



September 28, 2021

Gregory Gould, P.E.
Environmental Engineer
Washington State Department of Ecology
Solid Waste Management, Industrial Section
P.O. Box 47600
Olympia, Washington 98504

Transmitted via email to: greg.gould@ecy.wa.gov

Dear Mr. Gould:

Emerald Kalama Chemical and Fire Mountain Farms have completed the removal of mixed materials and cleaning of the Newaukum Prairie location in accordance with the Closure Plan approved by Washington Department of Ecology. Please confirm that the attached revised technical memorandum satisfies our obligations under the Closure Plan for the Newaukum Prairie location. Upon Ecology's confirmation, and in accordance with the 2016 Agreement among Emerald, Fire Mountain Farms and Ecology, FMF shall be solely responsible for any subsequent use of the Newaukum Prairie Storage Unit and Emerald shall have no responsibility for such subsequent use.

Sincerely,



Brian A. Denison

Vice President, Manufacturing Technology Specialist

Emerald Performance Materials, LLC

Emerald Kalama Chemical, LLC | 1499 SE Tech Center Place, Suite 300, Vancouver, WA 98683 | 800.223.0035

**Akron, OH • Geleen, Netherlands • Henry, IL • Hong Kong • Kalama, WA • Maple Shade, NJ
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www.kalama.emeraldmaterials.com

Technical Memorandum

TO: Brian A. Denison, Emerald Kalama Chemical LLC
Sloane Wildman, Perkins Coie LLP

FROM: Evelyn Ives, PE; Ken Reid, LEG

DATE: September 27, 2021

RE: **Newaukum Prairie Closure Summary**
Emerald Kalama Chemical/Fire Mountain Farms
Fire Mountain Farms Storage Units
Lewis County, Washington
LAI Project No. 0066045.110.114

Introduction

Landau Associates, Inc. (LAI) was retained by Perkins Coie LLP (Perkins) on behalf of Emerald Kalama Chemical, LLC (Emerald) to provide technical support and environmental services related to Administrative Order No. 10938 issued by the Washington State Department of Ecology (Ecology) to Emerald and Fire Mountain Farms, Inc. (FMF) (Ecology 2014) and the Agreement for Conditional Compliance with Ecology Administrative Order No. 10938 During Judicial Review (Agreement) between Ecology, Emerald, and FMF, dated June 3, 2016 (Ecology 2016).

This technical memorandum provides a summary of closure activities for Newaukum Prairie storage facility (Newaukum Prairie) operated by FMF. From October 17, 2020 through September 10, 2021, FMF completed the facility's closure in accordance with the Final Closure Plan (LAI 2020), which was prepared for all three facilities as stipulated in the Agreement. Closure activities for Newaukum Prairie are described in the following sections and consisted of water removal; mixed-material dewatering, removal and disposal; decontamination; and collection of confirmation samples.

Background

The Newaukum Prairie facility is in Lewis County located at 349 State Route 508, in Chehalis, Washington (Figure 1) and is a below-grade unit that stored mixed material, which was composed of municipal wastewater treatment plant derived biosolids and industrial wastewater biological solids (IWBS). The mixed material contains biosolids from municipal wastewater treatment plants and IWBS generated at Emerald's wastewater treatment plant in Kalama, Washington. Ecology designated the IWBS and mixed material at FMF as dangerous waste in 2014 based on the Resource Conservation and Recovery Act's (RCRA's) derived-from rule. Mixed material at the FMF facilities was designated as U019- and U220-listed dangerous waste.

Emerald and FMF submitted delisting petitions to the US Environmental Protection Agency (EPA) and Ecology in 2018, which were subsequently approved by both agencies on April 8, 2020. The delisting approvals allow for disposal of the mixed material at FMF in a Washington State Subtitle D landfill. The EPA approved a total volume of 10,400 cubic yards (cy) of mixed material at Newaukum Prairie.

As stated in the Closure Plan, the storage unit is approximately square with a constructed berm on each side. According to the 2013 drawing, each side of the storage unit is approximately 220 feet (ft) in length with a total depth of 14 ft (LAI 2020). The berms are reportedly sloped 3H:1V (horizontal:vertical) on the interior and 2H:1V on the exterior of the storage unit and are lined using a dual system consisting of a 60 milliliter (mL) high-density polyethylene (HDPE) primary liner, a geonet leak detection layer, and a 30 mL HDPE secondary liner. The bottom of the storage unit reportedly has dimensions of roughly 148 ft by 148 ft according to the 2013 drawing. Based on these dimensions, the total storage unit has a capacity of approximately 4 million gallons including 2 ft of freeboard. The storage unit contained mixed material and accumulated precipitation until closure activities commenced. LAI took measurements of the depth to the mixed-material surface below the water level in August 2017. Measurements were collected in a grid at 17 locations across the storage unit. Based on these measurements, the estimated average mixed-material thickness was 6 ft. Given this thickness, the approximate volume of wet mixed material was approximately 7,000 cy.

Mixed-Material and Water Removal

Prior to mixed-material removal, the storage unit was drained of most accumulated precipitation. In accordance with the Closure Plan, accumulated precipitation was trucked from the storage unit to the Emerald Kalama plant for treatment. A total of 794,221 gallons of non-hazardous water was trucked from Newaukum Prairie to Emerald Kalama between June 8, 2020 and August 18, 2020. Once the storage unit was drained to the desired level, mixed-material removal commenced.

Mixed-material removal occurred in two phases. The first phase was completed with a large-scale centrifuge between October 17, 2020 and November 23, 2020. Mixed material was removed from Newaukum Prairie using an FMF-operated dredge, pumped to a polymer mix tank where coagulants and flocculants were added, and then processed through two centrifuges running in parallel at rates up to 200 gallons per minute each. Filtrate water from the centrifuge was recirculated back to the unit. The centrifuge work was stopped once the influent mixed-material solids content was less than 3 percent, which is out of operable range for that equipment. A total of 2,362 tons of dewatered mixed material was removed during the first phase.

After the first phase was complete, there was still a significant amount of mixed material in the storage unit, because it was either missed by the dredge pump or had been light enough that it would not settle to the bottom while the dredge was operating. Between December 3, 2020 and February 22, 2021, water and suspended mixed-material solids were trucked from Newaukum Prairie to Emerald Kalama for treatment. Liquid loads were temporarily halted after February 22, 2021 to 1) accommodate wastewater treatment system maintenance requirements at the Emerald Kalama plant, and 2) manage hydraulic capacity of the Emerald Kalama wastewater treatment system. Trucking of water from the Newaukum Prairie facility resumed on May 17, 2021 and continued until June 24, 2021.

After an evaluation of alternative dewatering technologies, use of a belt filter press (BFP) and a submerged intake pump (rather than a dredge) was selected for the final stage of dewatering. Ecology was consulted and approved of the use of a BFP for the final dewatering stage. The BFP was operated between about July 28 and August 19, 2021. Once the mixed-material dewatering was completed, residual mixed-material solids at the bottom of the storage unit were removed by hand, with hand-removal completed on September 2, 2021. A total of 288 tons of dewatered mixed material was removed during the second phase (BFP dewatering and hand-removal). Hazardous wastewater loads (consisting of filtrate and rinse water generated during both dewatering phases and accumulated precipitation in the storage unit) totaled 2,702,079 gallons and were trucked from Newaukum Prairie to Emerald Kalama between December 2020 and September 2021.

During both phases of mixed-material removal, mixed material was loaded into plastic-lined shipping containers on truck trailers that were provided and transported by LeMay Enterprises, Inc. (LeMay), which is Lewis County's designated solid waste hauler. FMF cleaned any spilled mixed material from the sides and top of each container and each container was then covered before leaving the site. LeMay hauled 99 containers to the Centralia Rail Yard where containers were transferred onto rail cars and transported to the Roosevelt Landfill in Roosevelt, Washington for final disposal. Each container had a capacity of 53 cy and, therefore, the total volume removed from Newaukum Prairie was no more than 5,247 cy. Based on the bills of lading, the total weight of all disposed material was 2,650 tons.

Decontamination and Confirmation Sampling

Newaukum Prairie was decontaminated by FMF between September 2 and September 10, 2021. The HDPE-lined side slopes and bottom were cleaned and decontaminated using brooms and pressure washers. The approximately 3,860 gallons of decontamination water generated by pressure-washing was collected at the bottom of the storage unit. In accordance with the Closure Plan, rinse water samples were collected to confirm that the storage unit had been decontaminated.

LAI collected two composite water samples, NP-RINSE1-091021 and NP-RINSE2-091021, from standing rinse water in the bottom of the storage unit (Figure 2). The two samples and trip blanks were placed in a cooler on ice and delivered to the analytical laboratory. Samples were analyzed for benzene and toluene by EPA Method 8260D with a 3-day turnaround time. The laboratory analytical reports are provided as Attachment 1. After sampling was complete, rinse water was transferred into a tanker and transported to the Emerald Kalama plant on September 10, 2021. Photographs of the decontaminated pond are provided in Attachment 2.

The results of the first sampling event (results detailed in the next section) were non-detect, but the reporting limits were elevated due to laboratory dilution requirements. Therefore, an additional sample was collected on September 21, 2021 after another rinse of the storage unit to confirm the non-detect (or compliant) status of benzene and toluene concentrations.

Confirmation Sampling Results

Laboratory results for rinse water samples are provided in Attachment 1, and in Table 1 below are compared to the Model Toxics Control Act (MTCA) Method A cleanup levels, which are the closure standards set forth in the Closure Plan. The results from the first set of samples indicate concentrations of benzene and toluene were not detected above the laboratory reporting limit of 20 micrograms per liter ($\mu\text{g/L}$), which is a higher reporting limit than the compliance level for benzene. As stated above, a third rinse sample was collected after another rinse of the storage unit. No laboratory dilution was required to analyze the third sample and results indicate that both benzene and toluene were not detected at concentrations above the laboratory reporting limits of 1.0 $\mu\text{g/L}$, thereby meeting closure criteria with reporting limits below MTCA Method A cleanup levels. These results demonstrate compliance with conditions for closure of Newaukum Prairie as a hazardous waste storage unit.

Table 1: Newaukum Prairie Rinse Water Analytical Results

| Sample ID | Lab Sample ID | Sampling Date | SW-846 8260D ($\mu\text{g/L}$) | |
|------------------------------|---------------|------------------|----------------------------------|---------|
| | | | Benzene | Toluene |
| NP-RINSE1-091021 | 580-105772-1 | 9/10/2021 | 20 U | 20 U |
| NP-RINSE2-091021 | 580-105772-2 | 9/10/2021 | 20 U | 20 U |
| NP-RINSE3-092121 | 580-106029-1 | 9/21/2021 | 1.0 U | 1.0 U |
| MTCA Method A Cleanup Level: | | | 5 | 1,000 |

Note:

U = The analyte was not detected above the level of the reported sample quantitation limit.

Abbreviations/Acronyms:

MTCA = Model Toxics Control Act

$\mu\text{g/L}$ = micrograms per liter

* * * * *

If you have any questions regarding the information provided in this technical memorandum, please contact the undersigned.

LANDAU ASSOCIATES, INC.



Ken Reid, LEG
Associate



Evelyn Ives, PE
Associate

EHI/CPH/ccy

\\edmdata01\projects\066\045\R\Closure Rpt - Newaukum Prairie\LAI Emerald FMF Newaukum Prairie Closure_tm - 09-27-21.docx

References

Ecology. 2014. Administrative Order No. 10938 In the Matter of an Administrative Order Against Emerald Kalama Chemical, LLC and Fire Mountain Farms, Inc. Washington State Department of Ecology. September 11. Bates: EKC006135-EKC006143.

Ecology. 2016. Agreement for Conditional Compliance with Ecology Administrative Order No. 10938 During Judicial Review. Washington State Department of Ecology. June 3. Bates: EKC022878-EKC022888.

LAI. 2020. Final Closure Plan, Fire Mountain Farms, Inc. Storage Units, Kalama, Washington. Landau Associates, Inc. August 12.

Attachments

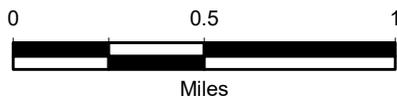
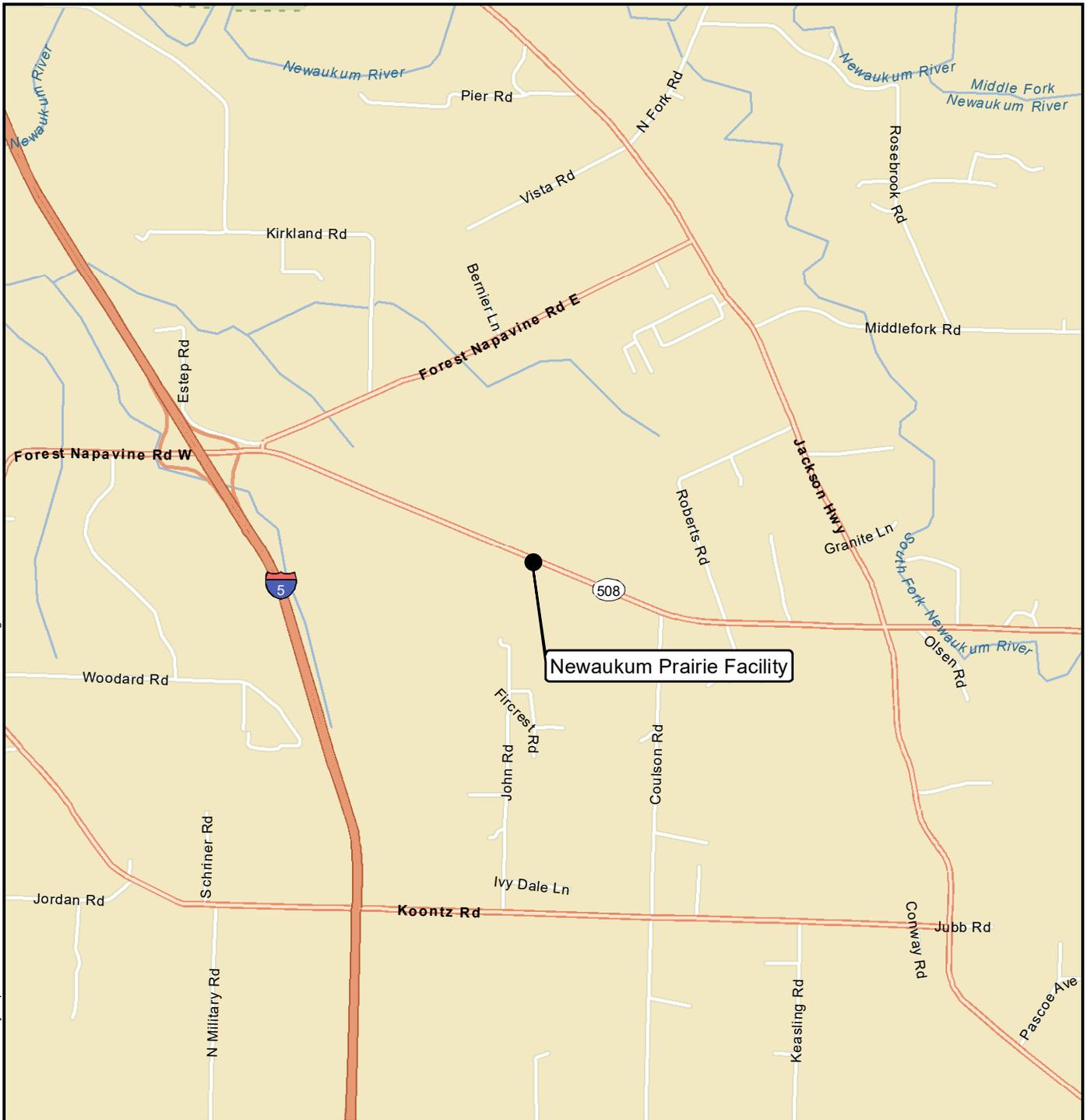
Figure 1: Newaukum Prairie Vicinity Map

Figure 2: Newaukum Prairie Storage Unit Sampling Locations

Attachment 1: Laboratory Analytical Reports

Attachment 2: Newaukum Prairie Closure Completion Photographs

G:\Projects\066\045\11\01\14\Newaukum Prairie Storage Units\F01-VicinityMap NewaukumPrairie.mxd 9/14/2021 NAD 1983 StatePlane Washington North FIPS 4801 Feet



Data Source: Esri 2012

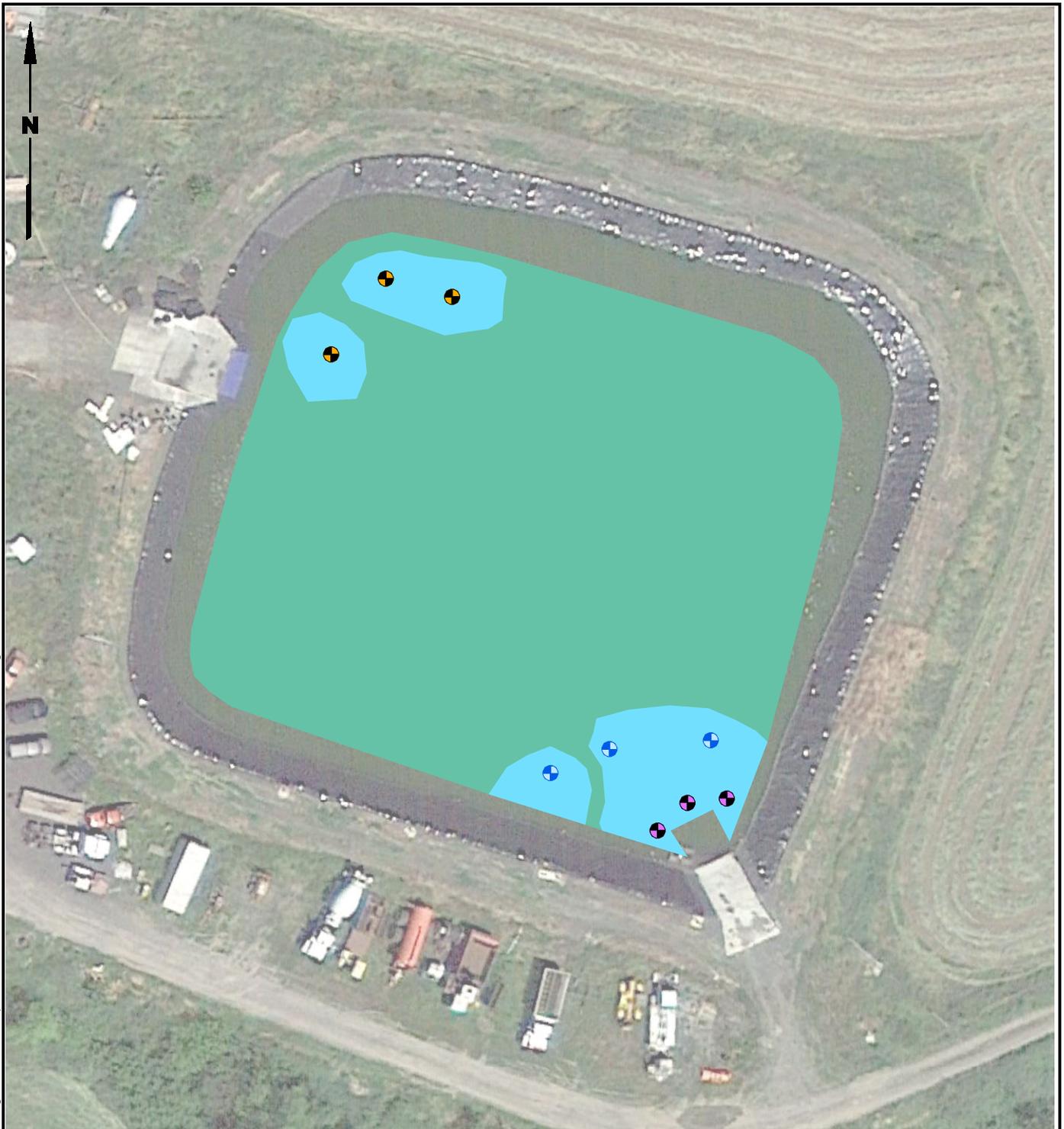


Fire Mountain Farms Storage Units
Lewis County, Washington

**Newaukum Prairie
Vicinity Map**

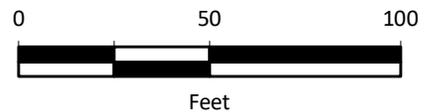
Figure
1

G:\Projects\066\045\11\01\14\Newaukum Prairie Storage Units\F02SampleLocationsNP2.mxd 9/27/2021 NAD 1983 StatePlane Washington South FIPS 4602 Feet



Legend

-  Water Sample Aliquot Location for Sample NP-RINSE1-091021
 -  Water Sample Aliquot Location for Sample NP-RINSE2-091021
 -  Water Sample Aliquot Location for Sample NP-RINSE3-092121
-  Standing Water on 9/10/2021
 -  Standing Water on 9/21/2021



Data Source: Google Earth Pro, 2014.



Fire Mountain Farms Storage Units
Lewis County, Washington

**Newaukum Prairie Storage Unit
Sampling Locations**

Figure
2

Laboratory Analytical Reports

ANALYTICAL REPORT

Eurofins FGS, Seattle
5755 8th Street East
Tacoma, WA 98424
Tel: (253)922-2310

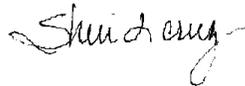
Laboratory Job ID: 580-105772-1

Client Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

For:

Landau & Associates, Inc.
130 Second Ave South
Edmonds, Washington 98020

Attn: Evelyn Ives



*Authorized for release by:
9/15/2021 12:15:04 PM*

Sheri Cruz, Project Manager I
(253)922-2310
Sheri.Cruz@Eurofinset.com

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This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.



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Case Narrative

Client: Landau & Associates, Inc.
Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Job ID: 580-105772-1

Laboratory: Eurofins FGS, Seattle

Narrative

**Job Narrative
580-105772-1**

Comments

No additional comments.

Receipt

The samples were received on 9/10/2021 12:45 PM. Unless otherwise noted below, the samples arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 16.7° C.

GC/MS VOA

Method 8260D: The following volatiles samples were diluted due to foaming at the time of purging during the original sample analysis: NP-RINSE1-091021 (580-105772-1) and NP-RINSE2-091021 (580-105772-2). Elevated reporting limits (RLs) are provided.

Method 8260D: The RPD of the laboratory control sample (LCS) and laboratory control sample duplicate (LCSD) for analytical batch 580-367715 recovered outside control limits for the following analytes: Benzene and Toluene.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

VOA Prep

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

Definitions/Glossary

Client: Landau & Associates, Inc.
Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Qualifiers

GC/MS VOA

| Qualifier | Qualifier Description |
|-----------|--------------------------------------|
| *1 | LCS/LCSD RPD exceeds control limits. |

Glossary

| Abbreviation | These commonly used abbreviations may or may not be present in this report. |
|----------------|---|
| α | Listed under the "D" column to designate that the result is reported on a dry weight basis |
| %R | Percent Recovery |
| CFL | Contains Free Liquid |
| CFU | Colony Forming Unit |
| CNF | Contains No Free Liquid |
| DER | Duplicate Error Ratio (normalized absolute difference) |
| Dil Fac | Dilution Factor |
| DL | Detection Limit (DoD/DOE) |
| DL, RA, RE, IN | Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample |
| DLC | Decision Level Concentration (Radiochemistry) |
| EDL | Estimated Detection Limit (Dioxin) |
| LOD | Limit of Detection (DoD/DOE) |
| LOQ | Limit of Quantitation (DoD/DOE) |
| MCL | EPA recommended "Maximum Contaminant Level" |
| MDA | Minimum Detectable Activity (Radiochemistry) |
| MDC | Minimum Detectable Concentration (Radiochemistry) |
| MDL | Method Detection Limit |
| ML | Minimum Level (Dioxin) |
| MPN | Most Probable Number |
| MQL | Method Quantitation Limit |
| NC | Not Calculated |
| ND | Not Detected at the reporting limit (or MDL or EDL if shown) |
| NEG | Negative / Absent |
| POS | Positive / Present |
| PQL | Practical Quantitation Limit |
| PRES | Presumptive |
| QC | Quality Control |
| RER | Relative Error Ratio (Radiochemistry) |
| RL | Reporting Limit or Requested Limit (Radiochemistry) |
| RPD | Relative Percent Difference, a measure of the relative difference between two points |
| TEF | Toxicity Equivalent Factor (Dioxin) |
| TEQ | Toxicity Equivalent Quotient (Dioxin) |
| TNTC | Too Numerous To Count |

Sample Summary

Client: Landau & Associates, Inc.
Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

| Lab Sample ID | Client Sample ID | Matrix | Collected | Received |
|---------------|-----------------------------|--------|----------------|----------------|
| 580-105772-1 | NP-RINSE1-091021 | Water | 09/10/21 08:30 | 09/10/21 12:45 |
| 580-105772-2 | NP-RINSE2-091021 | Water | 09/10/21 08:39 | 09/10/21 12:45 |
| 580-105772-3 | TRIP BLANK NP-RINSE1-091021 | Water | 09/10/21 08:30 | 09/10/21 12:45 |
| 580-105772-4 | TRIP BLANK NP-RINSE2-091021 | Water | 09/10/21 08:39 | 09/10/21 12:45 |

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11



Chain-of-Custody Record

Seattle/Edmonds (425) 778-0907 Spokane (509) 327-9737
 Tacoma (253) 926-2493 Portland (503) 542-1080

Date 9/10/2021
Page 1 of 1

Turnaround Time:
Standard _____
Accelerated 3-DAY

Project Name FIRE WTN FARMS Project No. 0066045.110.113
 Project Location/Event NEWARKUM PRAIRIE RINSE
 Sampler's Name LANCE LEVINE
 Project Contact EVELYN IVES
 Send Results To EVELYN IVES

0260D (BENZENE + TOLUENE ONLY)

Testing Parameters

105772
 Special Handling Requirements: _____
 Shipment Method: _____
 Stored on ice: Yes / No

| Sample I.D. | Date | Time | Matrix | No. of Containers | | | | | | | | | | | | | | | | Observations/Comments |
|----------------------------|---------|------|--------|-------------------|---|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| NP-RINSE1-091021 | 9/10/21 | 8:30 | WATER | 3 | X | | | | | | | | | | | | | | | Allow water samples to settle, collect aliquot from clear portion <input type="checkbox"/> |
| NP-RINSE2-091021 | 9/10/21 | 8:39 | WATER | 3 | X | | | | | | | | | | | | | | | NWTPH-Dx - Acid wash cleanup <input type="checkbox"/> |
| TRIPBLANK-NP-RINSE1-091021 | 9/10/21 | 8:30 | TB | 1 | X | | | | | | | | | | | | | | | - Silica gel cleanup <input type="checkbox"/> |
| TRIPBLANK-NP-RINSE2-091021 | 9/10/21 | 8:39 | TB | 1 | X | | | | | | | | | | | | | | | Dissolved metal samples were field filtered |
| | | | | | | | | | | | | | | | | | | | | Other _____ |

clides SmRad / gel / bub
 A2 TB 16.7 / 17.0

Relinquished by
 Signature [Signature]
 Printed Name LANCE LEVINE
 Company LANDAU ASSOCIATES
 Date 9/10/2021 Time _____

Received by
 Signature [Signature]
 Printed Name Blankinskip
 Company EPGS
 Date 9 TEN 21 Time 1245

Relinquished by
 Signature _____
 Printed Name _____
 Company _____
 Date _____ Time _____

Received by
 Signature _____
 Printed Name _____
 Company _____
 Date _____ Time _____



Login Sample Receipt Checklist

Client: Landau & Associates, Inc.

Job Number: 580-105772-1

Login Number: 105772

List Source: Eurofins FGS, Seattle

List Number: 1

Creator: Blankinship, Tom X

| Question | Answer | Comment |
|---|--------|---|
| Radioactivity wasn't checked or is \leq background as measured by a survey meter. | True | |
| The cooler's custody seal, if present, is intact. | True | |
| Sample custody seals, if present, are intact. | True | |
| The cooler or samples do not appear to have been compromised or tampered with. | True | |
| Samples were received on ice. | True | |
| Cooler Temperature is acceptable. | True | Received same day of collection; chilling process has begun. |
| Cooler Temperature is recorded. | True | |
| COC is present. | True | |
| COC is filled out in ink and legible. | True | |
| COC is filled out with all pertinent information. | True | |
| Is the Field Sampler's name present on COC? | True | |
| There are no discrepancies between the containers received and the COC. | True | |
| Samples are received within Holding Time (excluding tests with immediate HTs) | True | |
| Sample containers have legible labels. | True | |
| Containers are not broken or leaking. | True | |
| Sample collection date/times are provided. | True | |
| Appropriate sample containers are used. | True | |
| Sample bottles are completely filled. | True | |
| Sample Preservation Verified. | N/A | |
| There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs | True | |
| Containers requiring zero headspace have no headspace or bubble is <math><6\text{mm}</math> (1/4"). | False | Narrative to indicate if headspace container used for analysis. |
| Multiphasic samples are not present. | True | |
| Samples do not require splitting or compositing. | True | |
| Residual Chlorine Checked. | N/A | |

Client Sample Results

Client: Landau & Associates, Inc.
 Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Client Sample ID: NP-RINSE1-091021

Lab Sample ID: 580-105772-1

Date Collected: 09/10/21 08:30

Matrix: Water

Date Received: 09/10/21 12:45

Method: 8260D - Volatile Organic Compounds by GC/MS

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---------|--------|-----------|----|-----|------|---|----------|----------------|---------|
| Benzene | ND | *1 | 20 | | ug/L | | | 09/14/21 04:48 | 20 |
| Toluene | ND | *1 | 20 | | ug/L | | | 09/14/21 04:48 | 20 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|-------------------------------------|-----------|-----------|----------|----------|----------------|---------|
| <i>Toluene-d8 (Surr)</i> | 104 | | 80 - 120 | | 09/14/21 04:48 | 20 |
| <i>4-Bromofluorobenzene (Surr)</i> | 90 | | 80 - 120 | | 09/14/21 04:48 | 20 |
| <i>Dibromofluoromethane (Surr)</i> | 103 | | 80 - 120 | | 09/14/21 04:48 | 20 |
| <i>1,2-Dichloroethane-d4 (Surr)</i> | 105 | | 80 - 120 | | 09/14/21 04:48 | 20 |

Client Sample Results

Client: Landau & Associates, Inc.
 Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Client Sample ID: NP-RINSE2-091021

Lab Sample ID: 580-105772-2

Date Collected: 09/10/21 08:39

Matrix: Water

Date Received: 09/10/21 12:45

Method: 8260D - Volatile Organic Compounds by GC/MS

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|-------------------------------------|-----------|-----------|----------|-----|------|---|----------|----------------|---------|
| Benzene | ND | *1 | 20 | | ug/L | | | 09/14/21 05:13 | 20 |
| Toluene | ND | *1 | 20 | | ug/L | | | 09/14/21 05:13 | 20 |
| Surrogate | %Recovery | Qualifier | Limits | | | | Prepared | Analyzed | Dil Fac |
| <i>Toluene-d8 (Surr)</i> | 101 | | 80 - 120 | | | | | 09/14/21 05:13 | 20 |
| <i>4-Bromofluorobenzene (Surr)</i> | 93 | | 80 - 120 | | | | | 09/14/21 05:13 | 20 |
| <i>Dibromofluoromethane (Surr)</i> | 100 | | 80 - 120 | | | | | 09/14/21 05:13 | 20 |
| <i>1,2-Dichloroethane-d4 (Surr)</i> | 106 | | 80 - 120 | | | | | 09/14/21 05:13 | 20 |

Client Sample Results

Client: Landau & Associates, Inc.
 Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Client Sample ID: TRIP BLANK NP-RINSE1-091021

Lab Sample ID: 580-105772-3

Date Collected: 09/10/21 08:30

Matrix: Water

Date Received: 09/10/21 12:45

Method: 8260D - Volatile Organic Compounds by GC/MS

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---------|--------|-----------|-----|-----|------|---|----------|----------------|---------|
| Benzene | ND | *1 | 1.0 | | ug/L | | | 09/14/21 02:45 | 1 |
| Toluene | ND | *1 | 1.0 | | ug/L | | | 09/14/21 02:45 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|-------------------------------------|-----------|-----------|----------|----------|----------------|---------|
| <i>Toluene-d8 (Surr)</i> | 103 | | 80 - 120 | | 09/14/21 02:45 | 1 |
| <i>4-Bromofluorobenzene (Surr)</i> | 93 | | 80 - 120 | | 09/14/21 02:45 | 1 |
| <i>Dibromofluoromethane (Surr)</i> | 100 | | 80 - 120 | | 09/14/21 02:45 | 1 |
| <i>1,2-Dichloroethane-d4 (Surr)</i> | 107 | | 80 - 120 | | 09/14/21 02:45 | 1 |

Client Sample Results

Client: Landau & Associates, Inc.
 Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Client Sample ID: TRIP BLANK NP-RINSE2-091021

Lab Sample ID: 580-105772-4

Date Collected: 09/10/21 08:39

Matrix: Water

Date Received: 09/10/21 12:45

Method: 8260D - Volatile Organic Compounds by GC/MS

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---------|--------|-----------|-----|-----|------|---|----------|----------------|---------|
| Benzene | ND | *1 | 1.0 | | ug/L | | | 09/14/21 03:10 | 1 |
| Toluene | ND | *1 | 1.0 | | ug/L | | | 09/14/21 03:10 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|-------------------------------------|-----------|-----------|----------|----------|----------------|---------|
| <i>Toluene-d8 (Surr)</i> | 104 | | 80 - 120 | | 09/14/21 03:10 | 1 |
| <i>4-Bromofluorobenzene (Surr)</i> | 88 | | 80 - 120 | | 09/14/21 03:10 | 1 |
| <i>Dibromofluoromethane (Surr)</i> | 98 | | 80 - 120 | | 09/14/21 03:10 | 1 |
| <i>1,2-Dichloroethane-d4 (Surr)</i> | 105 | | 80 - 120 | | 09/14/21 03:10 | 1 |

QC Sample Results

Client: Landau & Associates, Inc.
 Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Method: 8260D - Volatile Organic Compounds by GC/MS

Lab Sample ID: MB 580-367715/7
Matrix: Water
Analysis Batch: 367715

Client Sample ID: Method Blank
Prep Type: Total/NA

| Analyte | MB MB | | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|------------------------------|-----------|-----------|----------|-----|------|---|----------|----------------|---------|
| | Result | Qualifier | | | | | | | |
| Benzene | ND | | 1.0 | | ug/L | | | 09/14/21 01:06 | 1 |
| Toluene | ND | | 1.0 | | ug/L | | | 09/14/21 01:06 | 1 |
| Surrogate | MB MB | | Limits | | | | Prepared | Analyzed | Dil Fac |
| | %Recovery | Qualifier | | | | | | | |
| Toluene-d8 (Surr) | 98 | | 80 - 120 | | | | | 09/14/21 01:06 | 1 |
| 4-Bromofluorobenzene (Surr) | 90 | | 80 - 120 | | | | | 09/14/21 01:06 | 1 |
| Dibromofluoromethane (Surr) | 97 | | 80 - 120 | | | | | 09/14/21 01:06 | 1 |
| 1,2-Dichloroethane-d4 (Surr) | 104 | | 80 - 120 | | | | | 09/14/21 01:06 | 1 |

Lab Sample ID: LCS 580-367715/4
Matrix: Water
Analysis Batch: 367715

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

| Analyte | Spike Added | LCS Result | LCS Qualifier | Unit | D | %Rec | %Rec. Limits |
|------------------------------|-------------|------------|---------------|------|---|------|--------------|
| | | | | | | | |
| Toluene | 10.0 | 10.9 | | ug/L | | 109 | 80 - 120 |
| Surrogate | LCS LCS | | Limits | | | | |
| | %Recovery | Qualifier | | | | | |
| Toluene-d8 (Surr) | 101 | | 80 - 120 | | | | |
| 4-Bromofluorobenzene (Surr) | 97 | | 80 - 120 | | | | |
| Dibromofluoromethane (Surr) | 95 | | 80 - 120 | | | | |
| 1,2-Dichloroethane-d4 (Surr) | 97 | | 80 - 120 | | | | |

Lab Sample ID: LCSD 580-367715/5
Matrix: Water
Analysis Batch: 367715

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA

| Analyte | Spike Added | LCSD Result | LCSD Qualifier | Unit | D | %Rec | %Rec. Limits | RPD | Limit |
|------------------------------|-------------|-------------|----------------|------|---|------|--------------|-----|-------|
| | | | | | | | | | |
| Toluene | 10.0 | 8.47 | *1 | ug/L | | 85 | 80 - 120 | 25 | 13 |
| Surrogate | LCSD LCSD | | Limits | | | | | | |
| | %Recovery | Qualifier | | | | | | | |
| Toluene-d8 (Surr) | 100 | | 80 - 120 | | | | | | |
| 4-Bromofluorobenzene (Surr) | 96 | | 80 - 120 | | | | | | |
| Dibromofluoromethane (Surr) | 97 | | 80 - 120 | | | | | | |
| 1,2-Dichloroethane-d4 (Surr) | 98 | | 80 - 120 | | | | | | |

Lab Chronicle

Client: Landau & Associates, Inc.
Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Client Sample ID: NP-RINSE1-091021

Lab Sample ID: 580-105772-1

Date Collected: 09/10/21 08:30

Matrix: Water

Date Received: 09/10/21 12:45

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|-----------|------------|--------------|-----|-----------------|--------------|----------------------|---------|---------|
| Total/NA | Analysis | 8260D | | 20 | 367715 | 09/14/21 04:48 | B1M | FGS SEA |

Client Sample ID: NP-RINSE2-091021

Lab Sample ID: 580-105772-2

Date Collected: 09/10/21 08:39

Matrix: Water

Date Received: 09/10/21 12:45

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|-----------|------------|--------------|-----|-----------------|--------------|----------------------|---------|---------|
| Total/NA | Analysis | 8260D | | 20 | 367715 | 09/14/21 05:13 | B1M | FGS SEA |

Client Sample ID: TRIP BLANK NP-RINSE1-091021

Lab Sample ID: 580-105772-3

Date Collected: 09/10/21 08:30

Matrix: Water

Date Received: 09/10/21 12:45

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|-----------|------------|--------------|-----|-----------------|--------------|----------------------|---------|---------|
| Total/NA | Analysis | 8260D | | 1 | 367715 | 09/14/21 02:45 | B1M | FGS SEA |

Client Sample ID: TRIP BLANK NP-RINSE2-091021

Lab Sample ID: 580-105772-4

Date Collected: 09/10/21 08:39

Matrix: Water

Date Received: 09/10/21 12:45

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|-----------|------------|--------------|-----|-----------------|--------------|----------------------|---------|---------|
| Total/NA | Analysis | 8260D | | 1 | 367715 | 09/14/21 03:10 | B1M | FGS SEA |

Laboratory References:

FGS SEA = Eurofins FGS, Seattle, 5755 8th Street East, Tacoma, WA 98424, TEL (253)922-2310

Accreditation/Certification Summary

Client: Landau & Associates, Inc.
Project/Site: Fire Mtn Farms_Newaukum Prairie Rinse

Job ID: 580-105772-1

Laboratory: Eurofins FGS, Seattle

The accreditations/certifications listed below are applicable to this report.

| Authority | Program | Identification Number | Expiration Date |
|------------|---------|-----------------------|-----------------|
| Washington | State | C788 | 07-13-22 |

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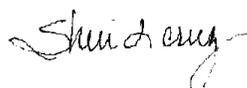
ANALYTICAL REPORT

Eurofins FGS, Seattle
5755 8th Street East
Tacoma, WA 98424
Tel: (253)922-2310

Laboratory Job ID: 580-106029-1
Client Project/Site: Fire MTN Farms

For:
Landau & Associates, Inc.
130 Second Ave South
Edmonds, Washington 98020

Attn: Evelyn Ives



*Authorized for release by:
9/24/2021 3:46:44 PM*

Sheri Cruz, Project Manager I
(253)922-2310
Sheri.Cruz@Eurofinset.com

LINKS

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This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.



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Case Narrative

Client: Landau & Associates, Inc.
Project/Site: Fire MTN Farms

Job ID: 580-106029-1

Job ID: 580-106029-1

Laboratory: Eurofins FGS, Seattle

Narrative

Job Narrative
580-106029-1

Comments

No additional comments.

Receipt

The samples were received on 9/21/2021 12:30 PM. Unless otherwise noted below, the samples arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 5.4° C.

GC/MS VOA

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

VOA Prep

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.



Definitions/Glossary

Client: Landau & Associates, Inc.
Project/Site: Fire MTN Farms

Job ID: 580-106029-1

Glossary

| Abbreviation | These commonly used abbreviations may or may not be present in this report. |
|----------------|---|
| α | Listed under the "D" column to designate that the result is reported on a dry weight basis |
| %R | Percent Recovery |
| CFL | Contains Free Liquid |
| CFU | Colony Forming Unit |
| CNF | Contains No Free Liquid |
| DER | Duplicate Error Ratio (normalized absolute difference) |
| Dil Fac | Dilution Factor |
| DL | Detection Limit (DoD/DOE) |
| DL, RA, RE, IN | Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample |
| DLC | Decision Level Concentration (Radiochemistry) |
| EDL | Estimated Detection Limit (Dioxin) |
| LOD | Limit of Detection (DoD/DOE) |
| LOQ | Limit of Quantitation (DoD/DOE) |
| MCL | EPA recommended "Maximum Contaminant Level" |
| MDA | Minimum Detectable Activity (Radiochemistry) |
| MDC | Minimum Detectable Concentration (Radiochemistry) |
| MDL | Method Detection Limit |
| ML | Minimum Level (Dioxin) |
| MPN | Most Probable Number |
| MQL | Method Quantitation Limit |
| NC | Not Calculated |
| ND | Not Detected at the reporting limit (or MDL or EDL if shown) |
| NEG | Negative / Absent |
| POS | Positive / Present |
| PQL | Practical Quantitation Limit |
| PRES | Presumptive |
| QC | Quality Control |
| RER | Relative Error Ratio (Radiochemistry) |
| RL | Reporting Limit or Requested Limit (Radiochemistry) |
| RPD | Relative Percent Difference, a measure of the relative difference between two points |
| TEF | Toxicity Equivalent Factor (Dioxin) |
| TEQ | Toxicity Equivalent Quotient (Dioxin) |
| TNTC | Too Numerous To Count |

Sample Summary

Client: Landau & Associates, Inc.
Project/Site: Fire MTN Farms

Job ID: 580-106029-1

| Lab Sample ID | Client Sample ID | Matrix | Collected | Received |
|---------------|------------------|--------|----------------|----------------|
| 580-106029-1 | NP-RINSE3-092121 | Water | 09/21/21 11:10 | 09/21/21 12:30 |
| 580-106029-2 | Trip Blank | Water | 09/21/21 00:00 | 09/21/21 12:30 |

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Login Sample Receipt Checklist

Client: Landau & Associates, Inc.

Job Number: 580-106029-1

Login Number: 106029

List Number: 1

Creator: Greene, Ashton R

List Source: Eurofins FGS, Seattle

| Question | Answer | Comment |
|--|--------|---------|
| Radioactivity wasn't checked or is \leq background as measured by a survey meter. | N/A | |
| The cooler's custody seal, if present, is intact. | True | |
| Sample custody seals, if present, are intact. | True | |
| The cooler or samples do not appear to have been compromised or tampered with. | True | |
| Samples were received on ice. | True | |
| Cooler Temperature is acceptable. | True | |
| Cooler Temperature is recorded. | True | |
| COC is present. | True | |
| COC is filled out in ink and legible. | True | |
| COC is filled out with all pertinent information. | True | |
| Is the Field Sampler's name present on COC? | True | |
| There are no discrepancies between the containers received and the COC. | True | |
| Samples are received within Holding Time (excluding tests with immediate HTs) | True | |
| Sample containers have legible labels. | True | |
| Containers are not broken or leaking. | True | |
| Sample collection date/times are provided. | True | |
| Appropriate sample containers are used. | True | |
| Sample bottles are completely filled. | True | |
| Sample Preservation Verified. | True | |
| There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs | True | |
| Containers requiring zero headspace have no headspace or bubble is $<6\text{mm}$ (1/4"). | True | |
| Multiphasic samples are not present. | True | |
| Samples do not require splitting or compositing. | True | |
| Residual Chlorine Checked. | N/A | |

Client Sample Results

Client: Landau & Associates, Inc.
 Project/Site: Fire MTN Farms

Job ID: 580-106029-1

Client Sample ID: NP-RINSE3-092121

Lab Sample ID: 580-106029-1

Date Collected: 09/21/21 11:10

Matrix: Water

Date Received: 09/21/21 12:30

Method: 8260D - Volatile Organic Compounds by GC/MS

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---------|--------|-----------|-----|-----|------|---|----------|----------------|---------|
| Benzene | ND | | 1.0 | | ug/L | | | 09/24/21 13:14 | 1 |
| Toluene | ND | | 1.0 | | ug/L | | | 09/24/21 13:14 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|-------------------------------------|-----------|-----------|----------|----------|----------------|---------|
| <i>Toluene-d8 (Surr)</i> | 97 | | 80 - 120 | | 09/24/21 13:14 | 1 |
| <i>4-Bromofluorobenzene (Surr)</i> | 93 | | 80 - 120 | | 09/24/21 13:14 | 1 |
| <i>Dibromofluoromethane (Surr)</i> | 102 | | 80 - 120 | | 09/24/21 13:14 | 1 |
| <i>1,2-Dichloroethane-d4 (Surr)</i> | 104 | | 80 - 120 | | 09/24/21 13:14 | 1 |

Client Sample Results

Client: Landau & Associates, Inc.
Project/Site: Fire MTN Farms

Job ID: 580-106029-1

Client Sample ID: Trip Blank

Lab Sample ID: 580-106029-2

Date Collected: 09/21/21 00:00

Matrix: Water

Date Received: 09/21/21 12:30

Method: 8260D - Volatile Organic Compounds by GC/MS

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---------|--------|-----------|-----|-----|------|---|----------|----------------|---------|
| Benzene | ND | | 1.0 | | ug/L | | | 09/24/21 11:35 | 1 |
| Toluene | ND | | 1.0 | | ug/L | | | 09/24/21 11:35 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|-------------------------------------|-----------|-----------|----------|----------|----------------|---------|
| <i>Toluene-d8 (Surr)</i> | 101 | | 80 - 120 | | 09/24/21 11:35 | 1 |
| <i>4-Bromofluorobenzene (Surr)</i> | 93 | | 80 - 120 | | 09/24/21 11:35 | 1 |
| <i>Dibromofluoromethane (Surr)</i> | 100 | | 80 - 120 | | 09/24/21 11:35 | 1 |
| <i>1,2-Dichloroethane-d4 (Surr)</i> | 103 | | 80 - 120 | | 09/24/21 11:35 | 1 |

QC Sample Results

Client: Landau & Associates, Inc.
 Project/Site: Fire MTN Farms

Job ID: 580-106029-1

Method: 8260D - Volatile Organic Compounds by GC/MS

Lab Sample ID: MB 580-368745/13
Matrix: Water
Analysis Batch: 368745

Client Sample ID: Method Blank
Prep Type: Total/NA

| Analyte | MB MB | | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|------------------------------|-----------|-----------|----------|-----|------|---|----------|----------------|---------|
| | Result | Qualifier | | | | | | | |
| Benzene | ND | | 1.0 | | ug/L | | | 09/24/21 11:10 | 1 |
| Toluene | ND | | 1.0 | | ug/L | | | 09/24/21 11:10 | 1 |
| Surrogate | MB MB | | Limits | | | | Prepared | Analyzed | Dil Fac |
| | %Recovery | Qualifier | | | | | | | |
| Toluene-d8 (Surr) | 107 | | 80 - 120 | | | | | 09/24/21 11:10 | 1 |
| 4-Bromofluorobenzene (Surr) | 91 | | 80 - 120 | | | | | 09/24/21 11:10 | 1 |
| Dibromofluoromethane (Surr) | 104 | | 80 - 120 | | | | | 09/24/21 11:10 | 1 |
| 1,2-Dichloroethane-d4 (Surr) | 101 | | 80 - 120 | | | | | 09/24/21 11:10 | 1 |

Lab Sample ID: LCS 580-368745/10
Matrix: Water
Analysis Batch: 368745

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

| Analyte | Spike Added | LCS Result | LCS Qualifier | Unit | D | %Rec | %Rec. Limits |
|------------------------------|-------------|------------|---------------|------|---|------|--------------|
| | | | | | | | |
| Toluene | 10.0 | 9.87 | | ug/L | | 99 | 80 - 120 |
| Surrogate | LCS LCS | | Limits | | | | |
| | %Recovery | Qualifier | | | | | |
| Toluene-d8 (Surr) | 102 | | 80 - 120 | | | | |
| 4-Bromofluorobenzene (Surr) | 100 | | 80 - 120 | | | | |
| Dibromofluoromethane (Surr) | 101 | | 80 - 120 | | | | |
| 1,2-Dichloroethane-d4 (Surr) | 92 | | 80 - 120 | | | | |

Lab Sample ID: LCSD 580-368745/11
Matrix: Water
Analysis Batch: 368745

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA

| Analyte | Spike Added | LCSD Result | LCSD Qualifier | Unit | D | %Rec | %Rec. Limits | RPD | Limit |
|------------------------------|-------------|-------------|----------------|------|---|------|--------------|-----|-------|
| | | | | | | | | | |
| Toluene | 10.0 | 10.6 | | ug/L | | 106 | 80 - 120 | 8 | 13 |
| Surrogate | LCSD LCSD | | Limits | | | | | | |
| | %Recovery | Qualifier | | | | | | | |
| Toluene-d8 (Surr) | 101 | | 80 - 120 | | | | | | |
| 4-Bromofluorobenzene (Surr) | 101 | | 80 - 120 | | | | | | |
| Dibromofluoromethane (Surr) | 96 | | 80 - 120 | | | | | | |
| 1,2-Dichloroethane-d4 (Surr) | 96 | | 80 - 120 | | | | | | |

Lab Chronicle

Client: Landau & Associates, Inc.
Project/Site: Fire MTN Farms

Job ID: 580-106029-1

Client Sample ID: NP-RINSE3-092121

Lab Sample ID: 580-106029-1

Date Collected: 09/21/21 11:10

Matrix: Water

Date Received: 09/21/21 12:30

| <u>Prep Type</u> | <u>Batch Type</u> | <u>Batch Method</u> | <u>Run</u> | <u>Dilution Factor</u> | <u>Batch Number</u> | <u>Prepared or Analyzed</u> | <u>Analyst</u> | <u>Lab</u> |
|------------------|-------------------|---------------------|------------|------------------------|---------------------|-----------------------------|----------------|------------|
| Total/NA | Analysis | 8260D | | 1 | 368745 | 09/24/21 13:14 | B1M | FGS SEA |

Client Sample ID: Trip Blank

Lab Sample ID: 580-106029-2

Date Collected: 09/21/21 00:00

Matrix: Water

Date Received: 09/21/21 12:30

| <u>Prep Type</u> | <u>Batch Type</u> | <u>Batch Method</u> | <u>Run</u> | <u>Dilution Factor</u> | <u>Batch Number</u> | <u>Prepared or Analyzed</u> | <u>Analyst</u> | <u>Lab</u> |
|------------------|-------------------|---------------------|------------|------------------------|---------------------|-----------------------------|----------------|------------|
| Total/NA | Analysis | 8260D | | 1 | 368745 | 09/24/21 11:35 | B1M | FGS SEA |

Laboratory References:

FGS SEA = Eurofins FGS, Seattle, 5755 8th Street East, Tacoma, WA 98424, TEL (253)922-2310

Accreditation/Certification Summary

Client: Landau & Associates, Inc.
Project/Site: Fire MTN Farms

Job ID: 580-106029-1

Laboratory: Eurofins FGS, Seattle

The accreditations/certifications listed below are applicable to this report.

| Authority | Program | Identification Number | Expiration Date |
|------------|---------|-----------------------|-----------------|
| Washington | State | C788 | 07-13-22 |

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Newaukum Prairie Closure Completion Photographs



1. Newaukum Prairie during rinse water draining activities; west end; September 10, 2021.



2. Newaukum Prairie during rinse water draining activities; September 10, 2021.

09/17/21 P:\066\045\RA\Closure Rpt - Newaukum Prairie\Attachment 2\Emerald FMF Newaukum Prairie Closure_att2-1.docx



3. Newaukum Prairie during rinse water draining activities; east end; September 10, 2021.