STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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February 9, 2026

Sarah Hazani
CREF3 Puyallup Owner, LLC
11611 San Vicente Boulevard, 10th Floor
Los Angeles, CA 90049
Sent by email: shazani@fortess.com

Re: No Further Action opinion for the following Property associated with a contaminated Site

Site Name:	Washington Cold Storage
Site Address:	240 15th St SE, Puyallup, Pierce County, WA 98372
Facility/Site ID:	99997041
Cleanup Site ID:	16703
VCP Project ID:	XS0012
Parcel No:	0420274127

Dear Sarah Hazani:

The Washington State Department of Ecology (Ecology) received your request for an opinion with a Cleanup Action Report dated December 22, 2025. This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA),[1] chapter 70A.305 Revised Code of Washington (RCW).[2]

This letter attaches **Appendix A** Basis for the Opinion (Reference Documents), **Appendix B** Site Description and Diagrams, and **Appendix C** (Recorded Environmental Covenant).

[1] https://apps.ecology.wa.gov/publications/SummaryPages/9406.html
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305

Background

On August 21, 2021, a fire occurred on the Property, destroying a warehouse and freezing building and apparently resulting in contamination releases on the Property. The Site was enrolled into Ecology's Expedited Voluntary Cleanup Program (VCP) as project XS0012 on December 21, 2022. An Interim Remedial Investigation Report dated January 20, 2022, was included with the application to enter into the Expedited VCP process.

The following activities (see Appendix A for references) followed enrollment of the Site into the Expedited VCP process:

- Following additional investigations to address data gaps, a Remedial Investigation/Focused Feasibility Study and Cleanup Action Plan (RI/FFS/CAP) dated May 12, 2023, was submitted to Ecology.
- Ecology issued a No Further Action (NFA) Likely letter on July 19, 2023 (subsequently corrected on July 24, 2023).
- An Off-Property Investigation Report was submitted to Ecology on October 15, 2025.
- On April 17, 2025, Ecology notified that MTCA cleanup levels for polyfluoroalkyl substances (PFAS) compounds had changed.
- Cleanup activities were conducted between April and October 2025 and a Cleanup Action Report dated December 22, 2025, was submitted to Ecology.
- An Environmental Covenant (EC) was recorded at Pierce County on February 5, 2026.

A significant number of interim submittals and technical assistance from Ecology occurred between 2022 and 2025. Please refer to Appendix A for a more comprehensive list of documents.

Opinion

Ecology has determined that no further remedial action is necessary at the Property. However, further remedial action remains necessary elsewhere at the Site to clean up contamination.[3]

This opinion depends on the continued performance and effectiveness of the post-cleanup controls and monitoring specified in this letter and in the environmental covenant in **Appendix C**.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in chapter 70A.305 RCW and chapter 173-340 WAC[4] (collectively called "MTCA").

Property Description

This opinion applies only to the Property described in this section, which was affected by release(s) at the Site and addressed by your cleanup. The Property includes the following parcel of real property in Pierce County:

- Tax parcel 0420274127

This tax parcel was formed when three separate parcels (0420274126, 7845000161, 7845000170) were combined by Pierce County in approximately November of 2023.

Appendix C includes a legal description of the Property. Appendix B includes a diagram that shows where the Property is located within the Site.

Site Description

This opinion applies only to the Site described in this section. The Site is defined by the extent of contamination associated with the following release(s):

- Petroleum Diesel-range (DRO) and Gasoline-range (GRO) into the groundwater and potentially air.

[3] Ecology has concluded that the possibility of limited soil contamination on parcel 7845100327 located at 1402 E Main Street in Puyallup cannot be precluded at this time. This suspected contamination is further discussed below.

[4] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340

- Petroleum Heavy oil-range (ORO) into the soil and groundwater.
- Benzene into the soil, groundwater, and potentially air.
- Tetrachloroethene (PCE) into the soil.
- Trichloroethene (TCE) into the soil, groundwater, and potentially air.
- cis-1,2-dichloroethene (cDCE) into groundwater and potentially air.
- 1,2-Dichloroethane (EDC) potentially into the air.
- Per- and polyfluoroalkyl substances (PFAS) compounds into the soil and groundwater.

The above list includes volatile contaminants that can have potential for vapor intrusion into indoor air. As further discussed below, Ecology has found no evidence of remaining volatile contamination in soil or groundwater, hence it appears that the concern of potential impacts to indoor air within future structures has been sufficiently addressed, and indoor air is no longer a media of concern at the Site.

Exact sources of the petroleum, benzene, and chlorinated solvents in soil and groundwater are unknown but are suspected to have been released during the 2021 fire. The PFAS compounds in soil and groundwater are suspected to have originated from the aqueous firefighting foam (AFFF) used during the 2021 fire response.

The contamination appears to be largely limited to the Property described above. However, the possibility of some contamination having crossed the property line onto the adjacent parcel to the north (Parcel 7845100327 located at 1402 E Main Street in Puyallup) cannot be precluded at this time. Contamination characterization has not taken place on that property, hence, this NFA opinion letter applies solely to Parcel 0420274126, 7845000161, 7845000170 (the Property).

Please note that releases from multiple sites can affect a parcel of real property. At this time, Ecology has no information that other sites affect the parcel(s) associated with this Site.

Basis for the Opinion

Ecology bases this opinion on the information in the documents listed in **Appendix A**.

You can request these documents by filing a records request.[5] For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call 360-407-6040. Before making a request, check whether the documents are available on Ecology's Cleanup and Tank Search web page.[6]

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that no further remedial action is necessary at the Property to clean up contamination associated with the Site. However, Ecology has also concluded that further remedial action is still necessary to clean up contamination elsewhere at the Site. Ecology bases its conclusions on the following analysis:

Characterizing the Site

Ecology determined in our NFA Likely letter dated July 19, 2023, that your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action for the Property. **Appendix B** describes the Site. Contamination at the Property was characterized through soil, groundwater, and soil gas sampling and analysis activities. Please refer to Ecology's NFA Likely letter for discussion of Site characterization activities conducted prior to July 19, 2023. Subsequent characterization data are discussed as follows:

2024 Off-Property Soil and Groundwater Sampling

Soil and groundwater sampling was conducted on the north-adjacent property (Parcel 7845100301 at 1416 E Main Street) in 2024, as reported in the Technical Memorandum dated October 15, 2024. Two soil and groundwater samples were collected and analyzed for petroleum; benzene, toluene, ethylbenzene, and xylenes (BTEX); and chlorinated volatile organic compounds (CVOCs). All results were below detection limits except for cis-1,2-dichloroethene in one groundwater sample at 1.34 micrograms per Liter (µg/L), less than the MTCA Method B cleanup level of 16 µg/L.

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[5] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[6] https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=

2024 Subsurface Soil Characterization

Additional soil sampling was conducted in December 2024 on the Property to delineate the extent of contamination at locations with cleanup level exceedances identified during the RI. This included 16 soil samples from 8 locations analyzed for petroleum and BTEX; and 18 soil samples from 10 locations analyzed for CVOCs. Samples were collected between 0.5 and 10 feet below ground surface (ft bgs). The 2024 results for petroleum, BTEX, and CVOCs in soil were all below cleanup levels.

2025 Subsurface Soil Characterization

Additional soil sampling was conducted in May 2025 to delineate the extent of PFAS contamination near location A-1, where cleanup level exceedances were identified from data collected during the RI. This included 11 samples from 7 locations analyzed for PFAS compounds. Soil samples were collected between 0.5 and 3.0 ft bgs. Of the 11 samples, 7 had at least one had cleanup level exceedances for PFAS compounds.

Confirmatory soil sampling results following excavation cleanup is discussed below under “Implementing the Cleanup Action”.

2024-2025 Groundwater Characterization

Additional groundwater sampling was conducted in 2024 and 2025. As discussed in Ecology’s NFA Likely letter, significant attenuation was observed in monitoring well samples, and many of the monitoring locations sampled in 2024 targeted obtaining a minimum of four quarters of groundwater data below cleanup levels.

Based on the data presented within the December 2, 2025, Cleanup Action Report, a minimum of 4 consecutive quarterly groundwater monitoring rounds have been achieved throughout the Site for petroleum, BTEX, and CVOCs in groundwater. With respect to PFAS compounds, of 14 monitoring wells sampled at the Site, six had cleanup level exceedances in the most recent sampling round.

Groundwater results are further discussed below under “Implementing the Cleanup Action”.

Soil Gas Characterization

A passive soil gas survey that was conducted at the Site was discussed in Ecology's July 19, 2023, NFA Likely letter. Soil sampling was conducted at each of the areas with higher soil gas results. No vapor intrusion concerns were identified within a Vapor Intrusion Evaluation Technical Memorandum dated September 5, 2025.

Potential vapor intrusion is further discussed below under "Implementing the Cleanup Action".

Setting Cleanup Standards

Ecology has determined the cleanup levels and points of compliance set for the Site meet the substantive requirements of MTCA. The following cleanup levels have been selected for soil, groundwater, and indoor air at the Site:

Table 1. Cleanup Levels for Soil and Groundwater

Contaminant	**Method B Direct Contact-Based Cleanup Level for Soil** (mg/kg)	**Method A/B Soil-Protective-of Groundwater Cleanup Level for Soil** (mg/kg)	**Cleanup Level for Groundwater** (µg/L)
DRO	NA	2,000*	500*
ORO	NA	2,000*	500*
Benzene	18	0.027*	5*
EDC	11	0.023†	5*
PCE	480	0.050*	5*
TCE	12	0.025*	5*
cDCE	160	0.079†	16‡
PFAS Compounds	(pg/g)	(pg/g)	(ng/L)
PFHxS	780,000	62†	10
PFOA	34	25†	4
PFOS	8,000	46†	4
PFNA	200,000	89†	10
PFDA	160	0.38†	0.032
6:2 FTS	16,000,000	79,000†	3,200

* – Method A cleanup level.
† – Method B, soil-protective-of-groundwater concentration.
‡ – Method B, groundwater cleanup level
mg/kg = milligrams per kilogram
µg/L = micrograms per liter
pg/g = picograms per gram
ng/g = nanograms per gram

Ecology notes that soil-protective-of-groundwater-based cleanup levels are commonly significantly more restrictive than the direct contact-based cleanup levels.

Since the petroleum and CVOCs in groundwater have had no cleanup levels exceedances for at least the last four sampling rounds at all monitoring wells, Ecology has concluded that the conditions for an Empirical Demonstration of a lack of continued impact to groundwater for those constituents has been made.[7] However, because PFAS compounds in groundwater continue to be present at concentration above cleanup levels, the soil-protective of groundwater concentrations for PFAS compounds continue to apply.

Soil gas and indoor air screening levels are provided in the following table:

Table 2. Screening Level for Soil Gas and Indoor Air

Contaminant	Method B Sub-Slab Screening Level (Commercial) (µg/m^3)	Method B Indoor Air Screening Level (Commercial) (µg/m^3)
DRO	13,000*	390*
ORO	NA	NA
Benzene	50	1.5
EDC	15	0.45
PCE	1,500	44.92
TCE	95	2.85
cDCE	5,200	155.7
PFOA	NA	NA
PFOS	NA	NA
PFNA	NA	NA

µg/m^3 = micrograms per cubic meter
* – Generic screening level for total petroleum hydrocarbons (TPH).
NA – not applicable. (Vapor pressure too low to present a vapor intrusion risk).

As discussed above, the locations with elevated soil gas contaminant concentrations have all been investigated for contaminated soils. The locations with contaminated soil have been cleaned up, and Ecology has concluded that remaining soil gas concerns at the Site are unlikely.

[7] See WAC 173-340-747(9)(b)

Points of Compliance

The points of compliance for soil are throughout the Site. Cleanup levels based on the direct contact pathway apply to soils to a depth of 15 ft bgs, whereas cleanup levels for the soil-to-groundwater pathway apply without regard to depth. The maximum depth of soil contamination found at concentrations above cleanup levels at the Site was at 8 ft bgs at location A-22.

Points of compliance for petroleum, BTEX, and CVOCs in groundwater can be considered throughout the Site, as cleanup levels have been achieved at all monitoring well locations for the last four monitoring rounds. Ecology has selected Conditional Points of Compliance (CPOCs) for PFAS in groundwater along near the Property boundary.[8] These CPOCs, monitoring wells FMW-08, FMW-11, FMW-10R, and FMW-17 are shown in Figure 14 in Appendix B and are further discussed below.

Terrestrial Ecological Evaluation (TEE)

The Site is located in an area of Puyallup with commercial and light industrial land uses to the west, north, and east, and residential neighborhoods south of East Pioneer Avenue to the south. No open space is located within 500 feet, except for a forested buffer on a tributary of the Puyallup River that is located approximately 300 feet east of the Site. This forested buffer is approximately 3.0 acres in area. Based on completion of a simplified TEE[9] using MTCA Table 749-1, the TEE process has ended, as discussed in Ecology's July 19, 2023 NFA Likely letter.

Following completion of the cleanup, most contaminated soils have been removed (see below discussion on "Implementing the Cleanup Action"). The remaining contaminated soils will be covered by a structure or paving. No further evaluation of ecological concerns appears to be warranted for the Site.

Selecting the Cleanup Action

Ecology has determined the cleanup actions you selected and implemented for the Property meet the substantive requirements of MTCA. Ecology provided our concurrence on the selection of the cleanup actions within our NFA Likely letter dated July 19, 2023.

[8] WAC 173-340-720(8)(c)
[9] WAC 173-340-7492(2)(a)(ii)

The cleanup actions included the following:

- April 2025 – Groundwater Remedial Injections
- October 2025 – Contaminated Soil Excavations with Offsite Disposal

As discussed above, subsequent to Ecology July 2023 NFA Likely letter, cleanup levels for PFAS compounds changed. Ecology notified you of these changes in an email dated April 17, 2025. This change resulted in the need for additional soil characterization to determine the extent of PFAS contamination in soil in the vicinity of sample location A-1 (see Figure 6 in Appendix A). Additional soil sampling was conducted in May of 2025.

A disproportionate cost analysis (DCA) was submitted to Ecology on July 21, 2025, which compared the costs and relative benefits of complete versus partial removal of the PFAS in soil contamination. The results of that DCA are summarized as follows:

Table 3. Disproportionate cost analysis for PFAS in Soil

Alternative	Cost	Benefit Score
1 – Complete Removal	$300,000	8.0
2 – Limited Removal	$80,000	7.7
3 – Institutional and Engineering Controls	$0	2.9

Ecology provided concurrence on the selection of Alternative 2 as the preferred alternative in an email dated August 5, 2025. Ecology stated in that email:

> *The PFAS in soil and groundwater at the Site is believed originate from a fire response that included the use of aqueous firefighting foam (AFFF). Based on this release mechanism, there is potential for PFAS in soil to be very heterogeneous at the Site, and it could be akin to a "needle in a haystack" to find all exceedances of the soil-protective-of-groundwater-based cleanup level. In addition, groundwater is being addressed through the injected carbon barriers installed at the site. Hence, the proposal to not remove all soil with PFOS (and potentially other PFAS compounds) with concentrations exceeding soil-protective-of-groundwater-based cleanup levels is acceptable.*

Ecology notes that with limited excavation, the remaining PFAS in soil contamination exceeds the soil-protective-of-groundwater-based cleanup level, but not the direct-contact-based cleanup level. Following the limited excavation, institutional controls memorialized within an environmental covenant would need to include protection of the cap covering the entire Property to prevent infiltration from reaching remaining PFAS in soil contamination.

Implementing the Cleanup Action

2024 Remedial Injections

The basis of design of remedial injections was provided in a document submitted to Ecology dated February 28, 2024. Ecology provided concurrence on that document in an email dated March 5, 2024.

The remedial injections took place between April 2 and 26, 2025 in three areas (see Figure 10 in Appendix B). The specific product injected in each area was based on the type of contamination present (petroleum, CVOCs, or PFAS). The injectate at all locations included a colloidal carbon component to adsorb and immobilize the contaminants, plus additives designed to enhance biodegradation of petroleum and CVOCs. Injection Area 1 targeted petroleum and benzene, Area 2 targeted CVOCs, and Area 3 targeted PFAS.

The product information was included in Appendix D of the December 2025 Cleanup Action Report, and Underground Injection Control (UIC) authorizations from Ecology's Water Quality Program were provided in Appendix C of the December 2025 Cleanup Action Report.

The PFAS injection barrier is designed to prevent PFAS in groundwater from migrating to the north and off-Property. Several monitoring wells south (upgradient) of the injection barrier have had cleanup level exceedances for PFAS compounds in the most recent sampling rounds. A prohibition on water supply wells on the Property within the recorded Environmental Covenant is anticipated to address this concern.

The efficacy of the injection treatment has been demonstrated through the testing of monitoring wells located downgradient of the injection areas. None of the downgradient monitoring wells FMW-08, FMW-09, FMW-10, FMW-11, and FMW-17 have had any contamination cleanup level exceedances for at least the last two monitoring rounds. Continued monitoring requirements are discussed below.

A total of six monitoring wells on the Property had PFAS cleanup level exceedances during the most recent sampling round that they were sampled:

Table 4. PFAS in Groundwater Exceeding Cleanup Levels in Most Recent Sampling Data

Monitoring Well	Most Recent Sampling Date	PFAS Compound with Cleanup Level Exceedance	Groundwater Concentration (ng/L)	Method B Cleanup Level for Groundwater (ng/L)
MW-2	6/14/23	PFOS	**4.4**	4.0
MW-3	6/14/23	PFOA	**10**	4.0
		PFOS	**53**	4.0
MW-4	6/14/23	PFOA	**19**	4.0
		PFAS	**16**	4.0
		PFNA	**16**	10
		PFDA	**4.6**	0.032
FMW-14	5/21/25	PFOS	**24**	4.0
		6:2 FTS	**16,000**	3,200
FMW-15	9/11/23	PFOA	**11**	4.0
		PFOS	**25**	4.0
FMW-16	9/11/23	PFOA	**11**	4.0
		PFOS	5.0	4.0

Ng/g = nanograms per gram.

Bold = concentration above preliminary cleanup level.

The PFAS in groundwater contamination plume on the Property is defined by these monitoring wells, as shown in Figure 9 in Appendix B. Ecology has concluded that the remaining PFAS in groundwater appears to be effectively contained by the remedial injection barriers. Continued groundwater monitoring at CPOCs will be needed to verify this conclusion. Continued monitoring requirements are discussed below.

October 2025 Contaminated Soil Excavation

Contaminated soil excavation took place between October 13 and 24, 2025, in five areas. The soil removal areas are shown on Figures 11 through 13 in Appendix B. The majority of the excavation boundaries were pre-defined with soil sampling data collected in 2024. In addition, some excavation base samples were collected to confirm the removal of all contamination. Three excavation base samples were analyzed for CVOCs, and one excavation base sample was analyzed for BTEX.

The combination of previously collected soil data and the excavation base sample results demonstrate that all contaminated soil has been removed except for Excavation 5, where PFAS contamination remained at two locations (see Figure 13 in Appendix B). Remaining cleanup level exceedances for PFAS compounds are summarized as follows:

Table 5. Remaining PFAS in Soil Samples Exceeding Cleanup Levels

Sample	Contaminant	Soil Concentration (pg/g)	Method B Direct Contact-Based Cleanup Level for Soil (pg/g)	Method B Soil-Protective-of Groundwater Cleanup Level for Soil (mg/kg)
FB-40 @ 0.5 ft	PFOS	60	8,000	46
FB-37 @ 3 ft	PFOS	840	8,000	46
	PFDA	140	160	0.38

pg/g = picograms per gram
mg/kg = milligrams per kilogram

FB-40 is located south of Excavation 5, and FB-37 is located on the north edge of Excavation 5, near the property boundary with the north-adjacent property. The results presented in Table 4 show that the remaining contamination is below the direct-contact based cleanup level, but above the soil-protective-of-groundwater concentrations.

The data from location FB-37 at 3 feet depth indicate that the possibility of PFAS in soil contamination on the north-adjacent property (on parcel 7845100327 located at 1402 E Main Street in Puyallup). Hence, this letter is a Property-specific NFA rather than a Site NFA. The area of concern on the adjacent parcel is a paved parking lot south of a commercial building. Issuances of a Site NFA would require either further sampling data on the adjacent property that demonstrates no cleanup level exceedances are present or, if contamination is found, cleanup of such contamination. **Ecology will be forwarding this letter to the owner of parcel 7845100327.**

In addition to the two locations with soil-protective-of-groundwater-based cleanup level exceedances for PFAS compounds in soil, the relatively low density of soil sampling locations for PFAS analysis (see Figure 6 in Appendix A) suggests the possibility of other, not yet identified contamination releases. Ecology has concluded that risks from such potential remaining contamination can be effectively managed with engineering and institutional controls.

Vapor Intrusion

As discussed above, no volatile contaminants are known to remain in soil or groundwater at concentrations above MTCA cleanup levels following cleanup work. The locations of elevated soil gas concentrations from the passive soil gas survey conducted during the RI have all been investigated, and where contaminated soil was found, cleaned up. The risk of vapor intrusion at the Site following the cleanup work appears to be low.

Post-Cleanup Controls and Monitoring

Post-cleanup controls and monitoring are remedial actions performed to ensure compliance with cleanup standards. Ecology is issuing this NFA opinion for the Property based on the continued performance and effectiveness of the following post-cleanup remedial actions at the Site. Ecology may rescind this opinion if these remedial actions are not performed or do not effectively maintain the cleanup standards.

Compliance with Institutional Controls

Institutional controls prohibit or limit activities that may interfere with the integrity of engineered controls or result in exposure to contamination. The following site-specific institutional controls are needed at the Site:

- Maintenance of the cap (paving) preventing access to the remaining and potential contaminated soils and preventing infiltration of stormwater.
- A prohibition on drinking water use of groundwater beneath the Property.

To implement the controls, you recorded an environmental covenant (EC) on the following parcels of real property in Pierce County:

- Parcel No. 0420274127

Ecology signed the EC on January 28, 2026, and it was recorded at Pierce County on February 5, 2026, (see Appendix C). To amend or terminate the EC, you must request additional review under the Voluntary Cleanup Program (VCP).[10]

[10] Toxics Cleanup Program Procedure 440C: https://apps.ecology.wa.gov/publications/SummaryPages/1509057.html

The recorded EC includes, but is not limited to, the following provisions:

- Commercial or industrial land use for the Property in perpetuity.
- Requirement to contact Ecology prior to disturbing the cap (asphalt paving and impervious surfaces) on the Property.
- A prohibition on stormwater infiltration features.
- A prohibition on installation of water supply wells on the Property.

Maintenance and Monitoring of Engineered Controls

Engineered controls prevent or limit movement of, or exposure to, contamination. The following engineered controls are part of the Property cleanup:

- The existing asphalt pavement and impervious surfaces on the Property serve as a cap, preventing access to soils and stormwater infiltration.

Ecology should be notified within 48 hours of any damage, modifications, or repairs to the cap that have potential to affect exposure to contaminated soil or stormwater infiltration. The monitoring report to be submitted to Ecology for our 5-year periodic review (discussed below), should include a discussion on the status of the asphalt paving and impervious surface any modifications or planned modifications that have potential to affect access to or migration of the remaining soil and groundwater contamination.

Performance of Groundwater Confirmational Monitoring

Groundwater confirmational monitoring is needed at the Site to confirm the long-term effectiveness of the cleanup of the Property. Continued groundwater monitoring requirements are summarized below. A Long-Term Compliance Groundwater Monitoring Plan was submitted to Ecology on December 22, 2025. In the event of any differences between the monitoring plan and this letter, this letter shall prevail over the monitoring plan.

Ecology notes that this property-specific NFA is based on groundwater data that demonstrates that the PFAS in groundwater is effectively contained by the injection barriers. However, continued monitoring is needed to verify this conclusion.

Continued groundwater monitoring should take place at CPOC monitoring wells FMW-08, FMW-10R, and FMW-17. The rationale for the selection of these CPOCs is as follows:

- FMW-08 – near Property boundary, within/downgradient of the remedial injection barrier downgradient of PFAS in soil remedial excavation area 5.
- FMW-10R – near Property boundary, within/downgradient of the remedial injection barrier downgradient of PFAS in groundwater at FMW-16.
- FMW-11 – downgradient of PFAS in groundwater at MW-4.
- FMW-17 – near Property boundary, within/downgradient of the remedial injection barrier downgradient of PFAS in groundwater at FMW-14.

Ecology notes that monitoring well FMW-10 was decommissioned prior to excavation cleanup work conducted in October 2025 and replaced with FMW-10R on October 28, 2025.

In addition, monitoring for PFAS compounds in groundwater should take place at in-plume monitoring wells MW-04, FMW-14, FMW-16 where PFAS in groundwater cleanup level exceedances occurred during the most recent monitoring round. Samples should be analyzed for PFAS compounds using Ecology-approved analytical methods. Water level measurements should be taken during each round from each of the above monitoring wells, as well as at MW-06, and a potentiometric surface map prepared for each monitoring round to demonstrate consistent groundwater flow directions over time.

Ecology understands that no redevelopment of the Property is yet planned. Ecology requests that construction plans be submitted to Ecology as soon as they are available and any conflicts between construction plans and the continued monitoring network be resolved as quickly as possible. Ecology recognizes that some adjustments, particularly with the in-plume monitoring network may be needed to accommodate construction plans.

Post-NFA monitoring should take place on a 15-month interval, such that four monitoring rounds are conducted prior to Ecology's 5-year periodic review, estimated to take place in about the first quarter of 2031.

The following monitoring schedule is suggested:

- March 2027
- June 2028
- September 2029
- December 2030

Ecology will review the monitoring data during periodic reviews of post-cleanup conditions. Should any cleanup level exceedances occur at CPOC locations FMW-08, FMW-10R, FMW-11, or MW-17, then Ecology must be notified within 48 hours of receipt of such data. Should such circumstances occur, then the monitoring wells with such exceedances should be resampled, and if concentrations are still above cleanup levels, then contingency measures may be needed. If cleanup level exceedances remain at monitoring wells FMW-08, FMW-10R, FMW-11, or FMW-17 following execution of such contingency measures, then this NFA decision may be rescinded.

Groundwater monitoring results should be submitted to Ecology by January 15, 2031, for our 5-year periodic review. This submittal should include tabulated results, a sample location map, and laboratory analytical report. **If the groundwater monitoring data are not submitted to Ecology by January 15, 2031, then this NFA opinion may be rescinded.** The need for continued monitoring will be determined by Ecology's periodic reviewer during the preparation of the periodic review report.

You must decommission resource protection wells[11] installed as part of the remedial action that are not needed to conduct post-cleanup monitoring or for any other purpose at the Site. Wells must be decommissioned in accordance with WAC 173-160-460.[12]

Cap Inspections

An asphalt cap monitoring plan dated December 30, 2025, was submitted to Ecology. The plan calls for the annual inspection of the asphalt paving and impervious surface and the completion of the periodic monitoring form that was attached to that plan. Ecology concurs with the contents of that plan with the following clarifications:

[11] https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-410
[12] https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460

- If no concerns with the surface cap are found, then the forms can be submitted along with the groundwater monitoring report for the 5-year periodic review, discussed above. Ecology requests some representative photos of the paved surfaces to be included with that submittal.

- If concerns with the asphalt pavement or impervious surfaces are found during the scheduled inspections or at other times, then Ecology should be notified within 48 hours. Photos should be taken of the identified concerns and repairs made within 30 days. Discussion and documentation of repairs should be submitted to Ecology within 60 days of identification of the surface concerns.

Periodic Review of Post-Cleanup Conditions

Ecology will conduct periodic reviews of post-cleanup conditions at the Site to evaluate whether they remain protective of human health and the environment. Periodic reviews are anticipated to occur on a five-year basis. Based on a periodic review, if Ecology determines the Site needs further remedial action, Ecology will rescind this opinion. **Ecology notes that the need for continued monitoring at the Site after the monitoring period stipulated above will be determined by Ecology's periodic reviewer.** The need for continued monitoring would be provided within the Periodic Review Report, the first of which is anticipated to be prepared by Ecology in about the first quarter of 2031.

Limitations of the Opinion

Opinion does not settle liability with the state

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion does not:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under chapter 70A.305.040(4) RCW.[13]

Opinion does not constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. See chapter 70A.305.080 RCW[14] and chapter 173-340-545 WAC.[15]

State is immune from liability

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See chapter 70A.305.170(6) RCW.[16]

[13] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040
[14] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080
[15] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545
[16] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170

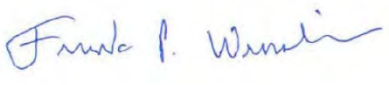
Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. XS0012. The remaining balance on the account will be refunded after deducting labor charges and applicable closure fees.

Questions

If you have any questions about this opinion, please contact me at frank.winslow@ecy.wa.gov or 509-424-0543.

Sincerely,



Frank P. Winslow, LHG
Cleanup Project Manager
Headquarters Section

FPW/tam

Appendices (3): A – Basis for the Opinion (Documents Reviewed)
B – Site Description, History, and Diagrams
C – Recorded Environmental Covenant

cc by mail: Parcel 7845100327 Property Owner, Westech Realty Co LLC

cc by email: Yusuf Pehlivan, Farallon Consulting, ypehlivan@farallonconsulting.com
Peter Kingston, Farallon Consulting, pkingston@farallonconsulting.com
Erik Snyder, Ecology, erik.snyder@ecy.wa.gov
Tim Mullin, LHG, Ecology, tim.mullin@ecy.wa.gov
Treasure Mitchell, Ecology, treasure.mitchell@ecy.wa.gov
VCP Fiscal Analyst, Ecology, ecyrevcp@ecy.wa.gov
Ecology Site File

Appendix A

Basis for the Opinion (Documents Reviewed)

Site Documents

1. Farallon. *Cleanup Action Report, Former Washington Cold Storage Building, 240 15th Street Southeast Puyallup, Washington*. December 22, 2025.

2. Ecology. *Email Re Ecology Feedback on Vapor Intrusion Technical Memorandum*. September 29, 2025.

3. Farallon. *Technical Memorandum, Vapor Intrusion Evaluation, Washington Cold Storage, Puyallup, Washington*. September 5, 2025.

4. Ecology. *Email Re Ecology Feedback on PFA Excavation DCA*. August 5, 2025.

5. Farallon. *Email Re PFAS Excavation DCA*. July 21, 2025.

6. Ecology. *Email Re Changes in PFAS Cleanup Levels*. April 17, 2025.

7. Farallon. *Email Re Groundwater Conditions Update*. April 16, 2025.

8. Ecology. *Email Re Ecology Feedback on Off-Property Investigation*. October 21, 2024.

9. Farallon. *Off-Property Subsurface Investigation Summary, Former Washington Cold Storage Building, 240 15th Street Southeast, Puyallup, Washington*. October 15, 2024.

10. Ecology. *Email re Ecology Concurrence on Revised Compliance Monitoring Plan*. July 25, 2024.

11. Farallon. *Compliance Monitoring Plan, Former Washington Cold Storage Building, 240 15th Street Southeast, Puyallup, Washington*. July 9, 2024.

12. Ecology. *Email re Ecology Feedback on Remedial Injection Basis of Design*. March 5, 2024.

13. Farallon. *Remedial Injection Basis of Design, Former Washington Cold Storage Building, 240 15th Street Southeast, Puyallup, Washington*. February 28, 2024.

14. Ecology. *NFA Likely Opinion Letter, Washington Cold Storage Site*. July 19, 2023, corrected July 24, 2023.

15. Farallon. *Email Re PFAS in Groundwater Results*. June 29, 2023.

16. Farallon. *Remedial Investigation/Focused Feasibility Study and Cleanup Action Plan, Former Washington Cold Storage Building*. May 12, 2023.

17. Atlas. *Interim Remedial Investigation Report, Former Washington Cold Storage Facility*. January 20, 2022.

    Atlas. *Phase I Environmental Site Assessment, Former Washington Cold Storage Facility*. October 18, 2021.

Appendix B

Site Description, History, and Diagrams

Site Description

Site

The Site is defined by contamination releases to soil and groundwater, and potentially air. Releases included petroleum (diesel-, gasoline-, and heavy oil-range); benzene; the chlorinated solvent compounds tetrachloroethene (PCE), trichloroethene (TCE), and cis-1,2-dichloroethene (cDCE); and per- and polyfluoroalkyl substances (PFAS). The contamination releases were identified following a fire that burned down a large warehouse and freezer building at the Site on August 21, 2021. No petroleum or chlorinated solvents were known to be stored or used at the Property.

Area and Property Description

The Property includes 7.95-acre Pierce County Parcel No. 0420274127. The Property is abutted by 15th Street SE to the east, BNSF Railroad to the south, and private parcels to the west, and north. Beyond BNSF Railroad to the south is East Pioneer Avenue. The Site is located in an area of Puyallup with commercial and light industrial land uses to the west, north, and east, and residential neighborhoods south of East Pioneer Avenue (to the south).

Site History

The following discussion of Site history is from the RI/FFS/CAP report:

> *The Property is developed with a one-story 1,495-square-foot modular office building constructed in 1985 and a one-story 19,885-square-foot industrial warehouse building constructed in 1960 and formerly used as a smokehouse. The Property historically also was developed with a 101,933-square-foot warehouse and freezer building constructed in 1985 and occupied by Washington Cold Storage, which was largely destroyed by a fire on August 21, 2021. Following the fire, the raised building foundation of the warehouse and freezer building remained on the Property. The building foundation consists of a loading-dock height concrete pad underlain by fill material and is approximately 4 feet higher than the grade of the remainder of the Property.*

Physiographic Setting

The Site is located near the middle of the Puyallup River Valley in Puyallup, Washington, approximately nine miles southeast of where the river discharges into Puget Sound (in Tacoma, Washington). The river valley cuts through undulating glacial topography within

the Puget Sound Physiographic Province. The Site is located at an elevation of approximately 55 feet above mean sea level (amsl).

Surface/Storm Water

The Site is approximately 1,400 feet southwest of the Puyallup River, and nine miles southeast of Puget Sound. An unnamed creek is located approximately 370 feet east of the Site that flows to the north, draining into the Puyallup River. Based on groundwater flow directions at the Site, risk to surface water appears to be low.

Surface elevations at the Site range from 52 to 56 feet above mean sea level (ft amsl), with topography generally dropping to the north and west. Stormwater in the vicinity of the Site is generally anticipated to drain to the north and west.

Ecological Setting

No open space is located within 500 feet of the Site except for a forested buffer on a tributary of the Puyallup River that is located approximately 300 feet east of the Site. This forested buffer is approximately 3.0 acres in area. Based on completion of MTCA Table 749-1, the TEE process can be ended. In addition, following completion of the proposed cleanup, all contaminated soils are anticipated be removed. If any contaminated soils do remain, such soils will all be covered by a structure or paving.

Geology

The following discussion of Site geology is from the RI/FFS/CAP report:

> *Soil encountered beneath the Property during the RI and during a geotechnical investigation conducted by Terra Associates Inc. in November 2021 generally consisted of poorly graded sand with varying amounts of silt and gravel to a depth of approximately 15 feet below ground surface (bgs), underlain by intermittent layers of silt and silty sand to the maximum explored depth of 31.5 feet bgs. Trace quantities of wood fragments and organic material also were reported intermittently in several borings advanced on the Property at depths ranging from approximately 5 to 31 feet bgs.*

Groundwater

The following discussion of Site hydrogeology is from the RI/FFS/CAP report:

> *Groundwater was encountered during drilling at depths ranging from approximately 3 to 11 feet bgs. The range in depth to groundwater measurements is largely due to the difference in surface elevation for borings advanced within the raised building foundation, which is approximately 4 feet higher than the surrounding ground surface. Groundwater was measured in monitoring wells at depths ranging from 3.72 to 9.26 feet below top of casing during the February 2022 groundwater monitoring event, corresponding to groundwater elevations between 51.58 to 49.02 feet North American Vertical Datum of 1988 (NAVD88) (Table 1). Groundwater beneath the Property has been interpreted to flow to the north toward the Puyallup River (Figure 3).*

Water Supply

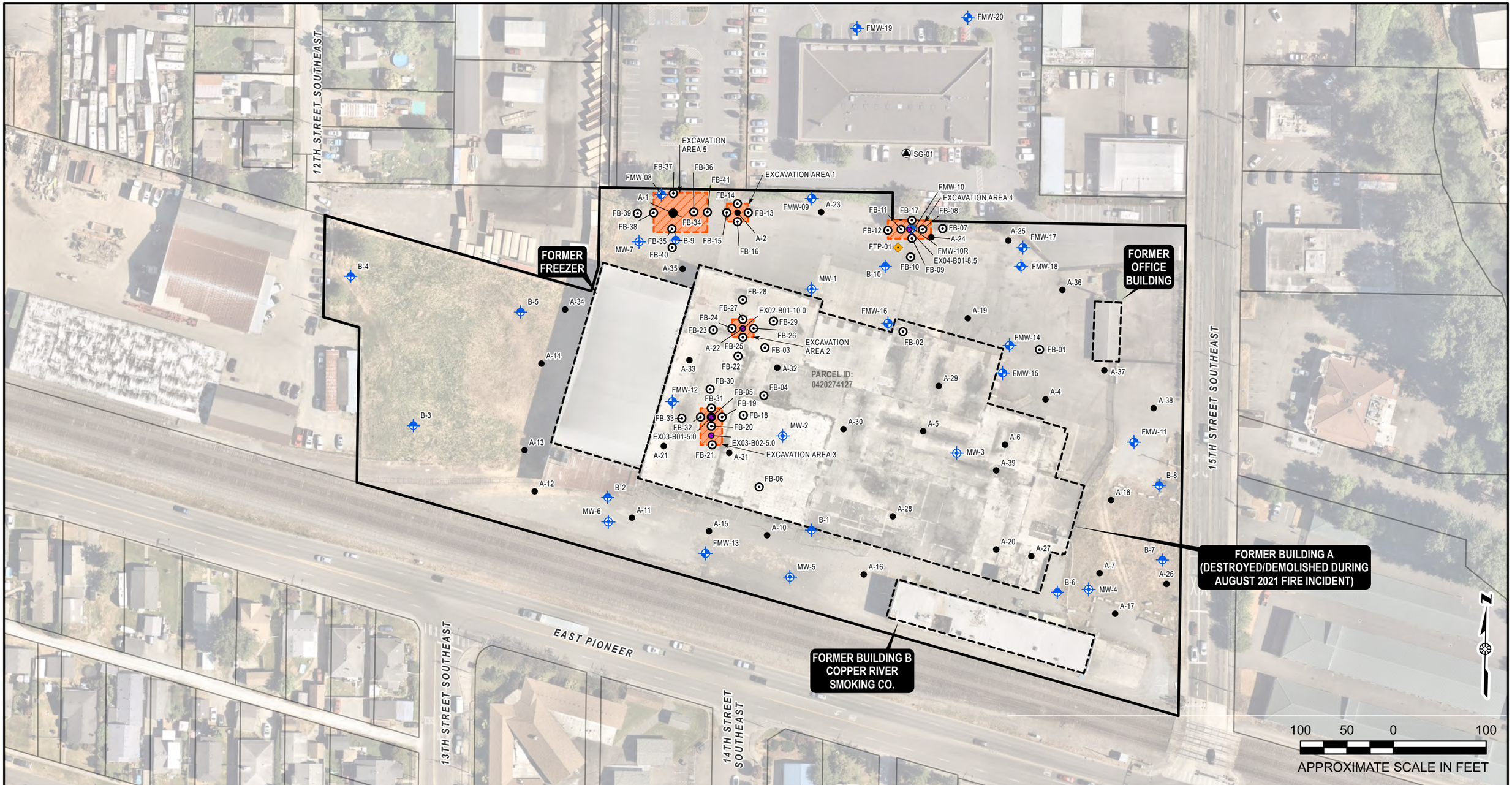
The following discussion of Water Supply at the Site is from the RI/FFS/CAP report:

> *The City of Puyallup reportedly receives approximately 76 percent of its water from two natural springs located east and west of the city. The remaining water is supplied by five deep groundwater wells and an inter-tie with the City of Tacoma. Well logs for the City of Puyallup's municipal water supply wells indicate that the wells range from depths of approximately 280 to 880 feet bgs and are screened in aquifers encountered at depths exceeding approximately 200 feet bgs. According to the Source Water Assessment Program Mapping Application, the Property is not located within a wellhead protection area.*

The nearest Group A/B water supply well is located approximately 2,000 feet southwest of the Site. The nearest wellhead protection zone is located approximately 2,400 feet north of the Site. Risk to existing water supply wells from the Site groundwater contamination appears to be low.

Site Diagrams

The following diagrams are from Farallon's *Cleanup Action Report*, dated December 22, 2025:



LEGEND

- EXCAVATION SOIL SAMPLE (FARALLON, 2025)
- TEST PIT (FARALLON, 2025)
- BORING (ATLAS 2021, 2022)
- BORING (FARALLON, 2023-2024)
- SOIL GAS SAMPLE (FARALLON, 2023)
- GEOTECHINCAL WELL (TERRA, 2021)
- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- SOURCE REMOVAL EXCAVATION AREA
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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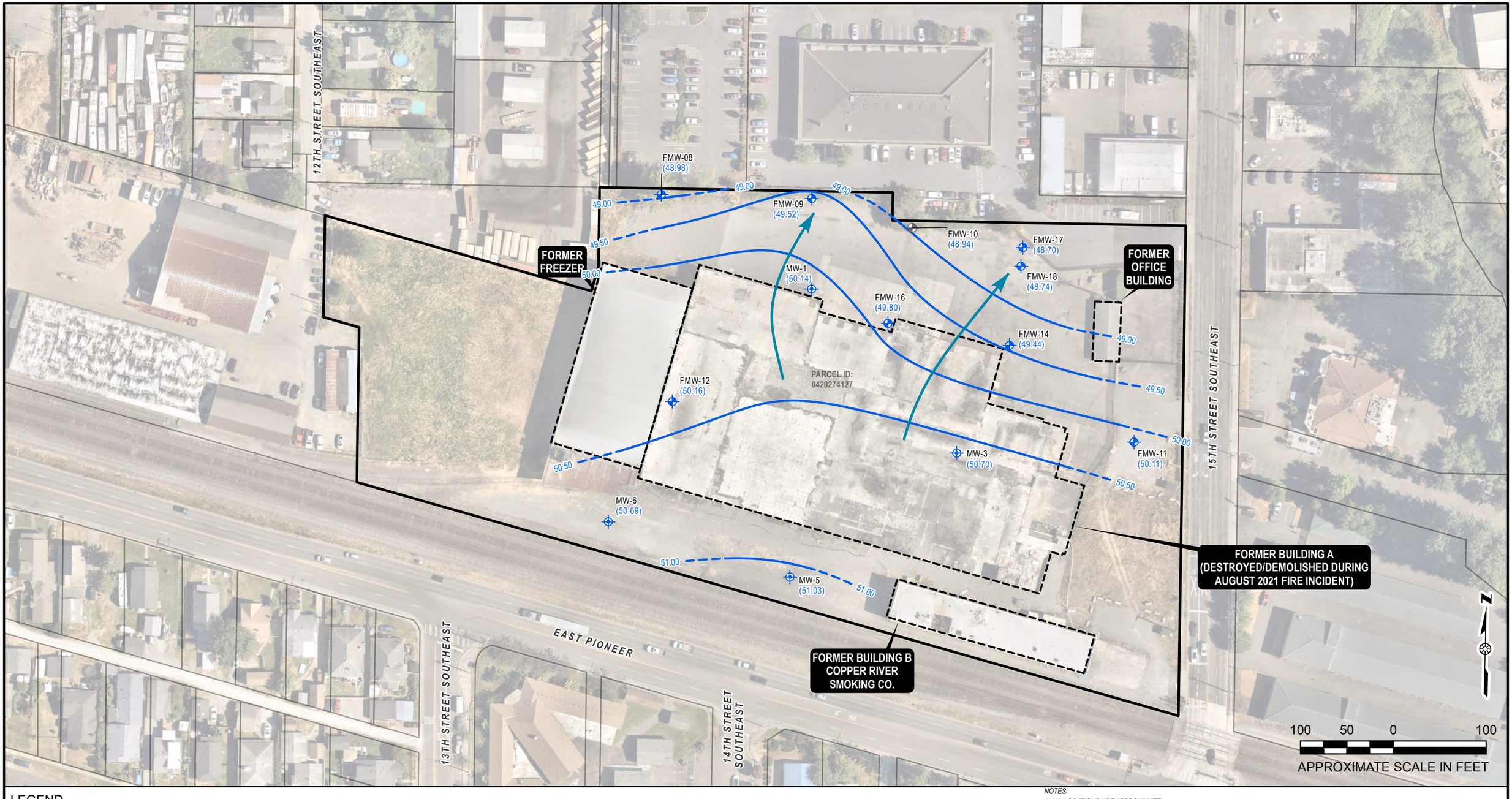
FIGURE 2

PROPERTY PLAN

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\2636001_CAR.aprx



LEGEND

- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY
- 51.00 GROUNDWATER ELEVATION CONTOUR (DASHED WHERE INFERRED)
- APPROXIMATE GROUNDWATER FLOW DIRECTION
- (51.03) GROUNDWATER ELEVATION IN FEET AS MEASURED 5/21/2025, VERTICAL DATUM: NAVD88

NOTES:
GROUNDWATER ELEVATIONS GIVEN IN FEET REFERENCED TO NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88).

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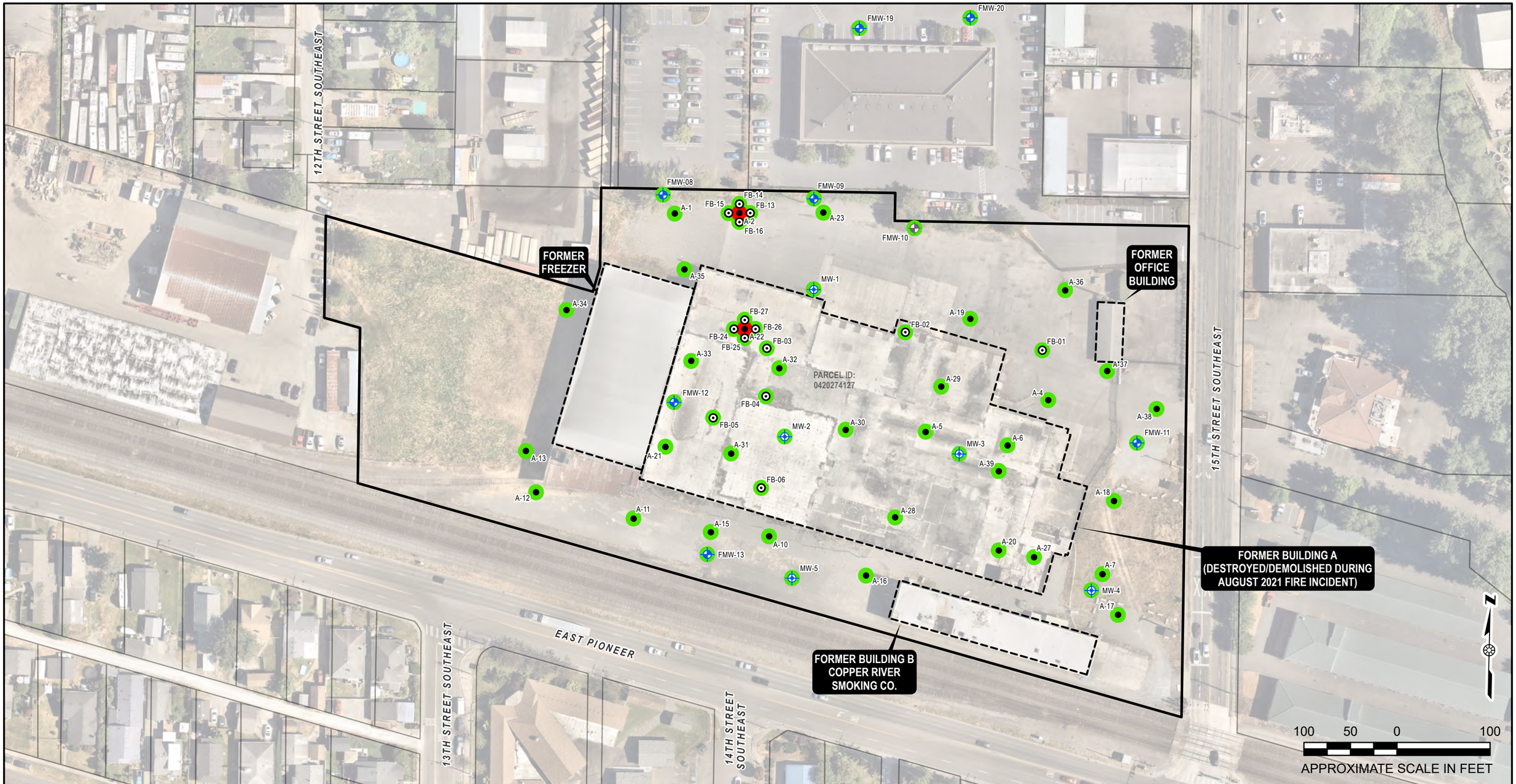
FIGURE 3

GROUNDWATER ELEVATION CONTOURS
MAY 21, 2025

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/5/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\2636001_CAR.aprx



LEGEND

- BORING (ATLAS 2021, 2022)
- BORING (FARALLON, 2023-2024)
- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- INDICATES TPH AND BENZENE WERE NOT DETECTED AT CONCENTRATIONS EXCEEDING MTCA CLEANUP LEVELS
- INDICATES ONE OR MORE MTCA EXCEEDANCES OF TPH AND/OR BENZENE IN SOIL
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

MTCA = MODEL TOXICS CONTROL ACT
TPH = TOTAL PETROLEUM HYDROCARBONS

NOTES:
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FIGURE 4

SOIL ANALYTICAL RESULTS FOR TPH AND BENZENE PRE-CLEANUP ACTION

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/2/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\2636001_CAR.aprx

Sample Location	Sampled By	Sample Depth (feet)[1]	Sample Date	Analytical Results (milligrams per kilogram)[2] PCE	TCE	cDCE	tDCE	Vinyl Chloride
A-1	Atlas	0.5	9/24/2021	< 0.0437	< 0.0219	< 0.0273	< 0.0328	< 0.0273
A-2	Atlas	0.5	9/24/2021	< 0.0722	< 0.0361	< 0.0451	< 0.0542	< 0.0451
A-4	Atlas	0.5	9/23/2021	< 0.0533	< 0.0266	< 0.0333	< 0.0400	< 0.0333
A-5	Atlas	6.0	9/24/2021	< 0.0578	< 0.0289	< 0.0361	< 0.0433	< 0.0361
A-6	Atlas	0.5	9/23/2021	< 0.0418	< 0.0209	< 0.0261	< 0.0313	< 0.0261
A-7	Atlas	0.5	9/24/2021	< 0.0501	< 0.0250	< 0.0313	< 0.0376	< 0.0313
A-10	Atlas	5.0	9/23/2021	< 0.0266	< 0.0532	< 0.0332	< 0.0399	< 0.0332
A-12	Atlas	1.0	9/23/2021	< 0.0594	< 0.0297	< 0.0371	< 0.0446	< 0.0371
A-13	Atlas	5.0	9/23/2021	< 0.0586	< 0.0293	< 0.0367	< 0.0440	< 0.0367
2023 Subsurface Investigation								
FB-02	Farallon	7.0	2/7/2023	< 0.0144	< 0.0144	< 0.0144	< 0.0144	< 0.0144
	Farallon	13.0	2/7/2023	< 0.0154	< 0.0154	< 0.0154	< 0.0154	< 0.0154
FB-04	Farallon	7.0	2/8/2023	< 0.0215	< 0.0215	< 0.0215	< 0.0215	< 0.0215
	Farallon	13.0	2/8/2023	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200
	Farallon	17.0	2/8/2023	< 0.0205	< 0.0205	< 0.0205	< 0.0205	< 0.0205
FB-05	Farallon	3.0	2/8/2023	< 0.0128	**0.120**	< 0.0128	< 0.0128	< 0.0128
	Farallon	7.5	2/8/2023	< 0.0193	< 0.0193	< 0.0193	< 0.0193	< 0.0193
FB-06	Farallon	3.0	2/8/2023	< 0.0199	< 0.0199	< 0.0199	< 0.0199	< 0.0199
	Farallon	7.0	2/8/2023	< 0.0183	< 0.0183	< 0.0183	< 0.0183	< 0.0183
FMW-10	Farallon	3.0	2/7/2023	< 0.0197	< 0.0197	< 0.0197	< 0.0197	< 0.0197
	Farallon	7.0	2/7/2023	**0.0832**	**0.0451**	< 0.0219	< 0.0219	< 0.0219
	Farallon	13.0	2/7/2023	< 0.0165 H	< 0.0165 H	< 0.0165 H	< 0.0165 H	< 0.0165 H
FMW-12	Farallon	7.0	2/8/2023	< 0.0216	< 0.0216	< 0.0216	< 0.0216	< 0.0216
	Farallon	13.0	2/8/2023	< 0.0213	< 0.0213	< 0.0213	< 0.0213	< 0.0213
2024 Subsurface Investigations								
FMW-19	Farallon	5.0	8/13/2024	< 0.0322	< 0.0322	< 0.0322	< 0.0322	< 0.0322
FMW-20	Farallon	5.0	8/13/2024	< 0.0321	< 0.0321	< 0.0321	< 0.0321	< 0.0321
FB-08	Farallon	7.0	12/2/2024	< 0.002	< 0.002	0.010	< 0.002	< 0.002
	Farallon	10.0	12/2/2024	0.0025	0.0023	0.0076	< 0.002	< 0.002
FB-09	Farallon	7.0	12/2/2024	0.0041	0.0054	0.030	0.0023	0.0054
	Farallon	10.0	12/2/2024	< 0.002	< 0.002	0.010	< 0.002	< 0.002
FB-11	Farallon	7.0	12/2/2024	**0.057**	**0.11**	0.015	< 0.002	< 0.002
	Farallon	10.0	12/2/2024	0.0041	0.0022	0.016	< 0.002	< 0.002
	Farallon	15.0	12/2/2024	< 0.002	< 0.002	0.0029	< 0.002	< 0.002
FB-12	Farallon	7.0	12/2/2024	< 0.002	< 0.002	0.0070	< 0.002	< 0.002
FB-17	Farallon	7.0	12/3/2024	< 0.002	< 0.002	0.0056	< 0.002	< 0.002
FB-19	Farallon	3.0	12/3/2024	< 0.002	0.0074	< 0.002	< 0.002	< 0.002
	Farallon	8.0	12/3/2024	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002
FB-20	Farallon	3.0	12/3/2024	< 0.002	**0.036**	< 0.002	< 0.002	< 0.002
	Farallon	7.5	12/3/2024	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002
FB-21	Farallon	3.0	12/3/2024	< 0.002	0.021	< 0.002	< 0.002	< 0.002
FB-31	Farallon	3.0	12/4/2024	< 0.002	0.025	< 0.002	< 0.002	< 0.002
	Farallon	7.0	12/4/2024	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002
FB-32	Farallon	3.0	12/4/2024	< 0.002	0.018	< 0.002	< 0.002	< 0.002
	Farallon	7.0	12/4/2024	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002
MTCA Cleanup Levels for Soil				**0.05**[3]	**0.03**[3]	**160**[4]	**1,600**[4]	**0.67**[4]

Atlas = Atlas Technical Consultants, LLC

Farallon = Farallon Consulting, LLC

H = Sample analyzed outside of holding time

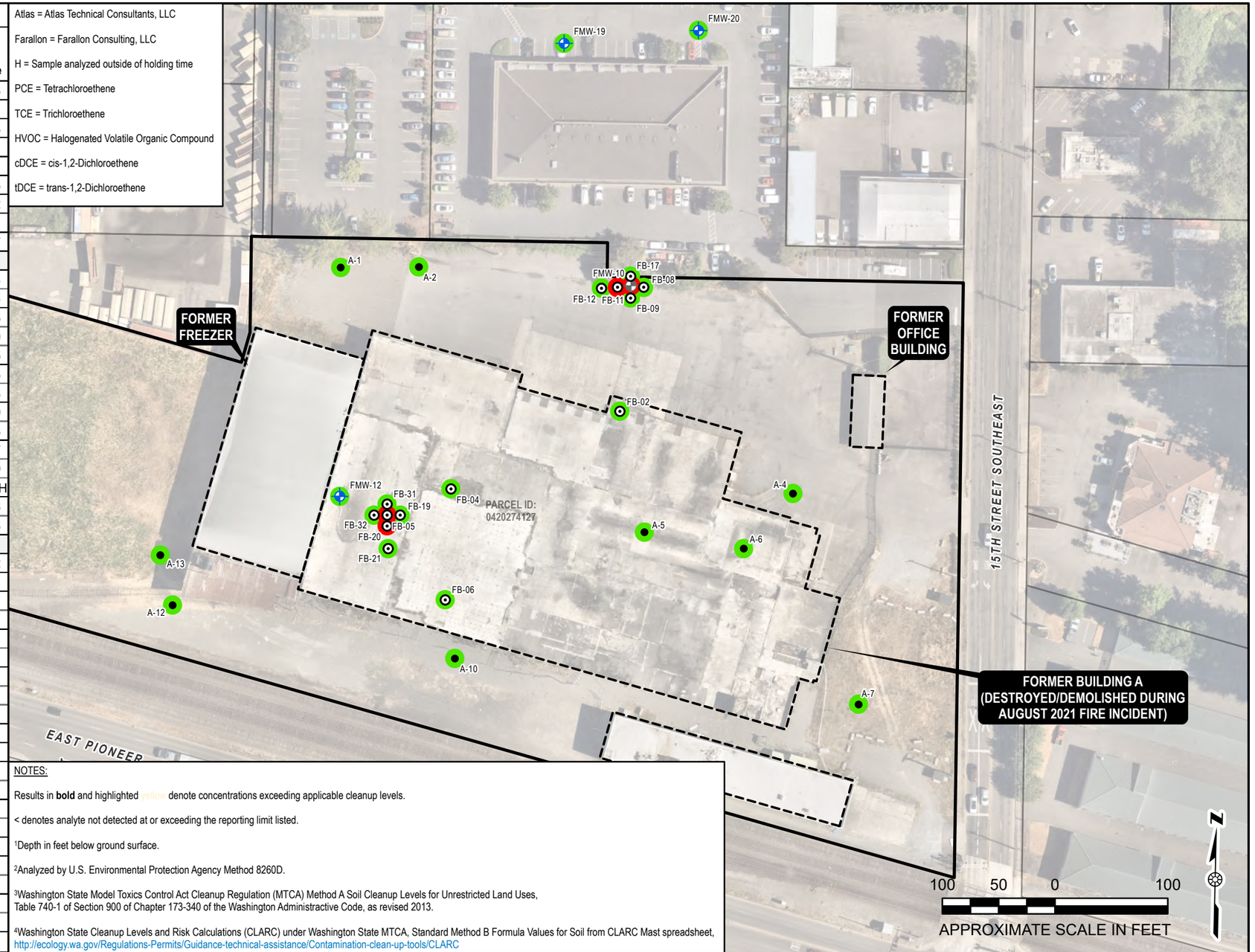
PCE = Tetrachloroethene

TCE = Trichloroethene

HVOC = Halogenated Volatile Organic Compound

cDCE = cis-1,2-Dichloroethene

tDCE = trans-1,2-Dichloroethene



NOTES:

Results in **bold** and highlighted yellow denote concentrations exceeding applicable cleanup levels.

< denotes analyte not detected at or exceeding the reporting limit listed.

[1]Depth in feet below ground surface.

[2]Analyzed by U.S. Environmental Protection Agency Method 8260D.

[3]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013.

[4]Washington State Cleanup Levels and Risk Calculations (CLARC) under Washington State MTCA, Standard Method B Formula Values for Soil from CLARC Mast spreadsheet, http://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC

LEGEND

- BORING (ATLAS 2021, 2022)
- BORING (FARALLON, 2023-2024)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- INDICATES NO DETECTIONS OF HVOCs IN SOIL EXCEEDING MTCA CLEANUP LEVELS
- INDICATES ONE OR MORE DETECTIONS OF HVOCs IN SOIL EXCEEDING CLEANUP LEVELS
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:

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2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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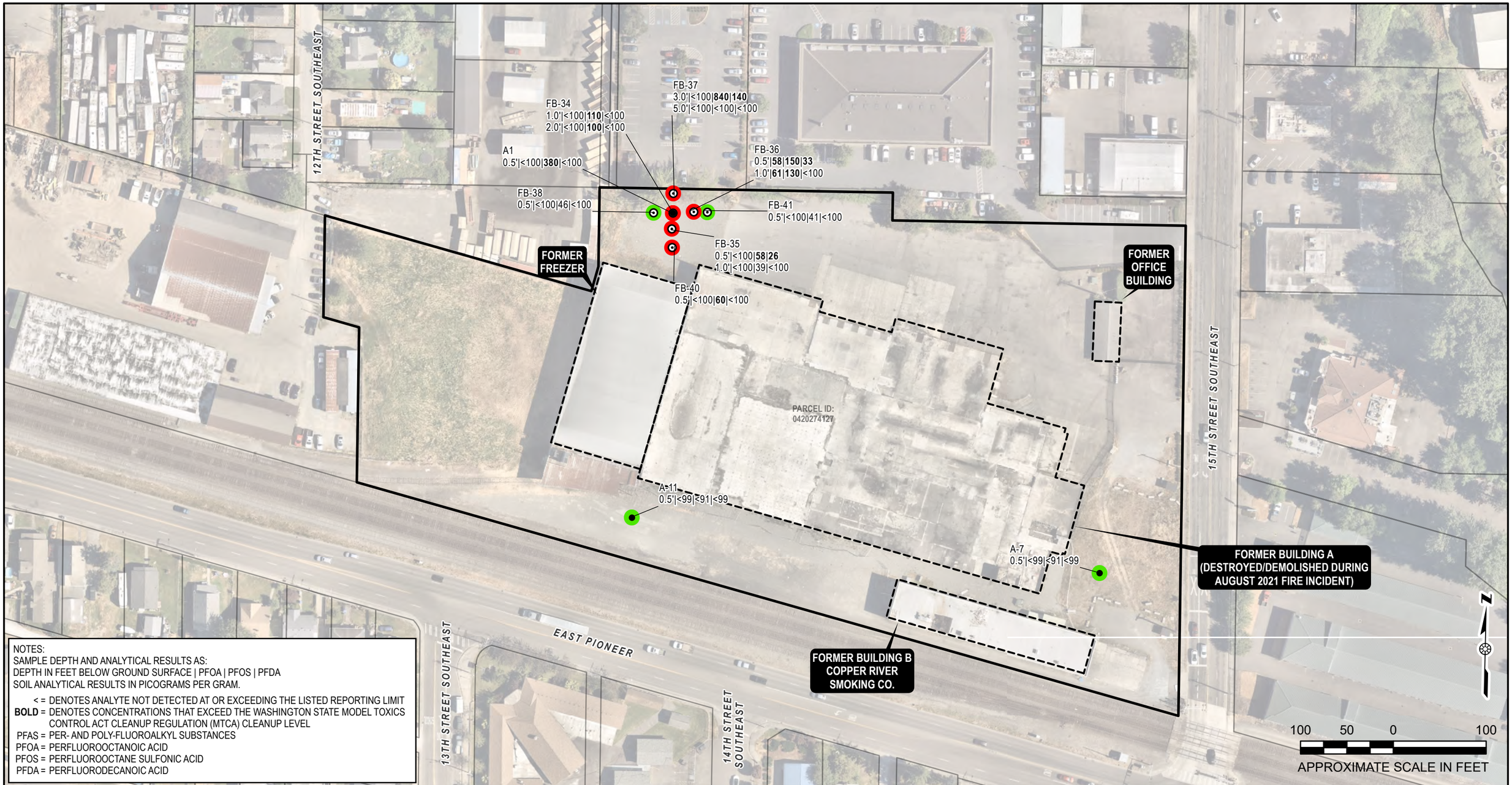
FIGURE 5

SOIL ANALYTICAL RESULTS FOR HVOCS
PRE CLEANUP ACTION

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\Figure-05_Soil_HVOCs_PreCleanup.aprx



NOTES:
SAMPLE DEPTH AND ANALYTICAL RESULTS AS:
DEPTH IN FEET BELOW GROUND SURFACE | PFOA | PFOS | PFDA
SOIL ANALYTICAL RESULTS IN PICOGRAMS PER GRAM.

< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION (MTCA) CLEANUP LEVEL
PFAS = PER- AND POLY-FLUOROALKYL SUBSTANCES
PFOA = PERFLUOROOCTANOIC ACID
PFOS = PERFLUOROOCTANE SULFONIC ACID
PFDA = PERFLUORODECANOIC ACID

LEGEND

- BORING (ATLAS 2021, 2022)
- BORING (FARALLON, 2023-2024)
- INDICATES PFAS WERE NOT DETECTED AT CONCENTRATIONS EXCEEDING MTCA CLEANUP LEVELS IN SOIL
- INDICATES ONE OR MORE MTCA EXCEEDANCES OF PFAS IN SOIL
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
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2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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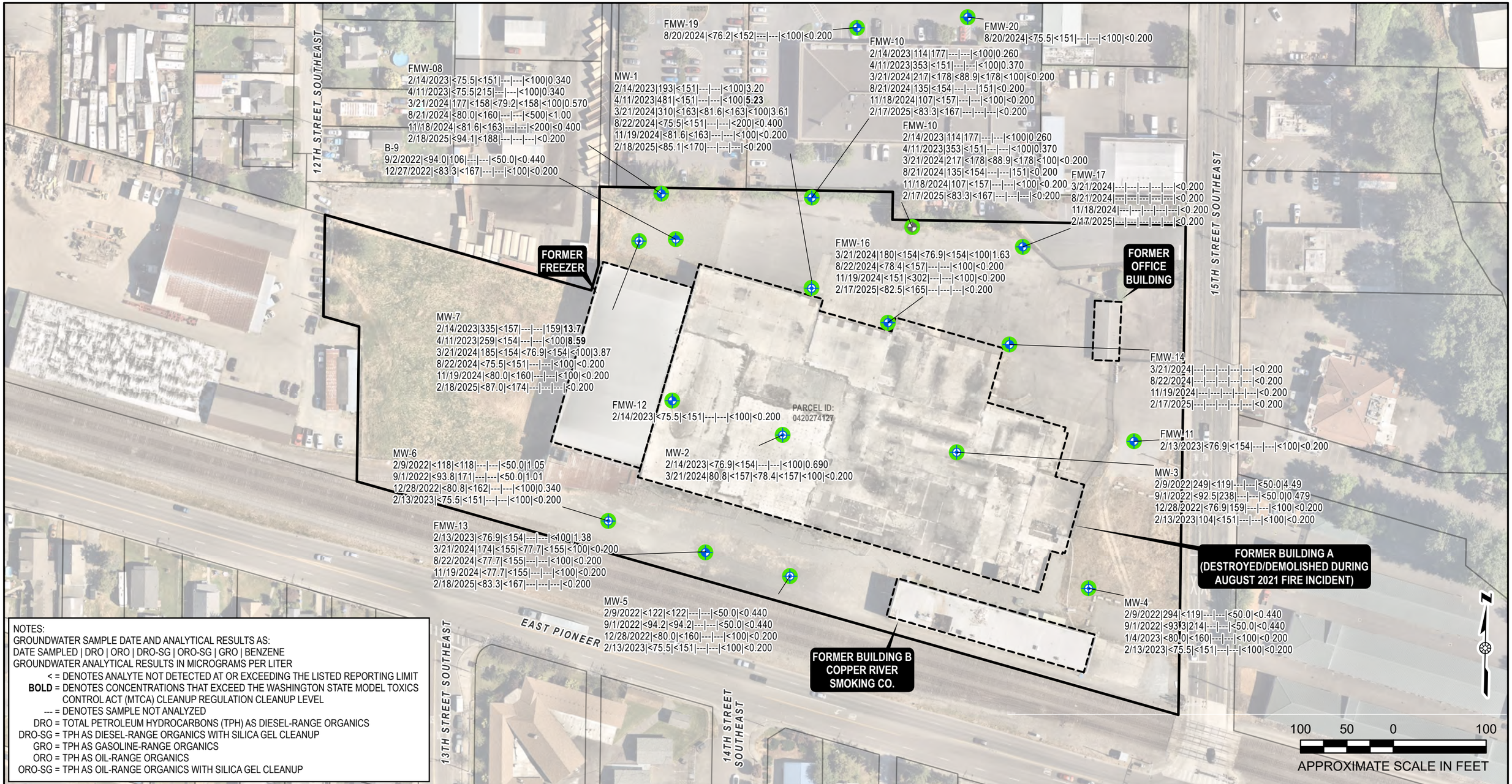
FIGURE 6

SOIL ANALYTICAL RESULTS FOR PFAS
PRE-CLEANUP ACTION

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\2636001_CAR.aprx



NOTES:
GROUNDWATER SAMPLE DATE AND ANALYTICAL RESULTS AS:
DATE SAMPLED | DRO | ORO | DRO-SG | ORO-SG | GRO | BENZENE
GROUNDWATER ANALYTICAL RESULTS IN MICROGRAMS PER LITER
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT (MTCA) CLEANUP REGULATION CLEANUP LEVEL
--- = DENOTES SAMPLE NOT ANALYZED
DRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS DIESEL-RANGE ORGANICS
DRO-SG = TPH AS DIESEL-RANGE ORGANICS WITH SILICA GEL CLEANUP
GRO = TPH AS GASOLINE-RANGE ORGANICS
ORO = TPH AS OIL-RANGE ORGANICS
ORO-SG = TPH AS OIL-RANGE ORGANICS WITH SILICA GEL CLEANUP

LEGEND

- GEOTECHINCAL WELL (TERRA, 2021)
- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- INDICATES TPH AND BENZENE WERE NOT DETECTED AT CONCENTRATIONS EXCEEDING MTCA CLEANUP LEVELS IN GROUNDWATER
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 7
GROUNDWATER ANALYTICAL RESULTS FOR TPH AND BENZENE

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\2636001_CAR.aprx

FMW-19
08/20/2024|<0.400|<0.400|1.34|<0.400|<0.200

FMW-20
8/20/2024|<0.400|<0.400|<0.400|<0.400|<0.200

FMW-09
03/21/2024|<0.400|<0.400|<0.400|<0.400|<0.200
08/21/2024|<0.800|<0.800|<0.800|<0.800|<0.400
11/18/2024|<0.400|<0.400|<0.400|<0.400|<0.200
2/18/2025|<0.400|<0.400|<0.400|<0.400|<0.200

FMW-10
03/21/2024|2.78|1.34|5.84|<0.400|<0.200
08/21/2024|<0.400|<0.400|<0.400|<0.400|<0.200
11/18/2024|<0.400|<0.400|<0.400|<0.400|<0.200
2/17/2025|<0.400|<0.400|<0.400|<0.400|<0.200

FMW-17
03/21/2024|<0.400|<0.400|<0.400|<0.400|<0.200
08/21/2024|<0.400|<0.400|<0.400|<0.400|<0.200
11/18/2024|<0.400|<0.400|<0.400|<0.400|<0.200
2/17/2025|<0.400|<0.400|<0.400|<0.400|<0.200

MW-1
03/21/2024|<0.400|<0.400|<0.400|<0.400|<0.200
8/22/2024|<0.800|<0.800|<0.800|<0.800|<0.400
11/19/2024|<0.400|<0.400|<0.400|<0.400|<0.200
2/18/2025|<0.400|<0.400|<0.400|<0.400|<0.200

FMW-16
03/21/2024|1.49|<0.400|6.74|<0.400|<0.200
08/22/2024|<0.400|<0.400|<0.400|<0.400|**0.330**
11/19/2024|<0.400|<0.400|<0.400|<0.400|**0.230**
2/17/2025|<0.400|<0.400|<0.400|<0.400|<0.200
5/21/2025|<0.5|<0.05|<1|<1|0.13
08/12/2025|<0.5|<0.05|<1|<1|0.059
11/13/2025|<0.5|<0.05|<1|<1|0.078

FMW-14
03/21/2024|<0.400|<0.400|<0.400|<0.400|<0.200
08/22/2024|<0.400|<0.400|<0.400|<0.400|<0.200
11/19/2024|<0.400|<0.400|<0.400|<0.400|<0.200
2/17/2025|<0.400|<0.400|<0.400|<0.400|<0.200

MW-2
03/21/2024|<0.400|<0.400|<0.400|<0.400|<0.200

FMW-13
03/21/2024|<0.400|<0.400|<0.400|<0.400|<0.200
08/22/2024|<0.400|<0.400|<0.400|<0.400|<0.200
11/19/2024|<0.400|<0.400|<0.400|<0.400|<0.200
2/18/2025|<0.400|<0.400|<0.400|<0.400|<0.200

12TH STREET SOUTHEAST
15TH STREET SOUTHEAST
13TH STREET SOUTHEAST
14TH STREET SOUTHEAST
EAST PIONEER

FORMER FREEZER
FORMER OFFICE BUILDING
FORMER BUILDING A (DESTROYED/DEMOLISHED DURING AUGUST 2021 FIRE INCIDENT)
FORMER BUILDING B COPPER RIVER SMOKING CO.

PARCEL ID: 0420274127

NOTES:
DATE SAMPLED AND ANALYTICAL RESULTS AS:
SAMPLE DATE | PCE | TCE | cis-1,2-DCE | trans-1,2-DCE | Vinyl Chloride
GROUNDWATER ANALYTICAL RESULTS IN MICROGRAMS PER LITER.

< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT (MTCA) CLEANUP REGULATION CLEANUP LEVEL
DCE = DICHLOROETHENE
HVOC = HALOGENATED VOLATILE ORGANIC COMPOUND
PCE = TETRACHLOROETHENE
TCE = TRICHLOROETHENE

100 50 0 100
APPROXIMATE SCALE IN FEET

LEGEND

- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- INDICATES HVOCS WERE NOT DETECTED AT CONCENTRATIONS EXCEEDING MTCA CLEANUP LEVELS IN GROUNDWATER
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 8
GROUNDWATER ANALYTICAL RESULTS FOR HVOCs

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

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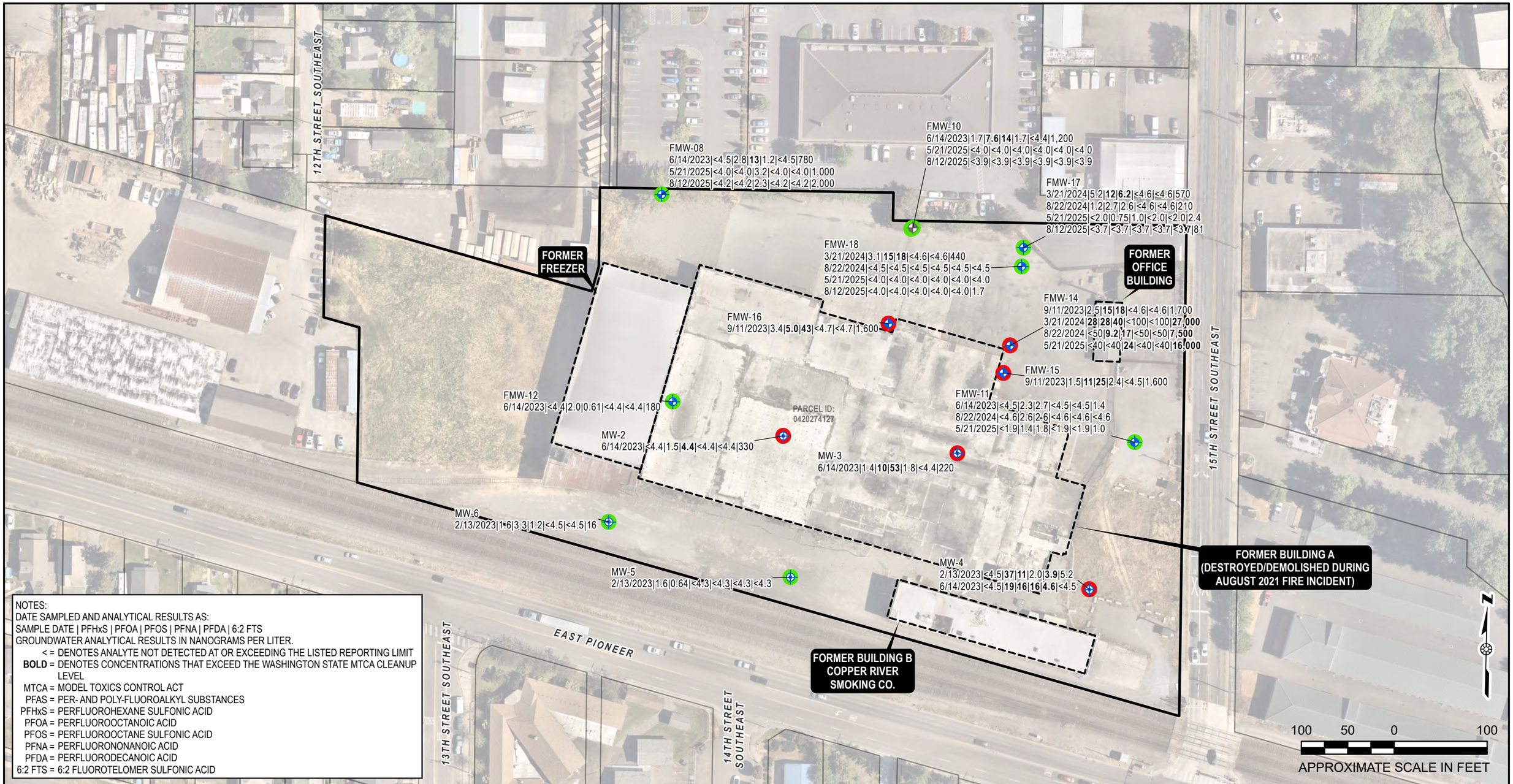

NOTES:
DATE SAMPLED AND ANALYTICAL RESULTS AS:
SAMPLE DATE | PFHxS | PFOA | PFOS | PFNA | PFDA | 6:2 FTS
GROUNDWATER ANALYTICAL RESULTS IN NANOGRAMS PER LITER.

< =	DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
BOLD =	DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MTCA CLEANUP LEVEL
MTCA =	MODEL TOXICS CONTROL ACT
PFAS =	PER- AND POLY-FLUOROALKYL SUBSTANCES
PFHxS =	PERFLUOROHEXANE SULFONIC ACID
PFOA =	PERFLUOROOCTANOIC ACID
PFOS =	PERFLUOROOCTANE SULFONIC ACID
PFNA =	PERFLUORONONANOIC ACID
PFDA =	PERFLUORODECANOIC ACID
6:2 FTS =	6:2 FLUOROTELOMER SULFONIC ACID

LEGEND

- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- INDICATES PFAS WERE NOT DETECTED AT CONCENTRATIONS EXCEEDING MTCA CLEANUP LEVELS IN GROUNDWATER
- INDICATES ONE OR MORE MTCA EXCEEDANCES OF PFAS IN GROUNDWATER
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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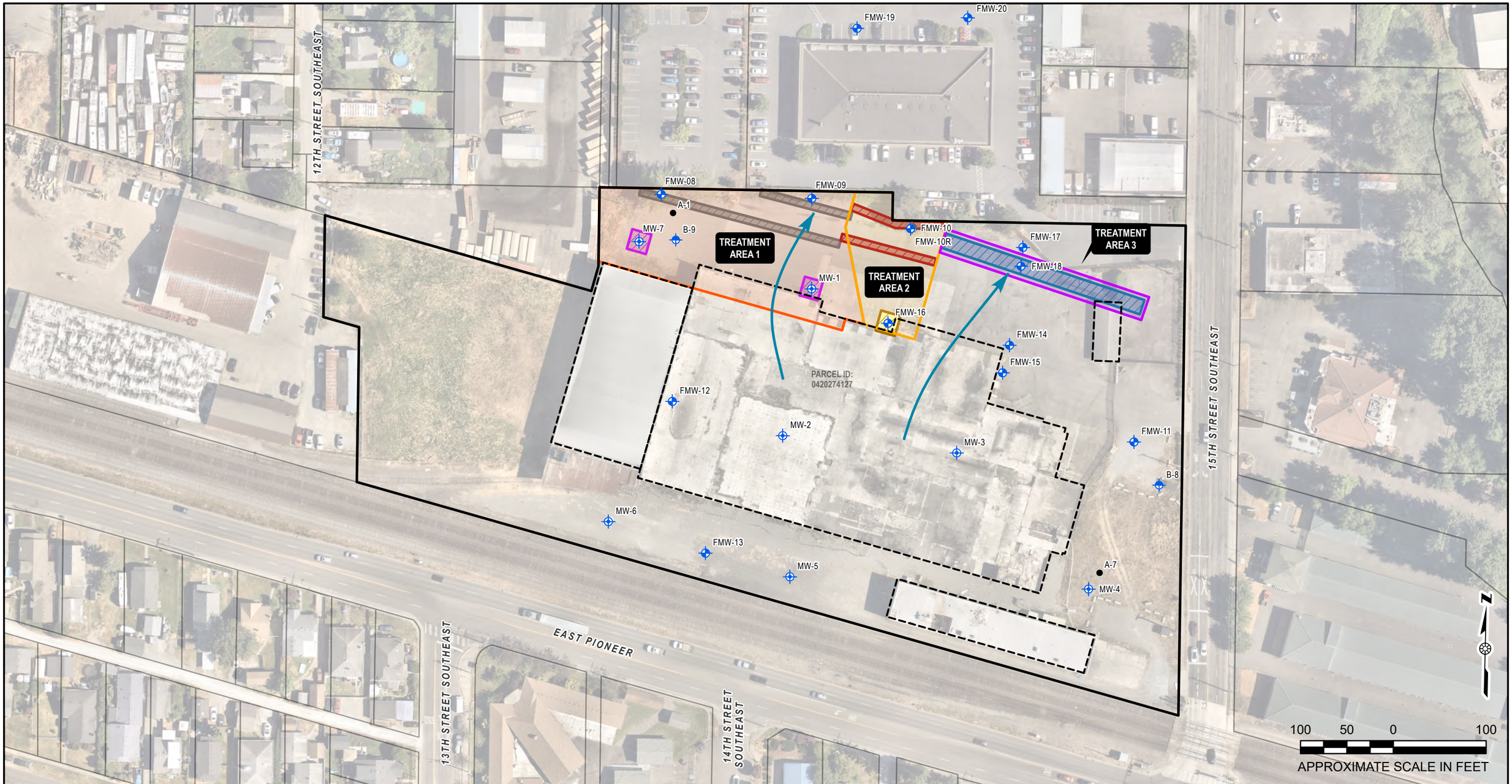
FIGURE 9

GROUNDWATER ANALYTICAL RESULTS FOR PFAS

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\2636001_CAR.aprx



LEGEND

- BORING (ATLAS 2021, 2022)
- GEOTECHINCAL WELL (TERRA, 2021)
- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- APPROXIMATE DIRECTION OF GROUNDWATER FLOW
- TREATMENT AREA 1
- TREATMENT AREA 2
- TREATMENT AREA 3
- PFAS TREATMENT BARRIER WALL
- PETROLEUM TREATMENT BARRIER WALL
- PETROLEUM TREATMENT INJECTION GRID
- HVOC TREATMENT BARRIER WALL
- HVOC TREATMENT INJECTION GRID
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

HVOC = HALOGENATED VOLATILE ORGANIC COMPOUND
PFAS = PER- AND POLY-FLUOROALKYL SUBSTANCES

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 10

REMEDIAL INJECTION TREATMENT AREAS

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

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EXCAVATION AREA 1
(EXCAVATED TO 2 FEET BGS)

FMW-08
3.0'|<25.7|80.2|<3.89|<0.00779
7.0'|<26.6|<53.1|<4.53|<0.00905

FB-14
0.5'|<50|<250|<5|<0.002
6.0'|<50|<250|<5|<0.002

FMW-09
3.0'|<42.9|368|<2.67|<0.00534
7.0'|<23.2|<46.3|<3.29|<0.00659
13.0'|<28.6|66.3|<4.70|<0.00939

A-1
0.5'|<48.2|<96.5|<28.9|<0.0219

FB-13
0.5'|310|800|<5|<0.002
6.0'|<50|<250|<5|0.0027

A-23
0.5'|<45.9|738|29.2|<0.0297
2.0'|<54.0|<108|<7.43|<0.0297
4.0'|<50.6|<101|14.7|<0.0294

A-2
0.5'|<560|**26,100**|<336|<0.0361

FB-15
0.5'|130|1500|<5|<0.002
6.0'|<50|<250|<5|0.0061

FB-16
0.5'|120|520|<5|<0.002
6.0'|<50|<250|<5|<0.002

EXCAVATION AREA 5

EXCAVATION AREA 4

FMW-10
3.0'|<23.8|<47.6|<3.94|<0.00787
7.0'|<25.8|<51.6|<4.38|<0.00876
13.0'|<25.4|<50.9|<3.31|<0.00661

A-35
1.5'|<67.0|<134|<6.08|<0.0243
7.0'|<58.6|<117|<5.26|<0.0210
14.0'|<60.6|<121|<5.84|<0.0234

MW-1
0.5'|<58.3|<117|<7.45|<0.0298

PARCEL ID:
0420274127

EXCAVATION AREA 2
(EXCAVATED TO 10 FEET BGS)

A-34
1.5'|<58.8|<118|<4.49|<0.0180
3.0'|<60.1|<120|<6.04|<0.0242
14.0'|<58.4|<117|<5.75|<0.0230

FB-27
1.0'|<50|<250|<5|<0.002
8.0'|<50|<250|<5|<0.002

EX02-B01-10.0
10.0'|---|---|---|<0.002

FB-24
1.0'|<50|<250|<5|<0.002
8.0'|<50|<250|<5|<0.002

FB-26
1.0'|<50|<250|<5|<0.002
8.0'|<50|<250|<5|<0.002

A-22
1.0'|<47.7|<95.4|19.5|**0.0760**
8.0'|<66.0|<132|<6.53|**0.0547**

FB-25
1.0'|<50|<250|<5|<0.002
8.0'|<50|<250|<5|<0.002

FB-03
7.0'|<25.6|<51.2|<4.22|0.0207
13.0'|<24.3|<48.6|<3.63|<0.00725
17.0'|<33.7|<67.5|<6.80|<0.0136
24.0'|<24.1|<48.2|<3.68|<0.00736

FB-02
7.0'|<22.2|<44.5|<2.89|<0.00578
13.0'|<24.1|<48.1|<3.09|<0.00618

A-33
1.0'|<51.7|<103|<7.02|<0.0281
7.0'|<59.9|<120|<6.27|<0.0251

A-32
2.0'|<57.6|<115|<5.46|<0.0218

30 15 0 30
APPROXIMATE SCALE IN FEET

NOTES:
SOIL DEPTH AND ANALYTICAL RESULTS AS:
SAMPLE DEPTH IN FEET BELOW GROUND SURFACE | DRO | ORO | GRO | BENZENE
SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM

< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
--- = DENOTES SAMPLE NOT ANALYZED
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT (MTCA) CLEANUP REGULATION CLEANUP LEVEL
GRAY = OVEREXCAVATED
DRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS DIESEL-RANGE ORGANICS
GRO = TPH AS GASOLINE-RANGE ORGANICS
ORO = TPH AS OIL-RANGE ORGANICS
BGS = BELOW GROUND SURFACE

LEGEND

- EXCAVATION SOIL SAMPLE (FARALLON, 2025)
- BORING (ATLAS 2021, 2022)
- BORING (FARALLON, 2023-2024)
- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- DECOMMISSIONED MONITORING WELL
- INDICATES TPH AND BENZENE WERE NOT DETECTED AT CONCENTRATIONS EXCEEDING MTCA CLEANUP LEVELS
- INDICATES OVEREXCAVATED SAMPLE
- SOURCE REMOVAL EXCAVATION AREA
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 11

SOURCE REMOVAL EXCAVATION AREAS AND SOIL ANALYTICAL RESULTS FOR TPH AND BENZENE POST CLEANUP ACTION

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

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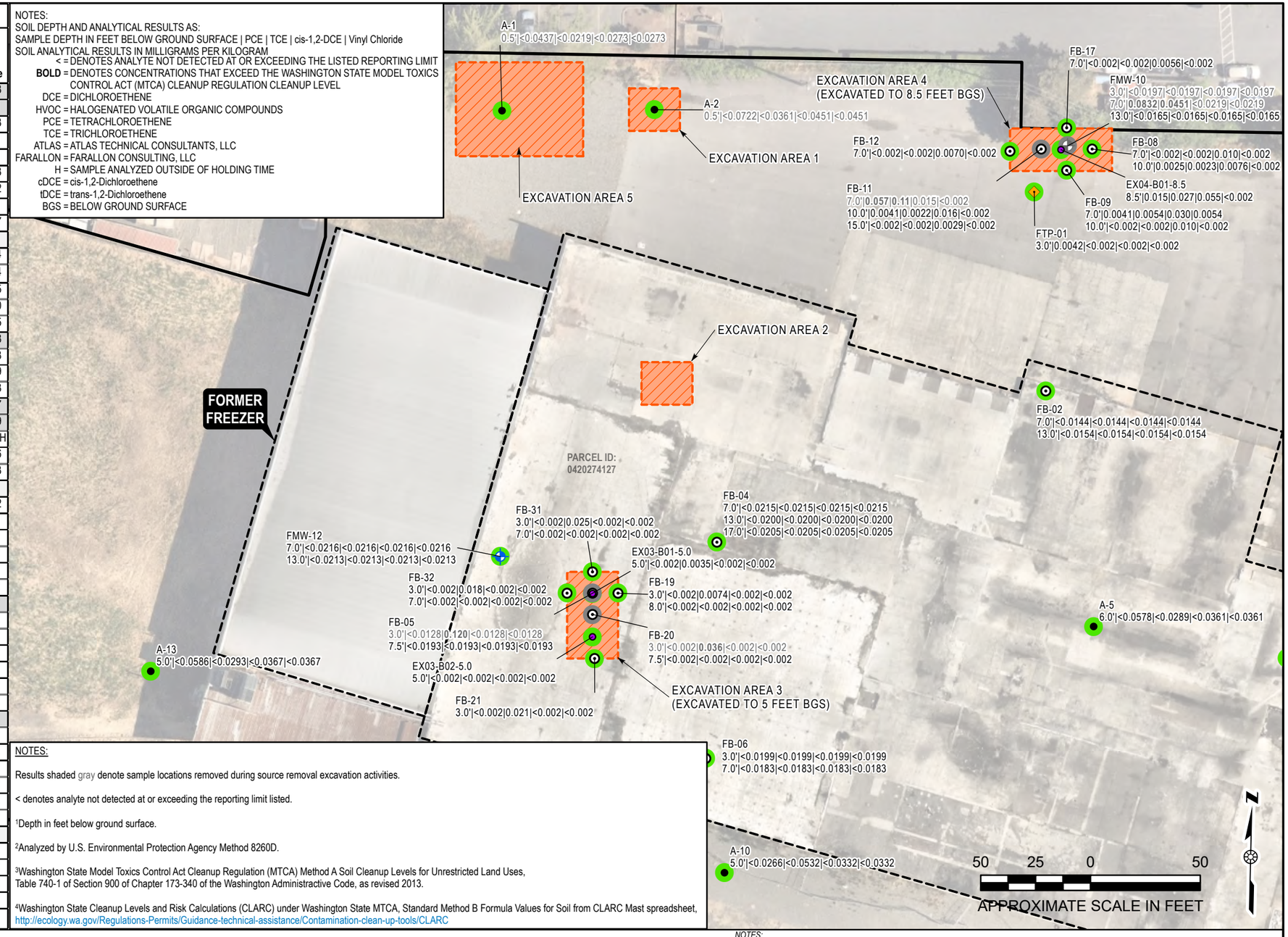
Sample Location	Sampled By	Sample Depth (feet)[1]	Sample Date	Analytical Results (milligrams per kilogram)[2] PCE	TCE	cDCE	tDCE	Vinyl Chloride
A-1	Atlas	0.5	9/24/2021	<0.0437	<0.0219	<0.0273	<0.0328	<0.0273
A-2	Atlas	0.5	9/24/2021	<0.0722	<0.0361	<0.0451	<0.0542	<0.0451
A-4	Atlas	0.5	9/23/2021	<0.0533	<0.0266	<0.0333	<0.0400	<0.0333
A-5	Atlas	6.0	9/24/2021	<0.0578	<0.0289	<0.0361	<0.0433	<0.0361
A-6	Atlas	0.5	9/23/2021	<0.0418	<0.0209	<0.0261	<0.0313	<0.0261
A-7	Atlas	0.5	9/24/2021	<0.0501	<0.0250	<0.0313	<0.0376	<0.0313
A-10	Atlas	5.0	9/23/2021	<0.0266	<0.0532	<0.0332	<0.0399	<0.0332
A-12	Atlas	1.0	9/23/2021	<0.0594	<0.0297	<0.0371	<0.0446	<0.0371
A-13	Atlas	5.0	9/23/2021	<0.0586	<0.0293	<0.0367	<0.0440	<0.0367
2023 Subsurface Investigation								
FB-02	Farallon	7.0	2/7/2023	<0.0144	<0.0144	<0.0144	<0.0144	<0.0144
	Farallon	13.0	2/7/2023	<0.0154	<0.0154	<0.0154	<0.0154	<0.0154
FB-04	Farallon	7.0	2/8/2023	<0.0215	<0.0215	<0.0215	<0.0215	<0.0215
	Farallon	13.0	2/8/2023	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200
	Farallon	17.0	2/8/2023	<0.0205	<0.0205	<0.0205	<0.0205	<0.0205
FB-05	Farallon	3.0	2/8/2023	<0.0128	**0.120**	<0.0128	<0.0128	<0.0128
	Farallon	7.5	2/8/2023	<0.0193	<0.0193	<0.0193	<0.0193	<0.0193
FB-06	Farallon	3.0	2/8/2023	<0.0199	<0.0199	<0.0199	<0.0199	<0.0199
	Farallon	7.0	2/8/2023	<0.0183	<0.0183	<0.0183	<0.0183	<0.0183
FMW-10	Farallon	3.0	2/7/2023	<0.0197	<0.0197	<0.0197	<0.0197	<0.0197
	Farallon	7.0	2/7/2023	**0.0832**	**0.0451**	<0.0219	<0.0219	<0.0219
	Farallon	13.0	2/7/2023	<0.0165 H	<0.0165 H	<0.0165 H	<0.0165 H	<0.0165 H
FMW-12	Farallon	7.0	2/8/2023	<0.0216	<0.0216	<0.0216	<0.0216	<0.0216
	Farallon	13.0	2/8/2023	<0.0213	<0.0213	<0.0213	<0.0213	<0.0213
2024 Subsurface Investigations								
FMW-19	Farallon	5.0	8/13/2024	<0.0322	<0.0322	<0.0322	<0.0322	<0.0322
FMW-20	Farallon	5.0	8/13/2024	<0.0321	<0.0321	<0.0321	<0.0321	<0.0321
FB-08	Farallon	7.0	12/2/2024	<0.002	<0.002	0.010	<0.002	<0.002
	Farallon	10.0	12/2/2024	0.0025	0.0023	0.0076	<0.002	<0.002
FB-09	Farallon	7.0	12/2/2024	0.0041	0.0054	0.030	0.0023	0.0054
	Farallon	10.0	12/2/2024	<0.002	<0.002	0.010	<0.002	<0.002
FB-11	Farallon	7.0	12/2/2024	**0.057**	**0.11**	0.015	<0.002	<0.002
	Farallon	10.0	12/2/2024	0.0041	0.0022	0.016	<0.002	<0.002
	Farallon	15.0	12/2/2024	<0.002	<0.002	0.0029	<0.002	<0.002
FB-12	Farallon	7.0	12/2/2024	<0.002	<0.002	0.0070	<0.002	<0.002
FB-17	Farallon	7.0	12/3/2024	<0.002	<0.002	0.0056	<0.002	<0.002
FB-19	Farallon	3.0	12/3/2024	<0.002	0.0074	<0.002	<0.002	<0.002
	Farallon	8.0	12/3/2024	<0.002	<0.002	<0.002	<0.002	<0.002
FB-20	Farallon	3.0	12/3/2024	<0.002	**0.036**	<0.002	<0.002	<0.002
	Farallon	7.5	12/3/2024	<0.002	<0.002	<0.002	<0.002	<0.002
FB-21	Farallon	3.0	12/3/2024	<0.002	0.021	<0.002	<0.002	<0.002
FB-31	Farallon	3.0	12/4/2024	<0.002	0.025	<0.002	<0.002	<0.002
	Farallon	7.0	12/4/2024	<0.002	<0.002	<0.002	<0.002	<0.002
FB-32	Farallon	3.0	12/4/2024	<0.002	0.018	<0.002	<0.002	<0.002
	Farallon	7.0	12/4/2024	<0.002	<0.002	<0.002	<0.002	<0.002
2025 Excavation								
FTP-01	Farallon	3.0	10/14/2025	0.0042	<0.002	<0.002	<0.002	<0.002
EX-03-B01-5.0	Farallon	5.0	10/15/2025	<0.002	0.0035	<0.002	<0.002	<0.002
EX-03-B02-5.0	Farallon	5.0	10/15/2025	<0.002	<0.002	<0.002	<0.002	<0.002
EX-04-B01-8.5	Farallon	8.5	10/15/2025	0.015	0.027	0.055	<0.002	<0.002
MTCA Cleanup Levels for Soil				**0.05**[3]	**0.03**[3]	**160**[4]	**1,600**[4]	**0.67**[4]

NOTES:
SOIL DEPTH AND ANALYTICAL RESULTS AS:
SAMPLE DEPTH IN FEET BELOW GROUND SURFACE | PCE | TCE | cis-1,2-DCE | Vinyl Chloride
SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT (MTCA) CLEANUP REGULATION CLEANUP LEVEL
DCE = DICHLOROETHENE
HVOC = HALOGENATED VOLATILE ORGANIC COMPOUNDS
PCE = TETRACHLOROETHENE
TCE = TRICHLOROETHENE
ATLAS = ATLAS TECHNICAL CONSULTANTS, LLC
FARALLON = FARALLON CONSULTING, LLC
H = SAMPLE ANALYZED OUTSIDE OF HOLDING TIME
cDCE = cis-1,2-Dichloroethene
tDCE = trans-1,2-Dichloroethene
BGS = BELOW GROUND SURFACE



NOTES:

Results shaded gray denote sample locations removed during source removal excavation activities.

< denotes analyte not detected at or exceeding the reporting limit listed.

[1]Depth in feet below ground surface.

[2]Analyzed by U.S. Environmental Protection Agency Method 8260D.

[3]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013.

[4]Washington State Cleanup Levels and Risk Calculations (CLARC) under Washington State MTCA, Standard Method B Formula Values for Soil from CLARC Mast spreadsheet, http://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC

LEGEND

- EXCAVATION SOIL SAMPLE (FARALLON, 2025)
- TEST PIT (FARALLON, 2025)
- BORING (ATLAS 2021, 2022)
- BORING (FARALLON, 2023-2024)
- MONITORING WELL (FARALLON, 2024)
- DECOMISSIONED MONITORING WELL
- INDICATES NO DETECTIONS OF HVOCs IN SOIL EXCEEDING MTCA CLEANUP LEVELS
- INDICATES OVEREXCAVATED SAMPLE
- SOURCE REMOVAL EXCAVATION AREA
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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California Oakland | Irvine

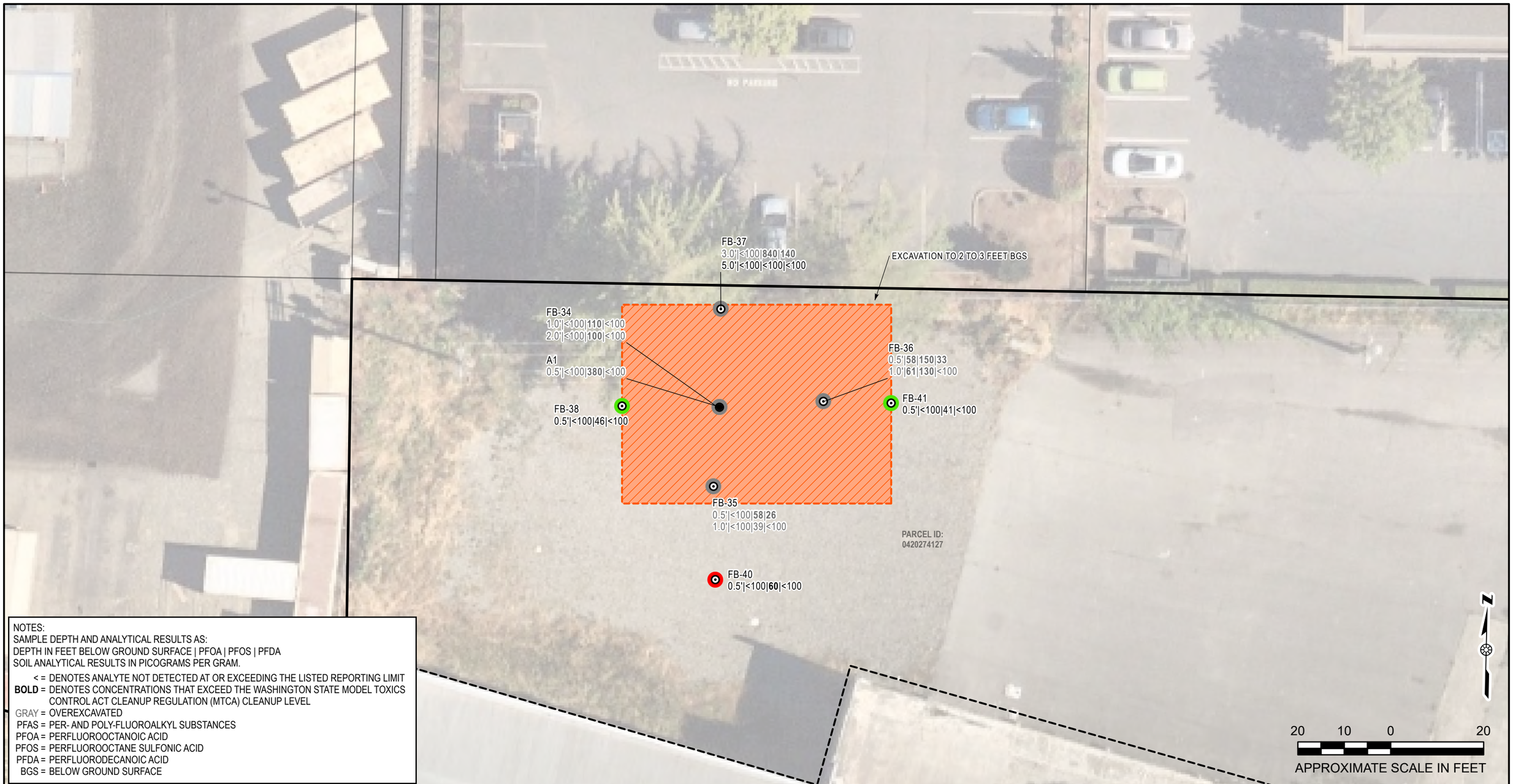
FIGURE 12

SOURCE REMOVAL EXCAVATION AREAS AND SOIL ANALYTICAL RESULTS FOR HVOCS POST CLEANUP ACTION

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\Figure-05_Soil_HVOCs_PreCleanup.aprx



NOTES:
SAMPLE DEPTH AND ANALYTICAL RESULTS AS:
DEPTH IN FEET BELOW GROUND SURFACE | PFOA | PFOS | PFDA
SOIL ANALYTICAL RESULTS IN PICOGRAMS PER GRAM.

< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION (MTCA) CLEANUP LEVEL
GRAY = OVEREXCAVATED
PFAS = PER- AND POLY-FLUOROALKYL SUBSTANCES
PFOA = PERFLUOROOCTANOIC ACID
PFOS = PERFLUOROOCTANE SULFONIC ACID
PFDA = PERFLUORODECANOIC ACID
BGS = BELOW GROUND SURFACE

LEGEND

- BORING (ATLAS 2021, 2022)
- BORING (FARALLON, 2023-2024)
- INDICATES PFAS WERE NOT DETECTED AT CONCENTRATIONS EXCEEDING MTCA CLEANUP LEVELS IN SOIL
- INDICATES ONE OR MORE MTCA EXCEEDANCES OF PFAS IN SOIL
- INDICATES OVEREXCAVATED SAMPLE
- SOURCE REMOVAL EXCAVATION AREA
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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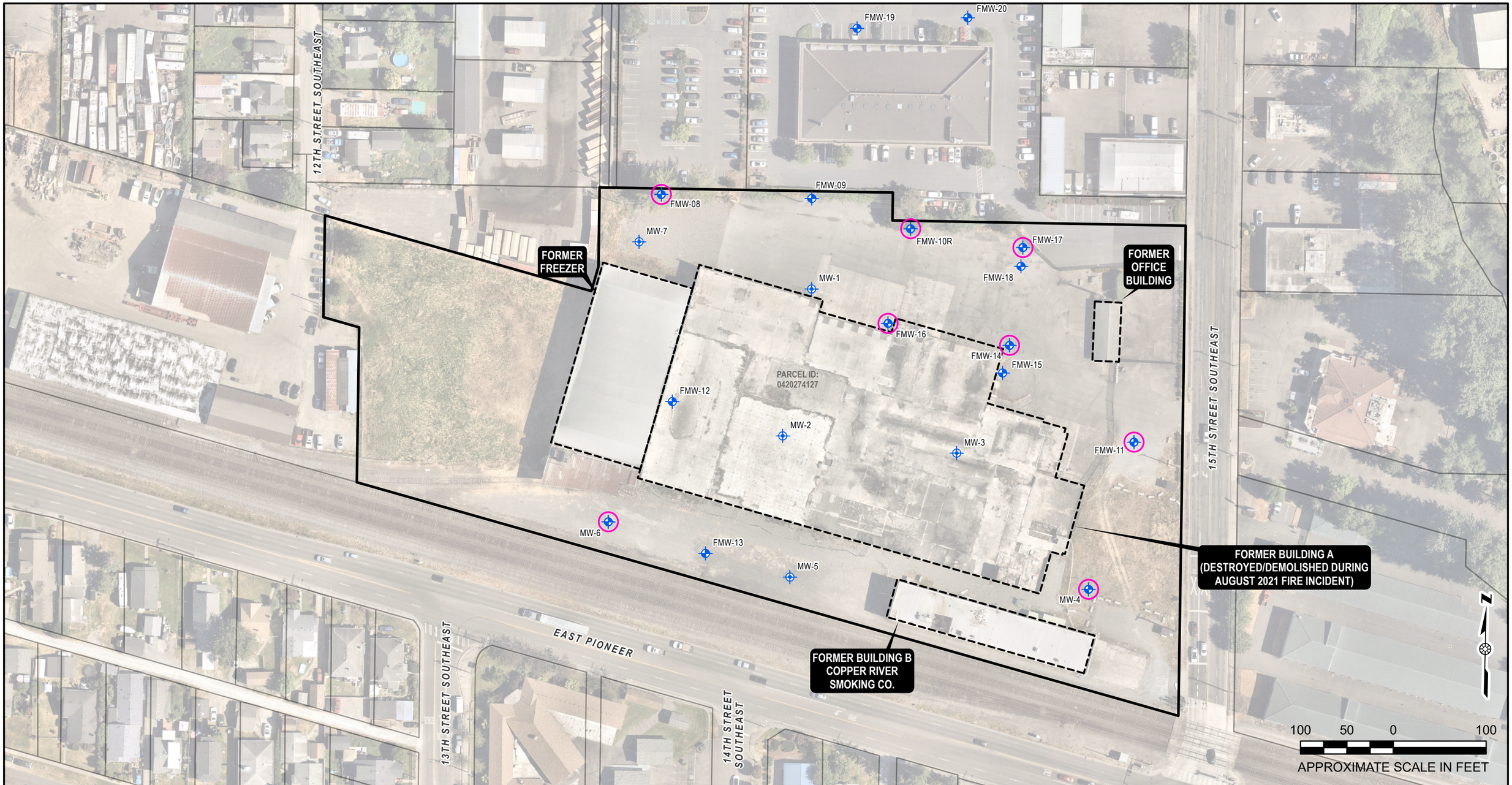
FIGURE 13

SOURCE REMOVAL EXCAVATION AREAS AND SOIL ANALYTICAL RESULTS FOR PFAS POST-CLEANUP ACTION

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: LMUROCK	CHECKED BY: YP	DATE: 12/9/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\2636001_CAR.aprx



LEGEND

- MONITORING WELL TO BE RETAINED FOR LONG-TERM COMPLIANCE GROUNDWATER MONITORING
- MONITORING WELL (ATLAS, 2021)
- MONITORING WELL (FARALLON, 2024)
- FORMER BUILDING
- APPROXIMATE PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 14

PROPOSED LONG-TERM COMPLIANCE MONITORING WELL NETWORK

WASHINGTON COLD STORAGE
240 15th STREET SOUTHEAST
PUYALLUP, WASHINGTON

DRAWN BY: NBEDELL	CHECKED BY: YP	DATE: 12/24/2025	FARALLON PN: 2636-001

Path: Q:\Projects\2636 Fortress Entities\001 Fmr Wa Cold Storage Bldg\Mapfiles\020\2636001_CAR.aprx

Appendix C

Recorded Environmental Covenant

After Recording Return
Original Signed Covenant to:

Erik G. Snyder
Toxics Cleanup Program
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Environmental Covenant

Grantor: CREF3 Puyallup Owner LLC
Grantee: State of Washington, Department of Ecology (hereafter "Ecology")
Brief Legal Description: Ptn Blks 33-37, Frank R. Spinnin's First Add to Puy & Ptn SE 27-20-4, Tax Account No.: 042020-4127
Tax Parcel Nos.: 0420274127
Cross Reference: VCP Project No. XS0012

RECITALS

a. This document is an environmental (restrictive) covenant (hereafter "Covenant") executed pursuant to the Model Toxics Control Act ("MTCA"), chapter 70A.305 RCW, and Uniform Environmental Covenants Act ("UECA"), chapter 64.70 RCW.

b. The Property that is the subject of this Covenant is part or all of a site commonly known as Washington Cold Storage, Cleanup Site ID 16703, Facility Site ID No. 99997041, VCP Project ID No. XS0012. The Property is legally described in Exhibit A.

c. The Property is the subject of remedial action conducted under MTCA. This Covenant is required because residual contamination remains on the Property after completion of remedial actions. Specifically, the following principal contaminants remain on the Property:

Medium	Principal Contaminants Present
Soil	Per- and Polyfluoroalkyl Substances (PFAS)
Groundwater	Per- and Polyfluoroalkyl Substances (PFAS)

d. It is the purpose of this Covenant to restrict certain activities and uses of the Property to protect human health and the environment, and the integrity of remedial actions conducted at the site. Records describing the extent of residual contamination and remedial actions conducted are available through Ecology.

e. Records describing the extent of residual contamination and remedial actions conducted are available through Ecology at:

https://apps.ecology.wa.gov/cleanupsearch/site/16703#site-documents

f. This Covenant grants Ecology certain rights under UECA and as specified in this Covenant. As a Holder of this Covenant under UECA, Ecology has an interest in real property; however, this is not an ownership interest which equates to liability under MTCA or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9601 *et seq*. The rights of Ecology as an "agency" under UECA, other than its right as a holder, are not an interest in real property.

COVENANT

CREF3 Puyallup Owner LLC, as Grantor and fee simple owner of the Property, hereby grants to the Washington State Department of Ecology, and its successors and assignees, the following covenants. Furthermore, it is the intent of the Grantor that such covenants shall supersede any prior interests the GRANTOR has in the property and run with the land and be binding on all current and future owners of any portion of, or interest in, the Property.

Section 1. General Restrictions and Requirements.

The following general restrictions and requirements shall apply to the Property:

a. **Interference with Remedial Action**. The Grantor shall not engage in any activity on the Property that may impact or interfere with the remedial action and any operation, maintenance, inspection, or monitoring of that remedial action without prior written approval from Ecology.

b. **Protection of Human Health and the Environment**. The Grantor shall not engage in any activity on the Property that may threaten continued protection of human health or the environment without prior written approval from Ecology. This includes, but is not limited to, any activity that results in the release of residual contamination that was contained as a part of the remedial action or that exacerbates or creates a new exposure to residual contamination remaining on the Property.

c. Continued Compliance Required. Grantor shall not convey any interest in any portion of the Property without providing for the continued adequate and complete operation, maintenance, and monitoring of remedial actions and continued compliance with this Covenant.

d. Leases. Grantor shall restrict any lease for any portion of the Property to uses and activities consistent with this Covenant and notify all lessees of the restrictions on the use of the Property.

e. Preservation of Reference Monuments. Grantor shall make a good faith effort to preserve any reference monuments and boundary markers used to define the areal extent of coverage of this Covenant. Should a monument or marker be damaged or destroyed, Grantor shall have it replaced by a licensed professional surveyor within 30 days of discovery of the damage or destruction.

Section 2. Specific Prohibitions and Requirements.

In addition to the general restrictions in Section 1 of this Covenant, the following additional specific restrictions and requirements shall apply to the Property.

a. Land use. The remedial action for the Property is based on a cleanup designed for commercial or industrial property. As such, the Property shall be used in perpetuity only for commercial or industrial land uses as that term is defined in the rules promulgated under chapter 70A.305 RCW. Prohibited uses on the Property include but are not limited to residential uses, childcare facilities, K-12 public or private schools, parks, grazing of animals, and growing of food crops.

b. Containment of Soil. The remedial action for the Property is based on containing limited residual contaminated soil under a cap consisting of impervious surfaces such as asphalt pavement. The primary purposes of this cap are to prevent direct contact with potentially contaminated soil and to prevent migration of soil contamination to groundwater. As such, the following restrictions shall apply at the Property:

Any activity on the Property that will compromise the integrity of the cap including: drilling; digging; piercing the cap with sampling device, post, stake or similar device; grading; excavation; installation of underground utilities; removal of the cap; or, application of loads in excess of the cap load bearing capacity, is prohibited without prior written approval by Ecology. The Grantor shall report to Ecology within 48 hours of the discovery of any damage to the cap. Unless an alternative plan has been approved by Ecology in

writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within 30 days of completing the repairs.

The Grantor shall not alter or remove the existing structures on or the asphalt cap over the Property in any manner that would expose contaminated soil, result in a release to the environment of contaminants, or create a new exposure pathway without prior written approval of Ecology. Should the Grantor propose to remove all or a portion of the existing structures or the asphalt cap on the Property so that access to the underlying contamination is feasible, Ecology may require treatment or removal of the underlying contaminated soil or approve installation of a substantially equivalent replacement cap or structure. Any intrusive subsurface soil work within or beneath the Property must be implemented by Hazardous Waste Operations and Emergency Response (HAZWOPER) trained workers in accordance with a health and safety plan.

c. Stormwater facilities. To minimize the potential for mobilization of contaminants remaining in the soil on the Property, no stormwater infiltration facilities or ponds shall be constructed on the Property. All stormwater catch basins, conveyance systems, and other appurtenances located within this area shall be of water-tight construction.

d. Groundwater Use. The groundwater beneath the Property remains contaminated and shall not be extracted for any purpose other than temporary construction dewatering, investigation, monitoring or remediation. Drilling of a well for any water supply purpose is strictly prohibited. Groundwater extracted from the Property for any purpose shall be considered potentially contaminated and any discharge of this water shall be done in accordance with state and federal law.

e. Cap Monitoring Plan. The Grantor shall comply with and implement the requirements of a Cap Monitoring Plan to be approved by Ecology in writing, until such time that Ecology confirms in writing that the obligations of the Cap Monitoring Plan are no longer necessary.

f. Monitoring. Several monitoring wells are located on the Property to monitor the performance of the remedial action. The Grantors shall maintain clear access to these devices and protect them from damage. The Grantors shall report to Ecology within 48 hours of the discovery of any damage to any monitoring device. Unless Ecology approves of an alternative plan in writing, the Grantors shall promptly repair the damage and submit a report documenting this work to Ecology within 30 days of completing the repairs.

Section 3. Access.

a. The Grantor shall maintain clear access to all remedial action components necessary to construct, operate, inspect, monitor, and maintain the remedial action.

b. The Grantor freely and voluntarily grants Ecology and its authorized representatives, upon reasonable notice, the right to enter the Property at reasonable times to evaluate the effectiveness of this Covenant and associated remedial actions, and enforce compliance with this Covenant and those actions, including the right to take samples, inspect any remedial actions conducted on the Property, and to inspect related records.

c. No right of access or use by a third party to any portion of the Property is conveyed by this instrument.

Section 4. Notice Requirements.

a. **Conveyance of Any Interest.** The Grantor, when conveying any interest in any part of the Property, including but not limited to title, easement, leases, and security or other interests, must:

i. Provide written notice to Ecology of the intended conveyance at least 30 days in advance of the conveyance.

ii. Include in the conveying document a notice in substantially the following form, as well as a complete copy of this Covenant:

NOTICE: THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL COVENANT GRANTED TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY ON [DATE] AND RECORDED WITH THE [COUNTY] COUNTY AUDITOR UNDER RECORDING NUMBER [RECORDING NUMBER]. USES AND ACTIVITIES ON THIS PROPERTY MUST COMPLY WITH THAT COVENANT, A COMPLETE COPY OF WHICH IS ATTACHED TO THIS DOCUMENT.

iii. Unless otherwise agreed to in writing by Ecology, provide Ecology with a complete copy of the executed document within 30 days of the date of execution of such document.

b. **Reporting Violations.** Should the Grantor become aware of any violation of this Covenant, Grantor shall promptly report such violation in writing to Ecology.

c. **Emergencies.** For any emergency or significant change in site conditions due to Acts of Nature (for example, flood or fire) resulting in a violation of this Covenant, the Grantor is authorized to respond to such an event in accordance with state and federal law. The Grantor must notify Ecology in writing of the event and response actions planned or taken as soon as practical but no later than within 24 hours of the discovery of the event.

d. **Notification procedure.** Any required written notice, approval, reporting, or other communication shall be personally delivered or sent by first class mail to the following persons. Any change in this contact information shall be submitted in writing to all parties to this Covenant. Upon mutual agreement of the parties to this Covenant, an alternative to personal delivery or first-class mail, such as e-mail or other electronic means, may be used for these communications.

CREF3 Puyallup Owner LLC
11611 San Vicente Blvd, 10th Floor
Los Angeles, CA 90049
Attention: Greg Pearson
949-378-3607
gpearson@fortress.com

Washington State Department of Ecology
Attn: Environmental Covenants Coordinator
Toxics Cleanup Program
P.O. Box 47600
Olympia, WA 98504-7600
360-407-6000
ToxicsCleanupProgramHQ@ecy.wa.gov

Section 5. Modification or Termination.

a. Grantor must provide written notice and obtain approval from Ecology at least 60 days in advance of any proposed activity or use of the Property in a manner that is inconsistent with this Covenant. For any proposal that is inconsistent with this Covenant and permanently modifies an activity or use restriction at the site:

i. Ecology must issue a public notice and provide an opportunity for the public to comment on the proposal.

ii. If Ecology approves of the proposal, the Covenant must be amended to reflect the change before the activity or use can proceed.

b. If the conditions at the site requiring a Covenant have changed or no longer exist, then the Grantor may submit a request to Ecology that this Covenant be amended or terminated. Any amendment or termination of this Covenant must follow the procedures in MTCA and UECA and any rules promulgated under these chapters.

c. By signing this agreement, per RCW 64.70.100, the original signatories to this agreement, other than Ecology, agree to waive all rights to sign amendments to and termination of this Covenant.

Section 6. Enforcement and Construction.

a. This Covenant is being freely and voluntarily granted by the Grantor.

b. Within 10 days of execution of this Covenant, Grantor shall provide Ecology with an original signed Covenant and proof of recording and a copy of the Covenant and proof of recording to others required by RCW 64.70.070.

c. Ecology shall be entitled to enforce the terms of this Covenant by resort to specific performance or legal process. All remedies available in this Covenant shall be in addition to any and all remedies at law or in equity, including MTCA and UECA. Enforcement of the terms of this Covenant shall be at the discretion of Ecology, and any forbearance, delay or omission to exercise its rights under this Covenant in the event of a breach of any term of this Covenant is not a waiver by Ecology of that term or of any subsequent breach of that term, or any other term in this Covenant, or of any rights of Ecology under this Covenant.

d. The Grantor shall be responsible for all costs associated with implementation of this Covenant. Furthermore, the Grantor, upon request by Ecology, shall be obligated to pay for Ecology's costs to process a request for any modification or termination of this Covenant and any approval required by this Covenant.

e. This Covenant shall be liberally construed to meet the intent of MTCA and UECA.

f. The provisions of this Covenant shall be severable. If any provision in this Covenant or its application to any person or circumstance is held invalid, the remainder of this Covenant or its application to any person or circumstance is not affected and shall continue in full force and effect as though such void provision had not been contained herein.

g. A heading used at the beginning of any section or paragraph or exhibit of this Covenant may be used to aid in the interpretation of that section or paragraph or exhibit but does not override the specific requirements in that section or paragraph.

EXECUTED this _____ day of _____, 2026.

_____
Signature

by: Timothy Bailey
Printed name

Title: Treasurer

CORPORATE ACKNOWLEDGMENT

STATE OF Texas

COUNTY OF Dallas

On this 22nd day of January, 2026, I certify that Timothy Bailey personally appeared before me, acknowledged that they are the Treasurer of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that they were authorized to execute said instrument for said corporation.

_____
Signature

KELLE LANE
Notary Public, State of Texas
Comm. Expires 01-17-2029
Notary ID 130965730

Notary Public in and for the State of
Texas

Residing at 4550 Travis St. 7th fl
Dallas, TX 75205

My appointment expires 1-17-2029

Ecology hereby accepts the status as GRANTEE and HOLDER of the above Environmental Covenant.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Signature

By: Erik G. Snyder

Title: Toxics Cleanup Program,
Headquarters Section Manager

Dated: 1/28/24

Exhibit A

Legal Description

Section 27 Township 20 Range 04 Quarter 41 LOT 1 OF LOT COMB 2023-11-14-0590 THAT POR OF B 34 TO 37 OF REPLAT OF PART OF FRANK R SPINNING'S FIRST ADD LY NLY OF NP RR ROW TOG/W S 30 OF VAC PIONEER AVE ABUTTING B 34 & 35 PER ORD 211 TOG/W A PARCEL OF LD DESC AS FOLL BEG AT SE COR OF B 33 OF REPLAT OF A PART OF FRANK R SPINNING'S FIRST ADD TH N 00 DEG 50 MIN W 28.58 FT TH S 14 DEG 18 MIN 45 SEC W 27.61 FT TH S 75 DEG 49 MIN E 7.47 FT TO POB TOG/W THAT POR DESC AS FOLL COM AT SEC COR COMMON TO SEC 26, 27, 34 & 35 TH NLY ALG SEC LI COMMON TO SD SEC 27 & 27 A DIST OF 1578 FT M/L TO A PT OF INTER WITH A LI DRAWN PAR/W & DIST 51.13 FT NLY OF AS MEAS AT R/A TO BN RR ROW TH NWLY DEFLECTING 74 DEG 59 MIN TO LEFT FROM SD LI ALG SD LI LY 51.13 FT NLY OF & PAR/W SD MAIN TR C/L A DIST OF 493 FT M/L TO PT OF INTER WITH W ROW LI OF 15TH ST SE SD PT BEING TPOB OF PARCEL TO BE DESC TH CONT NWLY ALG SD PAR/LI 920 FT M/L TO PT OF INTER WITH A LI DRAWN PAR/W & DIST 8.5 FT NLY OF AS MEAS AT R/A TO MOST NLY SPUR TR OF SD BN RR TH NLY PAR/W W LI OF B 32 OF REPLAT OF A PART OF FRANK R SPINNING'S FIRST ADD A DIST OF 148 FT TH NWLY PAR/W SD LI LY 51.13 FT NLY OF SD RR MAIN TR C/L A DIST 40 FT TH NLY PAR/W SD W LI OF B 32 106 FT TO A PT OF INTER WITH A LI DRAWN PAR/W & DIST 300 FT NLY OF AS MEAS AT R/W TO SD MAIN TR C/L TH ELY ALG SD PAR/LI 946 FT M/L TO PT OF INTER WITH W ROW LI OF 15TH ST SE TH SLY ALG SD W ROW LI TO TPOB EASE OF REC COMB OF 784500-016-1 & 017-0, 04-20-27-4-126 SEG 2024-0227