Limited Additional Subsurface Investigation Report

REPORT DATE: March 19, 2025

SITE INFORMATION
1545-1555 Monmouth Street
Independence, Oregon 97351

PROJECT INFORMATION
AEI Project No. 506056

PREPARED FOR
Upton Inc.
1555 Monmouth Street
Independence, Oregon 97351

PREPARED BY
AEI Consultants
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AEI Consultants
2500 Camino Diablo
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March 19, 2025

Mr. Dave Upton
Upton Inc.
1555 Monmouth Street
Independence, Oregon 97351

Subject: Limited Additional Subsurface Investigation
1545-1555 Monmouth Street
Independence, Oregon 97351
AEI Project No. 506056

Dear Mr. Upton,

This report presents the results of the Limited Additional Subsurface Investigation conducted by AEI Consultants (AEI) at 1545-1555 Monmouth Street, Independence, Oregon (subject property) to further characterize the concentrations of petroleum hydrocarbons identified in groundwater at the subject property above the Oregon Department of Equality risk-based concentrations comparison values for inhalation and ingestion from tap water, as presented in the January 31, 2019 *Limited Phase II Subsurface Investigation* report prepared by AEI. The investigation was performed in general accordance with the scope of services outlined in our proposal dated February 13, 2025 (AEI Proposal Number 153132), which was subsequently authorized on February 13, 2025.

AEI appreciates the opportunity to support this important project. If you have any questions, please do not hesitate to contact me.

Sincerely,

Charles Metzinger
Vice President
Phone: 916.333.4568
Email: cmetzinger@aeiconsultants.com

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1.0 PURPOSE

This report presents the results of the Limited Additional Subsurface Investigation conducted by AEI Consultants (AEI) at 1545-1555 Monmouth Street, Independence, Oregon (subject property) to further characterize the concentrations of petroleum hydrocarbons identified in groundwater at the subject property above the Oregon Department of Environmental Quality (DEQ) risk-based concentrations (RBCs) comparison values for inhalation and ingestion from tap water, as presented in the January 31, 2019 *Limited Phase II Subsurface Investigation* (Phase II) report prepared by AEI. The investigation was performed in general accordance with the scope of services outlined in our proposal dated February 13, 2025 (AEI Proposal Number 153132), which was subsequently authorized on February 13, 2025.

The Site description, background, investigation procedures, findings, summary, and conclusions are presented in the following sections.

2.0 SUBJECT PROPERTY DESCRIPTION AND BACKGROUND

Details on the subject property description and background are presented below as referenced in the 2019 AEI Phase II.

2.1 Subject Property Description

The subject property consists of four (4) single-story retail buildings with associated asphalt-paved parking areas covering approximately 1.25 acres of land. It is located on the southeastern corner of the intersection of South 16th Street and Monmouth Avenue within a residential area of Independence. There are two businesses currently operating at the Site, including The Heat Pump Store and True Value Hardware. The Heat Pump Store, a heating, ventilation, air conditioning business, addressed as 1545 Monmouth Street, occupies one of the buildings within the northeastern portion of the subject property. The remaining three buildings are occupied by True Value Hardware, addressed as 1555 Monmouth Street.

The subject property is relatively flat and lies at an elevation of approximately 185 feet above mean sea level. Regional topography slopes toward the south, and, therefore, on that basis, the direction of groundwater flow beneath the Site is inferred to be to the south. The Willamette River is located approximately 1.51 miles to the east. The subject property location appears on Figure 1 – Topographic Map.

2.2 Background

A Transaction Screen was performed by Terracon Consultants, Inc. (Terracon) of Portland, Oregon, as documented in their report dated August 23, 2018. As detailed in the Transaction Screen, the subject property was undeveloped or used for agricultural purposes between 1936 and 1967. Subsequently, buildings were gradually erected on the subject property between the 1970s and 1990s.

An automotive repair shop that performed oil changes and lubrication occupied the building addressed as 1545 Monmouth Street between 2000 and 2010. A three-stage clarifier is located adjacent to the northwestern portion of the building. An automotive repair business also occupied the current main subject property building (currently occupied by True Value Hardware, addressed as 1555 Monmouth Street) from the 1980s through the early 2000s. During Terracon's Site reconnaissance, evidence of the previous existence of in-ground hydraulic lifts was observed.

As detailed in the Transaction Screen, it was stated that the DEQ online Leaking Underground Storage Tank (LUST) database indicated that previous Phase II Subsurface Investigations were performed at the subject property. In 2004, the results of the investigations identified elevated concentrations of gasoline in soil. Groundwater samples collected and analyzed as part of the investigation revealed elevated concentrations of benzene, toluene, ethylbenzene, and xylenes (collectively "BTEX"), as well as naphthalene and lead in groundwater.

In March 2004, a 650-gallon underground storage tank (UST) was removed from the southeastern portion of the subject property. Initial soil samples collected from the excavation indicated that gasoline was present in soil at concentrations exceeding 2,000 parts per million (ppm) or milligrams per kilogram (mg/kg). A groundwater sample collected from the UST pit showed the presence of benzene, ethylbenzene, and naphthalene at concentrations exceeding DEQ RBCs for the ingestion and inhalation of a tap water exposure pathway. In May 2004, 145 tons of soil impacted with petroleum hydrocarbons was excavated from the UST pit. Confirmation soil samples collected following excavation indicated that gasoline was present in soil at concentrations ranging from 26.6 milligrams per kilogram (mg/kg) to 62.8 mg/kg. Detected concentrations of the gasoline were below the site-specific soil matrix cleanup level of 80 mg/kg.

Five groundwater samples were collected from other portions of the subject property (away from the UST). Analytical results showed concentrations of benzene, toluene, and xylenes. Although the detected concentration of benzene exceeded the RBC exposure pathway for ingestion and inhalation from tap water, it was below the RBC for urban residential scenarios. Toluene and xylenes were also detected; however, the detected concentrations of those constituents were below the most stringent RBCs.

Based on the results of these investigations, the DEQ issued a "No Further Action" (NFA) letter dated January 19, 2005. The NFA determination included a recommendation that groundwater beneath the site is not to be used for "either consumptive or non-consumptive purposes."

Despite having received regulatory closure, albeit with restrictions on the use of groundwater, Terracon noted that the subsurface investigations failed to address other areas associated with previous automotive repair businesses. Specifically, soil and/or groundwater samples had not been collected from areas near the former in-ground hydraulic lifts and clarifier. In addition, a suspect vent pipe was observed during Terracon's reconnaissance, indicating that soil and groundwater beneath the subject property may be impacted by petroleum hydrocarbon constituents from a remaining UST. This data gap was cited by Terracon as a potential

environmental concern (PEC). Based on the findings of their Transaction Screen, Terracon recommended performance of an additional subsurface investigation to address the cited PEC.

On January 17, 2019, AEI performed a Phase II investigation, which included a geophysical survey and advancing three exploratory soil borings (B-1, B-2, and B-3) at the subject property for the collection of soil and groundwater samples. The investigation focused on assessing the presence/absence of impacted subsurface conditions (i.e., soil and groundwater) relative to the former automotive repair activities within the 1555 Monmouth Street building, the suspect vent pipe, and clarifier. The results of the geophysical survey showed there was no evidence of a UST near the suspected vent pipe. Analytical results for soils showed low concentrations of total petroleum hydrocarbons (TPHs) and volatile organic compounds (VOCs), which were found not to exceed their applicable DEQ RBCs. For groundwater, the detected concentrations of TPH quantified as diesel (TPH-DRO) and TPH quantified as residual range organics (TPH-RRO) were found to exceed their applicable ODEQ RBCs. TPH-DRO and TPH-RRO were detected at concentrations of 2,820 and 9,630 micrograms per liter (µg/L) in sample B-2, respectively. The detected concentrations exceed the DEQ RBCs comparison values for ingestion and inhalation from tap water of 430 µg/L for TPH-DRO and 1,300 µg/L for TPH-RRO. The presence of TPH-DRO and TPH-RRO in groundwater indicated that a release(s) has occurred in association with historic subject property operations. The extent of TPH-impacted groundwater exceeding DEQ RBCs around Boring B-2 is unknown. Based on the results of the Phase II investigation, AEI recommended that additional investigation be performed to evaluate the extent of the TPH-impacted groundwater. Additionally, AEI recommended the report be shared with the ODEQ for further comment and direction.

3.0 FIELD INVESTIGATION AND OBSERVATIONS

Investigation efforts included advancing two exploratory soil borings at the subject property to collect soil and groundwater samples. The boring/sample locations are shown on Figure 2 – Sample Location Map. The completed subject property activities are summarized below.

3.1 Health and Safety Plan

A health and safety plan was prepared to address potential hazards during the subsurface investigation, reviewed by on-site personnel, and maintained by the field crew for the duration of the investigation.

3.2 Utility Clearance

The public underground utility locator Oregon Utility Notification Center was notified who, in turn, notified subscribing utility companies of the planned investigation work for underground utility locations to be marked along the ground surface around the boundaries of the subject property and proposed boring locations, where accessible. Private utility locating at each drilling location was conducted by Ground Penetrating Radar Systems (GPRS) of Portland, Oregon under subcontract to AEI to further identify and locate underground utilities on the subject property and adjust boring locations accordingly when encountered.

3.3 Drilling and Soil Sample Collection

On March 6, 2025, two exploratory soil borings B-4 and B-5 were advanced at the subject property at the locations shown on Figure 2. The borings were advanced by Cascade Drilling of Clackamas, Oregon using a direct push (DP) track-mounted drill rig to collect soil and groundwater samples. The locations of the borings are listed below:

- Boring B-4 was advanced to a total depth of 15 feet bgs using the DP drilling method, to the north of the suspected vent pipe and the former boring location B-2, within the parking lot; and
- Boring B-5 was advanced to a total depth of 15 feet bgs using the DP drilling method, to the southeast of the suspected vent pipe and former boring location B-2 and east of the building.

The locations of the borings were chosen in part based on the existing and former subject property structures, the results of the utility clearance and anticipated groundwater flow direction.

The soil borings were evaluated throughout their entire depths for the purposes of lithologic logging, field screening (headspace testing), and laboratory analyses. The soil samples from borings were obtained using a single-walled coring system approximately 2.25 inches in diameter and 5 feet long containing plastic liners. The coring system was connected to a 1.25-inch diameter, flush-jointed drill rod that was hydraulically driven (pushed) by the rig to each target sample depth. Upon retrieval from each sample depth interval, the coring system was opened, and the liners were removed and cut for visual inspection and lithologic logging purposes. Recovered soil samples were examined for soil classification and described on a detailed boring log in general conformance with the Unified Soil Classification System. The boring logs are presented in Appendix A.

Headspace screening was performed using a photoionization detector (PID) equipped with an electrodeless 10.6 electron volt ultraviolet lamp for detecting the presence of organic vapors in the soil samples collected. The PID was calibrated by the rental company before use. To initiate the headspace testing procedure, soil samples were placed into labeled, plastic bags, and sealed prior to conducting the tests. After approximately 20-30 minutes had elapsed for organic vapor build-up inside the bags, each bag was punctured with the probe tip of the PID to allow for measurement of the organic vapors or headspace gases. There was no visual evidence (i.e., soil discoloration) of potentially impacted soils that were recovered during drilling of borings B-4 and B-5. Light apparent hydrocarbon odor was observed in boring B-4 from 12-15 feet bgs and in boring B-5 from 10-12 feet bgs. The maximum PID reading was 0.8 parts per million (ppm), in boring B-4 at 9.5-10 feet bgs. The resulting PID measurements were recorded in the boring logs that are presented in Appendix A.

Select soil samples were collected from the depth just above the groundwater table. Samples not used for measuring organic vapors are transferred from the plastic liners and placed into clean, laboratory-supplied containers with preservative, as appropriate. After sealing, each sample was appropriately labeled and entered on the chain-of-custody documentation and

placed into an insulated shipping container with ice for transportation to a State of Oregon-certified laboratory. The soil samples were placed on hold and not analyzed as part of this investigation.

3.4 Groundwater Sample Collection

On March 6, 2025, after reaching the target depth of 15 feet bgs in borings B-4 and B-5, a temporary groundwater monitoring well was installed in each of the boring locations to facilitate collection of a groundwater sample. The temporary well materials consisted of one-inch diameter, polyvinyl chloride (PVC), 0.010-slotted well screen and PVC casing that was installed in the borehole to facilitate groundwater infiltration and groundwater sample collection from the borings. The temporary well materials remained in-place for approximately 20 minutes to allow groundwater infiltration for sample collection. During this time, a sufficient amount of groundwater infiltrated in each of the temporary wells to allow for groundwater sample collection.

Prior to the collection of groundwater from the specified locations, approximately one gallon of water was purged from each temporary well utilizing a peristaltic pump. After purging, a groundwater sample was collected in laboratory-supplied containers with preservatives, as appropriate. After sealing, each sample was appropriately labeled and recorded on chain-of-custody documentation in preparation for transfer to a State of Oregon-certified laboratory for analysis by placing them into an insulated shipping container with ice.

3.5 Boring Abandonment

Following the completion of field activities and removal of well construction material and tooling, the boring locations were backfilled with hydrated bentonite chips and completed at the surface with asphalt to match the surrounding conditions.

3.6 Decontamination Procedures and Investigation-Derived Waste

AEI personnel wore disposable Nitrile gloves during sample collection and changed gloves prior to and between each sample collection. Down-hole equipment including sampling tubes, samplers, and hand tools were decontaminated prior to drilling, each boring and were dedicated to a single boring.

Investigation-derived waste generated during field activities was placed in two 55-gallon drums and left at the subject property.

3.7 Laboratory Analyses

Soil and groundwater samples were labeled and placed into a cooler with ice following sampling and transferred under appropriate chain-of-custody documentation to Pace Analytical of Mount Juliet, Tennessee. Two groundwater samples were collected and analyzed for TPH-GRO using Testing Method NWTPH-Gx and TPH-DRO and RRO using Testing Method NWTPH-Dx. Soil samples collected were placed on hold.

No further sample analyses were conducted as part of this investigation. Chain-of-custody documentation and the certified analytical reports are provided in Appendix B.

4.0 FINDINGS

The findings of this investigation are summarized below.

4.1 Subsurface Conditions

Subsurface conditions observed during the drilling activities of borings SB-1 through SB-4 indicated that soils underlaying the Site consisted primarily of clay, gravelly sand, and silty clay to a depth of 15 feet, the maximum depth explored as part of this investigation. Refusal was not encountered during drilling activities. Groundwater was encountered during drilling of borings B-4 and B-5 at approximately 11 and 10.5 feet bgs, respectively. After approximately 20 minutes, the groundwater equilibrated to depths of 5.92 feet bgs and 6.51, respectively, in the two temporary wells installed (B-4 and B-5).

4.2 Analytical Results

For purposes of providing context to the data obtained during this investigation, analytical results were compared to applicable DEQ RBCs for Individual Chemicals (DEQ, revised August 2023). The ODEQ has the responsibility for overseeing soil and groundwater investigations and cleanups, which are managed under a variety of different programs. The groundwater analytical results were compared to the DEQ RBCs for ingestion and inhalation from tap water (RBC_{tw}), volatilization to outdoor air (RBC_{wo}), and groundwater in excavation (RBC_{we}) under the occupational land scenario.

Table 1 presents a summary of the historical and current groundwater sample results. The "J" flag indicates Estimated value above laboratory method detection limit, but below the limit for reporting. The analytical results can be summarized as follows:

- TPH-GRO was detected in groundwater samples B-4-W and B-5-W at concentrations of 48.7 J micrograms per liter (µg/L) and 224 µg/L, respectively. The detected concentrations are below the DEQ Occupational RBC_{tw} of 450 µg/L.
- TPH-DRO was detected in groundwater samples B-4-W and B-5-W at concentrations of 3,010 µg/L and 5,220 µg/L, respectively. The detected concentrations are above the DEQ Occupational RBC_{tw} of 430 µg/L.
- TPH-RRO was detected in groundwater samples B-4-W and B-5-W at concentrations of 11,400 µg/L and 18,700 µg/L, respectively. The detected concentrations are above the DEQ Occupational RBC_{tw} of 1,300 µg/L.

5.0 SUMMARY AND CONCLUSIONS

AEI completed a Limited Additional Subsurface Investigation at the subject property to further characterize the concentrations of petroleum hydrocarbons identified at the subject property above the ODEQ RBCs comparison values for inhalation and ingestion from tap water, as presented in the January 31, 2019, Phase II report prepared by AEI. Investigation efforts included advancing two exploratory soil borings B-4 and B-5 at the subject property to collect groundwater samples. The investigation results can be summarized as follows:

There was no visual evidence (i.e., soil discoloration) of potentially impacted soils that were recovered during drilling of borings B-4 and B-5. However, light apparent hydrocarbon odor was observed in boring B-4 from 12-15 feet bgs and in boring B-5 from 10-12 feet bgs. The maximum PID reading was 0.8 ppm, in boring B-4 at 9.5-10 feet bgs.

TPH-DRO was detected in groundwater samples B-4-W and B-5-W at concentrations of 3,010 µg/L and 5,220 µg/L, respectively, above the DEQ Occupational RBC_{tw} of 430 µg/L. TPH-RRO was detected in groundwater samples B-4-W and B-5-W at concentrations of 11,400 µg/L and 18,700 µg/L, respectively, above the DEQ Occupational RBC_{tw} of 1,300 µg/L.

Based on the results summarized above, a suspected release of TPH-DRO and TPH-RRO to groundwater above the Occupational RBC_{tw} was identified at sample locations SB-4 and SB-5, to the east of the subject property building. The identification of a suspected release of TPH-DRO and TPH-RRO is reportable by the subject property owner to the DEQ. However, based on the fact that these were grab-groundwater samples, and not sampled from a groundwater monitoring well, the identified TPH may be due to sediment in the samples as TPH-RRO is typically not found in water in a dissolved phase. AEI would consider it prudent to install a semi-permanent groundwater monitoring well at the Site in an attempt to more accurately determine the concentration of TPH in groundwater at the subject property. If elevated concentrations of TPH-DRO and TPH-RRO are identified in the groundwater samples collected from the semi-permanent groundwater well, the subject property owner (responsible party) should submit the report to the DEQ for review and evaluation/ranking. Should the DEQ open an Environmental Cleanup Site case on the subject property, the responsible party can apply to the Voluntary Cleanup Program for oversight in order to attempt to ultimately obtain a letter of No Further Action upon completion of required activities.

6.0 REFERENCES

AEI Consultants, 2019, *Limited Phase II Subsurface Investigation, 1545-1555 Monmouth Street, Independence, Oregon* (AEI Project No. 399590), dated January 31.

Terracon Consultants, 2018, *Transaction Screen, Upton, Inc., DBA Town & Country Hardware, 1545-1555 Monmouth Street, Independence, Polk County, Oregon*, dated August 23.

Oregon Department of Environmental Quality, 2023a, Risk-Based Concentrations, dated August.

7.0 REPORT LIMITATIONS AND RELIANCE

This report presents a summary of work completed by AEI Consultants. The completed work includes observations and descriptions of site conditions encountered. Where appropriate, it includes analytical results for samples taken during the course of the work. The number and location of samples are chosen to provide the requested information, subject to scope of work for which AEI was retained and limitations inherent in this type of work, but it cannot be assumed that they are representative of areas not sampled. This report should not be regarded as a guarantee that no further contamination beyond that which could have been detected within the scope of this investigation is present beneath the Site. Undocumented, unauthorized releases of hazardous material, the remains of which are not readily identifiable by visual inspection and are of different chemical constituents, are difficult and often impossible to detect within the scope of a chemical specific investigation.

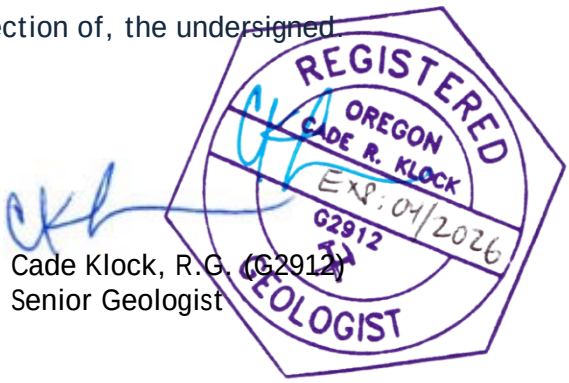
Any conclusions and/or recommendations are based on these analyses and observations, and the governing regulations. Conclusions beyond those stated and reported herein should not be inferred from this document. These services were performed in accordance with generally accepted practices, in the environmental engineering and construction field, which existed at the time and location of the work. No other warranty, either expressed or implied, has been made.

This investigation was prepared for the sole use and benefit of Upton Inc. Both verbal and written, whether in draft or final, are for the benefit of Upton Inc. This report has no other purpose and may not be relied upon by any other person or entity without the written consent of AEI. Either verbally or in writing, third parties may come into possession of this report or all or part of the information generated as a result of this work. In the absence of a written agreement with AEI granting such rights, no third parties shall have rights of recourse or recovery whatsoever under any course of action against AEI, its officers, employees, vendors, successors or assigns. Reliance is provided in accordance with AEI's Proposal and Standard Terms & Conditions executed by Upton Inc. The limitation of liability defined in the Terms and Conditions is the aggregate limit of AEI's liability to the client and all relying parties.

8.0 SIGNATURES

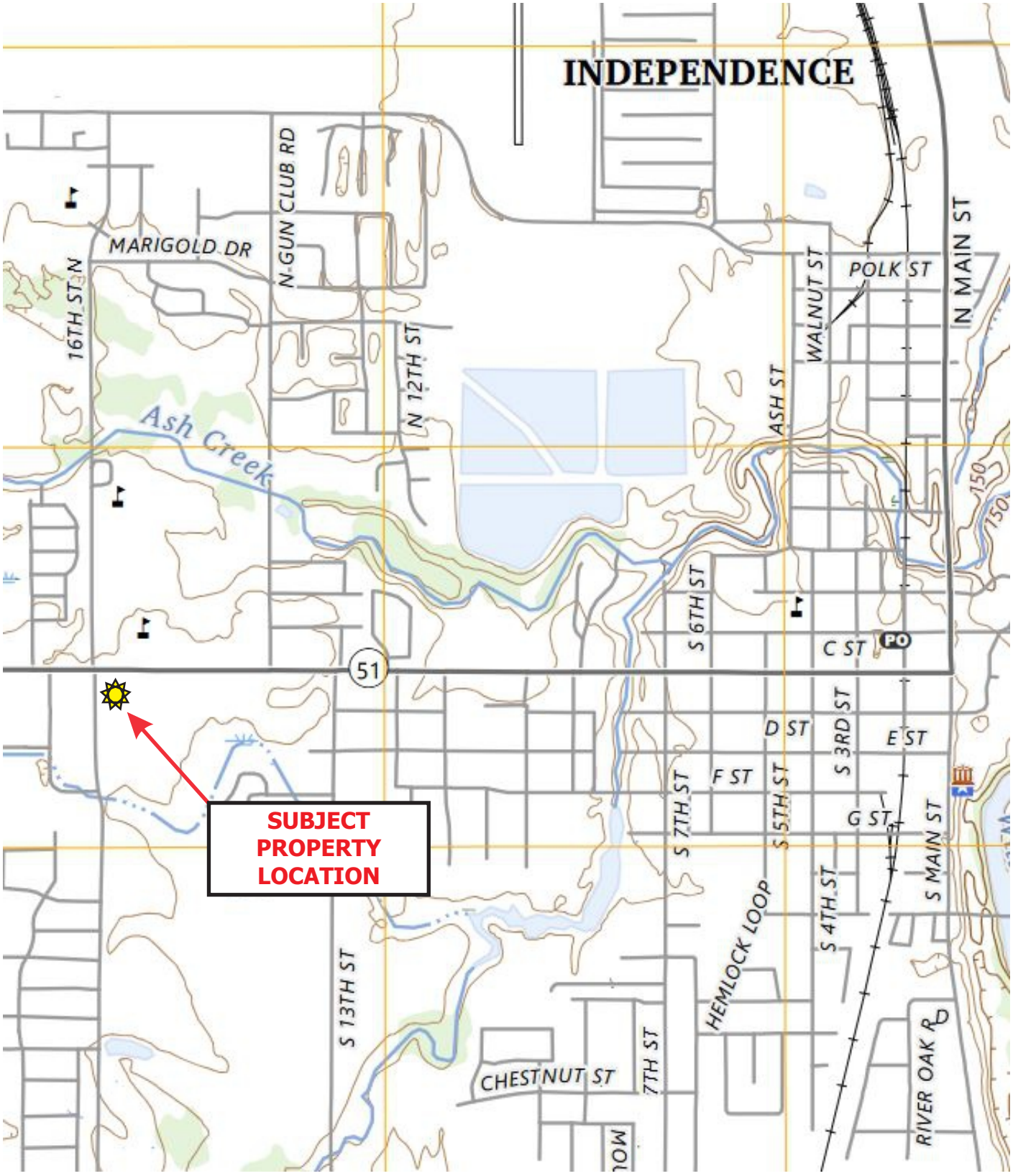
This document was prepared by, or under the direction of, the undersigned.

Natasha Budimirovic
Project Geologist



Cade Klock, R.G. (G2912)
Senior Geologist

FIGURES



LEGEND

Source: US Geological Survey

N

TOPOGRAPHIC MAP

AEI

1545-1555 Monmouth Street
Independence, Oregon 97351

FIGURE 1
Project No. 506056

N

0 25 50
SCALE: 1″ = 50′
Scale is Approximate

LEGEND

- Approximate Subject Property Boundary
- Approximate Boring Location (AEI, 2025)
- Approximate Former Boring Location (AEI, 2019)
- Approximate Clarifier Location
- Estimated Groundwater Flow Direction
- Approximate Location of Former Hydraulic Lift

SAMPLE LOCATION MAP

AEI

1545-1555 Monmouth Street
Independence, Oregon 97351

FIGURE 2
Project No. 506056

TABLE

TABLE 1: GROUNDWATER SAMPLE DATA SUMMARY
1545-1555 Monmouth Street, Independence, Oregon 97351
AEI Project No. 506056

Location ID	Date	TPH-GRO (µg/L)	TPH-DRO (µg/L)	TPH-RRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Total Xylenes (µg/L)	1,1-Dichloro-ethane (µg/L)	Remaining VOCs (µg/L)
Previous Limited Phase II Subsurface Investigation										
B-1	1/17/2019	43.4 B, J	ND<33.3	ND<83.3	ND<0.331	ND<0.412	1.79	10.2	ND<0.259	ND<MDL
B-2	1/17/2019	100 B	**2,820**	**9,630**	ND<0.331	ND<0.412	2.29	13.7	0.454 J	ND<MDL
Current Limited Additional Subsurface Investigation										
B-4-W	3/6/2025	48.7 J	**3,010**	**11,400**	NA	NA	NA	NA	NA	NA
B-5-W	3/6/2025	224	**5,220**	**18,700**	NA	NA	NA	NA	NA	NA
Comparison Values:										
ODEQ Occupational RBC_{tw}		450	430	1,300	2.1	6,300	6.4	830	13	Various
ODEQ Occupational RBC_{wo}		>S	>S	>S	14,000	>S	43,000	>S	68,000	Various
ODEQ Occupational RBC_{we}		14,000	>S	>S	1,800	220,000	4,500	23,000	10,000	Various

Notes:

µg/L	Micrograms per Liter
ND<	Not detected at or above the method detection limit (MDL)
NA	Not analyzed
J	Estimated value above laboratory method detection limit, but below the limit for reporting
B	The same analyte is found in the associated blank
--	No comparison value established
TPH-GRO	Total petroleum hydrocarbons as gasoline range organics
TPH-DRO	Total petroleum hydrocarbons as diesel range organics
TPH-RRO	Total petroleum hydrocarbons as residual range organics
VOCs	Volatile Organic Compounds
Bold	Exceeds occupational screening level I RBC_{tw}

Comparison Values:
Oregon Department of Environmental Quality (ODEQ) Risk Based Concentrations (RBCs), May, 2018, updated August 2023.

RBC_{tw}	Risk-Based Concentrations for Ingestion & Inhalation from Tapwater
RBC_{wo}	Risk-Based Concentration for Volatilization to Outdoor Air
RBC_{we}	Risk-Based Concentrations for Groundwater in Excavation
>S	This groundwater RBC exceeds the solubility limit (S). Groundwater concentrations in excess of S indicates that free product may be present.

APPENDIX A
BORING LOGS

AEI Consultants
2500 Camino Diablo
Walnut Creek CA 94597-3998
Telephone: 925 746-6000
Fax: 925 746-6099

BORING NUMBER B-4

CLIENT Upton Inc.
PROJECT NAME Limited Additional Subsurface Investigation
PROJECT NUMBER 506056
PROJECT LOCATION 1545-1555 Monmouth Street, Independence, OR
DATE STARTED 3/6/25 **COMPLETED** 3/6/25
GROUND ELEVATION **HOLE SIZE** 2.25 inches
DRILLING CONTRACTOR Cascade Drilling
GROUND WATER LEVELS:
DRILLING METHOD Direct Push
AT TIME OF DRILLING 11.00 ft
LOGGED BY N. Budimirovic **CHECKED BY** C. Klock
AT END OF DRILLING ---
NOTES
AFTER DRILLING 5.92 ft

DEPTH (ft)	SAMPLE TYPE NUMBER	Environmental Data	GRAPHIC LOG	MATERIAL DESCRIPTION
0.0				ASPHALT
			0.5	
		PID = 0.1		SITLY SAND (SM) with gravel, dark yellowish brown (10YR 4/4), loose, moist, fine grained sand, coarse grained gravel, no odor
			1.0	CLAY (CL) light yellowish brown (10YR 6/4), stiff, moist, medium plasticity, no odor
2.5				
5.0		PID = 0.1		
7.5				
10.0		PID = 0.8	10.0	GRAVELLY SAND (SWG) gray (10YR 6/1), loose, moist, fine grained sand, coarse grained gravel, no odor
				At 11 feet bgs wet
			12.0	
12.5				SILTY CLAY (CL) light yellowish brown (10YR 6/4), stiff, moist, medium plasticity, light apparent hydrocarbon odor
15.0			15.0	

Bottom of borehole at 15.0 feet.

AEI Consultants
2500 Camino Diablo
Walnut Creek CA 94597-3998
Telephone: 925 746-6000
Fax: 925 746-6099

BORING NUMBER B-5

CLIENT Upton Inc.
PROJECT NAME Limited Additional Subsurface Investigation
PROJECT NUMBER 506056
PROJECT LOCATION 1545-1555 Monmouth Street, Independence,
DATE STARTED 3/6/25 **COMPLETED** 3/6/25
OR **GROUND ELEVATION** **HOLE SIZE** 2.25 inches
DRILLING CONTRACTOR Cascade Drilling
GROUND WATER LEVELS:
DRILLING METHOD Direct Push
AT TIME OF DRILLING 10.50 ft
LOGGED BY N. Budimirovic **CHECKED BY** C. Klock
AT END OF DRILLING ---
NOTES
AFTER DRILLING 6.51 ft

DEPTH (ft)	SAMPLE TYPE NUMBER	Environmental Data	GRAPHIC LOG	MATERIAL DESCRIPTION
0.0				ASPHALT
			0.5	
		PID = 0.3		SILTY SAND (SM) with gravel, dark yellowish brown (10YR 4/4), loose, moist, fine grained sand, coarse grained gravel, no odor
			1.0	CLAY (CL) light yellowish brown (10YR 6/4), stiff, moist, medium plasticity, no odor
2.5				
5.0		PID = 0.3		
7.5				
		PID = 0.4		
10.0			10.0	
				GRAVELLY SAND (SWG) with silt, gray (10YR 6/1), loose, moist, fine grained sand, coarse grained gravel, light apparent hydrocarbon odor At 10.5 feet bgs wet
			12.0	
12.5				SILTY CLAY (CL) light yellowish brown (10YR 6/4), stiff, moist, medium plasticity, no odor
15.0			15.0	

Bottom of borehole at 15.0 feet.

APPENDIX B
LABORATORY
ANALYTICAL REPORT

ANALYTICAL REPORT

March 17, 2025

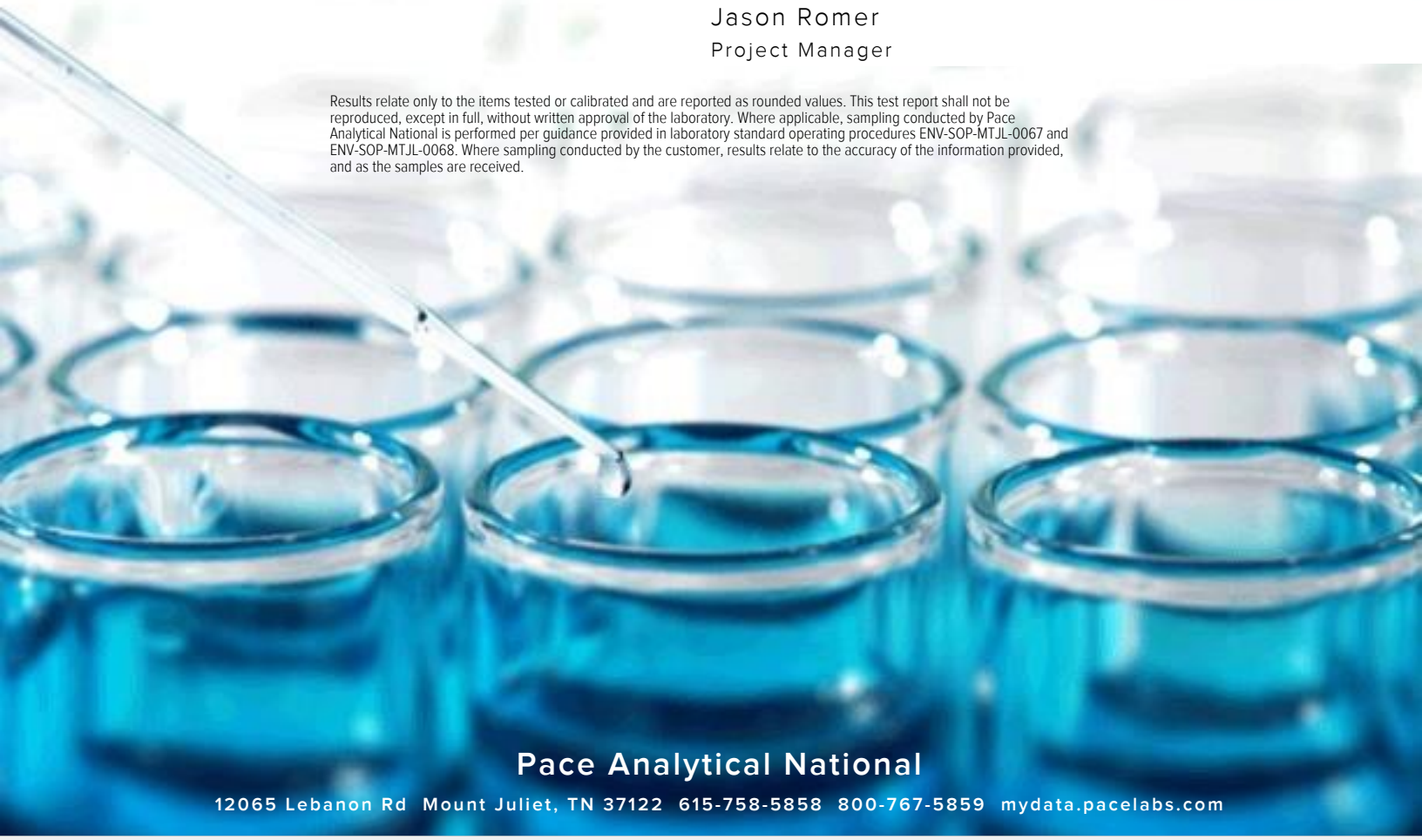
AEI Consultants - CA

Sample Delivery Group:	L1833750
Samples Received:	03/07/2025
Project Number:	506056
Description:	1545-1555 Honmouth Street

Report To: Natasha Budimirovic
2500 Camino Diablo
Walnut Creek, CA 94597

Entire Report Reviewed By:

Jason Romer
Project Manager



Pace Analytical National
12065 Lebanon Rd Mount Juliet, TN 37122 615-758-5858 800-767-5859 mydata.pacelabs.com

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SAMPLE SUMMARY

B-4-W L1833750-01 GW

Collected by: N Budimirovic
Collected date/time: 03/06/25 11:45
Received date/time: 03/07/25 09:00

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (GC) by Method NWTPHGX	WG2465884	1	03/10/25 20:16	03/10/25 20:16	DWR	Mt. Juliet, TN
Semi-Volatile Organic Compounds (GC) by Method NWTPHDX-NO SGT	WG2468664	10	03/14/25 07:10	03/14/25 20:36	TJD	Mt. Juliet, TN

B-5-W L1833750-02 GW

Collected by: N Budimirovic
Collected date/time: 03/06/25 12:30
Received date/time: 03/07/25 09:00

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (GC) by Method NWTPHGX	WG2465884	1	03/10/25 21:12	03/10/25 21:12	DWR	Mt. Juliet, TN
Semi-Volatile Organic Compounds (GC) by Method NWTPHDX-NO SGT	WG2468664	10	03/14/25 07:10	03/14/25 20:59	TJD	Mt. Juliet, TN

CASE NARRATIVE

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

Jason Romer
Project Manager

Volatile Organic Compounds (GC) by Method NWTPHGX

Analyte	Result ug/l	Qualifier	MDL ug/l	RDL ug/l	Dilution	Analysis date / time	Batch
Gasoline Range Organics-NWTPH	48.7	J	31.6	100	1	03/10/2025 20:16	WG2465884
(S) a,a,a-Trifluorotoluene(FID)	*97.5*			*78.0-120*		*03/10/2025 20:16*	WG2465884

Semi-Volatile Organic Compounds (GC) by Method NWTPHDX-NO SGT

Analyte	Result ug/l	Qualifier	MDL ug/l	RDL ug/l	Dilution	Analysis date / time	Batch
Diesel Range Organics (DRO)	3010		605	2000	10	03/14/2025 20:36	WG2468664
Residual Range Organics (RRO)	11400		772	2500	10	03/14/2025 20:36	WG2468664
(S) o-Terphenyl	*270*	J1		*52.0-156*		*03/14/2025 20:36*	WG2468664

Sample Narrative:

L1833750-01 WG2468664: Surrogate failure due to matrix interference

1 Cp
2 Tc
3 Ss
4 Cn
5 Sr
6 Qc
7 Gl
8 Al
9 Sc

Volatile Organic Compounds (GC) by Method NWTPHGX

Analyte	Result ug/l	Qualifier	MDL ug/l	RDL ug/l	Dilution	Analysis date / time	Batch
Gasoline Range Organics-NWTPH	224		31.6	100	1	03/10/2025 21:12	WG2465884
(S) a,a,a-Trifluorotoluene(FID)	*95.6*			*78.0-120*		*03/10/2025 21:12*	WG2465884

Semi-Volatile Organic Compounds (GC) by Method NWTPHDX-NO SGT

Analyte	Result ug/l	Qualifier	MDL ug/l	RDL ug/l	Dilution	Analysis date / time	Batch
Diesel Range Organics (DRO)	5220		605	2000	10	03/14/2025 20:59	WG2468664
Residual Range Organics (RRO)	18700		772	2500	10	03/14/2025 20:59	WG2468664
(S) o-Terphenyl	*350*	J1		*52.0-156*		*03/14/2025 20:59*	WG2468664

Sample Narrative:

L1833750-02 WG2468664: Surrogate failure due to matrix interference

Method Blank (MB)

(MB) R4185508-3 03/10/25 12:08

Analyte	MB Result ug/l	MB Qualifier	MB MDL ug/l	MB RDL ug/l
Gasoline Range Organics-NWTPH	U		31.6	100
(S) a,a,a-Trifluorotoluene(FID)	*94.9*			*78.0-120*

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R4185508-1 03/10/25 10:23 • (LCSD) R4185508-2 03/10/25 11:27

Analyte	Spike Amount ug/l	LCS Result ug/l	LCSD Result ug/l	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Gasoline Range Organics-NWTPH	5500	5040	5760	91.6	105	70.0-124			13.3	20
(S) a,a,a-Trifluorotoluene(FID)				*103*	*104*	*78.0-120*				

Method Blank (MB)

(MB) R4186762-1 03/14/25 12:36

Analyte	MB Result ug/l	MB Qualifier	MB MDL ug/l	MB RDL ug/l
Diesel Range Organics (DRO)	U		60.5	200
Residual Range Organics (RRO)	U		77.2	250
(S) o-Terphenyl	*92.0*			*52.0-156*

Laboratory Control Sample (LCS)

(LCS) R4186762-2 03/14/25 12:59

Analyte	Spike Amount ug/l	LCS Result ug/l	LCS Rec. %	Rec. Limits %	LCS Qualifier
Diesel Range Organics (DRO)	1500	1590	106	50.0-150	
(S) o-Terphenyl			*95.5*	*52.0-156*	

L1833702-02 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1833702-02 03/14/25 13:22 • (MS) R4186762-3 03/14/25 13:45 • (MSD) R4186762-4 03/14/25 14:08

Analyte	Spike Amount ug/l	Original Result ug/l	MS Result ug/l	MSD Result ug/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Diesel Range Organics (DRO)	1430	305	1880	1930	110	114	1	50.0-150			2.62	20
(S) o-Terphenyl					*97.4*	*95.3*		*52.0-156*				

GLOSSARY OF TERMS

Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

Abbreviations and Definitions

MDL	Method Detection Limit.
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state “ND” (Not Detected) or “BDL” (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier	Description
J	The identification of the analyte is acceptable; the reported value is an estimate.
J1	Surrogate recovery limits have been exceeded; values are outside upper control limits.

ACCREDITATIONS & LOCATIONS

Pace Analytical National 12065 Lebanon Rd Mount Juliet, TN 37122

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN000032021-1
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey–NELAP	TN002
California	2932	New Mexico [1]	TN00003
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina [1]	DW21704
Georgia	NELAP	North Carolina [3]	41
Georgia [1]	923	North Dakota	R-140
Idaho	TN00003	Ohio–VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LAO000356
Kentucky [1 6]	KY90010	South Carolina	84004002
Kentucky [2]	16	South Dakota	n/a
Louisiana	AI30792	Tennessee [1 4]	2006
Louisiana	LA018	Texas	T104704245-20-18
Maine	TN00003	Texas [5]	LAB0152
Maryland	324	Utah	TN000032021-11
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	110033
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	998093910
Montana	CERT0086	Wyoming	A2LA
A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 [5]	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA–Crypto	TN00003		

[1] Drinking Water [2] Underground Storage Tanks [3] Aquatic Toxicity [4] Chemical/Microbiological [5] Mold [6] Wastewater n/a Accreditation not applicable

* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace Analytical.

Company Name/Address:
AEI Consultants - CA

2500 Camino Diablo
Walnut Creek, CA 94597

Billing Information:
Accounts Payable- Jeremy Smith
2500 Camino Diablo
Walnut Creek, CA 94597

Pres Chk

Report to:
Natasha Budimirovic 925-746-6000

Email To: cklocke@aeiconsultants.com
nbudimirovic@aeiconsultants.com;klamb@aeic

Project Description: 1545-1555 Monmouth Street

City/State Collected: Independence, OR

Please Circle: (PT) MT CT ET

Regulatory Program(DOD,RCRA,DW,etc):

Client Project # **506056**

Lab Project # **AEICONWCCA-506056**

Collected by (print): K. BUDIMIROVIC

Site/Facility ID #

P.O. # **395251**

Collected by (signature):

Immediately Packed on Ice N ___ Y ✓

Rush? (Lab MUST Be Notified)
___ Same Day ___ Five Day
___ Next Day ___ 5 Day (Rad Only)
___ Two Day ___ 10 Day (Rad Only)
___ Three Day ___ STD TAT

Date Results Needed

Quote #

Analysis / Container / Preservative

Sample ID	Comp/Grab	Matrix *	Depth	Date	Time	No. of Cntrs	s NWTPHDX no SGT 4ozClr-NoPres	s NWTPHGX 40mlAmb/MeOH10ml/Syr	w NWTPHDX no SGT 40mlAmb-HCl-BT	w NWTPHGX 40mlAmb HCl	HOLD						Remarks	Sample # (lab only)
B-4-W	grab	GW	–	3-6-25	1145	5			X	X								-01
B-5-W	grab	GW	–	3-6-25	1230	5			X	X								-02
B-4 (9.5-10')	grab	~~GW~~ soil	9.5-10'	3-6-25	1130	2					X							-03
B-5 (9.5-10')	grab	soil	9.5-10	3-6-25	1215	2					X							-04

Chain of Custody Page ___ of ___

Pace
PEOPLE ADVANCING SCIENCE

MT JULIET, TN
12065 Lebanon Rd Mount Juliet, TN 37122
Submitting a sample via this chain of custody constitutes acknowledgment and acceptance of the Pace Terms and Conditions found at: https://info.pacelabs.com/hubfs/pas-standard-terms.pdf

SDG # 183750
D151
Ta

Acctnum: **AEICONWCCA**
Template: **T269228**
Prelogin: **P1135540**
PM: **110 - Brian Ford**
PB:
Shipped Via:

* Matrix:
SS - Soil **AIR** - Air **F** - Filter
GW - Groundwater **B** - Bioassay
WW - WasteWater
DW - Drinking Water
OT - Other_____

Remarks: Standard TAT

pH _____ Temp _____
Flow _____ Other _____

Samples returned via:
__ UPS __ FedEx __ Courier _____

Tracking # 4301 1538 5062

Sample Receipt Checklist
COC Seal Present/Intact: __NP ✓Y __N
COC Signed/Accurate: ✓Y __N
Bottles arrive intact: ✓Y __N
Correct bottles used: ✓Y __N
Sufficient volume sent: ✓Y __N
If Applicable
VOA Zero Headspace: __Y __N
Preservation Correct/Checked: __Y __N
RAD Screen <0.5 mR/hr: ✓Y __N

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)	Trip Blank Received: Yes / No HCL / MeoH TBR	
	3-6-25	1345	Shipped via FedEx	1	
Relinquished by : (Signature)	Date:	Time:	Received by: (Signature)	Temp: °C Bottles Received:	If preservation required by Login: Date/Time
				TLA 9.1 4 0.4-1-8 4	
Relinquished by : (Signature)	Date:	Time:	Received for lab by: (Signature)	Date: Time:	Hold: Condition: NCF / OK
				3/7/25 0900	