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INDEPENDENT CLEANUP ACTION

STATUS REPORT (LUST RELEASE #3910)

Former Glitsa, Inc. Property 327 South Kenyon Street Seattle, Washington

TENOR COMPANY, LLC.

ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue Northeast, Suite 300 Bellevue, Washington 98004 (425) 455-9025 Office (888) 453-5394 Toll Free (425) 455-2316 Fax

June 23, 2010

JN-28275-3

Mr. Duane Bartel Tenor Company, LLC. 1313 Washington Street Sumner, Washington 98390

Subject: INDEPENDENT CLEANUP ACTION LUST RELEASE #3910 - STATUS REPORT Former Glitsa, Inc. Property 327 South Kenyon Street Seattle, Washington

Dear Mr. Bartel:

Environmental Associates, Inc. (EAI) has completed our review of the documentation provided regarding the time line and performance of the soil and groundwater remediation system currently operating at the above referenced property located in Seattle, Washington. This report summarizes our project review findings along with our interpretation of system performance, and recommendations.

Background

In March 2009, a former underground stoddard solvent UST was removed from the property along with approximately 178 tons of stoddard solvent impacted soil. Due to the close proximity of the subject building not all of the impacted soil could be directly excavated. Subsequent explorations confirmed that solvent impacted soil and groundwater extended under the west-adjacent subject building. A remediation feasibility study was perform, in which the Client elected to pursue a combination of vapor extraction and groundwater pump and treat. In an effort to control costs, the Client further elected to act as his own contractor in the design and installation and daily operation of the remediation system. EAI's only role in this phase of the project has been to provide occasional comment and prepare summary reports. The Client remains fully responsible for the operation and performance of the remediation system.



Associate Offices: Oregon / San Francisco Bay Area

Tenor Company, LLC June 23, 2010

JN-28275-3 Page-2

Operational Time Line

Following completion of our remediation feasibility study in June 2009, the client promptly proceeded to acquire and fabricate the remediation system between June and into July 2009. A used blower and other vapor extraction system components were purchased from H2 Oil Recovery, of Bend, Oregon. The Client proceeded to assemble a basic vapor extraction system (VES) consisting of a 3 horsepower Rotron regenerative blower, equipped with a moisture knockout tank that exhausted through a twin set of 55-gallon drum carbon canisters. A groundwater / free-product recovery system consisting of a down-well pump, a settling tank, and an air-sparging tank was also constructed. The treated groundwater from the air-sparge tank was then pumped back to the former tank excavation to infiltrate back into the subsurface through perforated pipe previously installed. A schematic of the remediation system as drawn by the Client is included in Appendix-A.

The original system went operational 24/7 in July 2009. The VES side of the system was originally connected to draw vacuum from the perforated lines installed in the former tank excavation and three (3) of the VES wells (VES-1, VES-4, and VES-6). Well VES-5, inside the warehouse was equipped with a jet pump in an attempt to recover free product. The solvent-saturated groundwater was pumped from VES-5 into a holding tank, where some of the solvent would separate from the groundwater. The Client would skim off the accumulated solvent 3 to 4 times a week. The recovered solvent was transferred to a set of drums dedicated to that purpose. The jet pump system only processed approximately 200 gallons per day.

In August 2009, the Client shut down the entire system for over 1-week due to ambient air temperatures over 100 degrees and concerns regarding overheating of the remediation system.

The client also became unsatisfied by the performance of the jet-pump and in August 2009 replaced it with three (3) peristaltic pumps working in unison, which yield a more consistent 250 gallons of groundwater per day.

In September 2009, groundwater pumping was increased by installing six (6) more peristaltic pumps, three (3) in VES-4 and three (3) in VES-6. This increased the daily yield to approximately 750 gallons per day. Also in September 2009 the first set of carbon-canisters for the VES were replaced.

Although the expanded use of peristaltic pumps to recover solvent-laden groundwater successfully increased the daily yield, the Client was still unsatisfied and elected to shut down the system and significantly expand the network of extraction wells inside the warehouse building. Between October 2009 and January 2010. A total of 10 more wells were added and an interconnecting trench system was excavated for routing pipe and also as a means to install additional horizontal orientated VES piping and piping that could be later used to apply liquid remediation products. The various vapor extraction lines and peristaltic pump lines are routed to a cabinet that contains a network of control valves and sixteen peristaltic pumps. The air-vapor and solvent-laden groundwater is then routed to the exterior equipment shed. Plates 3 and 4, both present a graphic layout of the expanded system.

Tenor Company, LLC June 23, 2010

The expanded remediation system was brought back into 24/7 service in February 2010. In April the system was shut down for approximately 9 days for a maintenance cycle. At that time the carbon-canisters were changed out again.

Remediation System Performance

The Client reported making regular visitations to the site to monitor the status of the system. Specific tasks performed include visual inspections of the various system components. Exhaust gas is monitored with "Draeger tubes" sensitive to stoddard solvent to determine when carbon canisters are in need of changing. Accumulated phase-separated solvent is also decanted off the top of the water processing tank and transferred to a 55-gallon drum. The peristaltic pump heads are also inspected and the head tubing replaced when worn. The Client reports vary few problems with the currently operational system.

The Client further estimates that as of the end of April 2010, the system has processed approximately 17.82 million cubic feet of air and approximately 118,500 gallons of groundwater.

Early testing by the client of pre and post treatment water samples reportedly yielded over 97% contaminant mass removal, with the post-treatment water meeting MTCA Method-A target compliance levels for unrestricted land use. The treated water is discharged back into the former tank excavation, where it is intended to be recaptured by the groundwater pump and treat system, forming a closed-loop. To date approximately 5 (55-gallon) drums of free-product solvent mixed with solvent-saturated groundwater have been decanted off the groundwater processing tank. The Client estimates that approximately 50 to 60 gallons of recovered pure solvent reside within the drums.

In regard to the amount of contaminant mass removed by the VES, it is difficult to calculate since samples of pre-treatment soil vapor have not been collected frequently for laboratory analysis, however, the average absorption rate of activated carbon may provide some indication of mass removed. The Client reports that he is on his third set of carbon canisters, therefore at least four (4) canisters have achieved saturation. According to manufacturers, a 55-gallon canister of activated carbon contains approximately 239 pounds of carbon. The efficiency of absorption for stoddard solvent by activated carbon ranges between 20 to 50 percent (i.e. 0.2 to 0.5 pounds of solvent absorbed per pound of carbon). Applying basic mathematics suggests that approximately 192 to 480 pounds (87 to 217 Kg) of stoddard solvent may be bound up in the four (4) carbon canisters spent to date.

More refined estimates of total mass removed would require frequent monitoring of pre-treatment concentrations in both the vapor stream and groundwater stream.

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Subsurface Conditions

Soil

Prior to and during the installation of the original six (6) VES wells (VES-1 through VES-6 and temporary boring LAR-2) soil samples were collected between April and May 2009 and analyzed for stoddard solvent. Concentrations of stoddard solvent exceeding the WDOE's target compliance level of 100 ppm ranged between 980 ppm to 92,000 ppm, as presented in Table 1, lower section. In December 2009 during the system expansion, additional soil samples were collected and analyzed for stoddard solvent (Table 1, upper section). In between these times, the interior and exterior extraction wells were utilized. At the time of the December 2009 sampling event, concentration of stoddard solvent present in study area soil ranged from 318 ppm to 9,800 ppm. The soil testing data from a depth of 7 to 8 feet is also presented graphically on Plate 3, Stoddard in Soil.

Although the above referenced initial and interim soil data sets are different in size and distribution, on balance it would appear that the several months of operation through the summer and fall of 2009 had a net positive effect on reducing overall contaminant concentrations / mass.

Groundwater

Table 2, presents an ongoing tabulation of groundwater sampling data. To date, the remediation system has largely focused on removing contaminant mass from the area directly below the warehouse space. Prior to the remediation system becoming operation four (4) groundwater samples had been collected from borings and monitoring wells inside the warehouse (VES-4, VES-5, VES-6, and LAR2). The average pre-treatment concentration of stoddard solvent in the groundwater in this area was 94,500 parts per billion (ppb). As of April 2010, groundwater samples collected from the interior wells yielded an average concentration of stoddard solvent of 8,818 ppb, which corresponds to a one order of magnitude decline in average concentration since remediation was initiated.

Plate 4 further presents the most recent concentrations made in groundwater across the network of monitoring wells installed inside the warehouse building. Groundwater within several of the extraction wells still yield stoddard concentrations over 10,000. Those locations are the current focus of the remediation system.

Tenor Company, LLC June 23, 2010

Conclusions & Recommendations

EAI simply concludes that the existing remediation system appears to be effectively removing contaminate mass from the subsurface and continued operation of the current system appears to be warranted.

In terms of recommendations, EAI offers the following:

- Continue to operate the existing system, focusing the VES and groundwater pumping on those extraction points, were groundwater concentrations remain greater than 10,000 ppb stoddard solvent. Once the concentration of stoddard solvent at all of the monitoring points have declined below 10,000 and preferably below 8,000, contaminant masses may be reduced to the point where other remediation approaches could be considered to augment the treatment system, if it appears that the current system is no longer efficiently removing contaminate mass. At these lower concentrations bio-remediation processes may become more effective and efficient.
- More frequent sampling and testing of the pre-treatment soil vapor and pumped groundwater would be useful if the Client desires more refined estimates of system performance in terms of efficiency and total mass removed from the system.
- Periodic sampling of the outlying perimeter wells may also be of use in monitoring and documenting overall stability of site groundwater.
- Lastly, to fulfil the regulatory reporting requirements of Washington States's Model Toxics Control Act; MTCA (WAC 173-340), EAI recommends that a copy of this status report along with any future reports regarding this remediation project be forwarded to the WDOE for inclusion in their file for the subject property.

Limitations

This report has been prepared for the exclusive use of Tenor Company, LLC., along with their several representatives, for specific application to this site. Our work for this project was conducted in a manner consistent with that level of care and skill normally exercised by members of the environmental science profession currently practicing under similar conditions in the area, and in accordance with the terms and conditions set forth in our proposal PR-28275-3 dated April 7, 2009. The opinions expressed in this report are based upon interpretations, observations and testing made at separated sampling locations and conditions may of course vary between those localities or at other locations, media, or depths. No other warranty, expressed or implied, is made. If new information is developed in future site work that may include excavations, borings, studies, etc., Environmental Associates, Inc., must be retained to reevaluate the conclusions of this report and to provide amendments as required.

Tenor Company, LLC June 23, 2010

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Robert B. Roe

We appreciate the opportunity to be of service on this assignment. If you have any questions or if we may be of additional service, please do not hesitate to contact us.

Robert B. Roe, M. Sc., LHG. Project Manager / Hydrogeologist

Licence: 1125 (Washington) Wasi 3 Don W. Spencer, M.Sc., P.G., R.E.A Principal Hydroneoloo 604 Registered Site Assessor/Licensed UST Supervisore State Certification #0878545-U7 DON W. SPENCER (Washington) License: 604 (Oregon) License: 11464 (California) License: 876 License: 5195 (Illinois)

(Mississippi)



Boring / Sample Name	Depth	Stoddard Solvent (mineral spirits)	Benzene	Toluene	Ethylbenzene	Total Xylenes
Soil Samples Colle	cted During Expansion of VES S	System in December 2	009			
W2 (SGB7)	3 to 4 feet	<10	NA	NA	NA	NA
	7 to 8 feet	9,800	NA	NA	NA	Na
W3 (SGB8)	3 to 4 feet	9,400	NA	NA	NA	NA
	7 to 8 feet	7,700	NA	NA	NA	NA
W6 (SGB6)	3 to 4 feet	<10	NA	NA	NA	NA
	7 to 8 feet	1,700	NA	NA	NA	NA
W7 (SGB5)	3 to 4 feet	<10	NA	NA	NA	NA
	7 to 8 feet	4,700	NA	NA	NA	NA
W10 (SGB3)	3 to 4 feet	<10	NA	NA	NA	NA
	7 to 8 feet	318	NA	NA	NA	NA
W11 (SGB2)	3 to 4 feet	<10	NA	NA	NA	NA
	7 to 8 feet	2,100	NA	NA	NA	NA
W12 (SGB1)	3 to 4 feet	13	NA	NA	NA	NA
	7 to 8 feet	4,700	NA	NA	NA	NA
-	11 to 12 feet	9,000	NA	NA	NA	NA
Soil Samples Colle	cted In April / May 2009, Prior	To Installation of the	Original VE	S Wells (VI	ES 1 through VE	CS 6)
AR-2	3-4 feet	10	NA	NA	NA	NA
	5-6 feet	92,000	NA	NA	N.A	NA
HA1 (VES-1)	3-4 feet	980	NA	NA	NA	NA
HA2 (VES-2)	3-4 feet	<50	NA	NA	NA	NA
IA3 (VES-3)	3-4 feet	1,500	NA	NA	NA	NA
HA4 (VES-4)	5-6 feet	<50	NA	NA	NA	NA
	7-8 feet	15,000	NA	NA	NA	NA
IA5 (VES-5)	5-6 feet	<50	NA	NA	NA	NA
()	7-8 feet	<50	NA	NA	NA	NA
IA6 (VES-6)	5-6 feet	<50	NA	NA	NA	NA
	7-8 feet	<50	NA	NA	NA	NA
	Reporting Limit ³	1	0.02	0.02	0.02	0.06
	WDOE Target Compliance Level ⁴	100	0.03	7	6	9

Notes:

"ND" denotes analyte not detected at or above listed Reporting Limit.
 "NA" denotes sample not analyzed for specific analyte.

3- "Reporting Limit" represents the laboratory lower quantitation limit.

4- Method A soil cleanup levels as published in the Model Toxics Control Act (MTCA) 173-340-WAC.

5- The MTCA gasoline (stoddard) TPH cleanup level is 30 ppm for soils with benzene otherwise it is 100 ppm.

Samples screened for the presence of petroleum hydrocarbons (gasoline, diesel, and heavy oil) by test method NWTPH-HCID. HD indicates no petroleum 6fractions were detected.

Bold and Italics denotes concentrations above MTCA Method A soil cleanup levels.

Monitoring Point / Sample Name	Sample Obtained From	Sample Date	Gasoline (Stoddard)	Benzene	Toluene	Ethylbenzene	Total Xylenes
Previously Installed W	ells / Borings						
MW-1	Probe boring prior to well installation	12/2/2008	11,000	<5	<1	5	14
MW-2	Permanent Well	12/16/2008	92	<]	<1	<]	<3
MW-3	Permanent Well	12/16/2008	71	<]	<1	<1	<3
MW-4	Permanent Well	12/16/2008	2,500	1	<1	5	<3
MW-5	Permanent well	4/20/2009	<100	<1	<1	<	<3
MW-6	Permanent well	4/20/2009	<100	<1	<1	<	<3
LAR2	Probe boring grab sample	4/20/2009	170,000	29	1.5	28	<3
B-5	Probe boring grab sample	12/16/2008	<50	<1	<1	<	<3
emediation System W	Vells						
W1 (SGB-9)	Remediation Wells	4/7/2010	27,000	NA	NA	NA	NA
W2 (SGB-7)	Remediation Wells	12/9/2009	3,500	NA	NA	NA	NA
W3 (SGB-8)	Remediation Wells	12/9/2009	120	NA	NA	NA	NA
W4 (SGB-10)	Remediation Wells	4/7/2010	15,000	NA	NA	NA	NA
W5 (VES-4)	Remediation Wells	5/14/2009	86,000	7.9	<1	7.5	7.8
		4/18/2010	6,100	NA	NA	NA	NA
W6 (SGB-6)	Remediation Wells	12/9/2009	24,000	NA	NA	NA	NA
		4/18/2010	13,000	NA	NA	NA	NA
W7 (SGB-5)	Remediation Wells	12/9/2009	24,000	NA	NA	NA	NA.
		4/18/2010	16,000	NA	NA	NA	NA
W8 (SGB-4)	Remediation Wells	12/9/2009	3,500	NA	NA	NA	NA
		4/18/2010	6,400	NA	NA	NA	NA
W9 (VES-5)	Remediation Wells	05/14/209	57,000	4.7	<1	<]	<3
		4/18/2010	4,500	NA	NA	NA	NĂ
W10 (SGB-3)	Remediation Wells	12/9/2009	3,300	NA	NA	NA	NA
W11 (SGB-2)	Remediation Wells	12/9/2009	3,600	NA	NA	NA	NA
		4/18/2010	4,800	NA	NA	NA	NA
W12 (SGB-1)	Remediation Wells	12/9/2009	ND	NA	NA	NA	NA
W13 (VES-6)	Remediation Wells	5/14/2009	65,000	4.4	<1	1.2	<3
		12/9/2009	6,100	NA	NA	NA	NA

Reporting Limit ³	100	1	1	I	3
MTCA-Method-A Cleanup Levels ⁴	800 or 1000 ⁵	5	1000	700	1000

 Notes:
 1
 "NO" denotes analyte not detected at or above listed Reporting Limit.

 2 "NA" denotes sample not analyzed for specific analyte.

 3 "Reporting Limit" represents the laboratory lower quantitation limit.

 4 Method A groundwater cleanup levels as published in the Model Toxics Control Act (MTCA) 173-340-WAC.

 5 The MTCA gasoline TPH cleanup level is 800 ppb for groundwater with benzene. Otherwise, the cleanup level is 1000 ppb.

Bold and Italics denotes concentrations above existing or proposed MTCA Method A groundwater cleanup levels.

Environmental Associates, Inc.











View of the expanded network of extraction wells and associated trench work inside the warehouse building.



VES blower and groundwater solvent stripper tank air injection pump.



Groundwater / solvent recovery pump control closet.



Upper level: VES moisture knock-out tank and twin carbon canisters. Lower level: Groundwater/solvent separating tank and air-stripping tank.

ENVIRONMENTAL ASSOCIATES, INC. 1380 - 112th Avenue N.E., Suite 300 Bellevue, Washington 98004

SITE PHOTOGRAPHS

Former Glitsa, Inc. Property 327 South Kenyon Street Seattle, Washington

Job Number:	Date:	Plate:
JN-28275-3	May 2010	5

ATTACHMENT-A

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MATTER PROCESSING

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ATTACHMENT-B

Laboratory Reports

ESN NORTHWEST CHEMISTRY LABORATORY

Duane Bartel FARWEST PROJECT Seattle, Washington ESN Northwest 1210 Eastside Street SE Suite 200 Olympia, WA 98501 (360) 459-4670 (360) 459-3432 Fax lab@esnnw.com

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Analysis of Mineral Spirit in Soil by Method NWTPH-Dx/Dx Extended

Sample	Date	Date	Surrogate	Mineral Spirits
Number	Prepared	Analyzed	Recovery (%)	(mg/kg)
Method Blank	12/3/2009	12/8/2009	108	nd
SGB1-4	12/3/2009	12/8/2009	106	13
SGB1-4 DUP	12/3/2009	12/8/2009	95	15
SGB1-8	12/3/2009	12/9/2009	int	4700
SGB1-12	12/3/2009	12/9/2009	int	9000
SGB2-4	12/3/2009	12/8/2009	93	nd
SGB2-8	12/3/2009	12/9/2009	int	2100
SGB3-4	12/3/2009	12/8/2009	99	nd
SGB3-8	12/3/2009	12/8/2009	93	318
SGB5-4	12/3/2009	12/8/2009	96	nd
SGB5-8	12/3/2009	12/9/2009	int	4700
SGB6-4	12/3/2009	12/9/2009	96	nd
SGB6-8	12/3/2009	12/9/2009	int	1700
SGB7-4	12/3/2009	12/8/2009	104	nd
SGB7-8	12/3/2009	12/9/2009	int	9800
SGB8-4	12/3/2009	12/9/2009	int	940 0
SGB8-8	12/3/2009	12/9/2009	int	7700

Reporting Limits

"nd" Indicates not detected at the listed detection limits. "int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 50% TO 150%

ESN NORTHWEST CHEMISTRY LABORATORY

Duane Bartel FARWEST PROJECT Seattle, Washington

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ESN Northwest 1210 Eastside Street SE Suite 200 Olympia, WA 98501 (360) 459-4670 (360) 459-3432 Fax lab@esnnw.com

Analysis of Mineral Spirit in Water by Method NWTPH-Dx

Sample	Date	Date	Surrogate	Mineral Spirits
Number	Prepared	Analyzed	Recovery (%)	(ug/L)
Method Blank	11/30/2009	12/9/2009	92	nd
SGB1-W	11/30/2009	12/9/2009	103	nđ
SGB2-W	11/30/2009	12/9/2009	108	3600
SGB3-W	11/30/2009	12/9/2009	99	3300
SGB4-W	11/30/2009	12/9/2009	94	3500
SGB5-W	11/30/2009	12/9/2009	int	24000
SGB6-W	11/30/2009	12/9/2009	int	24000
SGB7-W	11/30/2009	12/9/2009	100	3500
SGB8-W	11/30/2009	12/9/2009	94	120
Reporting Limits				100

Reporting Limits

"nd" Indicates not detected at the listed detection limits. "int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 50% TO 150%

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SGBI-W				Boa	++	- -							1.1							ŀ
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ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D. Charlene Morrow, M.S. Yelena Aravkina, M.S. Bradley T. Benson, B.S. Kurt Johnson, B.S. 3012 16th Avenue West Seattle, WA 98119-2029 TEL: (206) 285-8282 FAX: (206) 283-5044 e-mail: fbi@isomedia.com

March 18, 2010

Duane Bartel, Project Manager Tenor Co., LLC 1313 Washington St. Sumner, WA 98390

Dear Mr. Bartel:

Included are the results from the testing of material submitted on March 15, 2010 from the Soil/Water Test, F&BI 003143 project. There are 6 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

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

Sincerely,

FRIEDMAN & BRUYA, INC.

Calu

Michael Erdahl Project Manager

Enclosures NAA0318R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on March 15, 2010 by Friedman & Bruya, Inc. from the Tenor Co., LLC Soil/Water Test, F&BI 003143 project. Samples were logged in under the laboratory ID's listed below.

1

<u>Laboratory ID</u>	<u>Tenor Co., LLC</u>
003143-01	Well 5
003143-02	Well 6
003143-03	Well 7
003143-04	Well 8
003143-05	Well 9
003143-06	Well 11
003143-07	Soil 1
003143-08	Soil 2
003143-09	Soil 3

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 03/18/10 Date Received: 03/15/10 Project: Soil/Water Test, F&BI 003143 Date Extracted: 03/17/10 Date Analyzed: 03/18/10

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Results Reported on a Dry Weight Basis Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	Stoddard Solvent Range (C8-C11)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
Soil 1 003143-07	<50	101
Soil 2 003143-08	<50	100
Soil 3 003143-09	<50	100
Method Blank 00-0393 MB	<50	99

ENVIRONMENTAL CHEMISTS

Date of Report: 03/18/10 Date Received: 03/15/10 Project: Soil/Water Test, F&BI 003143 Date Extracted: 03/16/10 Date Analyzed: 03/16/10

RESULTS FROM THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Results Reported as ug/L (ppb)

<u>Sample ID</u> Laboratory ID	<u>Stoddard Solvent Range</u> (C ₈ -C ₁₁)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
Well 5 003143-01	6,100	102
Well 6 003143-02	13,000	109
Well 7 003143-03	16,000	109
Well 8 003143-04	6,400	113
Well 9 003143-05	4,500	109
Well 11 003143-06	4,800	100
Method Blank 00-0355 MB	<50	103

3

ENVIRONMENTAL CHEMISTS

Date of Report: 03/18/10 Date Received: 03/15/10 Project: Soil/Water Test, F&BI 003143

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Laboratory Code:	003143-09 (Dupli	icate)				
-	-	(Wet wt)) (Wet wt) Relat	ive	
	Reporting	Sample	Duplicat	e Perce	ent Accept	tance
Analyte	Units	Result	Result	Differe	ence Crite	eria
Stoddard Solvent	mg/kg (ppm)	<50	<50	nr	n 0-2	20
Laboratory Code:	Laboratory Cont	rol Sample	:			
			Percent	Percent		
	Reporting	Spike	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	LCS	LCSD	Criteria	(Limit 20)
Stoddard Solvent	mg/kg (ppm)	5,000	88	90	70-130	2

ENVIRONMENTAL CHEMISTS

Date of Report: 03/18/10 Date Received: 03/15/10 Project: Soil/Water Test, F&BI 003143

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Laboratory Code: Laboratory Control Sample

			Percent	Percent		
	Reporting	Spike	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	LCS	LCSD	Criteria	(Limit 20)
Stoddard Solvent	ug/L (ppb)	2,500	76	83	70-130	9

ENVIRONMENTAL CHEMISTS

Data Qualifiers & Definitions

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

A1 – More than one compound of similar molecule structure was identified with equal probability.

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

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

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

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - Insufficient sample was available to achieve normal reporting limits and limits are raised accordingly.

fb - Analyte present in the blank and the sample.

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

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

ht - Analysis performed outside the method or client-specified holding time requirement.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j – The result is below normal reporting limits. The value reported is an estimate.

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

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

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

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

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

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

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - Estimated concentration calculated for an analyte response above the valid instrument calibration range. A dilution is required to obtain an accurate quantification of the analyte.

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

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

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ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D. Charlene Morrow, M.S. Yelena Aravkina, M.S. Bradley T. Benson, B.S. Kurt Johnson, B.S. 3012 16th Avenue West Seattle, WA 98119-2029 TEL: (206) 285-8282 FAX: (206) 283-5044 e-mail: fbi@isomedia.com

April 7, 2010

Duane Bartel, Project Manager Tenor Co., LLC 1313 Washington St. Sumner, WA 98390

Dear Mr. Bartel:

Included are the results from the testing of material submitted on April 1, 2010 from the Water Test, F&BI 004015 project. There are 4 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

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

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures NAA0407R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on April 1, 2010 by Friedman & Bruya, Inc. from the Tenor Co., LLC Water Test, F&BI 004015 project. Samples were logged in under the laboratory ID's listed below.

1

Laboratory ID	Tenor Co., LLC
004015-01	Well No. 1
004015-02	Well No. 4

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 04/07/10 Date Received: 04/01/10 Project: Water Test, F&BI 004015 Date Extracted: 04/05/10 Date Analyzed: 04/06/10

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RESULTS FROM THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx Results Reported as ug/L (ppb)

Surrogate Sample ID Stoddard Solvent Range (% Recovery) Laboratory ID $(C_8 - C_{11})$ (Limit 50-150) Well No. 1 27,000 112 004015-01 Well No. 4 15,000 107 004015-02 Method Blank <50 99 00-0494 MB

2

ENVIRONMENTAL CHEMISTS

Date of Report: 04/07/10 Date Received: 04/01/10 Project: Water Test, F&BI 004015

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Laboratory Code: Laboratory Control Sample

			Percent	Percent		
	Reporting	Spike	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	LCS	LCSD	Criteria	(Limit 20)
Stoddard Solvent	ug/L (ppb)	2,500	81	86	70-130	6

ENVIRONMENTAL CHEMISTS

Data Qualifiers & Definitions

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

A1 – More than one compound of similar molecule structure was identified with equal probability.

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

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

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

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - Insufficient sample was available to achieve normal reporting limits and limits are raised accordingly.

fb - Analyte present in the blank and the sample.

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

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

ht - Analysis performed outside the method or client-specified holding time requirement.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j – The result is below normal reporting limits. The value reported is an estimate.

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

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

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

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

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

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

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - Estimated concentration calculated for an analyte response above the valid instrument calibration range. A dilution is required to obtain an accurate quantification of the analyte.

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

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

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Phone # 206-321-556	<u> </u>													Will call with instructions						
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Samples received at <u>14</u>°C

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ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D. Charlene Morrow, M.S. Yelena Aravkina, M.S. Bradley T. Benson, B.S. Kurt Johnson, B.S. 3012 16th Avenue West Seattle, WA 98119-2029 TEL: (206) 285-8282 FAX: (206) 283-5044 e-mail: fbi@isomedia.com

November 24, 2009

Duane Bartel Tenor Co., LLC 1313 Washington St. Sumner, WA 98390

Dear Mr. Bartel:

Included are the results from the testing of material submitted on November 17, 2009 from the Farwest UST, F&BI 911133 project. There are 4 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

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

Sincerely,

FRIEDMAN & BRUYA, INC.

al

Michael Erdahl Project Manager

Enclosures c: Rob Roe NAA1124R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on November 17, 2009 by Friedman & Bruya, Inc. from the Tenor Co., LLC Farwest UST, F&BI 911133 project. Samples were logged in under the laboratory ID's listed below.

1

<u>Laboratory ID</u>	<u>Tenor Co., LLC</u>
911133-01	West Well 11/17/09
911133-02	North Well 11/17/09
911133-03	South Well 11/17/09

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 11/24/09 Date Received: 11/17/09 Project: Farwest UST, F&BI 911133 Date Extracted: 11/17/09 Date Analyzed: 11/19/09

RESULTS FROM THE ANALYSIS OF THE WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING NWTPH-Dx

Results Reported as ug/L (ppb)

<u>Sample ID</u> Laboratory ID	Stoddard Solvent Range (C8-C11)	Surrogate <u>(% Recovery)</u> (Limit 51-137)
West Well 11/17/09 911133-01	6,100	98
North Well 11/17/09 911133-02 1/100r	9,700,000	ip
South Well 11/17/09 911133-03 1/100r	2,100,000	ip
Method Blank	<50	96

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ENVIRONMENTAL CHEMISTS

Date of Report: 11/24/09 Date Received: 11/17/09 Project: Farwest UST, F&BI 911133

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING NWTPH-Dx

Laboratory Code: Laboratory Control Sample

-			Percent	Percent		
	Reporting	Spike	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	LCS	LCSD	Criteria	(Limit 20)
Stoddard Solvent	ug/L (ppb)	2,500	90	94	70-130	4

ENVIRONMENTAL CHEMISTS

Data Qualifiers & Definitions

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

A1 – More than one compound of similar molecule structure was identified with equal probability.

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

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

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

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - Insufficient sample was available to achieve normal reporting limits and limits are raised accordingly.

fb - The analyte indicated was found in the method blank. The result should be considered an estimate.

fc – The compound is a common laboratory and field contaminant.

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

ht - The sample was extracted outside of holding time. Results should be considered estimates.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j - The result is below normal reporting limits. The value reported is an estimate.

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

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

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

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

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

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

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.

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

x - The pattern of peaks present is not indicative of diesel.

y - The pattern of peaks present is not indicative of motor oil.

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ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D. Charlene Morrow, M.S. Yelena Aravkina, M.S. Bradley T. Benson, B.S. Kurt Johnson, B.S. 3012 16th Avenue West Seattle, WA 98119-2029 TEL: (206) 285-8282 FAX: (206) 283-5044 e-mail: fbi@isomedia.com

October 8, 2009

Duane Bartel, Project Manager Tenor Co., LLC 1313 Washington St. Sumner, WA 98390

Dear Mr. Bartel:

Included are the results from the testing of material submitted on October 1, 2009 from the Farwest UST Cleanup, F&BI 910015 project. There are 6 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

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

Sincerely,

FRIEDMAN & BRUYA, INC.

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Michael Erdahl Project Manager

Enclosures c: Rob Roe NAA1008R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

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This case narrative encompasses samples received on October 1, 2009 by Friedman & Bruya, Inc. from the Tenor Co., LLC Farwest UST Cleanup, F&BI 910015 project. Samples were logged in under the laboratory ID's listed below.

<u>Tenor Co., LLC</u>
North Well
West Well
South Well
North Well-3ft E/4'DP
West Well-2ft NE/4'DP
South Well-3ft.E/4'DP
RH Process Tank

Please note that sample North Well had 50 ml of product removed from the container prior to sample extraction. All quality control requirements were acceptable.

1

ENVIRONMENTAL CHEMISTS

Date of Report: 10/08/09 Date Received: 10/01/09 Project: Farwest UST Cleanup, F&BI 910015 Date Extracted: 10/02/09 Date Analyzed: 10/05/09

RESULTS FROM THE ANALYSIS OF THE WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Results Reported as ug/L (ppb)

<u>Sample ID</u> Laboratory ID	<u>Stoddard Solvent Range</u> (C8-C11)	Surrogate <u>(% Recovery)</u> (Limit 51-137)
North Well d 910015-01 1/20	260,000	101
West Well 910015-02	2,200	96
South Well d 910015-03 1/100	900,000	137
RH Process Tank 910015-07	130	94
Method Blank	<50	84

ENVIRONMENTAL CHEMISTS

Date of Report: 10/08/09 Date Received: 10/01/09 Project: Farwest UST Cleanup, F&BI 910015 Date Extracted: 10/02/09 Date Analyzed: 10/02/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Results Reported on a Dry Weight Basis Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	<u>Stoddard Solvent Range</u> (C8-C11)	Surrogate <u>(% Recovery)</u> (Limit 67-127)
North Well-3ft E/4'DP 910015-04	<50	98
West Well-2ft NE/4'DP 910015-05	<50	88
South Well-3ft.E/4'DP 910015-06	<50	88
Method Blank	<50	94

ENVIRONMENTAL CHEMISTS

Date of Report: 10/08/09 Date Received: 10/01/09 Project: Farwest UST Cleanup, F&BI 910015

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Laboratory Code: Laboratory Control Sample

			Percent	Percent		
	Reporting	Spike	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	LCS	LCSD	Criteria	(Limit 20)
Stoddard Solvent	ug/L (ppb)	2,500	94	91	70-130	3

ENVIRONMENTAL CHEMISTS

Date of Report: 10/08/09 Date Received: 10/01/09 Project: Farwest UST Cleanup, F&BI 910015

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS STODDARD SOLVENT USING METHOD NWTPH-Dx

Laboratory Code: 9	910015-04 (Matr	ix Spike)) (Wet wt)	Percent	Percent		
	Reporting	Spike	Sample	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	Result	MS	MSD	Criteria	(Limit 20)
Stoddard Solvent	mg/kg (ppm)	5,000	<50	98	108	50-150	10
Laboratory Code: 1	Laboratory Cont	rol Sam	ple Percent				
	Reporting	Spike	Recover		ance		
Analyte	Units	Level	LCS	Criter	ria		
Stoddard Solvent	mg/kg (ppm)	5,000	97	70-13	30		

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ENVIRONMENTAL CHEMISTS

Data Qualifiers & Definitions

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

A1 – More than one compound of similar molecule structure was identified with equal probability.

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

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

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

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - Insufficient sample was available to achieve normal reporting limits and limits are raised accordingly.

fb - The analyte indicated was found in the method blank. The result should be considered an estimate.

fc – The compound is a common laboratory and field contaminant.

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

ht - The sample was extracted outside of holding time. Results should be considered estimates.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j – The result is below normal reporting limits. The value reported is an estimate.

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

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

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

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

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

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

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.

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

x - The pattern of peaks present is not indicative of diesel.

y - The pattern of peaks present is not indicative of motor oil.

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ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue Northeast, Suite 300 Bellevue, Washington 98004 (425) 455-9025 Office (888) 453-5394 Toll Free (425) 455-2316 Fax

June 23, 2010

JN-28275-3

UST Le178

Ms. Cathie Richardson Washington State Department of Ecology UST Division 3190 - 160th Avenue SE Bellevue, Washington 98008-5452

RE: Remediation Feasibility Study & Independent Cleanup Action Status Report Former Glitsa Property (LUST Release #3910 327 South Kenyon Street Seattle, Washington

Dear Ms. Richardson:

On behalf of our Client (Tenor Company, LLC) please find enclosed a copy of Environmental Associates, Inc's (EAI's) Supplemental Exploration & Further Remediation Feasibility Study, and a copy of EAI's Independent Cleanup Action Status report.

Sincerely submitted,

Robert B. Roe, M.Sc., LHG. Senior Hydrogeologist / Project Manager License: 1125 (Washington)



Associate Offices: Oregon / San Francisco Bay Area

