

WHITMAN Environmental Sciences

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October 3, 2022

FedEx Freight, Inc.
3405 Victor St.
Santa Clara, CA 95054

Attention: Mr. Chong Lee

Subject: Response to Department of Ecology Comments
Former FedEx Freight Terminal
18221 E. Valley Highway
Kent, Washington

Dear Mr. Lee:

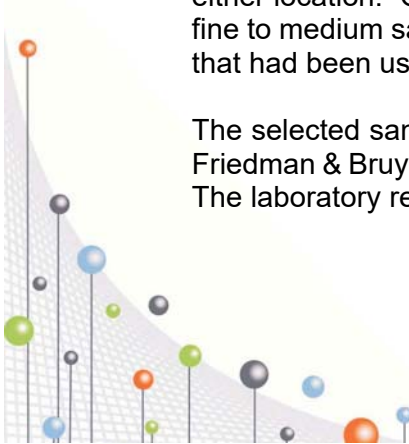
As you are aware, the former location of the Kent, Washington FedEx Freight terminal has been under review by the Washington Department of Ecology's Voluntary Cleanup Program (VCP). The location of the property is noted in Figure 1. Mr. Mike Warfel is completing Ecology's review and has requested further information regarding one potential remaining source of contamination on the property.

Based on the agency's review of historical cleanup documents, Mr. Warfel identified one shallow soil sample taken in 1998 from the former location of a dispenser island associated with the last remaining underground storage tank at the site. There had been no subsequent sampling to demonstrate that the pump island area had been remediated. Without further documentation, the underground storage tank assessment is insufficient to demonstrate that soil is not contaminated with diesel-range petroleum hydrocarbons (TPH-D).

To address this comment, WES obtained soil samples from two open monument covers at locations in the immediate vicinity of the former pump island. One monument cover installed near the east end of the former pump island allowed access to a control valve of a former vapor extraction system that had been operated in the 1990s. The other cover was in place to protect a former water valve and air line that had extended to the west end of the pump island from the former truck shop. The sample locations (designated PI-E and PI-W for the east and west ends of the pump island, respectively) and former location of the pump island are shown in Figure 2. The figure shows the current condition of the property and was developed by overlaying historical aerial photographs that show the former pump island location.

At each location, WES collected discrete soil samples from depths of 2, 3 and 4 feet below the asphalt surface. At sample point PI-W, a 5-foot deep sample was also collected. There were no field detectable indications of petroleum, such as odors, sheen or discoloration at any depth at either location. Groundwater was not encountered. Soils at the western sampling location were fine to medium sand, unlike other soils observed on the site, suggesting good quality imported fill that had been used to fill an excavation.

The selected samples were placed in laboratory-prepared jars, labeled, chilled and submitted to Friedman & Bruya, Inc. All four samples were tested for TPH-D by Method NWTPH-D (extended). The laboratory report is included in Appendix A.



Findings and Conclusions

The results of laboratory testing on soil samples is summarized in Table 1. The testing found no detectable diesel or motor oil range TPH in any of the seven samples. These samples are in the immediate vicinity of the 1998 dispenser island sample and indicate the former pump island has been remediated to a level that meets MTCA Method A cleanup levels.

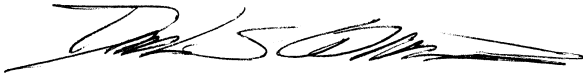
Based on the findings, no further investigation or action appears warranted. This summary can be submitted to the Washington Department of Ecology Voluntary Cleanup Program as documentation toward an updated opinion letter. WES will file this report on your behalf.

Closure

Thank you for the opportunity to be of service to you in this matter. If you have any questions regarding this letter, or if I may be of any further assistance, please feel free to contact me at your convenience.

Respectfully submitted,

Whitman Environmental Sciences



Daniel S. Whitman, LG
Principal



DANIEL S. WHITMAN

Attachments: Table 1 - Summary of Former Pump Island Soil Sample Analyses
 Figure 1 - Site Map
 Figure 2 - Sample Location Plan
 Appendix A - Laboratory Analytical Reports

TABLE 1
Summary of Former Pump Island Soil Sample Analyses
Former FedEx Freight Terminal
18221 E. Valley Highway
Kent, Washington

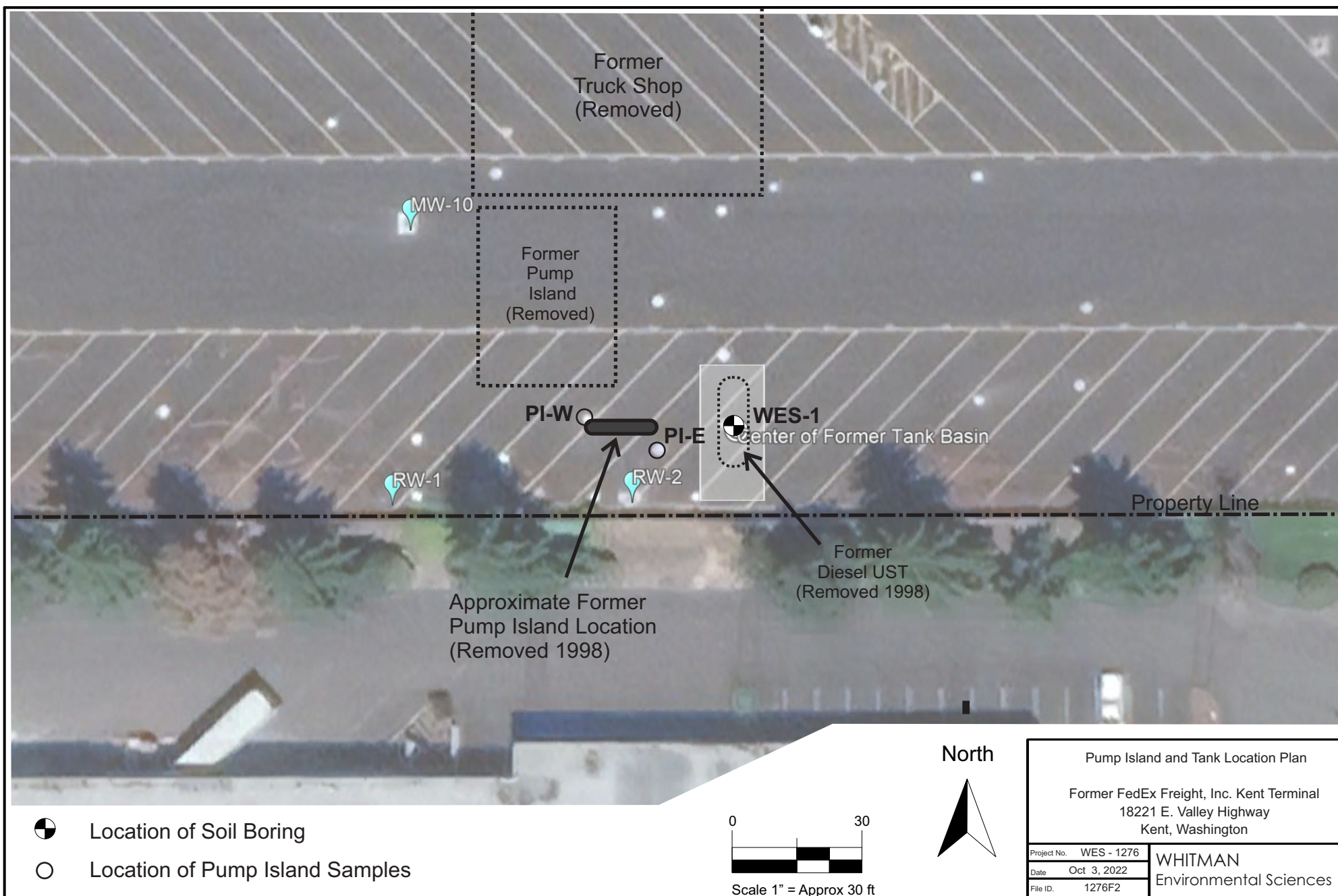
Sample ID	Sample Depth	Sample Date	Total Petroleum Hydrocarbons (mg/kg)		MTCA Method A Soil Cleanup Level (mg/kg)
			Diesel-Range	Oil Range	
PI-E-2'	2'	9/20/2022	ND (<50)	ND (<250)	2000
PI-E-3'	3'	9/20/2022	ND (<50)	ND (<250)	
PI-E-4'	4'	9/20/2022	ND (<50)	ND (<250)	
PI-W-2'	2'	9/20/2022	ND (<50)	ND (<250)	
PI-W-3'	3'	9/20/2022	ND (<50)	ND (<250)	
PI-W-4'	4'	9/20/2022	ND (<50)	ND (<250)	
PI-W-5'	5'	9/20/2022	ND (<50)	ND (<250)	

Notes:

ND (<XXX) - Parameter not detected at concentrations at or above the noted reporting limit.

TPH-D by Washington accepted method NWTPH-D (extended).

MTCA Method A soil cleanup level per WAC Chapter 173-340-900, Table 740-1.



APPENDIX A

***Laboratory Analytical Report
Friedman & Bruya, Inc.***

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

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

3012 16th Avenue West
Seattle, WA 98119-2029
(206) 285-8282
fbi@isomedia.com
www.friedmanandbruya.com

September 26, 2022

Dan Whitman, Project Manager
Whitman Environmental Sciences
6812 16th Ave NE
Seattle, WA 98115

Dear Mr Whitman:

Included are the results from the testing of material submitted on September 20, 2022 from the FedEx Old Kent WES-1276, F&BI 209311 project. There are 4 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days, or as directed by the Chain of Custody document. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

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

Sincerely,

FRIEDMAN & BRUYA, INC.



Michael Erdahl
Project Manager

Enclosures
WES0926R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on September 20, 2022 by Friedman & Bruya, Inc. from the Whitman Environmental Sciences FedEx Old Kent WES-1276, F&BI 209311 project. Samples were logged in under the laboratory ID's listed below.

<u>Laboratory ID</u>	<u>Whitman Environmental Sciences</u>
209311 -01	P1-E-2'
209311 -02	P1-E-3'
209311 -03	P1-E-4'
209311 -04	P1-W-2
209311 -05	P1-W-3
209311 -06	P1-W-4
209311 -07	P1-W-5

All quality control requirements were acceptable.

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 09/26/22

Date Received: 09/20/22

Project: FedEx Old Kent WES-1276, F&BI 209311

Date Extracted: 09/21/22

Date Analyzed: 09/21/22

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

Results Reported on a Dry Weight Basis

Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	<u>Diesel Range</u> (C ₁₀ -C ₂₅)	<u>Motor Oil Range</u> (C ₂₅ -C ₃₆)	<u>Surrogate</u> <u>(% Recovery)</u> (Limit 48-168)
P1-E-2' 209311-01	<50	<250	102
P1-E-3' 209311-02	<50	<250	92
P1-E-4' 209311-03	<50	<250	93
P1-W-2 209311-04	<50	<250	94
P1-W-3 209311-05	<50	<250	101
P1-W-4 209311-06	<50	<250	90
P1-W-5 209311-07	<50	<250	101
Method Blank 02-2242 MB	<50	<250	90

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 09/26/22

Date Received: 09/20/22

Project: FedEx Old Kent WES-1276, F&BI 209311

**QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES
FOR TOTAL PETROLEUM HYDROCARBONS AS
DIESEL EXTENDED USING METHOD NWTPH-D_x**

Laboratory Code: 209304-01 (Matrix Spike)

Analyte	Reporting Units	Spike Level	Sample Result (Wet Wt)	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	102	106	73-135	4

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Diesel Extended	mg/kg (ppm)	5,000	110	74-139

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Data Qualifiers & Definitions

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

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

ca - The calibration results for the analyte were outside of acceptance criteria. The value reported is an estimate.

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

cf - The sample was centrifuged prior to analysis.

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

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

f - The sample was laboratory filtered prior to analysis.

fb - The analyte was detected in the method blank.

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

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

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

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

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

j - The analyte concentration is reported below the lowest calibration standard. The value reported is an estimate.

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

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

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

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

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

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

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

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

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

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

Report to

24/2/2000

09-20-22

702

Page # of

TURNAROUND TIME

standard turnaround

☐ RUSH _____
Rush charges authorized by:

SAMPLE DISPOSAL

Whether _____

Default: Dispose after 30

SAMPLERS (<i>signature</i>)	
PROJECT NAME	<i>Ferry Old</i>
REMARKS	<i>MHC-000 Project specific RLS? - Y</i>

PO #	11/16	11/16	11/16
Invoice To	11/16	11/16	11/16
Invoice To	11/16	11/16	11/16
Invoice To	11/16	11/16	11/16
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Invoice To	11/16	11/16	11/16
Invoice To	11/16	11/16	11/16

Page # _____ of _____

TURNAROUND TIME

☒ Standard turnaround

☐ RUSH

Rush charges authorized by: _____

SAMPLE DISPOSAL

☐ Archive samples

☐ Other _____

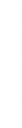
Default: Dispose after 30 days

209311
Report of ~~_____~~ Mr. Williams
Company Williams Fuel Services
Address 4818 163rd Ave NE
City, State, ZIP Seattle, WA 98145
Phone _____ Email williams@

ANALYSES REQUESTED

[illegible]

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

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by: 			11-10-02	5:53 PM
Received by: 	JOE MONTANINO	FBI	04/10/12	17:34
Relinquished by:	Samples received at	3 °C		
Received by:				