene, ethylbenzene, xylenes, and diesel. However, concentrations of all analytes were below state cleanup standards. Groundwater from boring B2 contained detections of gasoline, benzene and diesel, but concentrations were below their respective cleanup standards. Groundwater from borings B3 and B5 were non-detect for all analytes, except for a detection of diesel from boring B3 that was well below the cleanup standard. MTBE was non-detect in groundwater from borings B1, B2, B3, and

B5. Oil-range petroleum was not detected in groundwater from any of the borings.

Based upon the concentrations of contaminants identified in the samples, soil and groundwater in at least a portion of the northern portion of the subject property have been impacted by gasoline, diesel, and BTEX constituents. Although detections for these analytes were identified in several locations, contaminant exceedances were only identified in one sampling location immediately north of the existing espresso stand. This location is down gradient of the potential buried USTs identified in the GPR survey. Field observations and soil and water sampling indicate the contamination is primarily located below the top of the water table, which is located at between approximately 7 and 11 feet bgs.

The presence of gasoline, diesel and BTEX in the soil and groundwater, as well as MTBE in the groundwater, indicates that a release of fuel has occurred into the subsurface on the subject property. The source of the petroleum release was not determined. However, the contamination is likely associated with the previously unrecognized tank(s) identified in GPR. The tank(s) are likely related to the site's historical use as a gas station in and prior to the 1960s. Sample analysis indicates the petroleum is weathered to highly weathered, consistent with a historical release. The known heating oil UST adjacent to the building may also be contributing to the diesel concentrations identified down gradient. However, the heating oil tank would not account for the observed concentrations of gasoline and BTEX.

Our sampling confirms the presence of petroleum, BTEX, and MTBE in the subsurface of a portion of the northern area of the subject property. The horizontal extent of the contamination was not completely delineated. However, sampling results suggests contamination is migrating in a rather narrow plume to north-northeast of the inferred fuel tank(s). The vertical extent of contamination appears to be limited to the upper part of the groundwater which ranges from 7 to 11 feet bgs on the subject property.

6.0 CONCLUSIONS

GPR identified one set of three anomalies beneath the parking area west of the existing market and espresso stand. The anomalies are consistent with buried fuel USTs that may be related to the site's historical use as a gas station. GPR also confirmed the presence of a heating oil UST located near the northwest corner of the market building.

Gasoline, diesel, and BTEX constituents were identified in soil and groundwater at concentrations above MTCA Method A cleanup standards in one of the borings (B4). Several other borings had detections for gasoline, diesel, and various BTEX constituents; however, concentrations of these analytes in borings B1, B2, B3, and B5 were all below state cleanup standards. The results indicate a release of petroleum on the site. The area impacted appears to be limited to a plume north-northeast of the potential UST(s). The impacts also appear to be limited to the upper groundwater located at between 7 and 11 feet bgs.

The property is not currently listed as a Confirmed and Suspected Contaminated Site with Department of Ecology and Ecology. Regarding environmental liability, the MTCA cleanup regulation (WAC 173-340-300) requires that any owner or operator that has knowledge that a hazardous substance has been released to the environment at their facility and where the release may be a threat to human health or the environment, report the release to Ecology. Reporting of this property to Department of Ecology would place the property on the Confirmed and Suspected Contaminated Sites List. We recommend that Ecology be notified of the release identified during this investigation. Additional site characterization work would be needed to fully delineate the extent of the petroleum contamination.

APPENDIX I

Site Photographs

View of boring B1, looking southwest.


Soil from B1.

View of boring B2, looking east.

Soil from B2.

View of boring B3, looking south.

Soil from B3.

View of boring B4, looking south.

Soil from B4.

View of boring B5, looking south.

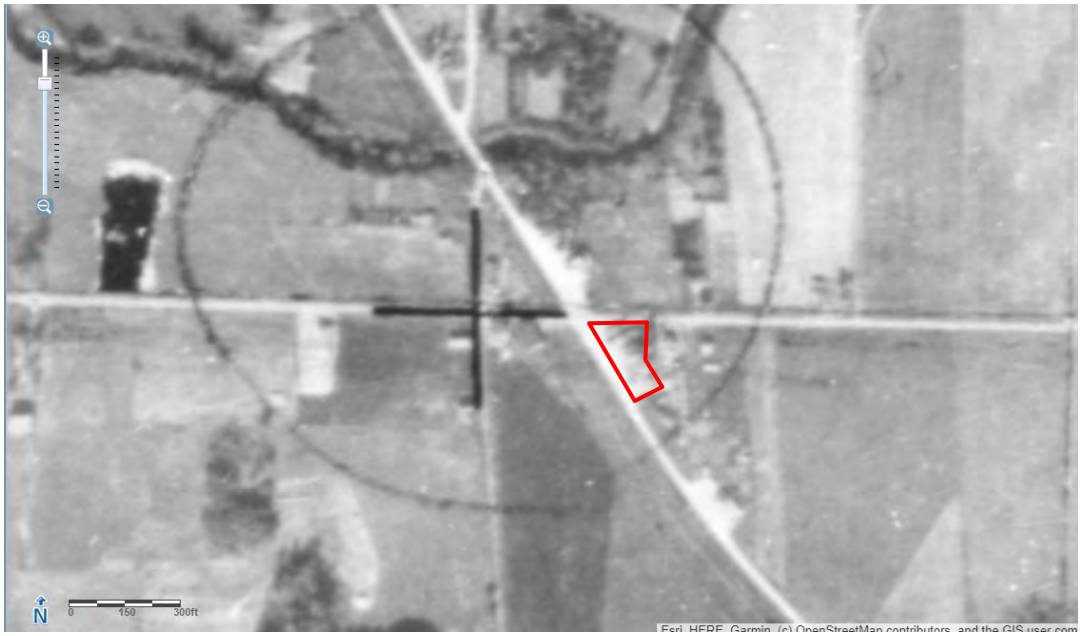
Soil from B5.

APPENDIX II

Aerial Photographs

Aerial Photographs

(property boundaries are approximate)



1937

1941

1954

1969

1998

2009

2015

APPENDIX II

Boring Logs

Laboratory Results with Chain-of-Custody

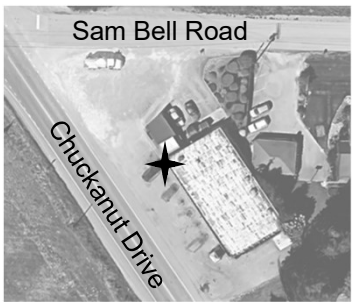
STRATUM GROUP

BOREHOLE NUMBER	**B1**
PROJECT	WD Foods
LOCATION	9029 Chuckanut Drive, Bow, WA
PROJECT NUMBER	5.24.19
LOGGED BY	Ben Carlson

SAMPLE INFORMATION					Groundwater depth (ft)	Depth (ft)	STRATA	DESCRIPTION
Sample ID	Sample Depth (ft)	Discolor-ation	Sheen	Odor				USCS group name, color, grain size range, minor constituents, plasticity, odor, sheen, moisture content, texture, weathering, cementation, geologic interpretation, etc.
							SP-SM	0.5'-thick asphalt
								Brown, fine to coarse SAND with silt and gravel. Moist.
							ML	Gray-brown, SILT with find sand. Moist. Mottled.
						5--		Brown to gray, fine to medium SAND with silt. Moist.
							SP-SM	
B1-7.5	7.5	No	No	Yes	▼			
						10--		
								- Becomes gray at 13' bgs
B1-13	13	Yes	No	Yes				
						15--		Boring terminated at 15' bgs
								Groundwater was encountered at 7.5' bgs during drilling.
B1-W		No	No	Sl				Groundwater sampling screen set at 9.5' to 13.5'. No turbidity.
						20--		
						25--		

DRILLING CONTRACTOR	ESN Northwest
DRILLING METHOD	Geoprobe
SAMPLING EQUIPMENT	Stainless steel spoon & bowl
DRILLING DATE	July 9, 2019
SURFACE ELEVATION	~22 feet
DATUMS	

Boring Location



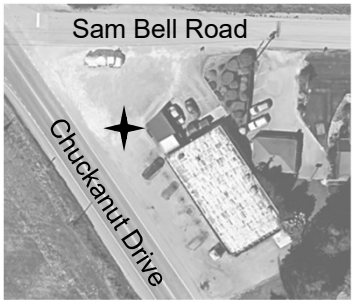
STRATUM GROUP

BOREHOLE NUMBER	**B2**
PROJECT	WD Foods
LOCATION	9029 Chuckanut Drive, Bow, WA
PROJECT NUMBER	5.24.19
LOGGED BY	Ben Carlson

SAMPLE INFORMATION					Groundwater depth (ft)	Depth (ft)	STRATA	DESCRIPTION
Sample ID	Sample Depth (ft)	Discolor-ation	Sheen	Odor				USCS group name, color, grain size range, minor constituents, plasticity, odor, sheen, moisture content, texture, weathering, cementation, geologic interpretation, etc.
							GM	0.5'-thick asphalt
								Gray, silty GRAVEL with sand. Dry.
B1-2.5	2.5	No	No	Yes			ML	Gray, SILT with sand. Moist.
						5--	SM	Brown, silty fine to medium SAND. Moist.
					▼			-Becomes gray at 4.5' bgs
B2-7	7	Yes	No	Yes				
						10--		
								- Sand becomes coarser below 14' bgs
B2-15	15	Yes	No	Sl		15--		
								Boring terminated at 15' bgs
								Groundwater was encountered at 7' bgs during drilling.
B2-W		No	No	Sl				Groundwater sampling screen set at 9' to 13'. No turbidity.
						20--		
						25--		

DRILLING CONTRACTOR	ESN Northwest
DRILLING METHOD	Geoprobe
SAMPLING EQUIPMENT	Stainless steel spoon & bowl
DRILLING DATE	July 9, 2019
SURFACE ELEVATION	~22 feet
DATUMS	

Boring Location



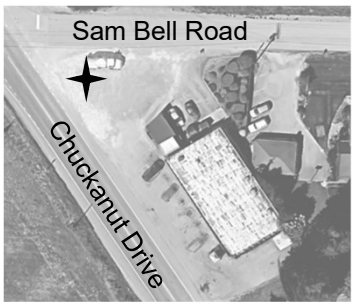
STRATUM GROUP

BOREHOLE NUMBER	**B3**
PROJECT	WD Foods
LOCATION	9029 Chuckanut Drive, Bow, WA
PROJECT NUMBER	5.24.19
LOGGED BY	Ben Carlson

SAMPLE INFORMATION					Groundwater depth (ft)	Depth (ft)	STRATA	DESCRIPTION
Sample ID	Sample Depth (ft)	Discolor-ation	Sheen	Odor				USCS group name, color, grain size range, minor constituents, plasticity, odor, sheen, moisture content, texture, weathering, cementation, geologic interpretation, etc.
							SM	Gray-brown, silty fine to coarse SAND with gravel. Dry.
							ML	Gray and red-brown mottled, clayey SILT. Moist. Trace fine sand.
						5--		Brown, fine to medium SAND with silt. Moist.
								- Becomes gray at 7' bgs
B3-8.5	8.5	Yes	No	Sl			SP-SM	
					▼	10--		
								- Sand becomes coarser below 14' bgs
B3-15	15	Yes	No	No		15--		
								Boring terminated at 15' bgs
								Groundwater was encountered at bgs during drilling.
B3-W		No	No	No				Groundwater sampling screen set at 11' to 15'. No turbidity.
						20--		
						25--		

DRILLING CONTRACTOR	ESN Northwest
DRILLING METHOD	Geoprobe
SAMPLING EQUIPMENT	Stainless steel spoon & bowl
DRILLING DATE	July 9, 2019
SURFACE ELEVATION	~22 feet
DATUMS	

Boring Location



STRATUM GROUP

BOREHOLE NUMBER	**B4**
PROJECT	WD Foods
LOCATION	9029 Chuckanut Drive, Bow, WA
PROJECT NUMBER	5.24.19
LOGGED BY	Ben Carlson

SAMPLE INFORMATION					Groundwater depth (ft)	Depth (ft)	STRATA	DESCRIPTION
Sample ID	Sample Depth (ft)	Discolor-ation	Sheen	Odor				USCS group name, color, grain size range, minor constituents, plasticity, odor, sheen, moisture content, texture, weathering, cementation, geologic interpretation, etc.
							SM/ GM	Gray, silty GRAVEL with sand to silty SAND with gravel. Dry. Fine to coarse sand.
							ML	Dark brown to yellow brown mottled, SILT to clayey SILT. Moist.
						5--		
							SP/ SP-SM	Gray-brown, SAND to SAND with silt. Moist. Fine to medium sand.
					▼			- Becomes gray at 8.5' bgs
B4-9.5	9.5	Yes	No	Yes		10--		
B4-15	15	Yes	No	Sl		15--		
								Boring terminated at 15' bgs
								Groundwater was encountered at bgs during drilling.
B4-W		No	No	Sl				Groundwater sampling screen set at 11' to 15'. No turbidity.
						20--		
						25--		

DRILLING CONTRACTOR	ESN Northwest
DRILLING METHOD	Geoprobe
SAMPLING EQUIPMENT	Stainless steel spoon & bowl
DRILLING DATE	July 9, 2019
SURFACE ELEVATION	~22 feet
DATUMS	

Boring Location

N

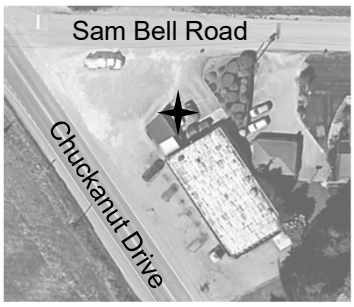
STRATUM GROUP

BOREHOLE NUMBER	**B5**
PROJECT	WD Foods
LOCATION	9029 Chuckanut Drive, Bow, WA
PROJECT NUMBER	5.24.19
LOGGED BY	Ben Carlson

SAMPLE INFORMATION					Groundwater depth (ft)	Depth (ft)	STRATA	DESCRIPTION
Sample ID	Sample Depth (ft)	Discolor-ation	Sheen	Odor				USCS group name, color, grain size range, minor constituents, plasticity, odor, sheen, moisture content, texture, weathering, cementation, geologic interpretation, etc.
							GM	Gray, silty GRAVEL with sand. Dry.
							ML	Dark brown, sandy SILT. Moist
							SP-SM	Gray-brown, SAND with silt. Moist. Fine to medium sand.
						5--		
								Brown, silty SAND. Moist. Fine to medium sand.
						10--	SM	
B5-11.5	11.5	No	No	No	▼			- Becomes gray at 12' bgs
B5-15	15	No	No	No		15--		
								Boring terminated at 15' bgs
								Groundwater was encountered at bgs during drilling.
B5-W	10	No	No	No				Groundwater sampling screen set at 11' to 15'. No turbidity.
						20--		
						25--		

DRILLING CONTRACTOR	ESN Northwest
DRILLING METHOD	Geoprobe
SAMPLING EQUIPMENT	Stainless steel spoon & bowl
DRILLING DATE	July 9, 2019
SURFACE ELEVATION	~22 feet
DATUMS	

Boring Location



July 16, 2019

Ms. Kim Ninnemann
Stratum Group
P.O. Box 2546
Bellingham, WA 98227

Dear Ms. Ninnemann,

On July 9th, 16 samples were received by our laboratory and assigned our laboratory project number EV19070051. The project was identified as your WD Foods. The sample identification and requested analyses are outlined on the attached chain of custody record.

No abnormalities or nonconformances were observed during the analyses of the project samples.

Please do not hesitate to call me if you have any questions or if I can be of further assistance.

Sincerely,

ALS Laboratory Group

Rick Bagan
Laboratory Director

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-02
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 10:49:00 AM
CLIENT SAMPLE ID	B1-13.5	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**9.4**	3.0	1	MG/KG	07/09/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	07/09/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	07/09/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	07/09/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	07/09/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	07/09/2019	KLS
TPH-Diesel Range	NWTPH-DX	U	25	1	MG/KG	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**73.3**	07/09/2019	KLS
TFT	EPA-8021	**70.1**	07/09/2019	KLS
C25	NWTPH-DX	**85.2**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains weathered gasoline.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-03
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 11:20:00 AM
CLIENT SAMPLE ID	B2-2.5	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**3.2**	3.0	1	MG/KG	07/11/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	07/11/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	07/11/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	07/11/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	07/11/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	07/11/2019	KLS
TPH-Diesel Range	NWTPH-DX	U	25	1	MG/KG	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**82.7**	07/11/2019	KLS
TFT	EPA-8021	**83.0**	07/11/2019	KLS
C25	NWTPH-DX	**87.2**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains highly weathered gasoline.

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ALS Group USA, Corp dba ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-04
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 11:27:00 AM
CLIENT SAMPLE ID	B2-7	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**8.8**	3.0	1	MG/KG	07/09/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	07/09/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	07/09/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	07/09/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	07/09/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	07/09/2019	KLS
TPH-Diesel Range	NWTPH-DX	U	25	1	MG/KG	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**108**	07/09/2019	KLS
TFT	EPA-8021	**99.0**	07/09/2019	KLS
C25	NWTPH-DX	**81.6**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains highly weathered gasoline.

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ALS Group USA, Corp dba ALS Environmental

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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-05
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 11:33:00 AM
CLIENT SAMPLE ID	B2-15	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	3.0	1	MG/KG	07/09/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	07/09/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	07/09/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	07/09/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	07/09/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	07/09/2019	KLS
TPH-Diesel Range	NWTPH-DX	U	25	1	MG/KG	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**72.8**	07/09/2019	KLS
TFT	EPA-8021	**72.2**	07/09/2019	KLS
C25	NWTPH-DX	**90.9**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

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ALS Group USA, Corp dba ALS Environmental

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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-06
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 12:00:00 PM
CLIENT SAMPLE ID	B3-8.5	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	3.0	1	MG/KG	07/09/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	07/09/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	07/09/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	07/09/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	07/09/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	07/09/2019	KLS
TPH-Diesel Range	NWTPH-DX	U	25	1	MG/KG	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**75.6**	07/09/2019	KLS
TFT	EPA-8021	**78.2**	07/09/2019	KLS
C25	NWTPH-DX	**72.5**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

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ALS Group USA, Corp dba ALS Environmental

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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-08
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 12:35:00 PM
CLIENT SAMPLE ID	B4-9.5	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**1100**	300	100	MG/KG	07/11/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	07/10/2019	KLS
Benzene	EPA-8021	**1.1**	0.030	1	MG/KG	07/10/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	07/10/2019	KLS
Ethylbenzene	EPA-8021	**5.3**	0.050	1	MG/KG	07/10/2019	KLS
Xylenes	EPA-8021	**2.2**	0.20	1	MG/KG	07/10/2019	KLS
TPH-Diesel Range	NWTPH-DX	U	25	1	MG/KG	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT 100X Dilution	NWTPH-GX	**683 SUR07**	07/11/2019	KLS
TFT	EPA-8021	**260 SUR12**	07/10/2019	KLS
C25	NWTPH-DX	**90.1**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
SUR12 -Surrogate recoveries were outside of the control limits due to matrix interference.
SUR07 -The surrogate recoveries could not be determined due to dilution below the calibration range.
Chromatogram indicates that it is likely that sample contains weathered gasoline.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-10
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 1:10:00 PM
CLIENT SAMPLE ID	B5-11.5	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	3.0	1	MG/KG	07/11/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	0.10	1	MG/KG	07/11/2019	KLS
Benzene	EPA-8021	U	0.030	1	MG/KG	07/11/2019	KLS
Toluene	EPA-8021	U	0.050	1	MG/KG	07/11/2019	KLS
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	07/11/2019	KLS
Xylenes	EPA-8021	U	0.20	1	MG/KG	07/11/2019	KLS
TPH-Diesel Range	NWTPH-DX	U	25	1	MG/KG	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**76.5**	07/11/2019	KLS
TFT	EPA-8021	**69.2**	07/11/2019	KLS
C25	NWTPH-DX	**97.0**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-12
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 11:03:00 AM
CLIENT SAMPLE ID	B1-W	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**680**	50	1	UG/L	07/10/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	3.0	1	UG/L	07/10/2019	KLS
Benzene	EPA-8021	**2.1**	1.0	1	UG/L	07/10/2019	KLS
Toluene	EPA-8021	U	1.0	1	UG/L	07/10/2019	KLS
Ethylbenzene	EPA-8021	**3.1**	1.0	1	UG/L	07/10/2019	KLS
Xylenes	EPA-8021	**6.8**	3.0	1	UG/L	07/10/2019	KLS
TPH-Diesel Range	NWTPH-DX	**220**	130	1	UG/L	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**116**	07/10/2019	KLS
TFT	EPA-8021	**125**	07/10/2019	KLS
C25	NWTPH-DX	**97.4**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains weathered gasoline and an unidentified diesel range product.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-13
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 11:35:00 AM
CLIENT SAMPLE ID	B2-W	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**470**	50	1	UG/L	07/10/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	3.0	1	UG/L	07/10/2019	KLS
Benzene	EPA-8021	**2.5**	1.0	1	UG/L	07/10/2019	KLS
Toluene	EPA-8021	U	1.0	1	UG/L	07/10/2019	KLS
Ethylbenzene	EPA-8021	U	1.0	1	UG/L	07/10/2019	KLS
Xylenes	EPA-8021	U	3.0	1	UG/L	07/10/2019	KLS
TPH-Diesel Range	NWTPH-DX	**150**	130	1	UG/L	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**98.0**	07/10/2019	KLS
TFT	EPA-8021	**112**	07/10/2019	KLS
C25	NWTPH-DX	**99.0**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains weathered gasoline and an unidentified diesel range product.

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-14
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 12:12:00 PM
CLIENT SAMPLE ID	B3-W	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	50	1	UG/L	07/10/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	3.0	1	UG/L	07/10/2019	KLS
Benzene	EPA-8021	U	1.0	1	UG/L	07/10/2019	KLS
Toluene	EPA-8021	U	1.0	1	UG/L	07/10/2019	KLS
Ethylbenzene	EPA-8021	U	1.0	1	UG/L	07/10/2019	KLS
Xylenes	EPA-8021	U	3.0	1	UG/L	07/10/2019	KLS
TPH-Diesel Range	NWTPH-DX	**220**	130	1	UG/L	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	07/10/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**86.7**	07/10/2019	KLS
TFT	EPA-8021	**89.0**	07/10/2019	KLS
C25	NWTPH-DX	**98.2**	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains an unidentified diesel range product.

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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-15
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 12:50:00 PM
CLIENT SAMPLE ID	B4-W	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	**9600**	500	10	UG/L	07/11/2019	KLS
Methyl T-Butyl Ether	EPA-8021	**110**	30	10	UG/L	07/11/2019	KLS
Benzene	EPA-8021	**140**	10	10	UG/L	07/11/2019	KLS
Toluene	EPA-8021	**40**	10	10	UG/L	07/11/2019	KLS
Ethylbenzene	EPA-8021	**280**	10	10	UG/L	07/11/2019	KLS
Xylenes	EPA-8021	**630**	30	10	UG/L	07/11/2019	KLS
TPH-Diesel Range	NWTPH-DX	**2900**	130	1	UG/L	07/15/2019	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	07/15/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT 10X Dilution	NWTPH-GX	**102**	07/11/2019	KLS
TFT 10X Dilution	EPA-8021	**109**	07/11/2019	KLS
C25	NWTPH-DX	**92.9**	07/15/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains weathered gasoline and an unidentified diesel range product.
Diesel range product results biased high due to gasoline range product overlap.

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ALS Group USA, Corp dba ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE: ALS JOB#: ALS SAMPLE#:	7/16/2019 EV19070051 EV19070051-16
CLIENT CONTACT:	Kim Ninnemann	DATE RECEIVED:	07/09/2019
CLIENT PROJECT:	WD Foods	COLLECTION DATE:	7/9/2019 1:25:00 PM
CLIENT SAMPLE ID	B5-W	WDOE ACCREDITATION:	C601

SAMPLE DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	50	1	UG/L	07/11/2019	KLS
Methyl T-Butyl Ether	EPA-8021	U	3.0	1	UG/L	07/11/2019	KLS
Benzene	EPA-8021	U	1.0	1	UG/L	07/11/2019	KLS
Toluene	EPA-8021	U	1.0	1	UG/L	07/11/2019	KLS
Ethylbenzene	EPA-8021	U	1.0	1	UG/L	07/11/2019	KLS
Xylenes	EPA-8021	U	3.0	1	UG/L	07/11/2019	KLS
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	07/12/2019	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	07/12/2019	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
TFT	NWTPH-GX	**87.3**	07/11/2019	KLS
TFT	EPA-8021	**87.3**	07/11/2019	KLS
C25	NWTPH-DX	**97.0**	07/12/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE:	7/16/2019
		ALS SDG#:	EV19070051
		WDOE ACCREDITATION:	C601
CLIENT CONTACT:	Kim Ninnemann		
CLIENT PROJECT:	WD Foods		

LABORATORY BLANK RESULTS

MBG-070919S - Batch 142912 - Soil by NWTPH-GX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	MG/KG	3.0	07/09/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.

MBG-071019W - Batch 142917 - Water by NWTPH-GX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	U	UG/L	50	07/10/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.

MB-070919S - Batch 142912 - Soil by EPA-8021

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
Methyl T-Butyl Ether	EPA-8021	U	MG/KG	0.10	07/09/2019	KLS
Benzene	EPA-8021	U	MG/KG	0.030	07/09/2019	KLS
Toluene	EPA-8021	U	MG/KG	0.050	07/09/2019	KLS
Ethylbenzene	EPA-8021	U	MG/KG	0.050	07/09/2019	KLS
Xylenes	EPA-8021	U	MG/KG	0.20	07/09/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.

MB-071019W - Batch 142917 - Water by EPA-8021

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
Methyl T-Butyl Ether	EPA-8021	U	UG/L	3.0	07/10/2019	KLS
Benzene	EPA-8021	U	UG/L	1.0	07/10/2019	KLS
Toluene	EPA-8021	U	UG/L	1.0	07/10/2019	KLS
Ethylbenzene	EPA-8021	U	UG/L	1.0	07/10/2019	KLS
Xylenes	EPA-8021	U	UG/L	3.0	07/10/2019	KLS

U - Analyte analyzed for but not detected at level above reporting limit.

MB-071019S - Batch 142911 - Soil by NWTPH-DX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	MG/KG	25	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	MG/KG	50	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

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ALS Group USA, Corp dba ALS Environmental

ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT: Stratum Group
P.O. Box 2546
Bellingham, WA 98227
CLIENT CONTACT: Kim Ninnemann
CLIENT PROJECT: WD Foods

DATE: 7/16/2019
ALS SDG#: EV19070051
WDOE ACCREDITATION: C601

LABORATORY BLANK RESULTS

MB-071019W - Batch 142942 - Water by NWTPH-DX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	UG/L	130	07/10/2019	EBS
TPH-Oil Range	NWTPH-DX	U	UG/L	250	07/10/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

MB-071219W - Batch 143048 - Water by NWTPH-DX

ANALYTE	METHOD	RESULTS	UNITS	REPORTING LIMITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	UG/L	130	07/12/2019	EBS
TPH-Oil Range	NWTPH-DX	U	UG/L	250	07/12/2019	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

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ALS Group USA, Corp dba ALS Environmental

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CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE:	7/16/2019
		ALS SDG#:	EV19070051
		WDOE ACCREDITATION:	C601
CLIENT CONTACT:	Kim Ninnemann		
CLIENT PROJECT:	WD Foods		

LABORATORY CONTROL SAMPLE RESULTS

ALS Test Batch ID: 142912 - Soil by NWTPH-GX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range - BS	NWTPH-GX	**97.1**			66.5	122.7	07/09/2019	KLS
TPH-Volatile Range - BSD	NWTPH-GX	**100**	**3**		66.5	122.7	07/09/2019	KLS

SQ1 - Spike outside of control limits with a high bias. Associated compounds non-detect. No corrective action taken.oneoneoneone

ALS Test Batch ID: 142917 - Water by NWTPH-GX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range - BS	NWTPH-GX	**83.1**			66.5	122.7	07/10/2019	KLS
TPH-Volatile Range - BSD	NWTPH-GX	**89.3**	**7**		66.5	122.7	07/10/2019	KLS

ALS Test Batch ID: 142912 - Soil by EPA-8021

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
Methyl T-Butyl Ether - BS	EPA-8021	**122**		SQ1	66	116	07/09/2019	KLS
Methyl T-Butyl Ether - BSD	EPA-8021	**128**	**5**	SQ1	66	116	07/09/2019	KLS
Benzene - BS	EPA-8021	**99.8**			67.7	124	07/09/2019	KLS
Benzene - BSD	EPA-8021	**103**	**4**		67.7	124	07/09/2019	KLS
Toluene - BS	EPA-8021	**97.2**			71	123	07/09/2019	KLS
Toluene - BSD	EPA-8021	**103**	**6**		71	123	07/09/2019	KLS
Ethylbenzene - BS	EPA-8021	**96.7**			69.8	117	07/09/2019	KLS
Ethylbenzene - BSD	EPA-8021	**100**	**4**		69.8	117	07/09/2019	KLS
Xylenes - BS	EPA-8021	**98.4**			70	119	07/09/2019	KLS
Xylenes - BSD	EPA-8021	**100**	**2**		70	119	07/09/2019	KLS

SQ1 - Spike outside of control limits with a high bias. Associated compounds non-detect. No corrective action taken.oneoneoneone

ALS Test Batch ID: 142917 - Water by EPA-8021

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
Methyl T-Butyl Ether - BS	EPA-8021	**120**			69.2	133	07/10/2019	KLS
Methyl T-Butyl Ether - BSD	EPA-8021	**121**	**1**		69.2	133	07/10/2019	KLS
Benzene - BS	EPA-8021	**100**			83	120	07/10/2019	KLS
Benzene - BSD	EPA-8021	**102**	**2**		83	120	07/10/2019	KLS
Toluene - BS	EPA-8021	**96.9**			85	115	07/10/2019	KLS
Toluene - BSD	EPA-8021	**98.5**	**2**		85	115	07/10/2019	KLS
Ethylbenzene - BS	EPA-8021	**97.1**			85	113	07/10/2019	KLS
Ethylbenzene - BSD	EPA-8021	**98.7**	**2**		85	113	07/10/2019	KLS
Xylenes - BS	EPA-8021	**98.1**			85	116	07/10/2019	KLS
Xylenes - BSD	EPA-8021	**100**	**2**		85	116	07/10/2019	KLS

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

CERTIFICATE OF ANALYSIS

CLIENT:	Stratum Group P.O. Box 2546 Bellingham, WA 98227	DATE:	7/16/2019
		ALS SDG#:	EV19070051
		WDOE ACCREDITATION:	C601
CLIENT CONTACT:	Kim Ninnemann		
CLIENT PROJECT:	WD Foods		

LABORATORY CONTROL SAMPLE RESULTS

ALS Test Batch ID: 142911 - Soil by NWTPH-DX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range - BS	NWTPH-DX	**94.5**			75.5	122.1	07/10/2019	EBS
TPH-Diesel Range - BSD	NWTPH-DX	**99.1**	**5**		75.5	122.1	07/10/2019	EBS

ALS Test Batch ID: 142942 - Water by NWTPH-DX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range - BS	NWTPH-DX	**88.2**			67	125.2	07/10/2019	EBS
TPH-Diesel Range - BSD	NWTPH-DX	**91.5**	**4**		67	125.2	07/10/2019	EBS

ALS Test Batch ID: 143048 - Water by NWTPH-DX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	LIMITS MIN	LIMITS MAX	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range - BS	NWTPH-DX	**92.3**			67	125.2	07/12/2019	EBS
TPH-Diesel Range - BSD	NWTPH-DX	**94.5**	**2**		67	125.2	07/12/2019	EBS

APPROVED BY

Laboratory Director

ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 9820 | PHONE 425-356-2600 | FAX 425-356-2626
ALS Group USA, Corp dba ALS Environmental

ALS Environmental
8620 Holly Drive, Suite 100
Everett, WA 98208
Phone (425) 356-2600
Fax (425) 356-2626
http://www.alsglobal.com

Chain Of Custody/ Laboratory Analysis Request

ALS Job# (Laboratory Use Only): EV1907005

Date 7/9/19 Page 1 Of 2

PROJECT ID: WD Foods
REPORT TO COMPANY: Stratum Group
PROJECT MANAGER: Kim Nineman
ADDRESS: 2102 Young St.
Bellingham, WA 98225
PHONE: 360-714-9409 P.O. #:
E-MAIL: kim@stratumgroup.net
INVOICE TO COMPANY: Same
ATTENTION:
ADDRESS:

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	TYPE	LAB#	NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA 8021 ☑ BTEX by EPA 8260 ☐	MTBE by EPA 8021 ☑ MTBE by EPA 8260 ☐	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	EDB / EDC by EPA 8260 SIM (water)	EDB / EDC by EPA 8260 (soil)	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA 8270 SIM	PCB by EPA 8082 ☐ Pesticides by EPA 8081 ☐	Metals-MTCA-5 ☐ RCRA-8 ☐ Pri Pol ☐ TAL ☐	Metals Other (Specify)	TCLP-Metals ☐ VOA ☐ Semi-Vol ☐ Pest ☐ Herbs ☐	OTHER (Specify)	NUMBER OF CONTAINERS	RECEIVED IN GOOD CONDITION?
1. B1-7.5*	7/9/19	1041	Soil	1		X	X	X	X												2	
2. B1-13.5		1049		2		X	X	X	X												2	
3. B2-2.5		1120		3		X	X	X	X												2	
4. B2-7		1127		4		X	X	X	X												2	
5. B2-15		1133		5		X	X	X	X												2	
6. B3-8.5		1200		6		X	X	X	X												2	
7. B3-15*		1203		7																	2	
8. B4-9.5		1235		8		X	X	X	X												2	
9. B4-15*		1240		9																	2	
10. B5-11.5	↓	1310	↓	10		X	X	X	X												2	

OTHER (Specify)

SPECIAL INSTRUCTIONS * Archive for possible future analysis

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By: Stratum Group 7/9/19 1505
   Received By: Shawn Roberson ALS 7/9/19 1505
2. Relinquished By:
   Received By:

TURNAROUND REQUESTED in Business Days*

Organic, Metals & Inorganic Analysis: 10 Standard | 5 | 3 | 2 | 1 | SAME DAY

Fuels & Hydrocarbon Analysis: 5 Standard | 3 | 1 | SAME DAY

OTHER: Specify:

*Turnaround request less than standard may incur Rush Charges

ALS Environmental
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Chain Of Custody/ Laboratory Analysis Request

ALS Job# (Laboratory Use Only): EV1907005

Date 7/9/19 Page 2 Of 2

PROJECT ID: WD Foods
REPORT TO COMPANY: Stratum Group
PROJECT MANAGER: Kim Nineman
ADDRESS: 2102 Yarny St
Bellingham, WA 98225
PHONE: 360-714-9409 P.O. #:
E-MAIL: kim@stratumgroup.net
INVOICE TO COMPANY: Same
ATTENTION:
ADDRESS:

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	TYPE	LAB#	NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA 8021 ☑ BTEX by EPA 8260 ☐	MTBE by EPA 8021 ☑ MTBE by EPA 8260 ☐	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	EDB / EDC by EPA 8260 SIM (water)	EDB / EDC by EPA 8260 (soil)	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA 8270 SIM	PCB by EPA 8082 ☐ Pesticides by EPA 8081 ☐	Metals-MTCA-5 ☐ RCRA-8 ☐ Pri Pol ☐ TAL ☐	Metals Other (Specify)	TCLP-Metals ☐ VOA ☐ Semi-Vol ☐ Pest ☐ Herbs ☐	OTHER (Specify)	NUMBER OF CONTAINERS	RECEIVED IN GOOD CONDITION?
1. BS-1S*	7/9/19	1315	Soil	11																	2	
2. B1-W		1103	Water	12		X	X	X	X												3	
3. B2-W		1135		13		X	X	X	X												3	
4. B3-W		1212		14		X	X	X	X												3	
5. B4-W		1250		15		X	X	X	X												3	
6. BS-W		1325		16		X	X	X	X												3	
7.																						
8.																						
9.																						
10.																						

SPECIAL INSTRUCTIONS * Archive for possible future analysis

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By: Stratum Group 7/9/19 1505
   Received By: Shawn Roberson AW 7/9/19 1525
2. Relinquished By:
   Received By:

TURNAROUND REQUESTED in Business Days*

Organic, Metals & Inorganic Analysis: 10 Standard | 5 | 3 | 2 | 1 | SAME DAY

Fuels & Hydrocarbon Analysis: 5 Standard | 3 | 1 | SAME DAY

OTHER:
Specify:

*Turnaround request less than standard may incur Rush Charges