October 17, 2022

Mr. Jaskaran Singh
First Job Naches, LLC
10121 Highway 12
Naches, WA 98937-9785
karan1707@hotmail.com

RE: **UST Decommissioning Report Addendum**
Naches Pit Stop
10121 Highway 12
Naches, Washington 98937-9785
VCP ID No.: CE0449

Dear Mr. Singh:

Associated Environmental Group (AEG) has prepared this technical memorandum to provide a summary of the additional sampling performed at the request of the Washington State Department of Ecology (Ecology) at the above-referenced address in Naches, Washington (Site). The Site's location and current layout are illustrated in Figure 1, *Vicinity Map*, and Figure 2, *Site Map*.

In February 2022, AEG provided oversight during the decommissioning of three underground storage tanks (USTs) at the Site. An 8,000-gallon gasoline UST, a 2,500-gallon gasoline UST, and a 2,500-gallon diesel fuel UST were decommissioned in place by Cowlitz Clean Sweep (CCS) at the Site due to their proximity to the on-Site building. Following the completion of Site activities, AEG drafted a UST Decommissioning Report, which was submitted to Ecology on March 4, 2022.

On May 2, 2022, Ecology sent an email to Mr. Singh and AEG indicating that since the UST system was not continuing as a UST system (an aboveground tank was installed and connected instead), that it was considered a "change in service" under the UST regulations. As such, Ecology indicated additional sampling was warranted adjacent the product lines and dispensers.

AEG returned to the Site on May 16, 2022, and advanced four borings (B-6, B-7, B-8, and B-9) adjacent the product lines and dispensers. As was the case with borings B-1 through B-5, groundwater was not encountered in any of the borings. Boring locations are illustrated in Figure 2, *Site Map*, and boring logs are included in Appendix B, Supporting Documents, *Boring Logs*. The Ecology UST Inspector was on Site during drilling. For the final boring (B-9), Ecology requested AEG field staff move the planned boring location about 1.5 feet closer to the where the product line markings were drawn by the utility locator. While advancing the boring, the drilling rods punctured one of the product lines, and the UST system immediately shut off. Luckily, most

of the gasoline in the piping flowed backwards into a sump location between the aboveground tank and the dispensers, and was pumped out.

AEG returned to the Site the following day with subcontractor Northwest Petroleum Equipment, Inc. (NPE) who cut the concrete around boring B-9, removed the surrounding pea gravel using hand tools, and repaired the punctured product line. Photographs are included in Appendix A, Supporting Documents, *Site Photographs*. AEG observed a minor amount of free product within the pea gravel; however, no impacts to the dense soils below were visually noted once the pea gravel was removed. AEG collected a soil sample (Naches PL-1) immediately below the punctured line. Rushed analytical results indicated the presence of benzene in the sample. AEG then returned to the Site two days later, scraped an inch or two of the dense soil from the area of sample Naches PL-1 using hand tools, and re-sampled this location (PS-B) as well as two other locations from the east (PS-E) and west (PS-W) sides of the shallow excavation. All impacted soils were placed in 55-gallon drums using hand tools, and were transported off Site for disposal.

RESULTS

Analytical results of the soil samples collected from borings B-6 and B-7 were non-detect for all constituents analyzed. The sample from B-8 indicated the presence of gasoline-range petroleum hydrocarbons (TPH) at 466 milligrams per kilogram (mg/kg), and total xylenes at 27 mg/kg in boring B8-5 at 5 feet below ground surface (bgs). These detections exceeded the Model Toxics Control Act (MTCA) Method A cleanup levels of 30 mg/kg and 9 mg/kg, respectively, but were well below the Site-specific MTCA Method B cleanup level of 2,230 mg/kg previously calculated from the Site. Given the lack of benzene in this sample, the results are consistent with the weathered gasoline found elsewhere at the Site associated with the historical release previously assessed, and the Site-specific MTCA Method B cleanup level of 2,230 mg/kg would be applicable. Given the lack of benzene and its presence adjacent the dispensers, this sample would not be expected to create a potential vapor intrusion scenario.

The sample from B-9 did detect benzene at 0.22 mg/kg at 3 feet bgs. This detection was associated with the punctured product line, and the soil impacts were removed as part of the pipe repair as described above.

Also as noted above, the sample collected directly below the punctured product line (Naches PL-1) detected benzene at 0.13 mg/kg. All other constituents sampled were either non-detect or below MTCA Method A cleanup levels. These benzene impacts were removed via hand tools, and confirmation samples collected afterwards (PS-B, PS-E, and PS-W) were all non-detect for the constituents analyzed.

Soil results are summarized in Table 1, *Summary of Soil Analytical Results*. Laboratory results are included in Appendix B, Supporting Documents, *Laboratory Datasheets*.

CONCLUSIONS

Per Ecology request, AEG performed additional sampling to complete the Site Assessment associated with the closing in place of the on-Site USTs. Despite the unfortunate incident associated with puncturing a product line during the advancement of the remaining confirmation borings, the impacts to soil were limited given the density of the soils below the pea gravel, and the quick response by AEG and NPE to remove any soil impacts and repair the line.

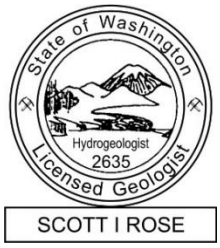
As noted above, the only remaining impacts to soil are those noted in boring B-8. While the gasoline-range TPH and xylene detections exceeded MTCA Method A cleanup levels, they were well below the Site-specific MTCA Method B cleanup level of 2,230 mg/kg previously calculated from the Site. Given the lack of benzene in this sample, the results are consistent with the weathered gasoline found elsewhere at the Site associated with the historical release previously assessed, and the Site-specific MTCA Method B cleanup level of 2,230 mg/kg would be applicable. Given the lack of benzene and its presence adjacent the dispensers, this sample would not be expected to create a potential vapor intrusion scenario.

It is AEG's professional opinion that the UST Site Assessment is complete, and no further action is warranted for the Site for the punctured piping or historical release. If you have comments or questions, please contact our office at your convenience at 360.352.9835.

Sincerely,

Associated Environmental Group

Scott Rose, L.H.G.
Director of Technical Services



Attachments: Figure 1 – *Vicinity Map*
Figure 2 – *Site Map*

Table 1 – *Summary of Soil Analytical Results*

Appendix A – Supporting Documents
Site Photographs

Appendix B – Supporting Documents
Boring Logs
Laboratory Datasheets

FIGURES

2633 PARKMONT LANE SW, SUITE A • OLYMPIA, WA • 98502-5751
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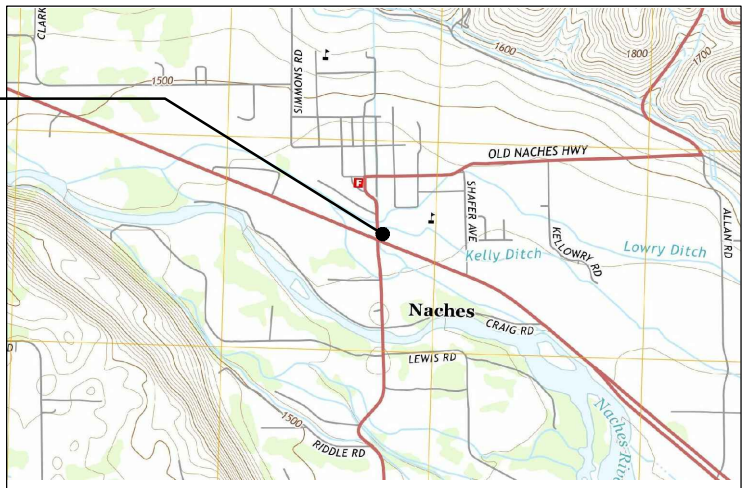
FILENAME	DRAWN BY		CHECKED BY		APPROVED BY		PROJECT NUMBER
16-102_15Q4.DWG	ICD	2/1/2016	BD	2/1/2016	BD	2/1/2016	16-102

N
W E
S

PROJECT LOCATION



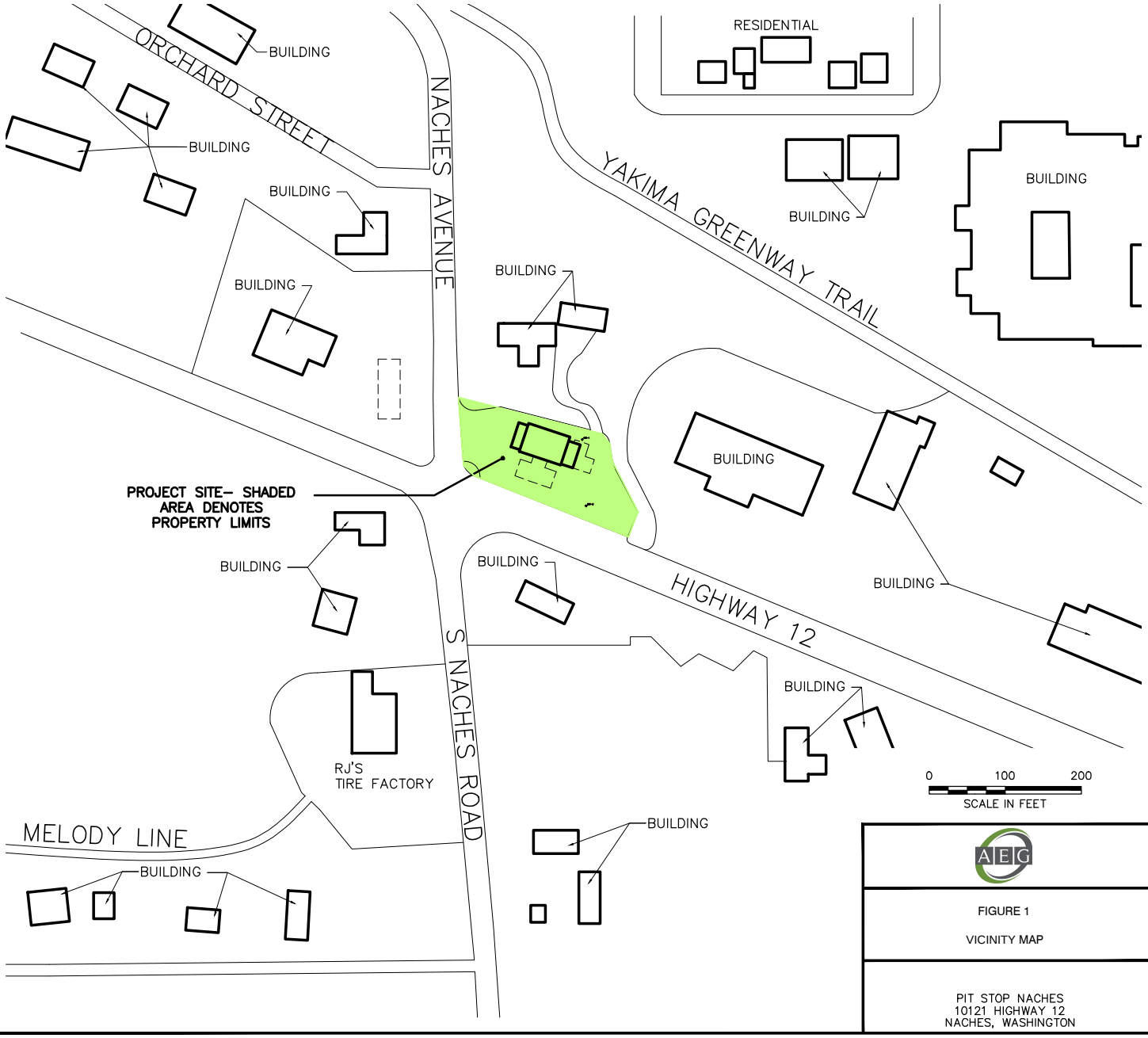
VICINITY MAP

NOTES

1. THE LOCATIONS OF ALL FEATURES SHOWN ARE APPROXIMATE
2. THIS DRAWING IS FOR INFORMATION PURPOSES. IT IS INTENDED TO ASSIST IN SHOWING FEATURES DISCUSSED IN AN ATTACHED DOCUMENT.

REFERENCE

DRAWING CREATED FROM AERIAL PHOTOGRAPH AND NOTES PROVIDED BY AEG, LLC.
VICINITY IMAGE SOURCE: U.S. GEOLOGICAL SURVEY–2013, 7.5 MINUTE QUADRANGLE MAP NACHES, WASHINGTON



AEG

FIGURE 1

VICINITY MAP

PIT STOP NACHES
10121 HIGHWAY 12
NACHES, WASHINGTON

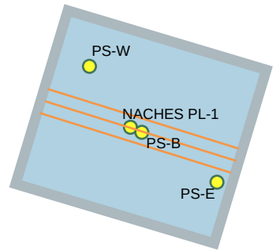
FILENAME	DRAWN BY	CHECKED BY	APPROVED BY	PROJECT NUMBER
16-102_2201_1.DWG	ICD 2/25/2022	JS 2/25/2022	JS 2/25/2022	16-102

SOURCE: 2021 AERIAL PHOTOGRAPHY; © GOOGLE

N
W E
S

LEGEND

- PROPERTY LINE
- B–1 ● BORING LOCATION
- AST ABOVE GROUND STORAGE TANK
- UST UNDERGROUND STORAGE TANK
- SUMP



EXCAVATION WITH CONFIRMATION SAMPLE LOCATIONS

NOTES

1. THE LOCATIONS OF ALL FEATURES SHOWN ARE APPROXIMATE
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REFERENCE

DRAWING CREATED FROM AERIAL PHOTOGRAPH AND NOTES PROVIDED BY AEG, LLC.

0 15 30
SCALE IN FEET

AEG

FIGURE 2

SITE MAP

PIT STOP NACHES
10121 HIGHWAY 12
NACHES, WASHINGTON

TABLES

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Table 1 - Summary of Soil Analytical Results
Naches Pit Stop
Naches, Washington

Sample Number	Depth Collected (feet)	Date Collected	Total Petroleum Hydrocarbons			Volatile Organic Compounds								Lead
			Gasoline	Diesel	Heavy Oil	Benzene	Toluene	Ethyl-benzene	Xylenes	EDC	EDB	Total Naphthalenes	MTBE	
Remedial Investigation Results														
MW1-13	13.0	1/21/2016	<10	<50	<100	<0.02	<0.05	<0.05	<0.15	--	--	--	--	--
MW1-15	15.0	1/21/2016	<10	<50	<100	<0.02	<0.05	<0.05	<0.15	--	--	--	--	--
MW2-8	8.0	1/21/2016	<10	<50	<100	<0.02	<0.05	<0.05	<0.15	--	--	--	--	--
MW2-13	13.0	1/21/2016	<10	**1,400**	<100	<0.02	<0.05	<0.05	<0.15	--	--	--	--	--
MW2-15	15.0	1/21/2016	<10	<50	<100	<0.02	<0.05	<0.05	<0.15	--	--	--	--	--
MW3-10	10.0	1/21/2016	<10	<50	<100	<0.02	<0.05	<0.05	<0.15	--	--	--	--	--
MW4-5	5.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	<0.03	<0.005	<0.10	<0.05	<5.0
MW4-10	10.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	<0.03	<0.005	<0.10	<0.05	<5.0
MW5-5	5.0	5/23/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW5-10	10.0	5/23/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW6-5	5.0	5/23/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW6-10	10.0	5/23/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW7-5a	5.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	<0.03	<0.005	<0.10	<0.05	<5.0
MW7-6	6.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	<0.03	<0.005	<0.10	<0.05	<5.0
MW7-10	10.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	<0.03	<0.005	<0.10	<0.05	<5.0
MW8-5	5.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW8-10	10.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW8-15	15.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW8-20	20.0	5/24/2016	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
B1-3	3.0	3/28/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
B1-8	8.0	3/28/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
B1-10	10.0	3/28/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
B1-15	15.0	3/28/2017	<10	**294**	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	**7.1**
B2-3	3.0	3/28/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
B2-9	9.0	3/28/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
B3-4	4.0	3/28/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	**12.6**
B3-9	9.0	3/28/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	**8.5**
B4-5	5.0	9/13/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	**9.1**
B4-14	14.0	9/13/2017	**464**	**258**	<250	**0.021**	<0.10	**2.6**	**4.73**	--	--	--	--	<5.0
B4-20	20.0	9/13/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
B5-6	6.0	9/13/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
B5-15	15.0	9/13/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
MW9-5	5.0	9/13/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
MW9-15	15.0	9/13/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
MW9-20	20.0	9/13/2017	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	<5.0
B6-15	15.0	4/17/2020	**1,620**	**1,070**	<250	<0.02	<0.10	**2.9**	**1.6**	--	--	--	--	--
B6-20	20.0	4/17/2020	**19**	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
B6-25	25.0	4/17/2020	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW10-14	14.0	4/17/2020	<10	**480**	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW10-20	20.0	4/17/2020	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW11-15	15.0	4/20/2020	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW12-15	15.0	3/16/2021	<10	<50	**390**	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW12-20	20.0	3/16/2021	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW12-25	25.0	3/16/2021	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW13-15	15.0	3/16/2021	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
MW13-20	20.0	3/16/2021	**560**	**280**	<250	**0.34**	**0.18**	**3.2**	**1.3**	--	--	--	--	--
MW13-25	25.0	3/16/2021	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--

Table 1 - Summary of Soil Analytical Results
Naches Pit Stop
Naches, Washington

Sample Number	Depth Collected (feet)	Date Collected	Total Petroleum Hydrocarbons			Volatile Organic Compounds								Lead
			Gasoline	Diesel	Heavy Oil	Benzene	Toluene	Ethyl-benzene	Xylenes	EDC	EDB	Total Naphthalenes	MTBE	
UST Site Assessment and Confirmation Sample Results														
Pit Stop B-1	--	2/14/2022	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
Pit Stop B-2	--	2/14/2022	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
Pit Stop B-3	--	2/14/2022	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
Pit Stop B-4	--	2/14/2022	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
Pit Stop B-5	--	2/14/2022	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
B6-4	4.0	5/16/2022	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
B7-6	6.0	5/16/2022	<10	<50	<250	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
B8-5	5.0	5/16/2022	**466 E**	<50	<250	<0.02	<0.10	**2.6**	**27 E**	--	--	--	--	--
B9-3	3.0	5/16/2022	**17**	<50	<250	**0.22**	**2.1**	**0.16**	**0.97**	--	--	--	--	--
Naches PL-1	--	5/17/2022	<10	--	--	**0.13**	**0.68**	<0.05	<0.15	--	--	--	--	--
PS-B	--	5/19/2022	<10	--	--	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
PS-E	--	5/19/2022	<10	--	--	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
PS-W	--	5/19/2022	<10	--	--	<0.02	<0.10	<0.05	<0.15	--	--	--	--	--
PQL			10	50	100 / 250	0.02	0.05 / 0.10	0.05	0.15	0.03	0.005	0.10	0.05	5.0
MTCA Method A Cleanup Levels			30*	2,000	2,000	0.03	7	6	9	--	0.005	5.0	0.1	250
MTCA Method B Cleanup Level for Direct Contact Exposure			2,230**			18	6,400	8,000	16,000	11	0.5	1,600	560	250

Notes:
All values reported in milligrams per kilogram (mg/kg)
-- = Not analyzed for constituent
< = Not detected at the listed laboratory detection limits
PQL = Practical Quantification Limit (laboratory detection limit)
Red Bold indicates the detected concentration exceeds Ecology MTCA Method A cleanup level
Bold indicates the detected concentration is below Ecology MTCA Method A cleanup levels
* TPH-Gasoline cleanup level with presence of Benzene anywhere at the Site
** Calculated using data from sample B6-15
E = reported result is an estimate because it exceeds the calibration range
MTBE = Methyl tert-butyl ether
EDC = 1,2-Dichloroethane
EDB = 1,2-Dibromoethane

APPENDIX A

Supporting Documents:

Site Photographs

2633 PARKMONT LANE SW SUITE A• OLYMPIA, WA • 98502-5751
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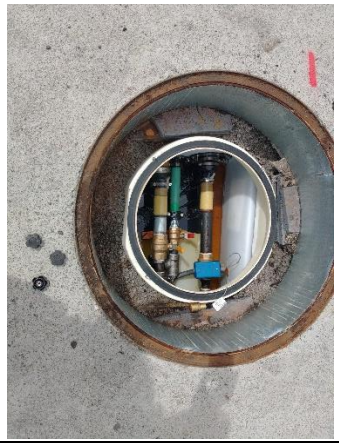
PROPERTY AND VICINITY PHOTOGRAPHIC RECORD

Project No.: 16-102

Project Name: Naches Pit Stop, Naches, Washington
May 21, 2022

				
Photo # 1	Punctured piping		Photo # 2	Punctured piping excavation looking west
				
Photo # 3	Ongoing piping repair		Photo # 4	Fuel in pea gravel
				
Photo # 5	Repaired inner piping with impacted pea gravel removed		Photo # 6	Gas in sump

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PROPERTY AND VICINITY PHOTOGRAPHIC RECORD

Project No.: 16-102

Project Name: Naches Pit Stop, Naches, Washington
May 21, 2022

		
Photo # 7	Sump where most of the gas in the piping was captured	

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APPENDIX B

Supporting Documents:

Boring Logs
Laboratory Data Sheets

2633 PARKMONT LANE SW SUITE A• OLYMPIA, WA • 98502-5751
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ASSOCIATED ENVIRONMENTAL GROUP **LOG OF BOREHOLE**

PROJECT: *Naches Pit Stop* **JOB #** ***16-102*** **BORING #** ***B-6*** **PAGE 1 of 1**

Location: *10121 SR 12 Naches, WA*

Equipment / Drilling Method: *Geoprobe 6600 Truck Mount*

Date: *May 16, 2022*

Boring Depth (feet)	Soil Description	Unified Soil Symbol	Sample Type	Sample Recovery	Sample Number	Time	Blows/Foot	PID Reading	Sheen	Comments
	Concrete Surface approximately 4-inches thick, underlain by; quarter in. pea gravel		DP	60/28	1	9:33	N/A			
	Brown silty fine sand, loose moist	SM						0.0	No	
5								0.0	No	
	TD = 5 feet bgs									
10										
	Backfilled borehole with Bentonite chips Concrete patch at surface									
15										
20										
25										
30										

Explanation

- Soil sample interval
- No Recovery
- Contact located approximately
- ATD — Groundwater level at time of drilling or date of measurement

ASSOCIATED ENVIRONMENTAL GROUP **LOG OF BOREHOLE**

PROJECT: *Naches Pit Stop* **JOB #** ***16-102*** **BORING #** ***B-7*** **PAGE 1 of 1**

Location: *10121 SR 12 Naches, WA*

Equipment / Drilling Method: *Geoprobe 6600 Truck Mount*

Date: *May 16, 2022*

Boring Depth (feet)	Soil Description	Unified Soil Symbol	Sample Type	Sample Recovery	Sample Number	Time	Blows/Foot	PID Reading	Sheen	Comments
	Concrete Surface approximately 4-inches thick, underlain by; quarter in. pea gravel		DP	60/16	1	9:52	N/A			
	Brown fine to course gravel, occ cobbles with fine to course							0.0	No	
	sand, dense, moist				2	9:59				
5			DP	60/33				0.0	No	
		GP								
								1.2	No	
10								0.0	No	
	TD = 10 feet bgs									
	Backfilled borehole with Bentonite chips Concrete patch at surface									
15										
20										
25										
30										

Explanation

- Soil sample interval
- No Recovery
- Contact located approximately
- ATD — Groundwater level at time of drilling or date of measurement

ASSOCIATED ENVIRONMENTAL GROUP **LOG OF BOREHOLE**

PROJECT: *Naches Pit Stop* **JOB #** ***16-102*** **BORING #** ***B-8*** **PAGE 1 of 1**

Location: *10121 SR 12 Naches, WA*

Equipment / Drilling Method: *Geoprobe 6600 Truck Mount*

Date: *May 16, 2022*

Boring Depth (feet)	Soil Description	Unified Soil Symbol	Sample Type	Sample Recovery	Sample Number	Time	Blows/Foot	PID Reading	Sheen	Comments
	Concrete Surface approximately 4-inches thick, underlain by; quarter in. pea gravel		DP	60/20	1	10:15	N/A			
	Brown fine to course sand with fine to course gravel,	SP						0.0	No	
	dense, moist				2	10:20				
5		SM	DP	60/36				658.3	No	
	Brown fine to course gravel, occ cobbles with fine to course							0.0	No	
	sand, dense, moist	GP								
10								0.0	No	
	TD = 10 feet bgs									
	Backfilled borehole with Bentonite chips Concrete patch at surface									
15										
20										
25										
30										

Explanation

- Soil sample interval
- No Recovery
- Contact located approximately
- ATD — Groundwater level at time of drilling or date of measurement

ASSOCIATED ENVIRONMENTAL GROUP **LOG OF BOREHOLE**

PROJECT: *Naches Pit Stop* **JOB #** ***16-102*** **BORING #** ***B-9*** **PAGE 1 of 1**

Location: *10121 SR 12 Naches, WA*

Equipment / Drilling Method: *Geoprobe 6600 Truck Mount*

Date: *May 16, 2022*

Boring Depth (feet)	Soil Description	Unified Soil Symbol	Sample Type	Sample Recovery	Sample Number	Time	Blows/Foot	PID Reading	Sheen	Comments
	Asphalt Surface approximately 3-inches thick, underlain by; quarter in. pea gravel		DP	60/30	1	10:30	N/A			
	Brown fine to course sand with fine to course gravel, dense, moist	SP						1280	No	Strong Gasoline Odor
5	Brown silty fine to coarse sand, medium dense moist	SM						266	No	
	TD = 5 feet bgs									
10	Backfilled borehole with Bentonite chips Asphalt patch at surface									
15										
20										
25										
30										

Explanation

- Soil sample interval
- No Recovery
- Contact located approximately
- ATD — Groundwater level at time of drilling or date of measurement

Libby Environmental, Inc.
3322 South Bay Road NE • Olympia, WA 98506-2957

May 19, 2022

Scott Rose
Associated Environmental Group, LLC
2633 Parkmont Lane SW, Suite A
Olympia, WA 98502

Dear Mr. Rose:

Please find enclosed the analytical data report for the Naches Pit Stop project located in Naches, Washington.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. The sample(s) will be disposed of within 30 days unless we are contacted to arrange long term storage.

Libby Environmental, Inc. appreciates the opportunity to have provided analytical services for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

Sherry L. Chilcutt
Senior Chemist
Libby Environmental, Inc.

Phone (360) 352-2110 • Fax (360) 352-4154 • libbyenv@gmail.com

Libby Environmental, Inc.

3322 South Bay Road NE
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NACHES PIT SHOP PROJECT
AEG, LLC
Naches, Washington
Libby Project # L22E073
Client Project # 16-102

Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8260D) in Soil

Sample Description		Method Blank	B-6 4's	B-7 6's	B-8 5's	B-9 3's
Date Sampled		N/A	5/16/2022	5/16/2022	5/16/2022	5/16/2022
Date Analyzed	PQL (mg/kg)	5/18/2022 (mg/kg)	5/18/2022 (mg/kg)	5/18/2022 (mg/kg)	5/18/2022 (mg/kg)	5/18/2022 (mg/kg)
Benzene	0.02	nd	nd	nd	nd	0.22
Toluene	0.10	nd	nd	nd	nd	2.1
Ethylbenzene	0.05	nd	nd	nd	2.6	0.16
Total Xylenes	0.15	nd	nd	nd	27 E	0.97
Gasoline	10	nd	nd	nd	466 E	17
Surrogate Recovery						
Dibromofluoromethane		134	128	128	114	116
1,2-Dichloroethane-d4		140 S	135	134	122	112
Toluene-d8		96	94	96	106	99
4-Bromofluorobenzene		80	76	79	87	85

"E" Reported result is an estimate because it exceeds the calibration range.
"S" Spike compound recovery is outside acceptance limits (High Bias).
"nd" Indicates not detected at listed detection limit.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: Matthew Hansen

Libby Environmental, Inc.

3322 South Bay Road NE
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Phone: (360) 352-2110
FAX: (360) 352-4154
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NACHES PIT SHOP PROJECT
AEG, LLC
Naches, Washington
Libby Project # L22E073
Client Project # 16-102

QA/QC for Gasoline (NWTPH-Gx) & BTEX (EPA Method 8260D) in Soil

Matrix Spike Sample Identification: BWE0067
Date Analyzed: 5/18/2022

	Spiked Conc. (mg/kg)	MS Response (mg/kg)	MSD Response (mg/kg)	MS Recovery (%)	MSD Recovery (%)	RPD (%)	Limits Recovery (%)	Data Flag
Benzene	0.25	0.27	0.25	108	100	7.7	65-135	
Toluene	0.25	0.26	0.23	104	92	12.2	65-135	
Ethylbenzene	0.25	0.21	0.20	84	80	4.9	65-135	
Total Xylenes	0.75	0.55	0.53	73	71	3.7	65-135	

Surrogate Recovery (%)	MS	MSD	
Dibromofluoromethane	115	117	65-135
1,2-Dichloroethane-d4	115	120	65-135
Toluene-d8	93	89	65-135
4-Bromofluorobenzene	96	95	65-135

ACCEPTABLE RPD IS 35%

ANALYSES PERFORMED BY: Mathew Hansen

Laboratory Control Sample

Date Analyzed: 5/18/2022

	Spiked Conc. (mg/kg)	LCS Response (mg/kg)	LCS Recovery (%)	LCS Recovery Limits (%)	Data Flag
Benzene	0.25	0.21	84	80-120	
Toluene	0.25	0.24	96	80-120	
Ethylbenzene	0.25	0.24	96	80-120	
Total Xylenes	0.75	0.54	72	80-120	

Surrogate Recovery		
Dibromofluoromethane	118	65-135
1,2-Dichloroethane-d4	129	65-135
Toluene-d8	98	65-135
4-Bromofluorobenzene	103	65-135

ANALYSES PERFORMED BY: Mathew Hansen

Libby Environmental, Inc.

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NACHES PIT SHOP PROJECT
AEG, LLC
Naches, Washington
Libby Project # L22E073
Client Project # 16-102

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Diesel (mg/kg)	Oil (mg/kg)
Method Blank	5/17/2022	103	nd	nd
B-6 4's	5/17/2022	94	nd	nd
B-7 6's	5/17/2022	101	nd	nd
B-8 5's	5/17/2022	95	nd	nd
B-9 3's	5/17/2022	92	nd	nd
Practical Quantitation Limit			50	250

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

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Randolph Kraus

Libby Environmental, Inc.

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Email: libbyenv@gmail.com

NACHES PIT SHOP PROJECT
AEG, LLC
Libby Project # L22E073
Date Received 5/17/22 9:00

Received By JA

Sample Receipt Checklist

Chain of Custody

1. Is the Chain of Custody complete?	☐ Yes	☑ No	
2. How was the sample delivered?	☑ Hand Delivered	☐ Picked Up	☐ Shipped

Log In

3. Cooler or Shipping Container is present.	☑ Yes	☐ No	☐ N/A
4. Cooler or Shipping Container is in good condition.	☑ Yes	☐ No	☐ N/A
5. Cooler or Shipping Container has Custody Seals present.	☐ Yes	☑ No	☐ N/A
6. Was an attempt made to cool the samples?	☑ Yes	☐ No	☐ N/A
7. Temperature of cooler (0°C to 8°C recommended)	1.5 °C		
8. Temperature of sample(s) (0°C to 8°C recommended)	6.1 °C		
9. Did all containers arrive in good condition (unbroken)?	☑ Yes	☐ No	
10. Is it clear what analyses were requested?	☑ Yes	☐ No	
11. Did container labels match Chain of Custody?	☑ Yes	☐ No	
12. Are matrices correctly identified on Chain of Custody?	☑ Yes	☐ No	
13. Are correct containers used for the analysis indicated?	☑ Yes	☐ No	
14. Is there sufficient sample volume for indicated analysis?	☑ Yes	☐ No	
15. Were all containers properly preserved per each analysis?	☑ Yes	☐ No	
16. Were VOA vials collected correctly (no headspace)?	☑ Yes	☐ No	☐ N/A
17. Were all holding times able to be met?	☑ Yes	☐ No	

Discrepancies/ Notes

18. Was client notified of all discrepancies? ☑ Yes ☐ No ☐ N/A

Person Notified: Scott Rose Date: 5/17/2022

By Whom: JA Via: E-Mail

Regarding: TAT

19. Comments. VOAs pre-preserved with 4mL MeOH

Rush TAT per Scott

Libby Environmental, Inc.

Chain of Custody Record

www.LibbyEnvironmental.com

3322 South Bay Road NE
Olympia, WA 98506
Ph: 360-352-2110
Fax: 360-352-4154

Date: 5/16/22 Page: 1 of 1

Client: AEG

Project Manager: Scott Rose

Address: 2633 Parkmount Ln. SW Suite A

Project Name: Naches Pit Stop

City: Olympia State: WA Zip: 98502-5751

Location: 10121 SR12 Naches City, State: WA

Phone: (360) 352-9435 Fax: (360) 352-8164

Collector: Kevin Vanderhoy Date of Collection: 5/16/22

Client Project # 16-102

Email: SRose@AEGWA.com

	Sample Number	Depth	Time	Sample Type	Container Type	VOC 8260	PCE & Daughter Prod.	NWTPH-Gx	BTEX (8260) / (8021)	NWTPH-HCID	NWTPH-Dx / Dx	PCB 8082	MTCA 5 Metals	RCRA 8 Metals	c PAH 8270	PAH 8270	Semi Vol 8270			Field Notes
1	B-6 4's	4'	9:33	Soil	2x0A, 1Sm			X	X		X									
2	B-7 6's	6'	9:59	↓	↓			X	X		X									
3	B-8 5's	5'	10:15					X	X		X									
4	B-9 3's	3'	10:30					X	X		X									
5																				
6																				
7																				
8																				
9																				
10																				
11																				
12																				
13																				
14																				
15																				
16																				
17																				

Relinquished by:	Date / Time	Received by:	Date / Time
Kevin Vanderhoy	5/16/22 18:00	Jeanette Andrew	5-17-22 0900
Relinquished by:	Date / Time	Received by:	Date / Time
Relinquished by:	Date / Time	Received by:	Date / Time

Sample Receipt

Good Condition?	Y	N
Cooler Temp.		°C
Sample Temp.		°C
Total Number of Containers		

Remarks:
5-17-22 Rush TAT per Scott via email.

TAT: 24HR 48HR 5-DAY

Distribution: White - Lab, Yellow - Originator

Libby Environmental, Inc.
3322 South Bay Road NE • Olympia, WA 98506-2957

May 23, 2022

Scott Rose
Associated Environmental Group, LLC
2633 Parkmont Lane SW, Suite A
Olympia, WA 98502

Dear Mr. Rose:

Please find enclosed the analytical data report for the Naches Pit Stop (AEG # 16-102) project located in Naches, Washington.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. The sample(s) will be disposed of within 30 days unless we are contacted to arrange long term storage.

Libby Environmental, Inc. appreciates the opportunity to have provided analytical services for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

Sherry L. Chilcutt
Senior Chemist
Libby Environmental, Inc.

Phone (360) 352-2110 • Fax (360) 352-4154 • libbyenv@gmail.com

Libby Environmental, Inc.

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NACHES PIT STOP (AEG # 16-102) PROJECT
AEG, LLC
Naches, Washington
Libby Project # L22E078
Client Project # 16-102

Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8260D) in Soil

Sample Description		Method Blank	Naches PL-1
Date Sampled		N/A	5/17/2022
Date Analyzed	PQL	5/18/2022	5/18/2022
	(mg/kg)	(mg/kg)	(mg/kg)
Benzene	0.02	nd	0.13
Toluene	0.10	nd	0.68
Ethylbenzene	0.05	nd	nd
Total Xylenes	0.15	nd	nd
Gasoline	10	nd	nd
Surrogate Recovery			
Dibromofluoromethane		134	113
1,2-Dichloroethane-d4		140 S	112
Toluene-d8		96	95
4-Bromofluorobenzene		80	85

"nd" Indicates not detected at listed detection limit.
"S" Spike compound recovery is outside acceptance limits.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: Matthew Hansen

Libby Environmental, Inc.

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NACHES PIT STOP (AEG # 16-102) PROJECT
AEG, LLC
Naches, Washington
Libby Project # L22E078
Client Project # 16-102

QA/QC for Gasoline (NWTPH-Gx) & BTEX (EPA Method 8260D) in Soil

Matrix Spike Sample Identification: BWE0067

Date Analyzed: 5/18/2022

	Spiked Conc. (mg/kg)	MS Response (mg/kg)	MSD Response (mg/kg)	MS Recovery (%)	MSD Recovery (%)	RPD (%)	Limits Recovery (%)	Data Flag
Benzene	0.25	0.27	0.25	110	102	7.4	65-135	
Toluene	0.25	0.26	0.23	104	92	12.1	65-135	
Ethylbenzene	0.25	0.21	0.20	85	81	5.2	65-135	
Total Xylenes	0.75	0.55	0.53	73	71	3.0	65-135	

Surrogate Recovery (%)	MS	MSD	
Dibromofluoromethane	115	117	65-135
1,2-Dichloroethane-d4	115	120	65-135
Toluene-d8	93	89	65-135
4-Bromofluorobenzene	96	95	65-135

ACCEPTABLE RPD IS 35%

ANALYSES PERFORMED BY: Matthew Hansen

Laboratory Control Sample

Date Analyzed: 5/18/2022

	Spiked Conc. (mg/kg)	LCS Response (mg/kg)	LCS Recovery (%)	LCS Recovery Limits (%)	Data Flag
Benzene	0.25	0.21	82	80-120	
Toluene	0.25	0.24	97	80-120	
Ethylbenzene	0.25	0.21	83	80-120	
Total Xylenes	0.75	0.58	77	80-120	S

Surrogate Recovery		
Dibromofluoromethane	118	65-135
1,2-Dichloroethane-d4	129	65-135
Toluene-d8	98	65-135
4-Bromofluorobenzene	103	65-135

"S" Spike compound recovery is outside acceptance limits.

ANALYSES PERFORMED BY: Matthew Hansen

Libby Environmental, Inc.

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Olympia, WA 98506
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FAX: (360) 352-4154
Email: libbyenv@gmail.com

NACHES PIT STOP (AEG # 16-102) PROJECT
AEG, LLC
Libby Project # L22E078
Date Received 5/18/22 10:17

Received By JC

Sample Receipt Checklist

Chain of Custody

1. Is the Chain of Custody complete?	☑ Yes	☐ No	
2. How was the sample delivered?	☐ Hand Delivered	☑ Picked Up	☐ Shipped

Log In

3. Cooler or Shipping Container is present.	☑ Yes	☐ No	☐ N/A
4. Cooler or Shipping Container is in good condition.	☑ Yes	☐ No	☐ N/A
5. Cooler or Shipping Container has Custody Seals present.	☐ Yes	☑ No	☐ N/A
6. Was an attempt made to cool the samples?	☑ Yes	☐ No	☐ N/A
7. Temperature of cooler (0°C to 8°C recommended)	-8.0 °C		
8. Temperature of sample(s) (0°C to 8°C recommended)	-3.0 °C		
9. Did all containers arrive in good condition (unbroken)?	☑ Yes	☐ No	
10. Is it clear what analyses were requested?	☑ Yes	☐ No	
11. Did container labels match Chain of Custody?	☑ Yes	☐ No	
12. Are matrices correctly identified on Chain of Custody?	☑ Yes	☐ No	
13. Are correct containers used for the analysis indicated?	☑ Yes	☐ No	
14. Is there sufficient sample volume for indicated analysis?	☑ Yes	☐ No	
15. Were all containers properly preserved per each analysis?	☑ Yes	☐ No	
16. Were VOA vials collected correctly (no headspace)?	☑ Yes	☐ No	☐ N/A
17. Were all holding times able to be met?	☑ Yes	☐ No	

Discrepancies/ Notes

18. Was client notified of all discrepancies? ☑ Yes ☐ No ☐ N/A

Person Notified: Mike Chun Date: 5/18/2022

By Whom: Paul Burke Via: In person

Regarding: No volume received for moisture analysis.

19. Comments. Used volume from a VOA for moisture analysis.

ESN NORTHWEST, INC. Environmental Services Network

Libby

CHAIN-OF-CUSTODY RECORD

CLIENT: AEG

ADDRESS:

PHONE: FAX:

CLIENT PROJECT #: 16-102 PROJECT MANAGER: Scott Rose

DATE: 5/17/22 PAGE 1 OF 1

PROJECT NAME: Naches Pit Stop (AEG #16-102)

LOCATION: Naches, WA

COLLECTOR: Scott Rose DATE OF COLLECTION: 5/17

Sample Number	Depth	Time	Sample Type	Container Type	TPH - HCID	TPH - Diesel & Oil	TPH - Gasoline	BTEX	VOC 8260CL	VOC 8260	SemiVol 8270	PAH's 8270	PCB's 8082	CL Pesticides 8081	RCRA 8 Metals	MTCA 5 Metals	Pb	Asbestos - PLM	GRO Suite	DRO Suite	WO Suite			NOTES	Total Number of Containers	Laboratory Note Number
1. Naches PL-1	4'	1600	Soil	VOA			X	X																		
2.																										
3.																										
4.																										
5.																										
6.																										
7.																										
8.																										
9.																										
10.																										
11.																										
12.																										
13.																										
14.																										
15.																										
16.																										
17.																										
18.																										

RELINQUISHED BY (Signature)	DATE/TIME	RECEIVED BY (Signature)	DATE/TIME
[signature]	5/18/22	[signature]	5/18/22 1017
RELINQUISHED BY (Signature)	DATE/TIME	RECEIVED BY (Signature)	DATE/TIME

SAMPLE RECEIPT	
TOTAL NUMBER OF CONTAINERS	2
CHAIN OF CUSTODY SEALS Y/N/NA	
SEALS INTACT? Y/N/NA	
RECEIVED GOOD COND./COLD	
NOTES:	

LABORATORY NOTES:

RUSH

Turn Around Time: 24 HR 48 HR 5 DAY

1210 Eastside Street SE, Suite 200
Olympia, Washington 98501

Phone: 360-459-4670
Fax: 360-459-3432

Website: www.esnnw.com
E-Mail: info@esnnw.com

Libby Environmental, Inc.
3322 South Bay Road NE • Olympia, WA 98506-2957

May 23, 2022

Scott Rose
Associated Environmental Group, LLC
2633 Parkmont Lane SW, Suite A
Olympia, WA 98502

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Sincerely,

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Senior Chemist
Libby Environmental, Inc.

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Libby Environmental, Inc.

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PIT STOP PROJECT
AEG, LLC
Naches, Washington
Libby Project # L22E089
Client Project # 16-102

Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8260D) in Soil

Sample Description		Method Blank	PS-B	PS-E	PS-E Dup	PS-W
Date Sampled		N/A	5/19/2022	5/19/2022	5/19/2022	5/19/2022
Date Analyzed	PQL (mg/kg)	5/19/2022 (mg/kg)	5/19/2022 (mg/kg)	5/19/2022 (mg/kg)	5/19/2022 (mg/kg)	5/19/2022 (mg/kg)
Benzene	0.02	nd	nd	nd	nd	nd
Toluene	0.10	nd	nd	nd	nd	nd
Ethylbenzene	0.05	nd	nd	nd	nd	nd
Total Xylenes	0.15	nd	nd	nd	nd	nd
Gasoline	10	nd	nd	nd	nd	nd
Surrogate Recovery						
Dibromofluoromethane		127	126	124	125	117
1,2-Dichloroethane-d4		125	127	116	126	114
Toluene-d8		92	90	92	93	90
4-Bromofluorobenzene		83	86	87	81	81

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

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: Matthew Hansen

Libby Environmental, Inc.

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PIT STOP PROJECT
AEG, LLC
Naches, Washington
Libby Project # L22E089
Client Project # 16-102

QA/QC for Gasoline (NWTPH-Gx) & BTEX (EPA Method 8260D) in Soil

Matrix Spike Sample Identification: PS-E

Date Analyzed: 5/19/2022

	Spiked Conc. (mg/kg)	MS Response (mg/kg)	MSD Response (mg/kg)	MS Recovery (%)	MSD Recovery (%)	RPD (%)	Limits Recovery (%)	Data Flag
Benzene	0.25	0.30	0.31	121	123	1.0	65-135	
Toluene	0.25	0.40	0.29	159	117	31.0	65-135	S
Ethylbenzene	0.25	0.27	0.21	108	85	24.4	65-135	
Total Xylenes	0.75	0.75	0.61	100	81	21.6	65-135	

Surrogate Recovery (%)	MS	MSD	
Dibromofluoromethane	132	121	65-135
1,2-Dichloroethane-d4	111	128	65-135
Toluene-d8	100	88	65-135
4-Bromofluorobenzene	98	80	65-135

ACCEPTABLE RPD IS 35%
"S" Spike compound recovery is outside acceptance limits.

ANALYSES PERFORMED BY: Matthew Hansen

Laboratory Control Sample

Date Analyzed: 5/19/2022

	Spiked Conc. (mg/kg)	LCS Response (mg/kg)	LCS Recovery (%)	LCS Recovery Limits (%)	Data Flag
Benzene	0.25	0.27	108	80-120	
Toluene	0.25	0.25	101	80-120	
Ethylbenzene	0.25	0.21	86	80-120	
Total Xylenes	0.75	0.57	76	80-120	S

Surrogate Recovery		
Dibromofluoromethane	121	65-135
1,2-Dichloroethane-d4	118	65-135
Toluene-d8	94	65-135
4-Bromofluorobenzene	98	65-135

"S" Spike compound recovery is outside acceptance limits.

ANALYSES PERFORMED BY: Matthew Hansen

Libby Environmental, Inc.

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FAX: (360) 352-4154
Email: libbyenv@gmail.com

PIT STOPPROJECT
AEG, LLC
Libby Project # L22E089
Date Received 5/19/22 13:48

Received By KLI

Sample Receipt Checklist

Chain of Custody

1. Is the Chain of Custody complete?	☑ Yes	☐ No	
2. How was the sample delivered?	☑ Hand Delivered	☐ Picked Up	☐ Shipped

Log In

3. Cooler or Shipping Container is present.	☑ Yes	☐ No	☐ N/A
4. Cooler or Shipping Container is in good condition.	☑ Yes	☐ No	☐ N/A
5. Cooler or Shipping Container has Custody Seals present.	☐ Yes	☑ No	☐ N/A
6. Was an attempt made to cool the samples?	☑ Yes	☐ No	☐ N/A
7. Temperature of cooler (0°C to 8°C recommended)	3.5 °C		
8. Temperature of sample(s) (0°C to 8°C recommended)	18.5 °C		
9. Did all containers arrive in good condition (unbroken)?	☑ Yes	☐ No	
10. Is it clear what analyses were requested?	☑ Yes	☐ No	
11. Did container labels match Chain of Custody?	☑ Yes	☐ No	
12. Are matrices correctly identified on Chain of Custody?	☑ Yes	☐ No	
13. Are correct containers used for the analysis indicated?	☑ Yes	☐ No	
14. Is there sufficient sample volume for indicated analysis?	☐ Yes	☑ No	
15. Were all containers properly preserved per each analysis?	☑ Yes	☐ No	
16. Were VOA vials collected correctly (no headspace)?	☑ Yes	☐ No	☐ N/A
17. Were all holding times able to be met?	☑ Yes	☐ No	

Discrepancies/ Notes

18. Was client notified of all discrepancies? ☐ Yes ☑ No ☐ N/A

Person Notified: _____ Date: _____

By Whom: _____ Via: _____

Regarding: _____

19. Comments. No volume provided for moisture analysis.

Libby Environmental, Inc.

Chain of Custody Record

www.LibbyEnvironmental.com

3322 South Bay Road NE
Olympia, WA 98506
Ph: 360-352-2110
Fax: 360-352-4154

Date: 5/19/22 Page: 1 of 1

Client: AEG

Project Manager: Scott Rose

Address:

Project Name: Pit Stop.

City: State: Zip:

Location: City, State: Naches, WA

Phone: Fax:

Collector: Date of Collection: 5-19-22

Client Project # 16-102

Email: SRose@AEGWA.com

	Sample Number	Depth	Time	Sample Type	Container Type	VOC 8260	PCE & Daughter Prod.	NWTPH-Gx	BTEX (8260) / (8021)	NWTPH-HCID	NWTPH-Dx / Dx	PCB 8082	MTCA 5 Metals	RCRA 8 Metals	c PAH 8270	PAH 8270	Semi Vol 8270			Field Notes
1	PS-B	4'		SOIL	VOA			✓	✓											
2	PS-E	4'		"	"			✓	✓											
3	PS-W	4'		"	"			✓	✓											
4																				
5																				
6																				
7																				
8																				
9																				
10																				
11																				
12																				
13																				
14																				
15																				
16																				
17																				

Relinquished by:	Date / Time	Received by:	Date / Time
	5/19/22		5-19-22 1348
Relinquished by:	Date / Time	Received by:	Date / Time
Relinquished by:	Date / Time	Received by:	Date / Time

Sample Receipt

Good Condition?	Y	N
Cooler Temp.	3.5	°C
Sample Temp.	18.5	°C
Total Number of Containers		

Remarks:

RUSH!

TAT: 24HR 48HR 5-DAY

Distribution: White - Lab, Yellow - Originator