

**PHASE II ENVIRONMENTAL SITE ASSESSMENT:**  
**SUPPLEMENTAL SUBSURFACE INVESTIGATION REPORT**

Skagit County Parcel #P74143  
306 Center Street  
La Conner, WA 98257

March 24, 2023

**Prepared for:**

KSA Investments LLC  
16559 Country Club Drive  
Burlington, WA 98233

**Prepared by:**

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- Figure 1: Topographic Map
- Figure 2: Site Plan
- Figure 3: Previous Exploration Locations
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### **Exhibit B: Tables:**

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### **Exhibit C: Boring Logs**

### **Exhibit D: Laboratory Analytical Reports**



## **1.0 Introduction**

On behalf of KSA Investments LLC (KSA), Dixon Environmental Services (Dixon ES) has prepared this Phase II Environmental Site Assessment (ESA): Supplemental Subsurface Investigation (SI) Report for the parcel addressed at 306 Center Street in La Conner, Washington (the Property) (Figure 1). This SI was conducted to evaluate the lateral extent of petroleum contaminated soil previously identified beneath the Property (Section 2.4).

This Supplemental SI Report details site activities and observations, investigation methodology, sample analytical results, and provides conclusions based on the investigation findings.

## **2.0 Property Location, Description, and Background**

The Property consists of a single rectangularly shaped Skagit County Tax Parcel (P74143), 0.35 acres in size, addressed at 306 Center Street in La Conner, Washington.

The Property is currently vacant, but was most recently improved with a 1,080 square foot (sf) manufactured home and detached garage. The southern portion of the Property is paved with asphalt and utilized for parking associated with a restaurant on the south adjacent parcel (Figure 2).

### **2.1 Land Use History**

According to records provided by the Washington State Department of Ecology (Ecology), the property addressed at 315 Morris Street was formerly occupied by several vintages of fuel stations between at least 1930 and 1989.

The fuel stations were reportedly improved with at least 6 underground storage tanks (USTs) and associated product distribution systems. The UST nests were reportedly positioned in two different locations on the site, as they were used during separate station operational configurations (Figure 2). The facility was also reportedly equipped with above ground bulk fuel tanks, which appear to have been positioned to the north of the current parcel line, on the Property itself. Historically, the Property and south adjacent property were one parcel, although the majority of facility activities occurred on the southern portion of the site.



## **2.2 Physical Setting**

<b>Category</b>	<b>Description</b>	<b>Source</b>
<b>Topographic Characteristics</b>		
Site Elevation	12 feet above mean sea level.	USGS Topographic Map La Conner, WA (2020)
Topographic Gradient	The general topographic gradient at the Property is from southwest to northeast.	Field Observations, USGS Topographic Map La Conner, WA (2020)
<b>Hydrologic Characteristics</b>		
Nearest Water Body	Swinomish Channel: Approximately 730 feet to the west of the Property.	USGS Topographic Map La Conner, WA (2020)
Flood Zones	Zone A: Areas Determined to be Inside the 1% Annual Flood Hazard zone.	FEMA Map Panel 5301560001B
Wetlands	The Property does not appear to lie within the National Wetland Inventory.	USGS Topographic Map La Conner, WA (2020)
<b>Geologic Characteristics</b>		
Primary Soil Types	Soil encountered during this investigation generally consisted of gravelly sand with silt in the upper 5 feet, underlain by a high plasticity silt with trace amounts of sand to approximately 9 feet, underlain by a fine to medium grained poorly graded sand to approximately 12 feet, then a medium to coarse grained poorly graded sand to the maximum depth explored of 15 feet below ground surface (bgs).	Drilling Observations (Exhibit D: Boring Logs)
Fill Material	Apparent fill material was encountered during the investigation between approximately 0 and 1.5 feet bgs.	Drilling Observations (Exhibit D: Boring Logs)



Category	Description	Source
Hydrogeologic Characteristics		
Depth to Nearest Groundwater	Shallow groundwater was encountered during this investigation at approximately 4 feet bgs.	Drilling Observations
Groundwater Flow Direction	Based on a review of regional topography and geomorphology, it appears that shallow-seated groundwater (if present), may flow in an easterly direction toward localized low-lying areas.	USGS Topographic Map La Conner, WA (2020)
Nearest Groundwater Supply Wells	The nearest groundwater supply wells appear to be located over 5,000 feet to the west of the Property.	Ecology Well Log Search

#### **2.4 Previous Environmental Investigations**

In 1989, at least 2 USTs were reportedly removed from the southwestern portion of the former fuel station. No records associated with the decommissioning of these tanks were available for review.

In 2003, 4 USTs were discovered during a utility improvement project, which were partially positioned beneath the Morris Street right-of-way (ROW). These tanks were subsequently removed by ADEPT Geoscience and Environment, Inc. (Adept).

According to Adept's UST Removal and Site Assessment Report, soil within the tank pit contained concentrations of gasoline-range petroleum hydrocarbons (GRPH) toluene, ethylbenzene, and xylenes in excess of their respective Model Toxics Control Act (MTCA) Method A Cleanup Levels.

Soil samples were also analyzed for diesel-range petroleum hydrocarbons (DRPH), oil-range petroleum hydrocarbons (ORPH), and lead. These contaminants were either not detected, or were at concentrations below their respective MTCA Method A Cleanup Level.

Approximately 127 tons of petroleum contaminated soil was removed from the former tank area; however, several soil samples collected at the final limits of the excavation still contained concentrations of contaminants of concern in excess of their respective MTCA Method A Cleanup Levels.

Groundwater was encountered during the cleanup activities, but no samples were collected.



In order to further evaluate the nature and extent of the release, Sound Environmental Strategies (SES) performed a subsurface investigation at the site in March of 2005.

The subsurface investigation included the advancement of 6 borings within the Morris Street ROW and 6 borings within the 4<sup>th</sup> Street ROW (Figure 3). At least 3 soil samples were collected from each boring at depths between 2 and 12 feet bgs.

Groundwater was encountered in all 12 borings, and was reportedly sampled using standard low-flow methodology from temporary monitoring wells.

Select soil and groundwater samples were analyzed for one or more of the following contaminants of concern: GRPH; DRPH; ORPH; benzene, toluene, ethylbenzene, and xylenes (BTEX); lead; manganese; and polycyclic aromatic hydrocarbons (PAHs).

Concentrations of GRPH, DRPH, benzene, ethylbenzene, xylenes, and/or naphthalene were detected in soil at concentrations exceeding their respective MTCA Method A Cleanup Levels in borings ROW-4, ROW-5, ROW-6, ROW-7, ROW-11, and ROW-12.

Concentrations of GRPH, DRPH, benzene, and/or lead were detected in groundwater at concentrations exceeding their respective MTCA Method A Cleanup Levels in borings ROW-3, ROW-4, ROW-5, ROW-6, ROW-7, ROW-11, and ROW-12.

It should be noted that all DRPH concentrations were flagged by the laboratory for not representing the fuel standard used for quantitation. The laboratory observed that the pattern variation is consistent with projects in close proximity to septic systems or marine waters.

The results of the investigation indicate that the nature and extent of the release(s) remain undefined.

Based on these findings, it was our opinion that a focused investigation along the southern Property boundary would provide sufficient information to evaluate whether the Property has been impacted by the known release(s), as well as evaluate any potential impacts from the staging of above ground bulk fuel tanks on the Property. No other areas of the Property appeared to warrant investigation based on the known historical land use practices.

On January 28, 2022, Dixon ES oversaw the advancement of 6 borings (B1 through B6) on the Property. Borings B1 and B2 were advanced near the southern Property boundary to evaluate the potential for contaminant migration from the south adjacent parcel. B3 was also intended to evaluate potential for contaminant migration from the southern parcel, but was positioned in a location which would evaluate a potential release from the former bulk fuel tanks on the Property as well (Figure 4).

Borings B4 through B6 were added to the west, east, and south of B3 due to indications of contamination identified during field screening.



Of the six borings, only one contained soil with concentrations of contaminants of concern above MTCA Method A Cleanup Levels. The soil sample collected from boring B3 at a depth of 5 feet bgs contained a concentration of GRPH in excess of its cleanup level and the sample collected from B3 at a depth of 9 feet bgs contained a concentration of benzene above its cleanup level.

These results indicated that soil beneath the Property had likely been impacted by surface spills associated with the above ground fuel tanks, but not substantially impacted by releases on the south adjacent parcel. During this investigation, access to the north of boring B3 had been restricted by the presence of a manufactured home, therefore the lateral extent of this contamination remained undefined.

The manufactured home was recently removed, and after discussion with the project development team, it was our recommendation that further data be collected to evaluate the extent of petroleum contaminated soil that would need to be removed during development activities.

### **3.0 Subsurface Investigation Tasks and Methodology**

#### **3.1 Approved Scope of Work**

The approved scope of work for this Supplemental SI included:

- Development of a project work plan;
- Identification of public and private utilities;
- Oversight of direct push drilling activities;
- Collection and laboratory analysis of soil samples; and,
- Preparation of this report.

#### **3.2 Contaminants of Concern**

Based on the results of previous investigations, the primary contaminants of concern (COCs) for the Property include:

- Gasoline-range Petroleum Hydrocarbons (GRPH);
- Diesel-range Petroleum Hydrocarbons (DRPH);
- Oil-range Petroleum Hydrocarbons (ORPH); and,
- Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX)



### **3.3 Pre-Field Activities**

Prior to subsurface work, the Washington Utility Notification Center was contacted to submit a public utility locate request (Ticket # 23073293), and Dixon ES contracted with Mountainview Locating Services (Mountainview) of Bonney Lake, Washington to perform a private utility sweep and clear any potential drilling conflicts.

Dixon ES also prepared a site-specific health and safety plan which identified physical and chemical hazards associated with the project.

### **3.4 Field Activities**

On March 7, 2023, Dixon ES oversaw the advancement of 6 borings (B7 through B12) by Holocene Drilling of Puyallup, Washington, using direct push drilling techniques. The borings were positioned laterally outward from boring B3 to establish western, northern, and eastern extents of soil contamination associated with the above ground fuel tanks.

Soil was extracted from each boring using 5-foot long, 2.25-inch MacroCore samplers, with 5-foot interior acetate liners. Soil was continuously screened for the presence of contamination using a photoionization detector (PID), as well as visual and olfactory observations, and was characterized in accordance with the Unified Soil Classification System (USCS) (Exhibit C: Boring Logs).

A total of 18 soil samples were collected from the 6 borings at depths between 5 and 15 feet bgs, however not all samples were selected for chemical analysis; certain samples were held at the laboratory for further contamination delineation if necessary, or were not analyzed due to the lack of field evidence of impacts. The full sample log is summarized in the table below:

BORING ID	SAMPLE ID	SAMPLE DEPTH (FT)	SELECTED FOR ANALYSIS	CONTAMINANTS OF CONCERN
B7	B7-5	5	YES	DRPH, ORPH, GRPH, BTEX
B7	B7-10	10	YES	DRPH, ORPH, GRPH, BTEX
B7	B7-15	15	NO	
B8	B8-5	5	YES	DRPH, ORPH, GRPH, BTEX
B8	B8-10	10	YES	DRPH, ORPH, GRPH, BTEX
B8	B8-15	15	NO	
B9	B9-5	5	YES	DRPH, ORPH, GRPH, BTEX
B9	B9-10	10	YES	DRPH, ORPH, GRPH, BTEX
B9	B9-15	15	NO	
B10	B10-5	5	YES	DRPH, ORPH, GRPH, BTEX





BORING ID	SAMPLE ID	SAMPLE DEPTH (FT)	SELECTED FOR ANALYSIS	CONTAMINANTS OF CONCERN
B10	B10-10	10	YES	DRPH, ORPH, GRPH, BTEX
B10	B10-15	15	NO	
B11	B11-5	5	YES	DRPH, ORPH, GRPH, BTEX
B11	B11-10	10	YES	DRPH, ORPH, GRPH, BTEX
B11	B11-15	15	NO	
B12	B12-5	5	YES	DRPH, ORPH, GRPH, BTEX
B12	B12-10	10	YES	DRPH, ORPH, GRPH, BTEX
B12	B12-15	15	NO	

Soil samples were collected directly from the acetate liners, extracted from the MacroCore samplers, and transferred into clean laboratory provided glassware, including 4oz jars and 40ml volatile organic analysis (VOA) vials. Samples collected for VOC analysis were done so in accordance with EPA Method 5035 Sampling Techniques.

Samples were placed in a cooler and kept on ice until delivered to a Washington State Department of Ecology (Ecology) Accredited Laboratory, Friedman and Bruya, Inc. (F&BI) of Seattle, Washington under standard chain of custody protocols. Laboratory analytical methods for the site specific COCs are presented below:

- GRPH – Northwest Method NWTPH-Gx
- ORPH and DRPH – Northwest Method NWTPH-Dx
- BTEX – EPA Method 8021B

## **4.0 Investigation Results**

### **4.1 Soil Analytical Results**

- The soil sample collected from B8 at 5 feet bgs contained concentrations of GRPH and ORPH in excess of their respective MTCA Method A Cleanup Levels. This sample also contained detectable concentrations of DRPH, ethylbenzene, and xylenes, however the values were below their respective MTCA Method A Cleanup Levels.
- No other soil samples contained detectable concentrations of site-specific COCs.

Soil sample analytical results are summarized on Table 1. Laboratory analytical reports are included in Exhibit D.



## **5.0 Summary, Conclusions, and Recommendations**

On March 7, 2023, Dixon ES collected soil samples beneath the Property to evaluate the lateral extent of soil impacts associated with the historical presence of above ground fuel tanks.

Dixon ES understands that site development activities will include the excavation and removal of petroleum contaminated soil present beneath the Property, and this data was recommended to appropriately plan for these remediation activities.

The results discussed above indicate the northern, western, and eastern extents of the impacts have been effectively delineated.

These findings suggest a lateral plume extent of approximately 500 square feet, and a vertical impact zone of between approximately 5 and 10 feet bgs. The approximate area of impacts is depicted on Figure 4.

## **6.0 Statement of Quality Assurance**

Dixon ES has performed this Phase II ESA: Supplemental SI in accordance with current generally accepted environmental practices and procedures. Dixon ES has employed the degree of care and skill ordinarily exercised under similar circumstances by reputable environmental professionals practicing in this area.

Conclusions presented within this report were based on the analytical results from a limited data set, as such, there remains a possibility that additional areas or sources of contamination exist on the Property that were not identified during this assessment. No warranty, expressed or implied, is made as to the environmental quality of the Property or risk associated with potential contamination.

## **7.0 References**

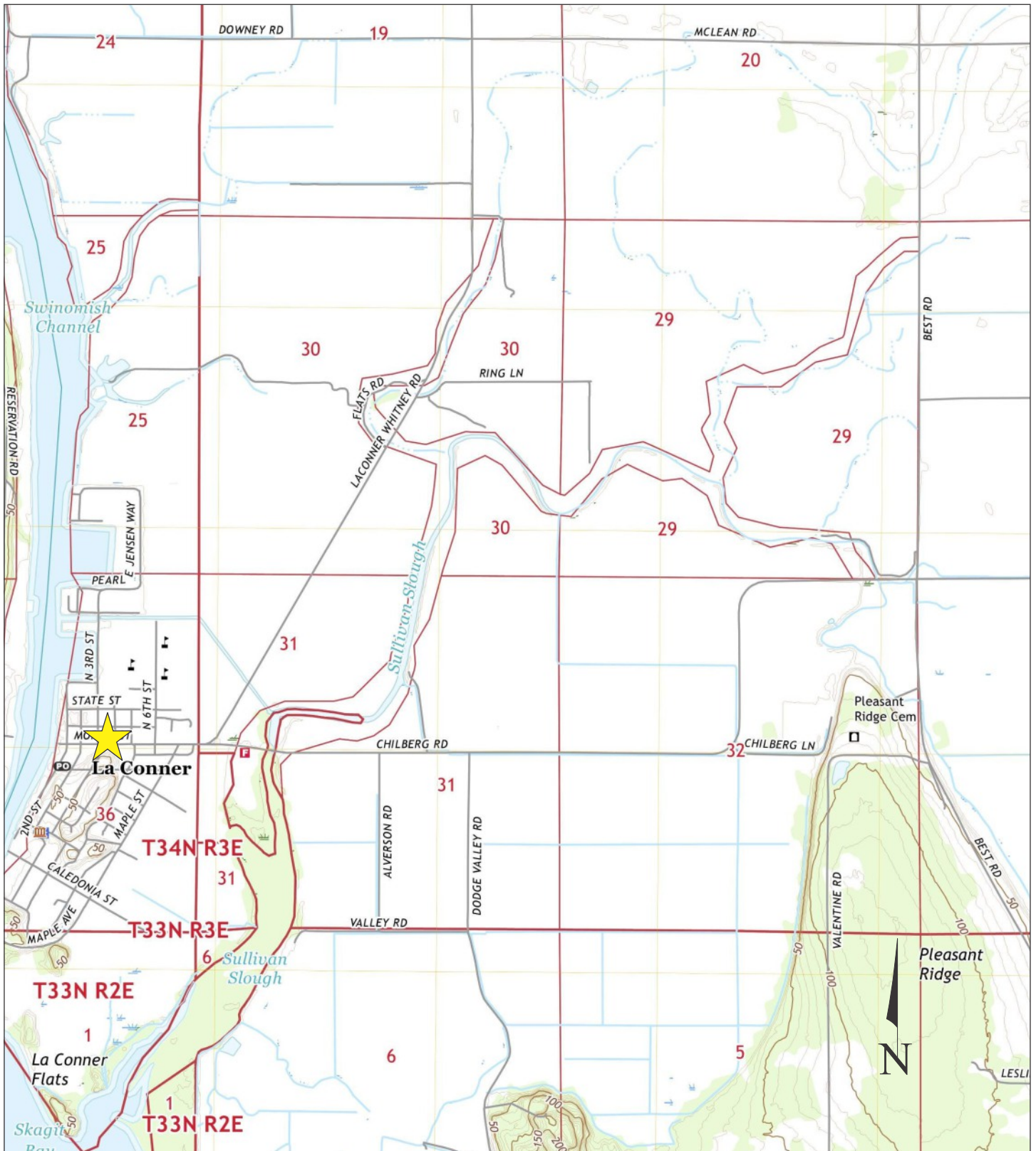
Adept Geoscience & Environment. 2003. *UST Removal & Site Assessment*. May.

Adept Geoscience & Environment. 2003. *Interim Soil Cleanup Report*. May.

Dixon ES. 2022. *Phase II Environmental Site Assessment: Subsurface Investigation Report*. February 15.

Sound Environmental Strategies. 2005. *Subsurface Investigation Report*. August 10.

## **Exhibit A: Figures**



# **LEGEND**

 **SUBJECT PROPERTY**

## **TOPOGRAPHIC MAP**

**PROJECT ADDRESS:**  
306 CENTER STREET  
LA CONNER, WA

**PAGE:**  
**1 OF 4**



**DIXON**  
ENVIRONMENTAL SERVICES

#### LEGEND

· · · · · PROPERTY BOUNDARY

#### **SITE PLAN**

**PROJECT ADDRESS:**  
306 CENTER STREET  
LA CONNER, WA

**PAGE:**

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**DIXON**  
ENVIRONMENTAL SERVICES

### LEGEND

- PROPERTY BOUNDARY
- ⊗ BORING LOCATION (SES, 2005)
- ⊗ COC CONCENTRATION EXCEEDS CLEANUP LEVEL IN SOIL OR GROUNDWATER

### **PREVIOUS EXPLORATION LOCATIONS**




**PROJECT ADDRESS:**  
**306 CENTER STREET**  
**LA CONNER, WA**

**PAGE:**

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	<b>LEGEND</b> - - - - - PROPERTY BOUNDARY  BORING LOCATION  COC CONCENTRATION EXCEEDS CLEANUP LEVEL IN SOIL	<b>DIXON ES</b> <b>BORING LOCATIONS</b>	
		PROJECT ADDRESS: 306 CENTER STREET LA CONNER, WA	PAGE: <b>4 OF 4</b>

## **Exhibit B: Tables**



**TABLE 1**  
**SUMMARY OF SOIL ANALYTICAL RESULTS**  
**PETROLEUM HYDROCARBONS AND SELECT VOLATILE ORGANIC COMPOUNDS**



SOIL SAMPLE ID	SAMPLE DEPTH (FT)	DATE SAMPLED	PETROLEUM HYDROCARBONS (MG/KG)			SELECT VOLATILE ORGANIC COMPOUNDS (MG/KG)			
			GASOLINE-RANGE	DIESEL-RANGE	OIL-RANGE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES
B1-5	5	1/28/2022	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B1-9	9	1/28/2022	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B2-5	5	1/28/2022	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B2-10	10	1/28/2022	<5	<50	<250	<b>0.025</b>	<0.02	<0.02	<0.06
B3-5	5	1/28/2022	<b>76</b>	<b>1,300</b>	<b>1,000</b>	<0.02	<0.02	<b>0.072</b>	<b>0.22</b>
B3-9	9	1/28/2022	<5	<50	<250	<b>0.18</b>	<0.02	<0.02	<0.06
B3-14	14	1/28/2022	<5	-	-	<0.02	<0.02	<0.02	<0.06
B4-5	5	1/28/2022	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B4-11	11	1/28/2022	-	-	-	-	-	-	-
B5-6	6	1/28/2022	<b>14</b>	<50	<250	<0.02	<0.02	<b>0.056</b>	<b>0.10</b>
B5-12	12	1/28/2022	-	-	-	-	-	-	-
B6-5	5	1/28/2022	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B6-11	11	1/28/2022	-	-	-	-	-	-	-
B7-5	5	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B7-10	10	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B8-5	5	3/7/2023	<b>71</b>	<b>800</b>	<b>3,400</b>	<0.02	<0.02	<b>0.30</b>	<b>0.85</b>
B8-10	10	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B9-5	5	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B9-10	10	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B10-5	5	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B10-10	10	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B11-5	5	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B11-10	10	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B12-5	5	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
B12-10	10	3/7/2023	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
ECOLOGY MTCA METHOD A CLEANUP LEVELS UNLESS OTHERWISE SPECIFIED			100/30 <sup>1</sup>	2,000	2,000	0.03	7	6	9

**NOTES:**

MG/KG = MILLIGRAMS PER KILOGRAM

MTCA = MODEL TOXICS CONTROL ACT

- = NOT ANALYZED FOR THIS CONTAMINANT


< = NOT DETECTED ABOVE LABORATORY DETECTION LIMITS

**BOLD** INDICATES A DETECTED CONCENTRATION THAT IS BELOW ECOLOGY MTCA METHOD A CLEANUP LEVELS

**BOLD RED** INDICATES THE DETECTED CONCENTRATION EXCEEDS ECOLOGY MTCA METHOD A CLEANUP LEVELS

<sup>1</sup> GASOLINE MIXTURES WITHOUT BENZENE AND THE TOTAL OF ETHYLBENZENE, TOLUENE AND XYLENES ARE LESS THAN 1% OF THE GASOLINE MIXTURE HAVE A CLEANUP LEVEL OF 100 MG/KG. ALL OTHER GASOLINE MIXTURES HAVE A CLEANUP LEVEL OF 30 MG/KG.

## **Exhibit C: Boring Logs**


<div></div> <div><b>DIXON</b> ENVIRONMENTAL SERVICES</div>					<b>Project:</b>	La Conner Station House		<b>Boring ID:</b>	<b>B8</b>			
					<b>Location:</b>	306 Center Street, La Conner, WA						
					<b>Client:</b>	KSA Investments LLC		<b>Project Number:</b>	<b>0037-01</b>			
<b>Date Start/Finish:</b>		3/7/2023		<b>Drilling Method:</b>		Direct Push		<b>Unified Soil Classification System</b>				
<b>Logged By:</b>		Brian Dixon		<b>Auger ID/OD:</b>		NA		NON-COHESIVE SOILS	GW	WELL-GRADED GRAVEL, FINE TO COARSE		
<b>Checked By:</b>		Andrew Blake		<b>Borehole ID/OD:</b>		2"			GP	POORLY-GRADED GRAVEL		
<b>Contractor:</b>		Holocene		<b>Sampler:</b>		Macro Core			GM	SILTY GRAVEL		
<b>Operator:</b>		Casey		<b>Hammer Wt./Fall:</b>		NA			GC	CLAYEY GRAVEL		
<b>Boring Location:</b>		See Figure		<b>Ground Elevation:</b>		~12 feet AMSL			SW	WELL-GRADED SAND, FINE TO COARSE SAND		
<b>Coordinates:</b>		NA		<b>Water Depth:</b>		4' bgs		SP	POORLY-GRADED SAND			
<b>Weather:</b>		Clear and Sunny		<b>Boring Depth:</b>		15' bgs		SM	SILTY SAND			
								SC	CLAYEY SAND			
								COHESIVE SOILS	ML	SILT		
									CL	CLAY		
									OL	ORGANIC SILT, ORGANIC CLAY		
									MH	SILT OF HIGH PLASTICITY, ELASTIC SILT		
									CH	CLAY OF HIGH PLASTICITY, FAT CLAY		
								OH	ORGANIC CLAY, ORGANIC SILT			
								PT	PEAT			
Depth (ft bgs)	Sample Number	Time	PID Reading	Remarks	Soil and Rock Description				Unified Classification	Well Construction Detail		
1					Brown, fine grained sandy SILT. Trace amounts of gravel.							
2												
3												
4												
5	B8-5	1150	2.4									
6												
7												
8												
9												
10	B8-10	1155	0.4									
11												
12												
13												
14												
15	B8-15	1200	0.0									
16					Boring terminated at 15 feet bgs.							
17												
18												
19												
20												
<b>Notes:</b>												



<b>Date Start/Finish:</b>	3/7/2023	<b>Drilling Method:</b>	Direct Push
<b>Logged By:</b>	Brian Dixon	<b>Auger ID/OD:</b>	NA
<b>Checked By:</b>	Andrew Blake	<b>Borehole ID/OD:</b>	2"
<b>Contractor:</b>	Holocene	<b>Sampler:</b>	Macro Core
<b>Operator:</b>	Casey	<b>Hammer Wt./Fall:</b>	NA
<b>Boring Location:</b>	See Figure	<b>Ground Elevation:</b>	~12 feet AMSL
<b>Coordinates:</b>	NA	<b>Water Depth:</b>	4' bgs
<b>Weather:</b>	Clear and Sunny	<b>Boring Depth:</b>	15' bgs

Depth (ft bgs)	Sample Number	Time	PID Reading	Remarks	Soil and Rock Description	Unified Classification	Well Construction Detail
1					Brown, fine grained sandy SILT. Trace amounts of gravel. Organics.  Gray, fine grained high plasticity SILT. Trace amounts of sand.  Gray, fine to medium grained poorly graded SAND.  Gray, medium to coarse grained poorly graded SAND.		
2							
3							
4							
5	B9-5	1215	0.2				
6							
7							
8							
9							
10	B9-10	1220	0.0				
11							
12							
13							
14							
15	B9-15	1230	0.0				
16					Boring terminated at 15 feet bgs.		
17							
18							
19							
20							

**Notes:**

<div></div> <div><b>DIXON</b> ENVIRONMENTAL SERVICES</div>					<b>Project:</b>	La Conner Station House		<b>Boring ID:</b>	<b>B10</b>	
					<b>Location:</b>	306 Center Street, La Conner, WA				
					<b>Client:</b>	KSA Investments LLC		<b>Project Number:</b>	<b>0037-01</b>	
<b>Date Start/Finish:</b>		3/7/2023		<b>Drilling Method:</b>		Direct Push		<b>Unified Soil Classification System</b>		
<b>Logged By:</b>		Brian Dixon		<b>Auger ID/OD:</b>		NA		NON-COHESIVE SOILS	GW	WELL-GRADED GRAVEL, FINE TO COARSE
<b>Checked By:</b>		Andrew Blake		<b>Borehole ID/OD:</b>		2"			GP	POORLY-GRADED GRAVEL
<b>Contractor:</b>		Holocene		<b>Sampler:</b>		Macro Core			GM	SILTY GRAVEL
<b>Operator:</b>		Casey		<b>Hammer Wt./Fall:</b>		NA			GC	CLAYEY GRAVEL
<b>Boring Location:</b>		See Figure		<b>Ground Elevation:</b>		~12 feet AMSL			SW	WELL-GRADED SAND, FINE TO COARSE SAND
<b>Coordinates:</b>		NA		<b>Water Depth:</b>		4' bgs		SP	POORLY-GRADED SAND	
<b>Weather:</b>		Clear and Sunny		<b>Boring Depth:</b>		15' bgs		SM	SILTY SAND	
								SC	CLAYEY SAND	
COHESIVE SOILS	ML	SILT								
	CL	CLAY								
	OL	ORGANIC SILT, ORGANIC CLAY								
	MH	SILT OF HIGH PLASTICITY, ELASTIC SILT								
	CH	CLAY OF HIGH PLASTICITY, FAT CLAY								
	OH	ORGANIC CLAY, ORGANIC SILT								
	PT	PEAT								
	<b>Soil and Rock Description</b>					<b>Unified Classification</b>	<b>Well Construction Detail</b>			
	<b>Depth (ft bgs)</b>	<b>Sample Number</b>	<b>Time</b>	<b>PID Reading</b>	<b>Remarks</b>					
	1							Brown, fine grained sandy SILT. Trace amounts of gravel.		
2										
3										
4										
5	B10-5	1245	0.0							
6					Gray, fine grained high plasticity SILT. Trace amounts of sand.					
7										
8	B10-W	1305								
9					Gray, fine to medium grained poorly graded SAND.					
10	B10-10	1250	0.0							
11										
12					Gray, medium to coarse grained poorly graded SAND.					
13										
14										
15	B10-15	1300	0.0							
16					Boring terminated at 15 feet bgs.					
17										
18										
19										
20										
<b>Notes:</b>										



<b>Date Start/Finish:</b>	3/7/2023	<b>Drilling Method:</b>	Direct Push
<b>Logged By:</b>	Brian Dixon	<b>Auger ID/OD:</b>	NA
<b>Checked By:</b>	Andrew Blake	<b>Borehole ID/OD:</b>	2"
<b>Contractor:</b>	Holocene	<b>Sampler:</b>	Macro Core
<b>Operator:</b>	Casey	<b>Hammer Wt./Fall:</b>	NA
<b>Boring Location:</b>	See Figure	<b>Ground Elevation:</b>	~12 feet AMSL
<b>Coordinates:</b>	NA	<b>Water Depth:</b>	4' bgs
<b>Weather:</b>	Clear and Sunny	<b>Boring Depth:</b>	15' bgs

Depth (ft bgs)	Sample Number	Time	PID Reading	Remarks	Soil and Rock Description	Unified Classification	Well Construction Detail
1					Brown, fine grained sandy SILT. Trace amounts of gravel.  Gray, fine grained high plasticity SILT. Trace amounts of sand.  Gray, fine to medium grained poorly graded SAND.  Gray, medium to coarse grained poorly graded SAND.		
2							
3							
4							
5	B11-5	1320	0.0				
6							
7							
8	B11-W	1405					
9							
10	B11-10	1325	0.0				
11							
12							
13							
14							
15	B11-15	1330	0.0				
16					Boring terminated at 15 feet bgs.		
17							
18							
19							
20							

**Notes:**



Depth (ft bgs)	Sample Number	Time	PID Reading	Remarks	Soil and Rock Description	Unified Classification	Well Construction Detail
1					Brown, fine grained sandy SILT. Trace amounts of gravel.  Gray, fine grained high plasticity SILT. Trace amounts of sand.  Gray, fine to medium grained poorly graded SAND.  Gray, medium to coarse grained poorly graded SAND.		
2							
3							
4							
5	B12-5	1430	0.0				
6							
7							
8	B12-W	1450					
9							
10	B12-10	1435	0.0				
11							
12							
13							
14							
15	B12-15	1440	0.0				
16					Boring terminated at 15 feet bgs.		
17							
18							
19							
20							

**Notes:**

## **Exhibit D: Laboratory Analytical Reports**



FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.  
Yelena Aravkina, M.S.  
Michael Erdahl, B.S.  
Vineta Mills, M.S.  
Eric Young, B.S.

5500 4th Avenue South  
Seattle, WA 98108  
(206) 285-8282  
fbi@isomedia.com  
www.friedmanandbruya.com

March 13, 2023

Brian Dixon, Project Manager  
Dixon Environmental Services  
4010 N 7<sup>th</sup> Street  
Tacoma, WA 98406

Dear Mr Dixon:

Included are the results from the testing of material submitted on March 8, 2023 from the La Conner 0037-01, F&BI 303116 project. There are 6 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days, or as directed by the Chain of Custody document. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

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


Sincerely,

FRIEDMAN & BRUYA, INC.



Michael Erdahl  
Project Manager

Enclosures  
DXN0313R.DOC

<div></div> <div><b>DIXON</b> ENVIRONMENTAL SERVICES</div>					<b>Project:</b>	La Conner Station House		<b>Boring ID:</b>	<b>B7</b>																																
					<b>Location:</b>	306 Center Street, La Conner, WA																																			
					<b>Client:</b>	KSA Investments LLC		<b>Project Number:</b>	<b>0037-01</b>																																
<b>Date Start/Finish:</b>		3/7/2023		<b>Drilling Method:</b>		Direct Push		<div><b>Unified Soil Classification System</b></div> <table><tr><td rowspan="5">NON-COHESIVE SOILS</td><td>GW</td><td>WELL-GRADED GRAVEL, FINE TO COARSE</td></tr><tr><td>GP</td><td>POORLY-GRADED GRAVEL</td></tr><tr><td>GM</td><td>SILTY GRAVEL</td></tr><tr><td>GC</td><td>CLAYEY GRAVEL</td></tr><tr><td>SW</td><td>WELL-GRADED SAND, FINE TO COARSE SAND</td></tr><tr><td rowspan="7">COHESIVE SOILS</td><td>SP</td><td>POORLY-GRADED SAND</td></tr><tr><td>SM</td><td>SILTY SAND</td></tr><tr><td>SC</td><td>CLAYEY SAND</td></tr><tr><td>ML</td><td>SILT</td></tr><tr><td>CL</td><td>CLAY</td></tr><tr><td>OL</td><td>ORGANIC SILT, ORGANIC CLAY</td></tr><tr><td>MH</td><td>SILT OF HIGH PLASTICITY, ELASTIC SILT</td></tr><tr><td>CH</td><td>CLAY OF HIGH PLASTICITY, FAT CLAY</td></tr><tr><td>OH</td><td>ORGANIC CLAY, ORGANIC SILT</td></tr><tr><td>PT</td><td>PEAT</td></tr></table>		NON-COHESIVE SOILS	GW	WELL-GRADED GRAVEL, FINE TO COARSE	GP	POORLY-GRADED GRAVEL	GM	SILTY GRAVEL	GC	CLAYEY GRAVEL	SW	WELL-GRADED SAND, FINE TO COARSE SAND	COHESIVE SOILS	SP	POORLY-GRADED SAND	SM	SILTY SAND	SC	CLAYEY SAND	ML	SILT	CL	CLAY	OL	ORGANIC SILT, ORGANIC CLAY	MH	SILT OF HIGH PLASTICITY, ELASTIC SILT	CH	CLAY OF HIGH PLASTICITY, FAT CLAY	OH	ORGANIC CLAY, ORGANIC SILT	PT	PEAT
NON-COHESIVE SOILS	GW	WELL-GRADED GRAVEL, FINE TO COARSE																																							
	GP	POORLY-GRADED GRAVEL																																							
	GM	SILTY GRAVEL																																							
	GC	CLAYEY GRAVEL																																							
	SW	WELL-GRADED SAND, FINE TO COARSE SAND																																							
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	SM	SILTY SAND																																							
	SC	CLAYEY SAND																																							
	ML	SILT																																							
	CL	CLAY																																							
	OL	ORGANIC SILT, ORGANIC CLAY																																							
	MH	SILT OF HIGH PLASTICITY, ELASTIC SILT																																							
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PT	PEAT																																								
<b>Logged By:</b>		Brian Dixon		<b>Auger ID/OD:</b>		NA																																			
<b>Checked By:</b>		Andrew Blake		<b>Borehole ID/OD:</b>		2"																																			
<b>Contractor:</b>		Holocene		<b>Sampler:</b>		Macro Core																																			
<b>Operator:</b>		Casey		<b>Hammer Wt./Fall:</b>		NA																																			
<b>Boring Location:</b>		See Figure		<b>Ground Elevation:</b>		~12 feet AMSL																																			
<b>Coordinates:</b>		NA		<b>Water Depth:</b>		4' bgs																																			
<b>Weather:</b>		Clear and Sunny		<b>Boring Depth:</b>		15' bgs																																			
<b>Depth (ft bgs)</b>	<b>Sample Number</b>	<b>Time</b>	<b>PID Reading</b>	<b>Remarks</b>	<b>Soil and Rock Description</b>		<b>Unified Classification</b>	<b>Well Construction Detail</b>																																	
1					Brown, fine grained sandy SILT. Trace amounts of gravel.																																				
2																																									
3																																									
4																																									
5	B7-5	1050	1.1																																						
6																																									
7																																									
8																																									
9																																									
10	B7-10	1055	0.8																																						
11																																									
12																																									
13																																									
14																																									
15	B7-15	1130	0.0																																						
16					Boring terminated at 15 feet bgs.																																				
17																																									
18																																									
19																																									
20																																									
<b>Notes:</b>																																									

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on March 8, 2023 by Friedman & Bruya, Inc. from the Dixon Environmental Services La Conner 0037-01, F&BI 303116 project. Samples were logged in under the laboratory ID's listed below.

<u>Laboratory ID</u>	<u>Dixon Environmental Services</u>
303116 -01	B7-5
303116 -02	B7-10
303116 -03	B7-15
303116 -04	B8-5
303116 -05	B8-10
303116 -06	B8-15
303116 -07	B9-5
303116 -08	B9-10
303116 -09	B9-15
303116 -10	B10-5
303116 -11	B10-10
303116 -12	B10-15
303116 -13	B11-5
303116 -14	B11-10
303116 -15	B11-15
303116 -16	B12-5
303116 -17	B12-10
303116 -18	B12-15
303116 -19	B10-W
303116 -20	B11-W
303116 -21	B12-W

All quality control requirements were acceptable.

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/13/23

Date Received: 03/08/23

Project: La Conner 0037-01, F&BI 303116

Date Extracted: 03/08/23

Date Analyzed: 03/09/23

**RESULTS FROM THE ANALYSIS OF SOIL SAMPLES  
FOR BENZENE, TOLUENE, ETHYLBENZENE,  
XYLENES AND TPH AS GASOLINE  
USING METHODS 8021B AND NWTPH-Gx**

Results Reported on a Dry Weight Basis

Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	<u>Benzene</u>	<u>Toluene</u>	<u>Ethyl Benzene</u>	<u>Total Xylenes</u>	<u>Gasoline Range</u>	<u>Surrogate (% Recovery)</u> (Limit 50-132)
B7-5 303116-01	<0.02	<0.02	<0.02	<0.06	<5	79
B7-10 303116-02	<0.02	<0.02	<0.02	<0.06	<5	82
B8-5 303116-04	<0.02	<0.02	0.30	0.85	71	87
B8-10 303116-05	<0.02	<0.02	<0.02	<0.06	<5	66
B9-5 303116-07	<0.02	<0.02	<0.02	<0.06	<5	76
B9-10 303116-08	<0.02	<0.02	<0.02	<0.06	<5	77
Method Blank 03-479 MB	<0.02	<0.02	<0.02	<0.06	<5	63

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/13/23

Date Received: 03/08/23

Project: La Conner 0037-01, F&BI 303116

Date Extracted: 03/08/23

Date Analyzed: 03/08/23

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

Results Reported on a Dry Weight Basis

Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	<u>Diesel Range</u> (C <sub>10</sub> -C <sub>25</sub> )	<u>Motor Oil Range</u> (C <sub>25</sub> -C <sub>36</sub> )	<u>Surrogate</u> <u>(% Recovery)</u> (Limit 50-150)
B7-5 303116-01	<50	<250	108
B7-10 303116-02	<50	<250	109
B8-5 303116-04	800 x	3,400	108
B8-10 303116-05	<50	<250	106
B9-5 303116-07	<50	<250	109
B9-10 303116-08	<50	<250	107
Method Blank 03-559 MB	<50	<250	108

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/13/23

Date Received: 03/08/23

Project: La Conner 0037-01, F&BI 303116

**QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES  
FOR BENZENE, TOLUENE, ETHYLBENZENE,  
XYLENES, AND TPH AS GASOLINE  
USING EPA METHOD 8021B AND NWTPH-Gx**

Laboratory Code: 303079-01 (Duplicate)

Analyte	Reporting Units	Sample Result (Wet Wt)	Duplicate Result (Wet Wt)	RPD (Limit 20)
Benzene	mg/kg (ppm)	<0.02	<0.02	nm
Toluene	mg/kg (ppm)	<0.02	<0.02	nm
Ethylbenzene	mg/kg (ppm)	<0.02	<0.02	nm
Xylenes	mg/kg (ppm)	<0.06	<0.06	nm
Gasoline	mg/kg (ppm)	<5	<5	nm

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Benzene	mg/kg (ppm)	0.5	90	66-121
Toluene	mg/kg (ppm)	0.5	88	72-128
Ethylbenzene	mg/kg (ppm)	0.5	94	69-132
Xylenes	mg/kg (ppm)	1.5	93	69-131
Gasoline	mg/kg (ppm)	20	90	61-153

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/13/23

Date Received: 03/08/23

Project: La Conner 0037-01, F&BI 303116

**QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES  
FOR TOTAL PETROLEUM HYDROCARBONS AS  
DIESEL EXTENDED USING METHOD NWTPH-D<sub>x</sub>**

Laboratory Code: 303104-01 (Matrix Spike)

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	94	96	70-130	2

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Diesel Extended	mg/kg (ppm)	5,000	94	70-130

# FRIEDMAN & BRUYA, INC.

## ENVIRONMENTAL CHEMISTS

### **Data Qualifiers & Definitions**

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

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

ca - The calibration results for the analyte were outside of acceptance criteria, biased high; or, the calibration results for the analyte were outside of acceptance criteria, biased high, with a detection for the analyte in the sample. The value reported is an estimate.

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

cf - The sample was centrifuged prior to analysis.

d - The sample was diluted. Detection limits were raised and surrogate recoveries may not be meaningful.

dv - Insufficient sample volume was available to achieve normal reporting limits.

f - The sample was laboratory filtered prior to analysis.

fb - The analyte was detected in the method blank.

fc - The analyte is a common laboratory and field contaminant.

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

hs - Headspace was present in the container used for analysis.

ht - The analysis was performed outside the method or client-specified holding time requirement.

ip - Recovery fell outside of control limits due to sample matrix effects.

j - The analyte concentration is reported below the standard reporting limit. The value reported is an estimate.

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

jl - The laboratory control sample(s) percent recovery and/or RPD were out of control limits. The reported concentration should be considered an estimate.

js - The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

k - The calibration results for the analyte were outside of acceptance criteria, biased high, and the analyte was not detected in the sample.

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

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

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

pc - The sample was received with incorrect preservation or in a container not approved by the method. The value reported should be considered an estimate.

ve - The analyte response exceeded the valid instrument calibration range. The value reported is an estimate.

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

x - The sample chromatographic pattern does not resemble the fuel standard used for quantitation.



303116

## SAMPLE CHAIN OF CUSTODY

03/08/23

vw1/121/VS-C2/G4  
Page # 1 of 3Report To Brian DixonCompany Dixon Env. ServicesAddress 4010 N 7th St.City, State, ZIP Tacoma, WA 98406Phone 253-380-4303 Email Brian.Dixon@es.com

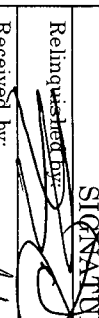

SAMPLERS (signature)		PO #
PROJECT NAME <u>La Cenner</u>		0037-01
REMARKS	INVOICE TO <u>Dixon ES</u>	
Project specific RIs? - Yes / No		

TURNAROUND TIME	SAMPLE DISPOSAL
<input checked="" type="checkbox"/> Standard turnaround	<input type="checkbox"/> Archive samples
<input type="checkbox"/> RUSH	<input type="checkbox"/> Other
Rush charges authorized by: _____	
Default: Dispose after 30 days	

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of Jars	ANALYSES REQUESTED							Notes
						NWTPH-Dx	NWTPH-Gx	BTEX EPA 8021	NWTPH-HCID	VOCs EPA 8260	PAHs EPA 8270	PCBs EPA 8082	
B7-5	01A-E	3-7-23	1050	S	5	X	X	X					
B7-10	02		1055		1	X	X	X					
B7-15	03		1130		1								
B8-5	04		1150			X	X	X					
B8-10	05		1155			X	X	X					
B8-15	06		1200										
B9-5	07		1215			X	X	X					
B9-10	08		1220			X	X	X					
B9-15	09		1230										
B10-5	10		1245										

Samples received at 0 °C

Friedman & Bruya, Inc.  
Ph. (206) 285-8282

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by: 	Brian Dixon	Dixon ES	3-8-23	850
Received by: 	ANH PHAM	FRB	03/08/23	08:50
Relinquished by:				
Received by:				

# SAMPLE CHAIN OF CUSTODY

03/08/23

vw1/12/15-C2/64

Page # 2 of 3

303116  
Report To Brian Dixon

Company Dixon Env. Services

Address 4010 N 7th St.

City, State, ZIP Tacoma, WA 98426

Phone 253-380-4303 Email Brian@DixonES.com

SAMPLERS (signature)		PO #
PROJECT NAME <u>La Conner</u>		0037-01
REMARKS	INVOICE TO	
Project specific RLS? - Yes / No	Dixon ES	

TURNAROUND TIME	
<input checked="" type="checkbox"/> Standard turnaround	
<input type="checkbox"/> RUSH	
Rush charges authorized by:	
SAMPLE DISPOSAL	
<input type="checkbox"/> Archive samples	
<input type="checkbox"/> Other	
Default: Dispose after 30 days	

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of Jars	ANALYSES REQUESTED							Notes
						NWTPH-Dx	NWTPH-Gx	BTEX EPA 8021	NWTPH-HCID	VOCs EPA 8260	PAHs EPA 8270	PCBs EPA 8082	
B10-10	11 A-E	3-7-23	1250	S	5								HOLD
B10-15	12		1300										
B11-5	13		1320										
B11-10	14		1325										
B11-15	15		1330										
B12-5	16		1430										
B12-10	17		1435										
B12-15	18		1440										
B10-4	19 A-D		1305										
B11-4	20		1405										

Friedman & Bruye, Inc.  
Ph. (206) 285-8282

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
	Brian Dixon	Dixon ES	3-8-23	150
Relinquished by:	ANHPHAN	ESB	03/08/23	08:50
Relinquished by:		Samples received at	0 °C	
Received by:				

303116

## SAMPLE CHAIN OF CUSTODY

08/08/23

vw1/12/VS-C2/G4

Report To Brian DixonCompany Dixon Env. ServicesAddress 4010 N 7th St.City, State, ZIP Tacoma, WAPhone 253-740-4303 Email Brian.Dixon@es.comPage # 3 of 3

TURNAROUND TIME

☒ Standard turnaround☐ RUSH

Rush charges authorized by: \_\_\_\_\_

SAMPLE DISPOSAL

☐ Archive samples☐ Other \_\_\_\_\_

Default: Dispose after 30 days

PROJECT NAME

La Conner

PO #

0037-01

REMARKS

INVOICE TO

Project specific RI's? Yes / No

Dixon ES

## ANALYSES REQUESTED

Sample ID

Lab ID

Date Sampled

Time Sampled

Sample Type

# of Jars

NWTPH-Dx

NWTPH-Gx

BTEX EPA 8021

NWTPH-HCID

VOCs EPA 8260

PAHs EPA 8270

PCBs EPA 8082

Notes

B12-L21A-D3-7-231450W4HOLDFriedman & Bruya, Inc.  
Ph. (206) 285-8282

SIGNATURE

PRINT NAME

COMPANY

DATE

TIME

Relinquished by:

Brian DixonDixon ES3-8-23850

Received by:

ANH PHANESB03/08/2308:50

Relinquished by:

Samples received at 0 °C

Received by:

FRIEDMAN & BRUYA, INC.

---

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.  
Yelena Aravkina, M.S.  
Michael Erdahl, B.S.  
Vineta Mills, M.S.  
Eric Young, B.S.

5500 4th Avenue South  
Seattle, WA 98108  
(206) 285-8282  
fbi@isomedia.com  
www.friedmanandbruya.com

March 20, 2023

Brian Dixon, Project Manager  
Dixon Environmental Services  
4010 N 7<sup>th</sup> Street  
Tacoma, WA 98406

Dear Mr Dixon:

Included are the additional results from the testing of material submitted on March 8, 2023 from the La Conner 0037-01, F&BI 303116 project. There are 6 pages included in this report.

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

Sincerely,

FRIEDMAN & BRUYA, INC.



Michael Erdahl  
Project Manager

Enclosures  
DXN0320R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on March 8, 2023 by Friedman & Bruya, Inc. from the Dixon Environmental Services La Conner 0037-01, F&BI 303116 project. Samples were logged in under the laboratory ID's listed below.

<u>Laboratory ID</u>	<u>Dixon Environmental Services</u>
303116 -01	B7-5
303116 -02	B7-10
303116 -03	B7-15
303116 -04	B8-5
303116 -05	B8-10
303116 -06	B8-15
303116 -07	B9-5
303116 -08	B9-10
303116 -09	B9-15
303116 -10	B10-5
303116 -11	B10-10
303116 -12	B10-15
303116 -13	B11-5
303116 -14	B11-10
303116 -15	B11-15
303116 -16	B12-5
303116 -17	B12-10
303116 -18	B12-15
303116 -19	B10-W
303116 -20	B11-W
303116 -21	B12-W

All quality control requirements were acceptable.

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/20/23

Date Received: 03/08/23

Project: La Conner 0037-01, F&BI 303116

Date Extracted: 03/14/23

Date Analyzed: 03/15/23

**RESULTS FROM THE ANALYSIS OF SOIL SAMPLES  
FOR BENZENE, TOLUENE, ETHYLBENZENE,  
XYLENES AND TPH AS GASOLINE  
USING METHODS 8021B AND NWTPH-Gx**

Results Reported on a Dry Weight Basis

Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	<u>Benzene</u>	<u>Toluene</u>	<u>Ethyl Benzene</u>	<u>Total Xylenes</u>	<u>Gasoline Range</u>	<u>Surrogate (% Recovery)</u> (Limit 50-132)
B10-5 303116-10	<0.02	<0.02	<0.02	<0.06	<5	127
B10-10 303116-11	<0.02	<0.02	<0.02	<0.06	<5	110
B11-5 303116-13	<0.02	<0.02	<0.02	<0.06	<5	124
B11-10 303116-14	<0.02	<0.02	<0.02	<0.06	<5	123
B12-5 303116-16	<0.02	<0.02	<0.02	<0.06	<5	125
B12-10 303116-17	<0.02	<0.02	<0.02	<0.06	<5	132
Method Blank 03-574 MB	<0.02	<0.02	<0.02	<0.06	<5	93

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/20/23

Date Received: 03/08/23

Project: La Conner 0037-01, F&BI 303116

Date Extracted: 03/15/23

Date Analyzed: 03/15/23

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

Results Reported on a Dry Weight Basis

Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	<u>Diesel Range</u> (C <sub>10</sub> -C <sub>25</sub> )	<u>Motor Oil Range</u> (C <sub>25</sub> -C <sub>36</sub> )	<u>Surrogate</u> <u>(% Recovery)</u> (Limit 50-150)
B10-5 303116-10	<50	<250	81
B10-10 303116-11	<50	<250	81
B11-5 303116-13	<50	<250	79
B11-10 303116-14	<50	<250	83
B12-5 303116-16	<50	<250	78
B12-10 303116-17	<50	<250	79
Method Blank 03-604 MB2	<50	<250	80

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/20/23

Date Received: 03/08/23

Project: La Conner 0037-01, F&BI 303116

**QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES  
FOR BENZENE, TOLUENE, ETHYLBENZENE,  
XYLENES, AND TPH AS GASOLINE  
USING EPA METHOD 8021B AND NWTPH-Gx**

Laboratory Code: 303175-01 (Duplicate)

Analyte	Reporting Units	Sample Result (Wet Wt)	Duplicate Result (Wet Wt)	RPD (Limit 20)
Benzene	mg/kg (ppm)	<0.02	<0.02	nm
Toluene	mg/kg (ppm)	<0.02	<0.02	nm
Ethylbenzene	mg/kg (ppm)	<0.02	<0.02	nm
Xylenes	mg/kg (ppm)	<0.06	<0.06	nm
Gasoline	mg/kg (ppm)	<5	<5	nm

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent	
			Recovery LCS	Acceptance Criteria
Benzene	mg/kg (ppm)	0.5	98	66-121
Toluene	mg/kg (ppm)	0.5	90	72-128
Ethylbenzene	mg/kg (ppm)	0.5	96	69-132
Xylenes	mg/kg (ppm)	1.5	100	69-131
Gasoline	mg/kg (ppm)	20	90	61-153



FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/20/23

Date Received: 03/08/23

Project: La Conner 0037-01, F&BI 303116

**QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES  
FOR TOTAL PETROLEUM HYDROCARBONS AS  
DIESEL EXTENDED USING METHOD NWTPH-D<sub>x</sub>**

Laboratory Code: 303211-01 (Matrix Spike)

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	92	92	70-130	0

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Diesel Extended	mg/kg (ppm)	5,000	92	70-130

# FRIEDMAN & BRUYA, INC.

## ENVIRONMENTAL CHEMISTS

### **Data Qualifiers & Definitions**

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

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

ca - The calibration results for the analyte were outside of acceptance criteria, biased high; or, the calibration results for the analyte were outside of acceptance criteria, biased high, with a detection for the analyte in the sample. The value reported is an estimate.

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

cf - The sample was centrifuged prior to analysis.

d - The sample was diluted. Detection limits were raised and surrogate recoveries may not be meaningful.

dv - Insufficient sample volume was available to achieve normal reporting limits.

f - The sample was laboratory filtered prior to analysis.

fb - The analyte was detected in the method blank.

fc - The analyte is a common laboratory and field contaminant.

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

hs - Headspace was present in the container used for analysis.

ht - The analysis was performed outside the method or client-specified holding time requirement.

ip - Recovery fell outside of control limits due to sample matrix effects.

j - The analyte concentration is reported below the standard reporting limit. The value reported is an estimate.

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

jl - The laboratory control sample(s) percent recovery and/or RPD were out of control limits. The reported concentration should be considered an estimate.

js - The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

k - The calibration results for the analyte were outside of acceptance criteria, biased high, and the analyte was not detected in the sample.

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

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

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

pc - The sample was received with incorrect preservation or in a container not approved by the method. The value reported should be considered an estimate.

ve - The analyte response exceeded the valid instrument calibration range. The value reported is an estimate.

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

x - The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

303116

Report To Brian DixonCompany Dixon Env. ServicesAddress 4010 N 7th St.City, State, ZIP Tacoma, WA 98406Phone 253-380-4303 Email Brian.Dixon@es.com

## SAMPLE CHAIN OF CUSTODY

03/08/23

vw/121/VS-C2/G4


Page # 1 of 3

SAMPLERS (signature)		PO #	
PROJECT NAME <u>La Cenner</u>		0037-01	
REMARKS		INVOICE TO	
Project specific RLS? - Yes / No		Dixon ES	
TURNAROUND TIME		Standard turnaround <input checked="" type="checkbox"/> RUSH Rush charges authorized by: _____	
SAMPLE DISPOSAL		<input type="checkbox"/> Archive samples <input type="checkbox"/> Other _____	
Default: Dispose after 30 days			

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of Jars	ANALYSES REQUESTED								Notes
						NWTPH-Dx	NWTPH-Gx	BTEX EPA 8021	NWTPH-HCID	VOCs EPA 8260	PAHs EPA 8270	PCBs EPA 8082		
B7-5	01A-E	3-7-23	1050	S	S	X	X	X						per BD 3/14/23 ME
B7-10	02		1055			X	X	X						
B7-15	03		1130											
B8-5	04		1150			X	X	X						
B8-10	05		1155			X	X	X						
B8-15	06		1200											
B9-5	07		1215			X	X	X						
B9-10	08		1220			X	X	X						
B9-15	09		1230											
B10-5	10		1245											

Samples received at 0 °C

Friedman & Bruya, Inc.  
Ph. (206) 285-8282

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
	Brian Dixon	Dixon ES	3-8-23	850
Relinquished by:				
Received by:	ANH PHAN	ESB	03/08/23	09:50
Relinquished by:				
Received by:				

303116

SAMPLE CHAIN OF CUSTODY

03/09/23

vw1/12/US-C2/G4

Report To Brian Dixon

Company Dixon Env. Services

Address 4010 N 7th St.

City, State, ZIP Tacoma, WA 98426

Phone 253-380-4303 Email Brian.Dixon@es.com

SAMPLERS (signature)		PO #
PROJECT NAME <u>La Conner</u>		0037-01
REMARKS		INVOICE TO
Project specific RLS? - Yes / No		<u>Dixon ES</u>

Page # <u>2</u> of <u>3</u> TURNAROUND TIME <input checked="" type="checkbox"/> Standard turnaround <input type="checkbox"/> RUSH Rush charges authorized by: _____ SAMPLE DISPOSAL <input type="checkbox"/> Archive samples <input type="checkbox"/> Other _____ Default: Dispose after 30 days
--

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of Jars	ANALYSES REQUESTED							Notes
						NWTPH-Dx	NWTPH-Gx	BTEX EPA 8021	NWTPH-HCID	VOCs EPA 8260	PAHs EPA 8270	PCBs EPA 8082	
B10-10	11 A-E	3-7-23	1250	S	5	●	●	●					<del>Hold</del>
B10-15	12		1300										
B11-5	13		1320			●	●	●					
B11-10	14		1325			●	●	●					
B11-15	15		1330										
B12-5	16		1430			●	●	●					
B12-10	17		1435										
B12-15	18		1440										
B10-10	19 A-D		1305										
B11-10	20		1405										

Friedman & Bruya, Inc.  
Ph. (206) 285-8282

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
	Brian Dixon	Dixon ES	3-8-23	150
Relinquished by:	ANY PHAIN	ESB	03/08/23	08:50
Received by:		Samples received at	0	°C

VW1/I2/VS-C2/G4

3  
E  
V  
2  
M

...

PO#

0037-01

INVOICE TO

Dixen ES

**SAMPLE DISPOSAL**




☐ Archive samples

☐ Other \_\_\_\_\_

Default: Dispose after 30 days

ANALYSES REQUESTED

[illegible]

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by: 	Brian Dixon	Dixon ES	3-8-23	850
Received by: 	ANH PHAN	F8B	03/08/23	08:50
Relinquished by:				
Received by:		Samples received at		°C