

November 8, 2024 ZGA Job No. 2577.20

Department of Ecology, Central Regional Office 1250 West Alder Street Union Gap, WA 98903-0009

- Attention: Ms. Valerie Bound, Section Manager Central Region Toxics Cleanup Program
- Subject:Submittal of Subsurface Investigation and Request for No Further Action OpinionSite Name:G&W Oil & Wood Inc.Site Address:903 West 1st Street, Cle Elum, Washington 98922Facility/Site ID (FSID):4658443Cleanup Site ID (CSID):7045

Dear Ms. Bound,

Zipper Geo Associates, LLC (ZGA) is pleased to present this *Submittal of Subsurface Investigation and Request for No Further Action Opinion*. At the request of the Subject Property owner and ZGA's client (*Cle Elum Development, LLC*), ZGA is respectfully re-engaging with the Washington State Department of Ecology (Ecology) to request an updated No Further Action determination for the G&W Oil & Wood Inc. site (Site) located at 903 West 1st Street in Cle Elum, Washington. The property is assigned FSID 4658443 and is associated with two cleanup sites:

- Pacific Pride Card Lock Site (CSID 7209, Voluntary Cleanup Program [VCP] Project # CE0332); and,
- G&W Oil & Wood Inc. Site (CSID 7045).

A number of relevant documents from ZGA's project folder pertaining to both of the above listed Sites are attached at the conclusion of this submittal.

Site Regulatory Status

The regulatory status of both sites are listed on Ecology's Cleanup and Tank Search database as *"No Further Action"* (NFA). The Pacific Pride Card Lock site was entered into the VCP in 2010 and received a formal Ecology-issued NFA Opinion dated November 8, 2010. The November 8, 2010 NFA Opinion was based on a remedial action cleanup effort documented in a deliverable entitled: *Final Cleanup Report, Pacific Pride Fueling Facility, 903 W.* 1st Street, Cle Elum, WA, prepared by DLH Environmental Consulting, dated July 29, 2010.



The November 8, 2010 NFA Opinion letter states:

"at this time, a second site is located on this parcel and described in <u>Site Assessment Report:</u> <u>Underground Storage Tank Removal & Soil Remediation</u>, Assessment and Remediation Consulting Services (ARCS), June 28, 1999. This site has **not received** a No Further Action from Ecology and was not reviewed as part of this VCP application.".

Ecology provided a *Department Decision Recommendation* letter for the G&W Oil & Wood Inc. Site dated December 5, 2012 and signed by Ecology on December 13, 2012. This letter states:

"In keeping with the requirement of WAC 173-340-310 (5) I recommend that this site receive a No Further Action (NFA).

Supporting Criteria:

A UST Site Assessment Report, June 28, 1999 details the removal of two UST's [6K gasoline and 12K diesel], closure in place of two UST's [capacity not stated] partially under an existing building, and removal of related piping and pumps/dispensers.

The construction activities occurred during May 1999. The in-place closure of the USTs had limited soil sampling conducted to verify that contamination was not present. Groundwater was not encountered in any excavation to a final excavated depth of 12 feet. All confirmatory sampling from the tank removal, piping/dispensers, and closed-in-place tanks indicated concentrations below current MTCA cleanup levels.

An additional cleanup for another site on the property occurred in 2008. This cleanup received a No Further Action in 2010 after demonstrating both soil and groundwater below cleanup levels. Based on the lack of groundwater contamination, it can be reasonably concluded that the 1999 closed-inplace tanks did not leak significantly to warrant additional cleanup actions.

This Department Decision Recommendation should be reviewed and re-evaluated based on any new information about this site."

It is our understanding that a formal NFA Opinion was never issued for the *G&W Oil & Wood Inc* Site (CSID 7045), however, the site is listed on Ecology's Cleanup and Tank Search database as "No Further Action" (NFA).

Department of Ecology, CRO Toxics Cleanup Program G&W Oil & Wood Inc (FSID 4658443, CSID 7045) 903 West 1st Street, Cle Elum, WA 98922 November 8, 2024



2022 Subsurface Investigation Results (ZGA)

On behalf of Cle Elum Development, LLC as part of environmental due diligence prior to purchase, ZGA observed the removal of two closed-in-place underground storage tanks (USTs) referenced in the 1999 ARCS Site Assessment Report. Our field observations, analytical laboratory results, and conclusions that in-situ soil is below applicable MTCA cleanup levels are summarized in ZGA's *Subsurface Investigation* report dated May 17, 2022 which is attached to this submittal. Relevant findings from the 2022 *Subsurface Investigation* report are summarized below.

- On April 8, 2022, Santa Inc., an earthwork contractor under subcontract to Cle Elum Development, LLC, advanced eight test pits under the direction of ZGA. Each test pit was strategically located in areas of the property where previous remedial action occurred as documented the Final Cleanup Report, Pacific Pride Fueling Facility, 903 W. 1st Street, Cle Elum, WA, prepared by DLH Environmental Consulting, dated July 29, 2010.
- Soils removed from/exposed during advancement of the eight test pits did not exhibit indications of contaminant impact, such as stains, sheen, odors, or elevated PID readings.
- ZGA provided oversight and documented the removal of 6,000-gallon and 2,000-gallon gasoline USTs which were closed in place in 1999 and filled with controlled density fill (CDF). The two tanks were located immediately adjacent to one another. *Santa Inc.* removed the tanks on May 4, 2022.
- A Washington State UST Site Assessor from ZGA collected six (6) (four excavation sidewall and two bottom) soil samples from the single UST tank cavity following tank removal.
- Soils in the immediate vicinity of the tanks did not exhibit indications of contaminant impact, such as stains, sheen, odors, or elevated PID readings during or following removal.
- Contaminants of concern (COCs) were not reported exceeding laboratory method reporting limits (MRLs) in fifteen (15) of the eighteen (18) soil samples collected from the test pits and from the UST cavity following tank removal. In five (5) of the soil samples, COCs, while detectable, were reported at concentrations well below applicable Model Toxics Control Act (MTCA) cleanup levels.

Request for Opinion

Based on the results of the 1999 and 2010 investigations by others, the 2012 NFA Recommendation letter issued by Ecology, and the findings of ZGA's 2022 Subsurface Investigation, it is the professional opinion of the undersigned that the G&W Oil & Wood Inc site is worthy of an Opinion of No Further Action relative to the standards of MTCA. On behalf of our client and current property owner, *Cle Elum Development, LLC*, we are respectfully requesting a formal written Opinion of No Further Action for the site.

Department of Ecology, CRO Toxics Cleanup Program G&W Oil & Wood Inc (FSID 4658443, CSID 7045) 903 West 1st Street, Cle Elum, WA 98922 November 8, 2024



Closing

We look forward to your review of this submittal. If you have any questions, comments, or if ZGA may be of further assistance as pertains to the information presented herein, please contact ZGA at 425-582-9928 or knewman@zippergeo.com.

Respectfully submitted,



Kaelin Newman, L.G., R.G. Project Geologist



Jeffrey S. Tinklepaugh, L.G., L.E.G. Senior Geologist

Sean W. Donnan, P.G., L.E.G., L.Hg. Principal Hydrogeologist

Attachments:

- Subsurface Investigation, 903 West 1st Street, Cle Elum, WA 98922, prepared by ZGA, dated May 17, 2022.
- Department Decision Recommendation, G&W Oil & Wood, FSID 4658443, prepared by Ecology, dated December 13, 2012.
- NFA Opinion Letter, Pacific Pride Card Lock site (FSID 4658443, VPC CE0332), prepared by Ecology, dated November 8, 2010.
- *Final Cleanup Report, Pacific Pride Fueling Facility, 903 W.* 1st *Street, Cle Elum, WA,* prepared by DLH Environmental Consulting, dated July 29, 2010.
- *Site Assessment Report: Underground Storage Tank Removal & Soil Remediation,* prepared for Pacific Pride Facility (G&W Oil and Wood, Inc.), 903 West First Street, Cle Ellum, WA, prepared by Assessment and Remediation Consulting Services (ARCS), dated June 28, 1999.

Transmittal: One (1) copy electronic to addressee; cc to Cle Elum Development, LLC



Subsurface Investigation 903 W 1st Street, Cle Elum, WA 98922 prepared by ZGA May 17, 2022

SUBSURFACE INVESTIGATION

903 WEST 1ST STREET CLE ELUM, KITTIAS COUNTY, WASHINGTON

ZGA Project No. 2577.23 May 17, 2022

Prepared for: Cle Elum Development LLC



Reference: Kittitas County Parcel Viewer with Google Earth aerial imagery basemap dated 2020.

Prepared by:

ZipperGeo Geoprofessional Consultants



May 17, 2022 ZGA Job No. 2577.23

Cle Elum Development LLC 14241 NE Woodinville Duval Road. #135 Woodinville, Washington 98072

Attention: Mr. Sang Ji

Subject: Subsurface Investigation 903 West 1st Street Cle Elum, Washington 98922 ZGA Project No. 2577.23

Dear Mr. Ji,

In accordance with your request and written authorization, Zipper Geo Associates, LLC (ZGA) has completed this Subsurface Investigation (SI) for the Property at the location noted above. This report presents the results of the subsurface exploration and laboratory analysis of soil and previous soil samples, as well as our interpretations of these data, and previous environmental work completed on the Property. Our services were completed in general accordance with our *Work Plan and Cost Estimate Limited Subsurface Investigation* (Proposal No. P22053) dated April 5, 2022. We appreciate the opportunity to be of service to you on this project. If you have any questions concerning this report, or if we may be of further service, please contact us.

Sincerely, Zipper Geo Associates, LLC

Chipalin Call

Elizabeth Cobb, Staff Geologist



KAELIN NEWMAN

Kaelin Newman, L.G. Project Geologist



Sean W. Donnan, P.G., L.E.G., L.Hg. Principal

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APPENDIX A

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APPENDIX B

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Friedman and Bruya Inc. Analytical Report # 204132 Friedman and Bruya Inc. Analytical Report # 205052



1.0 INTRODUCTION

This report presents the findings of our Subsurface Investigation (SI) for 903 West 1st Street in Cle Elum, Washington (the Property). Our environmental consulting scope of services for this project included: the review and summary of previous environmental reports completed on the Property; a subsurface exploration program consisting of the advancement of eight test pits to depths of approximately 10 feet below ground surface (bgs) and the removal of two closed in-place underground storage tanks (USTs); the collection of a total of eighteen soil samples for laboratory analysis; subcontracted laboratory analysis of soil samples for chemicals of concern; and the preparation of this report.

1.1 Site Description

The project site is located at 903 West 1st Street in Cle Elum, Kittitas County, Washington. The Property consists of Kittitas County Tax Parcel No. 263835 totaling approximately 3.39-acres of mostly gravel covered areas with undeveloped land stretching to the west. It is currently owned by Cle Elum Development LLC. The site and vicinity are zoned for commercial use. The Property appears relatively flat with little topographic relief. The site has previously been used as a logging business, trucking/excavator business, storage yard space, fueling station, HVAC business, and most recently as a mixed storage and office space.

The Subject Property is bordered to the south by I-90 and the building is operated by Cle Elum Hardware, to the east by Warrior Quick Stop gas station, undeveloped land to the west, and the Laurel Hill Memorial Cemetery to the north.

1.2 Project Understanding

It is our understanding that the Cle Elum Development LLC is planning to demolish all surface structures and construct a commercial development on the Subject Property. The purpose of this Subsurface Investigation is to evaluate current subsurface conditions prior to redevelopment.

1.3 Standard of Care

The analytical results within this report are based on samples collected from the indicated locations at the time of sample collection and should not be construed as a warranty of the subsurface conditions throughout the site or at other times. Within the limitations of scope, schedule, and budget for our work, we warrant that our work has been done in accordance with our Work Plan and Cost Estimate and generally accepted environmental assessment practices by other professionals in this area at the time the report was prepared. No other warranty, express or implied, is made.



1.4 Reliance

This report has been prepared for the exclusive use of Cle Elum Development LLC and any authorization for use or reliance by any other party (except a governmental entity having jurisdiction over the site) is prohibited without the express written authorization of Cle Elum Development LLC and ZGA.

2.0 DOCUMENT REVIEW

Several subsurface environmental investigations and remedial actions have been completed on the property since 1999. A summary of these reports and the Washington State Department of Ecology (Ecology) letters are provided below:

<u>1999 Underground Storage Tank Removal and Remediation Report prepared by ARCS</u> This report documented the closures of four petroleum USTs (two-6,000-gallon gasoline USTs, one 2,000-gallon gasoline UST, and one 12,000-gallon UST) and associated piping on the Property. Tone of the 6,000 gallon and 12,000-gallon USTs were removed, while the other 6,000-gallon UST gallon and 2,000-gallon USTs were closed in place.

Soils exhibiting signs of petroleum hydrocarbon impacts encountered in the excavation of the removed USTs was excavated and placed into a land farm for treatment. Soil samples collected from the limits of the UST excavation, product line and pump island locations did not exhibit concentrations of gasoline or diesel-range petroleum hydrocarbons or benzene, toluene, ethylbenzene, and xylenes in excess of laboratory detection limits. No samples were collected in the area of the closed-in-pace USTs.

2008 Soil Boring and Sampling Report prepared by White Shield, Inc.

White Shield completed a subsurface investigation of the property that included advancing six hollow-stem auger borings across the property, and collection and analytical testing of soil samples collected from the borings. The borings were advanced to depths of 20.5 feet to 21.5 feet below ground surface. None of the borings encountered measurable groundwater. Selected soil samples collected from borings B-1, B-2, and B-4 did not exhibit detectable concentrations of GRPH, DRPH, ORPH, or BTEX compounds. The 15-foot sample collected from boring B-3 exhibited a DRPH concentration of 197 milligrams per kilogram (mg/kg), which is below the DRPH + ORPH cleanup level of 2,000 mg/kg. However, surface and near surface (2.5-foot depth samples collected from boring 5 exhibited DRPH concentrations of 11,900 mg/kg and 5,680 mg/kg, both of which are in excess of the MTCA Method A cleanup level. White Shield recommended remedial excavation and disposal of the surface and near surface contaminated soil in the immediate vicinity of boring B-5.

Based on the conclusions, White Shield made the following recommendations:

• Notify the Washington State Department of Ecology of the sample results;



- Clean up the contaminated soil in the Vicinity of boring B-5; and,
- Obtain groundwater samples at the site.

2009 Soil Boring and Groundwater Sampling Report prepared by White Shield, Inc.

This report documented advancing four additional hollow stem auger soil borings. Two of the borings (B-3W and B-6W) were installed with temporary PVC wells near the south side of USTs and pump islands, respectively. Groundwater depth is the wells was 27.40 feet and 29.31 feet below the top of the PVC well casings (essentially ground surface). Soil samples from the borings did not exhibit obvious signs of contaminant impacts, according to the report. Groundwater samples were collected from each of the two wells, and a duplicate sample was also collected from B-MW6. All of the samples did not exhibit concentrations of GRPH, DRPH, and BTEX in excess of laboratory detection limits.

2010 Final Cleanup Report prepared by DLH Environmental

This report documented the removal of concrete and the remaining underground fuel lines and confirmed and suspect petroleum contaminated soil. A total of 1,066.97 tons of PCS were excavated and exported to Cemex's treatment facility in Everett, Washington. Contaminated soil was reportedly removed from four areas on the Property. Confirmation soil samples collected from the final excavation limits did not exhibit concentrations of DRPH + ORPH in excess of the MTCA Method A cleanup level.

2010 No Further Action Letter prepared by Ecology

Per the request of James Oil Company LLC and based upon its review of previous assessment and remediation reports, and the clean, post-remedial action soil and groundwater data, Ecology granted the site a No Further Action determination.

2014 Phase I Environmental Site Assessment (ESA) prepared by the Pacific Groundwater Group (PGG)

PGG completed a Phase I ESA of the Property. The Phase I did not identify any Recognized Environmental Conditions associated with the Property.

2022 Phase I ESA prepared by the Stratum Group

The report provided the following conclusions and recommendations:

"The property consists of two buildings that have been used as storage/shop buildings with offices and gravel areas that have been used for parking and storage yard areas for businesses in the buildings. A portion of one building partially collapsed this past winter due to very heavy snow loads.

In the past there were two above ground fuel tanks and two underground fuel tanks on the



site. The underground tanks were closed in place and the above ground tanks were removed as well as the fuel pumps. During the UST closures, soil contamination was encountered at the fuel pump area and soil was excavated and a cleanup was completed. Washington State Department of Ecology issued a 'No Further Action' letter in 2010 and removed the site from the contaminated site list.

Based upon our site observations, historical research, and review of site documents regarding the past fueling on the site and assessment of potential of off-site contamination sources, it is our opinion that the risk of contamination on the site is minimal and therefore no further investigation is warranted."

2.1 Subsurface Investigation Objectives

The purpose of this SI was to further assess near surface soil conditions in the areas of former potential contaminant source areas which had not been evaluated prior to the planned property redevelopment.

3.0 METHODOLOGY

Our approach to this investigation was based on our above-described project understanding, the findings of previous site work, and our experience on similar sites in the region. Our specific goal was to evaluate soil conditions in areas that have not been previously assessed and collect soil samples for analytical testing.

This SI included the completion of the following tasks:

- 1. Prepare a site-specific health and safety plan in accordance with 29 CFR 1910.120 and Chapter 296-843 WAC.
- 2. Observe the advancement of eight test pits using an excavator under subcontract to the client.
- 3. Screen and log soil conditions and collect representative soil samples for analytical testing.
- 4. Observation of the removal of two UST's.
- 5. Collect soil samples during UST removal.
- 6. Subcontract analytical laboratory testing on the collected soil samples.
- 7. Complete a limited data analysis and QA/QC.
- 8. Prepare this Subsurface Investigation Report.

These tasks are summarized below.

2.1 Subsurface Exploration

Eight test pits (designated TP-1 through TP-8) were advanced on the subject property under ZGA observation by Santa, Inc. (Santa) on April 8th, 2022. Test pits were advanced to depths ranging from approximately 9 to 10 feet bgs.



A Washington State-licensed UST Site Assessor from ZGA observed removal of the previously closed in place USTs and screened and collected confirmation soil samples within the excavation below and lateral to the formal UST locations.

A ZGA geologist continuously observed all excavations and screened and collected soil samples for analytical testing. Soils were field screened for indications of environmental impacts such as unnatural discoloration, odor, residues, and the presence of elevated levels of volatile organic compounds (VOCs) using a photoionization detector (PID) via the headspace method.

2.2 Soil Sample Collection

Soil samples were collected during excavation operations to characterize the site in accordance with our client's objectives. Select samples were submitted for laboratory analysis based on the results of field screening, potential sources of release, and observed soil conditions.

Soil samples were extracted from excavator bucket using clean hand tools and disposable gloves. Soil samples were placed directly into laboratory supplied glassware and then stored in a chilled cooler pending transport to the analytical laboratory. All soil samples for analysis of volatile compounds were collected in accordance with EPA field preservation Method 5035A. Sample containers were labeled with our company's name, the project number, the sample ID, the date of collection, and the time of collection. Soil samples were shipped under chain-of-custody procedures to Friedman and Bruya Inc. laboratory of Seattle, Washington.

2.3 Laboratory Analysis of Soil Samples

Up to two soil samples were collected from each test pit and six soil samples collected from the limits of the UST excavation were submitted to the analytical laboratory and subjected to analytical laboratory testing on April 11th, 2022. Soil samples were analyzed for Contaminants of Concern (COCs) associated with a gasoline release in accordance with MTCA Table 830-1, *Required Testing for Petroleum Releases*. All selected soil samples from the test pits were analyzed for the compounds listed below:

- Gasoline-range petroleum hydrocarbons (GRPH) by Northwest Method NWTPH-Gx.
- Benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8021B.
- Diesel and oil-range petroleum hydrocarbons (DRPH and ORPH, respectively) by Northwest Method NWTPH-Dx.
- Lead by EPA Method 200.8/6020A.



Additional selected soil samples were also analyzed for:

- Gasoline target volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX), 1-2, Dibromoethane (EDB), 1-2, dichloroethane (EDC), methyl tertiary-butyl ethyl (MTBE), and naphthalene's by EPA Method 8260D.
- Ethylene dibromide (EDB) utilizing a trace level laboratory method reporting limit (MRL) equal to the MTCA Method A soil cleanup standard of 0.005 mg/kg.

Six soil samples were collected from the UST sidewalls and base and were submitted to the analytical laboratory and subjected to analytical laboratory testing on May 4th, 2022. Soil samples were analyzed for Contaminants of Concern (COCs) under MTCA Table 830-1, *Required Testing for Petroleum Releases*. All of the samples were analyzed for the compounds listed below:

- GRPH by NWTPH-Gx.
- DRPH by NWTPH-Dx.
- BTEX by EPA Method 8260D.
- Lead by EPA Method 200.8/6020A.

Hold Times. All analyses were completed within specified hold times.

Method Blanks. Analytes were not detected in any of the laboratory method blanks.

Laboratory Control Sample Results. Recoveries were all within laboratory limits.

<u>Laboratory Reporting Limits</u>. Laboratory reporting detection limits (RDLs) were below applicable cleanup levels.

Chemical analyses were performed by Friedman & Bruya, Inc. (F&B) of Seattle, Washington, a Washington State-accredited analytical laboratory. Analytical laboratory reports and executed chain-of-custody forms are included in Appendix D. All analyses were completed using standard turnaround times. Data packages were checked for completeness immediately upon receipt from the laboratory to ensure that data and QA/QC information was present.

Data quality was assessed by considering hold times, surrogate recovery, method blanks, matrix spike and matrix spike duplicate (MS/MSD) recovery, and method reporting limits. QA/QC review was completed using guidance described in *USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review* (Draft Final, USEPA, 2017). Our evaluation assumes that the QA/QC is correct as reported by the laboratory, and merely provides an interpretation of the QA/QC results. Based upon our interpretation of quality control information provided by the laboratories, it is our opinion that the overall dataset is useable as qualified for the purposes of this Limited Phase II ESA.



4.0 RESULTS

4.1 UST Removal

Each of the two USTs had been previously filled with controlled density fill (CDF). Based on the large volume and weight of the CDF, Santa removed portions of the CDF before removing the tanks. The CDF and soil surrounding the tanks were field screened with a photoionization detector (PID). Soils in the immediate vicinity of the tanks did not exhibit obvious signs of contaminant impacts, such as stains, sheen, odors, or elevated PID readings.

4.2 General Soil Conditions

Soil conditions observed in the test pits were relatively consistent across the site. The test pits generally disclosed local areas of silty sand with variable gravel and organic debris interpreted to be fill soil that extended to depths of up to about 7 feet below ground surface (bgs). Where fill was not present or underneath the fill native soil were exposed that consisted of gravelly sand to sandy gravel with cobbles that extended to the full depth explored of up to 10 feet bgs. The underlying native soils are interpreted to be quaternary alluvial deposits.

Soils in exposed in the test pits did not exhibit obvious signs of contaminant impacts, such as stains, sheen, odors, or elevated PID readings.

4.3 General Groundwater Conditions

Groundwater was not encountered at the time of our exploration work to depths of up to 10 feet bgs. Previous groundwater analytical results completed in 2010 from White Shield Inc. indicating no detectable concentrations of contaminants of concern above laboratory MRLs are summarized in Table 2, Appendix B.

4.4 Analytical Laboratory Test Results - Soil

GRPH, DRPH, and ORPH were not reported at concentrations exceeding the MRLs in any of the soil samples analyzed with the exception of sample ID "*UST-SSW-7.5*", which exhibited concentrations of DRPH of 100 mg/kg and ORPH of 750 mg/kg and are below the MTCA Method A cleanup level of 2,000 total mg/kg. Toluene, ethylbenzene, xylenes, and lead were detected in several soil samples at concentrations well below the applicable MTCA Method A cleanup levels. Other gasoline target volatile organic compounds (VOCs) including benzene, 1-2, Dibromoethane (EDB), 1-2, dichloroethane (EDC), methyl tertiary-butyl ethyl (MTBE), and naphthalene were not reported at concentrations exceeding laboratory MRLs.

Soil sample analytical results are summarized in Table 1, Appendix B. Analytical laboratory reports are included in Appendix D.



Analytical results were compared to the most conservative (unrestricted land use) "Method A" cleanup levels (CULs) set forth in Chapter 70.105D RCW and its implementing regulations, the Model Toxics Control Act (MTCA), Chapter 173-340 WAC. MTCA Method A CULs were applicable for this project as the Property is considered to have few hazardous substances, as described in Chapter 173-340-704.

5.0 CONCLUSIONS

Zipper Geo Associates, LLC (ZGA) has completed a Subsurface Investigation for the Cle Elum project located at 903 West 1st Street, Cle Elum, Kittitas County, Washington. Our scope of work included:

- 1. Preparation of a site-specific health and safety plan in accordance with 29 CFR 1910.120 and Chapter 296-843 WAC;
- 2. Observe removal of two previously closed in Place gasoline USTs;
- 3. Observation of eight subsurface explorations (TP-1 through TP-8) using a subcontracted excavator;
- 4. Collection of twelve soil samples from the test pits for laboratory analysis;
- 5. Observation of the removal of two closed in-place UST's;
- 6. Collection of six soil samples during UST removal for laboratory analysis;
- 7. Laboratory analysis of soil samples for chemicals of concern;
- 8. Data analysis and QA/QC relative to applicable cleanup standards established under MTCA;
- 9. Tabulate data and draft figures to graphically depict test results;
- 10. Preparation of this SI Report.

Based on analytical laboratory test results of a total of eighteen soil samples collected on April 8, 2022 and May 4, 2022 and submitted for analytical testing, contaminants of concern were not reported at concentrations exceeding applicable MTCA Method A cleanup levels.

6.0 RECOMMENDATIONS

Based on the results of this investigation, no further environmental evaluation appears warranted at this time.



7.0 REFERENCES

- Chapter 70.105D of the Revised Code of Washington and its implementing regulations, *the Model Toxics Control Act*, chapter 173-340 of the Washington Administrative Code.
- DLH Environmental Consulting. (2010). *Final Cleanup Report Pacific Pride Fueling Facility Half-Acre Portion of Kittitas County Parcel #263835 903 W. 1st Street Cle Elum, Washington 98922,* July 29.
- Pacific Groundwater Group. (2014). Phase I Environmental Site Assessment 903 West 1st Street Cle Elum, Washington, August 28.
- State of Washington Department of Ecology. (2008). Early Notice Letter regarding the release of hazardous substances on property located at 903 1st Street West, Cle Elum, Washington, F/SID #4658443.
- State of Washington Department of Ecology. (2010). *No Further Action at the following Site: Pacific Pride* (formerly G&W Oil and Wood Inc.), November 8.
- State of Washington Department of Ecology. (2012). *Department Decision Recommendation [for G&W Oil and Wood Inc.]*.
- Stratum Group. (2022). Report Environmental Site Assessment Phase I 903 West 1st Street Cle Elum, WA 98922, March 22.
- Tabor, R. W., Waitt, R. B., Frizzell, Jr., V. A., Swanson, D. A., Byerly, G. R., & Bentley, R. D. (2006, August 24). *Geologic map of the Wenatchee 1:100,000 quadrangle, central Washington: A digital Database USGS DS-137*. U.S. Geological Survey Publications
 Warehouse. <u>https://pubs.usgs.gov/ds/137/</u>
- White Shield, Inc. (2008). Soil Boring and Sampling Report Pacific Pride Fueling Station 903 1st Street West Cle Elum, Washington, 98922, August 22.
- White Shield, Inc. (2009). Soil Boring and Groundwater Sampling Report, Former Pacific Pride Fueling Station 903 1st Street West Cle Elum, Washington, 98922, November 30.



APPENDIX A

FIGURES



REFERENCE: (1) KITTITAS COUNTY ASSESSOR'S MAP WITH GOOGLE EARTH AERIAL IMAGERY BASEMAP, (2) ASSESSMENT AND REMEDIATION CONSULTING SERVICES UST SITE ASSESSMENT SITE DIAGRAM DATED JUNE 28, 1999 (3) ZGA FIELD MEASUREMENTS.





PROPERTY BOUNDARY

APPROXIMATE GROUNDWATER MIGRATION DIRECTION

ACRONYMS UST

UNDERGROUND STORAGE TANK





903 West 1st Street Cle Elum, Washington

SITE & EXPLORATION PLAN

	APRIL 2022	Job No.	2577.23
25 50	Zipper Geo Associates, LLC	FIGURE	1
EET	19019 36th Ave. W.,Suite E Lynnwood, WA, 98036	SHT.1 of 1	I

APPROXIMATE SCALE IN FE



REFERENCE: (1) FIGURE 2, APPROXIMATE BORING LOCATIONS FROM SOIL BORING AND SAMPLING REPORT PREPARED BY WHITE SHIELD INC. DATED AUGUST 22, 2008 (2) ASSESSMENT AND REMEDIATION CONSULTING SERVICES UST SITE ASSESSMENT SITE DIAGRAM DATED JUNE 28, 1999 (3) FIGURE 1, JAMES OIL PACIFIC PRIDE SITE MAP AND SAMPLE LOCATIONS FROM CLEANUP ACTION REPORT PREPARED BY DLH ENVIRONMENTAL CONSULTING DATED JULY 29, 2010. ZGA FIELD MEASUREMENTS.

APPROXIMATE S

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TP-8	TEST PIT NUMBER AND LOCATION (ZGA, 2022)
О В-5	BORING NUMBER AND LOCATION (WHITE SHIELD INC, 2008)
OLH#6	SIDEWALL SOIL SAMPLE NUMBER AND LOCATION (DLH, 2010)
PGG05	BASE OF EXAVATION SOIL SAMPLE NUMBER AND LOCATION (DLH, 2010)
	FORMER CONCRETE SLAB
Sinnih.	LIMITS OF PHASE 1 EXCAVATION (DLH, 2010)
	LIMITS OF PHASE 2 EXCAVATION (DLH, 2010)
G	PPROXIMATE ROUNDWATER MIGRATION IRECTION

ACRO	NYMS							
UST	UNDERGROUND STORAGE TANK							
DLH	DONNA HEWITT S	OIL SAMF	LE					
PGG		PACIFIC GROUNDWATER GROUP SOIL SAMPLE						
		<u> </u>						
	903 West 1st Sti Cle Elum, Washin							
	FORMER PACIFIC PRIDE SITE							
	APRIL 2022	Job No.	2577.23					
5 10	Zipper Geo Associates, LLC	FIGURE	0					
SCALE IN FEET	19019 36th Ave. W.,Suite E Lynnwood, WA, 98036	SHT.1 of 1	2					



LEGEND



SOIL SAMPLE NUMBER AND UST-NSW-7.5' LOCATION (ZGA, 2022)



SOIL SAMPLE NUMBER AND LOCATION (ARCS, 1999)



APPROXIMATE **GROUNDWATER MIGRATION** DIRECTION

ACRONYMS UST

UNDERGROUND STORAGE TANK



903 West 1st Street Cle Elum, Washington

FORMER G&W OIL AND WOOD INC. SITE

	APRIL 2022	Job No.	2577.23
20	Zipper Geo Associates, LLC 19019 36th Ave. W.,Suite E		3
	Lynnwood, WA, 98036	SHT.1 of 1	-

APPROXIMATE SCALE IN FEET



APPENDIX B

TABLES

Table 1. Soil Analytical Summary Results

Cle Elum Limited Phase II ESA 903 WEst 1st Street Cle Elum, Washington ZGA Project No. 2577

Date of	Exploration ID	Depth (ft.)	Petroleum H	Hydrocarbor	ns (mg/kg)	V	olatile Petro	oleum Com	pouds (mg/	/kg)		Fuel Additi	ves (mg/kg))	Metals
Collection			Gasoline	Diesel	Oil	В	Т	E	X	Hexane	EDB	EDC	MTBE	Nap.	Pb
MTCA Method A	(mg/kg):		30^A/ 100	2,000	total	0.03	7	6	9	NE	0.005	NE	0.1	5	250
MTCA Method B	Cancer (mg/kg):									NE		11			
MTCA Method B	Non-Cancer (mg/k	.g):								4,800					
Regional 90th Pe	ercentile Natural Ba	ckground:	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	24
						1999	9 ARCS								
	GT1-Base-6	6	ND			ND	ND	ND	ND						
	GT1-SSW-5	5	ND			ND	ND	ND	ND						
	GT1-NSW-5	5	ND			ND	ND	ND	ND						
	GT1-ESW-5	5	ND			ND	ND	ND	ND						
	GDISP-8	8	ND			ND	ND	ND	ND						
	D1-DISP-8	8		ND	ND										
	D2-DISP-8	8	ND			ND	ND	ND	ND						
	DSDISP1-3	3	ND			ND	ND	ND	ND						
5/19/1999	DSDISP2-3	3	ND	ND	ND	ND	ND	ND	ND						
	DTWBASE-10	10		93	ND										
	DTEBASE-10	10		67	ND										
	DTESW-7	10		ND	ND										
	DTSSW-7	10		160	360										
	DTNSW-7	10		58	86										
	DT-Trench-3	3		ND	ND										
	GT-Trench-3	3	ND			ND	ND	ND	ND						
	GT2-TP-7	7	ND			ND	ND	ND	ND						
			-		1	2008 W	hite Shield		1	r	n	1	•		
	B-1-2	2	ND	ND	ND	ND	ND	ND	ND						
	B-1-17.5	17.5	ND	ND	ND	ND	ND	ND	ND						
	B-2-5	5	ND	ND	ND	ND	ND	ND	ND						
	B-2-20	20	ND	ND	ND	ND	ND	ND	ND						
	B-3-2	2	ND	ND	ND	ND	ND	ND	ND						
	B-3-15	15	ND	197	ND	ND	ND	ND	ND						
6/27/2008	B-4-7.5	7.5	ND	ND	ND	ND	ND	ND	ND						
0/2//2000	B-4-17.5	17.5	ND	ND	ND	ND	ND	ND	ND						
	B-5-2.5	2.5	ND	11,900	ND	ND	ND	ND	0.49						
	B-5-15	15	ND	947	ND	ND	ND	ND	ND						
	B-5A-2.5	2.5	ND	ND	ND	ND	ND	ND	ND						
	B-5B-SUR	Surface	ND	5,680	ND	ND	ND	ND	ND						
	S-5B-2.5	2.5	ND	ND	ND	ND	ND	ND	ND						
	S-5B-Pile	Pile	ND	854	ND	ND	ND	ND	ND						

ZipperGeo Geoprofessional Consultants

Table 1. Soil Analytical Summary Results

Cle Elum Limited Phase II ESA 903 WEst 1st Street Cle Elum, Washington ZGA Project No. 2577

Date of	Exploration ID	Depth (ft.)	Petroleum H	Hydrocarboi	ns (mg/kg)	V	olatile Petro	leum Com	pouds (mg/	/kg)		Fuel Additi	ves (mg/kg))	Metals
Collection			Gasoline	Diesel	Oil	В	Т	E	Х	Hexane	EDB	EDC	MTBE	Nap.	Pb
MTCA Method A	(mg/kg):		30^A/ 100	2,000	total	0.03	7	6	9	NE	0.005	NE	0.1	5	250
MTCA Method B	Cancer (mg/kg):									NE		11			
MTCA Method B	Non-Cancer (mg/k	g):								4,800					
Regional 90th Pe	ercentile Natural Ba	ckground:	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	24
						201	0 DLH					-			
	51810-16	17		<50	<250										
	51810-17	14		<50	<250										
	51810-18	13		<50	<250										
	51810-19	14		<50	<250										
	51810-20	14		<50	<250										
5/18/2010	51810-21	14		<50	<250										
	51810-22	2		96	400										
	51810-23	7		<50	<250										
	51810-24			190	470										
	51810-25			5,700	5,800*										
	51810-26			<50	<250										
					-	202	2 ZGA						•	•	
	TP-1	3.5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						12.2
		10	<5	<50	<250	<0.001	0.0027	0.0014	0.010	<0.25	<0.005	<0.002	<0.001	<0.005	4.6
	TP-2	2.5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						4.89
	11-2	8	<5	<50	<250	<0.001	0.0032	<0.001	<0.003	<0.25	<0.005	<0.002	<0.001	<0.005	3.41
	TP-3	4	<5	<50	<250	<0.001	0.0026	<0.001	<0.003	<0.25	<0.005	<0.002	<0.001	<0.005	3.85
4/8/2022	IF- J	9	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						3.66
4/0/2022	TP-4	3	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						5.14
		8	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						3.38
	TP-5	10	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						3.54
	TP-6	10	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						3.67
	TP-7	10	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						4.01
	TP-8	6	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						3.23
	UST-NSW	7.5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						16.4
	UST-ESW	7.5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						7.36
5/4/2022	UST-SSW	7.5	<5	100x	750	<0.02	<0.02	<0.02	<0.06						28.6
5/4/2022	USTWSW	7.5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						9.46
	UST-B1	10.5	<5	<50	<250	<0.02	0.04	<0.02	<0.06						6.97
	UST-B2	10	<5	<50	<250	<0.02	<0.02	<0.02	<0.06						4.82

ZipperGeo Geoprofessional Consultants

Table 1. Soil Analytical Summary Results

Cle Elum Limited Phase II ESA 903 WEst 1st Street Cle Elum, Washington ZGA Project No. 2577

Date of Collection	Exploration ID	Depth (ft.)	Petroleum Hydrocarbons (mg/kg)			V	olatile Petro	oleum Com	pouds (mg/	/kg)	Fuel Additives (mg/kg)				Metals
			Gasoline	Diesel	Oil	В	Т	E	Х	Hexane	EDB	EDC	MTBE	Nap.	Pb
MTCA Method A	MTCA Method A (mg/kg):		30^A/ 100	2,000) total	0.03	7	6	9	NE	0.005	NE	0.1	5	250
MTCA Method B	MTCA Method B Cancer (mg/kg):									NE		11			
MTCA Method B Non-Cancer (mg/kg):									4,800						
Regional 90th Percentile Natural Background:		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	24	

LEGEND		NOTES AN	ND LABORATORY N
200	Most applicable MTCA cleanup level (defaults to MTCA Method A, then Method B if Method A is not established).	A	The MTCA Meth
400	Other cleanup level provided for relative comparison, but not selected as most applicable.		level for gasoline
NE	Not Established.		presence of benz
N/A	Not Applicable.		
<5	Analyte not detected above laboratory RDL.	х	<u></u>
10	Analyte detected above laboratory RDL, but below MTCA cleanup level.		"The sample chr
40	Analyte detected above MTCA cleanup level.		pattern does not fuel standard us
<0.3	RDL exceeds MTCA cleanup level.		quantitation."
16.6	Analyte detected above laboratory RDL, but below backgrouND concentration.		4
ND	Not detected above unspecified laboratory RDL.		
	Not tested.		
*	A duplicate sample of this material was collected and analyzed by PGG and below cleanup levels in 2010.		

ACRONYMS AND ABBREVIATIONS

ACIONITI			
As	Arsenic	MTCA	Chapter 70A.305 RCW and its implementing regulations, the Model Toxics Cont
В	Benzene	MICA	340 WAC.
Е	Ethylbenzene	N/A	Not Applicable
EDB	1,2-Dibromoethane	NE	Not Established
EDC	1,2-Dichloroethane	Pb	Lead
ft.	Feet	RDL	Reporting Detection Limit
MTB	E Methyl Tertbutyl Ether	Т	Toluene
Nap	. Napthalene	VOCs	Volatile Organic CompouNDs
mg/k	g Milligrams per Kilogram, equivalent to parts-per-million (ppm)	Х	Xylenes
		VOCs	Volatile Organic CompouNDs



Y MODIFIERS ethod A cleanup line in soil in the enzene is 30 mg/kg.

chromatographic not resemble the used for

ontrol Act, Chapi

Table 2. Groundwater Analytical Summary Results



Date of Collection	Well/Boring ID	Well Depth (ft)	Petroleum H	Hydrocarbor	is (μg/L)	Volatile Organic Compounds (µg/L)					
			Gasoline	Diesel	Oil	В	Т	E	x		
MT	800^A/1,000	500 to	otal	5	1,000	700	1,000				
		White Shield G	Groundwater S	amples, Nov	ember 20	09					
	B-6W	30	<100	<200		<1	<2	<1	<3		
11/2/2009	B-2W*	30	<100	<200		<1	<2	<1	<3		
	B-3W	30	<100	<200		<1	<2	<1	<3		

LEGEND

200	Most applicable MTCA cleanup level (defaults to MTCA Method A, then Method B if Method A is not established).
400	Other cleanup level provided for relative comparison, but not selected as most applicable.
NE	Not Established.
<5	Analyte not detected above laboratory RDL.
10	Analyte detected above laboratory RDL, but below MTCA cleanup level.
40	Analyte detected above MTCA cleanup level.
<0.3	RDL exceeds MTCA cleanup level.
	Not Tested.

ACRONYMS AND ABBREVIATIONS

В	Benzene
Т	Toluene
Е	Ethylbenzene
Х	Xylenes
μg/L	Micrograms per Liter, equivalent to parts-per-billion (ppb)
MTCA	Chapter 70A.305 RCW and its implementing regulations, the Model Toxics Control Act, Chapter 173-340 WAC.
RDL	Reporting Detection Limit

NOTES AND LABORATORY MODIFIERS

- A The MTCA Method A cleanup level for gasoline in groundwater varies depending on the reported concentrations of benzene and other volatile petroleum compounds. Based on the detection of benzene in the sample collected from MW-4, we interpret that the lower cleanup level is most applicable to this site.
- ^B VOCs analyzed by EPA Method 8260D.
- * "Sample B-2W is a blind duplicate of sample B-6W".
- x "The sample chromatographic pattern does not resemble the fuel standard used for quantitation."



APPENDIX C

BORING LOGS

	Test Pit TP-1 Location: See Figures 1 - 3 Approx. Ground Surface Elevation: TBD	Project: (Project N Date Exca	opment LLC 2022		
Depth (ft)	Material Description	Sample	Nc	%М	Testing
1	1 to 2 inches gravel surfacing over medium dense, damp, grayish-brown, gravelly silty SAND (fill)				
2		TP-1 @			
3		3.5 ft.			
4	Black plastic, some woody debris, blue/white crystals (possible remnant of previous remedial cleanup) (fill)				
6	Medium dense, damp, reddish brown, sandy GRAVEL w/				
7	cobbles				
8					
9		TP-1 @			
10 11	Test pit completed at approximately 10 ft. No groundwater seepage at the time of excavation. Caving observed @ 7ft	10 ft.			
12					
13					
14					
15					
16 17					
<u> </u>	Note: N _c is the Dynamic Cone Penetrometer blow count per 1.75-inch interval measured in accordance with ASTM Special Technical Publication #399.		I	<u> </u>	

	Test Pit TP-2 Location: See Figures 1 – 3 Approx. Ground Surface Elevation: TBD	Project N	l o: 257	7	n Development LLC 7 April 8, 2022		
Depth (ft)	Material Description	Sample	Nc	%M	Testing		
1	1 to 2 inches gravel surfacing over medium dense, damp, brownish gray, gravely silty SAND (Fill)						
2	Pea gravel @ 2ft Medium dense, damp, reddish brown, silty SAND to sandy	TP-2 @ 2.5 ft					
3	SILT (Fill)						
4							
5							
6	Medium dense, damp, reddish brown, gravelly SAND w cobbles (native alluvium)						
7	cobbles (native alluvium)	TP-2 @					
8		8 ft.					
9							
10 11	Test pit completed at approximately 10 ft. No groundwater seepage at time of excavation.						
12	Caving observed @ 7ft No odors, no staining, PID <1ppm						
13							
14							
15							
16							
17	Note: N _C is the Dynamic Cone Penetrometer blow count per 1.75-inch interval measured in accordance with ASTM Special Technical Publication #399.						

	Test Pit TP-3 Location: See Figures 1 -3 Approx. Ground Surface Elevation: TBD	Project: Cle Elum Developmen Project No: 2577 Date Excavated: April 8, 2022			
Depth (ft)	Material Description	Sample	N _c	. дрін <i>0,</i>	Testing
1	0.5 inches gravel surfacing over dark brown, silty SAND, some gravel with roots (fill) Becomes reddish brown (fill)				
2 3	Woody debris (fill)	TP-3 @			
4 5	Becomes reddish (fill)	4 ft			
6 7	Dark brown, silty to sandy GRAVEL with cobbles (native)				
8 9	Damp, brown, sandy GRAVEL with cobbles, trace silts	TP-3 @ 9 ft.			
10	Damp, brown, sandy GRAVEL some cobbles, trace silts				
11 12	Test pit completed at approximately 10 ft. No groundwater seepage at time of excavation. Caving observed @ 10ft No odors				
13					
14 15					
<u>16</u> 17					
	Note: N _c is the Dynamic Cone Penetrometer blow count per 1.75-inch interval measured in accordance with ASTM Special Technical Publication #399.			· · · · ·	

	Test Pit TP-4 Location: See Figures 1 - 3 Approx. Ground Surface Elevation: TBD	Project: (Project N Date Exca	opment LLC 2022		
Depth (ft)	Material Description	Sample	Nc	%М	Testing
1	0.5 inches gravel surfacing medium dense, damp to moist, brown to reddish silty SAND with gravel, trace cobbles				
2	(native alluvium)	TP-4 @			
3	Increasing cobble content to cobbly sandy GRAVEL, "some" to "with" silt (native alluvium)	3 ft			
4 5					
6					
7					
8		TP-4 @ 8 ft.			
9 10	Test pit completed at approximately 9 ft. No groundwater seepage at time of excavation.	-			
10	No caving No odors				
12					
13					
14 15					
16					
17	Note: N _c is the Dynamic Cone Penetrometer blow count per				
	1.75-inch interval measured in accordance with ASTM Special Technical Publication #399.				

	Test Pit TP-5 Location: See Figures 1 - 3 Approx. Ground Surface Elevation: TBD	Project: Cle Elum Development Project No: 2577 Date Excavated: April 8, 2022				
Depth (ft)	Material Description	Sample	Nc	%М	Testing	
1	Moist, brown, sandy GRAVEL some cobbles (fill)					
2						
4	Moist, brown, sandy GRAVEL some cobbles (native alluvium)					
5	Moist, brown, sandy GRAVEL with cobbles					
7	Wet, brown, sandy GRAVEL with cobbles					
8						
9 10	Test pit completed at approximately 9 ft. No groundwater	TP-5 @ 10 ft				
11	No caving No odors *UST exposed @7ft, ~2ft North from building post*					
12 13						
14						
15 16						
10	Note: Nois the Dynamic Cone Penetrometer blow count per					
	Note: N _c is the Dynamic Cone Penetrometer blow count per 1.75-inch interval measured in accordance with ASTM Special Technical Publication #399.					

	<u>Test Pit TP-6</u> Location: See Figures 1 - 3 Approx. Ground Surface Elevation: TBD		Project: Cle Elum Development LL Project No: 2577 Date Excavated: April 8, 2022			
Depth (ft)	Material Description	Sample	Nc	%M	Testing	
1						
2	Moist, reddish dark brown, silty to sandy GRAVEL with cobbles; reworked native soil (fill)					
3						
4 5	Moist, reddish brown, silty to sandy GRAVEL with cobbles; reworked native soil					
6	Moist, reddish brown, silty to sandy GRAVEL with cobbles;					
7	reworked native soil					
8	Wet, reddish brown, silty to sandy GRAVEL with cobbles (native alluvium)					
9 10		TP-6 @ 10 ft				
11						
12	Test pit completed at approximately 10 ft. No groundwater seepage at time of excavation. No caving					
13	No odors					
14						
15						
16						
17	Note: N _c is the Dynamic Cone Penetrometer blow count per 1.75-inch interval measured in accordance with ASTM Special Technical Publication #399.					

	Test Pit TP-7 Location: See Figures 1 - 3 Approx. Ground Surface Elevation: TBD	Project: Cle Elum Development LLC Project No: 2577 Date Excavated: April 8, 2022				
Depth (ft)	Material Description	Sample	Nc	%М	Testing	
1	Moist, reddish brown, sandy GRAVEL with cobbles, trace silt,					
2	(native alluvium)					
3						
4 5						
6						
7	Reddish brown, sandy GRAVEL with cobbles					
8	Reduish brown, sandy GRAVEL with cobbles					
9 10		TP-7 @ 10 ft				
10	Test pit completed at approximately 10 ft.	1011				
12	No groundwater seepage at time of excavation. No caving No odors					
13						
14						
15 16						
10						
	Note: N _c is the Dynamic Cone Penetrometer blow count per 1.75-inch interval measured in accordance with ASTM Special Technical Publication #399.					

	Test Pit TP-8 Location: See Figures 1 - 3 Approx. Ground Surface Elevation: TBD	Project: Cle Elum Development Project No: 2577 Date Excavated: April 8, 2022				
Depth (ft)	Material Description	Sample	Nc	%М	Testing	
1						
2	Moist, brown, sandy GRAVEL, some cobbles, wood matter (fill)					
3	Damp, brown, sandy GRAVEL, some cobbles, organic debris					
4 5	(fill)					
6	Wet, brown, sandy GRAVEL with cobbles	TP-8 @ 6 ft				
7	Damp, black, sandy SILT with interbedded cobbles, organic rich (fill)					
8						
9	Saturated brown, sandy GRAVEL, some cobbles (native)					
<u> 10 </u>		 				
12	Test pit completed at approximately 10 ft. No groundwater seepage at time of excavation. No caving					
13	No odors					
14						
15						
16 17						
	Note: N _C is the Dynamic Cone Penetrometer blow count per 1.75-inch interval measured in accordance with ASTM Special Technical Publication #399.		I	<u> </u>		



APPENDIX D

ANALYTICAL LABORATORY REPORTS


Friedman & Bruya, Inc Analytical Report# 204132

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

April 18, 2022

Kaelin Newman, Project Manager Zipper Geo Associates, LLC 19019 36th Ave W, Suite E Lynnwood, WA 98036

Dear Ms Newman:

Included are the results from the testing of material submitted on April 11, 2022 from the Cle Elum 2577, F&BI 204132 project. There are 27 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 c: Sean Donnan, Chuck Cacek, Elizabeth Cobb ZGA0418R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on April 11, 2022 by Friedman & Bruya, Inc. from the Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 project. Samples were logged in under the laboratory ID's listed below.

<u>Laboratory ID</u>	Zipper Geo Associates, LLC
204132 -01	TP1-3.5'
204132 -02	TP1-10'
204132 -03	TP2-2.5'
204132 -04	TP2-8'
204132 -05	TP3-4'
204132 -06	TP3-9'
204132 -07	TP4-3'
204132 -08	TP4-8'
204132 -09	TP5-10'
204132 -10	TP6-10'
204132 -11	TP7-10'
204132 -12	TP8-6'

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 04/18/22 Date Received: 04/11/22 Project: Cle Elum 2577, F&BI 204132 Date Extracted: 04/13/22 Date Analyzed: 04/13/22

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS GASOLINE USING METHOD NWTPH-Gx

<u>Sample ID</u> Laboratory ID	<u>Gasoline Range</u>	Surrogate (<u>% Recovery</u>) (Limit 50-150)
TP1-10' 204132-02	<5	86
TP2-8' 204132-04	<5	96
TP3-4' 204132-05	<5	85
Method Blank 02-822 MB	<5	88

ENVIRONMENTAL CHEMISTS

Date of Report: 04/18/22 Date Received: 04/11/22 Project: Cle Elum 2577, F&BI 204132 Date Extracted: 04/13/22 Date Analyzed: 04/13/22

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR BENZENE, TOLUENE, ETHYLBENZENE, XYLENES AND TPH AS GASOLINE USING METHODS 8021B AND NWTPH-Gx

<u>Sample ID</u> Laboratory ID	<u>Benzene</u>	<u>Toluene</u>	Ethyl <u>Benzene</u>	Total <u>Xylenes</u>	Gasoline <u>Range</u>	Surrogate (<u>% Recovery)</u> (Limit 50-150)
TP1-3.5' 204132-01	< 0.02	< 0.02	< 0.02	< 0.06	<5	79
TP2-2.5' 204132-03	< 0.02	< 0.02	< 0.02	<0.06	<5	85
TP3-9' 204132-06	< 0.02	< 0.02	< 0.02	<0.06	<5	89
TP4-3' 204132-07	< 0.02	< 0.02	< 0.02	<0.06	<5	65
TP4-8' 204132-08	< 0.02	< 0.02	< 0.02	<0.06	<5	86
TP5-10' 204132-09	< 0.02	< 0.02	< 0.02	<0.06	<5	89
TP6-10' 204132-10	< 0.02	< 0.02	< 0.02	< 0.06	<5	85
TP7-10' 204132-11	< 0.02	< 0.02	< 0.02	< 0.06	<5	86
TP8-6' 204132-12	< 0.02	< 0.02	< 0.02	< 0.06	<5	91
Method Blank 02-822 MB	< 0.02	< 0.02	< 0.02	< 0.06	<5	82

ENVIRONMENTAL CHEMISTS

Date of Report: 04/18/22 Date Received: 04/11/22 Project: Cle Elum 2577, F&BI 204132 Date Extracted: 04/11/22 Date Analyzed: 04/11/22

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

<u>Sample ID</u> Laboratory ID	Diesel Range (C10-C25)	<u>Motor Oil Range</u> (C ₂₅ -C ₃₆)	Surrogate <u>(% Recovery)</u> (Limit 48-168)
TP1-3.5' 204132-01	<50	<250	111
TP1-10' 204132-02	<50	<250	111
TP2-2.5' 204132-03	<50	<250	99
TP2-8' 204132-04	<50	<250	109
TP3-4' 204132-05	<50	<250	110
TP3-9' 204132-06	<50	<250	111
TP4-3' 204132-07	<50	<250	108
TP4-8' 204132-08	<50	<250	102
TP5-10' 204132-09	<50	<250	100
TP6-10' 204132-10	<50	<250	101

ENVIRONMENTAL CHEMISTS

Date of Report: 04/18/22 Date Received: 04/11/22 Project: Cle Elum 2577, F&BI 204132 Date Extracted: 04/11/22 Date Analyzed: 04/11/22

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

<u>Sample ID</u> Laboratory ID	Diesel Range (C10-C25)	<u>Motor Oil Range</u> (C ₂₅ -C ₃₆)	Surrogate <u>(% Recovery)</u> (Limit 48-168)
TP7-10' 204132-11	<50	<250	101
TP8-6' 204132-12	<50	<250	100
Method Blank 02-863 MB	<50	<250	100

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	TP1-3.5' 04/11/22 04/11/22 04/11/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-01 204132-01.059 ICPMS2
Units:	mg/kg (ppm) Dry Weight Concentration	Operator:	AR
Analyte:	mg/kg (ppm)		
Lead	12.2		

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	TP1-10' 04/11/22 04/11/22 04/11/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-02 204132-02.060 ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	AR
Analyte:	Concentration mg/kg (ppm)		

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed:	TP2-2.5' 04/11/22 04/11/22 04/11/22	Client: Project: Lab ID: Data File:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-03 204132-03.063
Matrix:	Soil	Instrument:	ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	AR
Analyte:	Concentration mg/kg (ppm)		

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	TP2-8' 04/11/22 04/11/22 04/11/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-04 204132-04.064 ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	AR
Analyte:	Concentration mg/kg (ppm)		

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID:	TP3-4'	Client:	Zipper Geo Associates, LLC
Date Received:	04/11/22	Project:	Cle Elum 2577, F&BI 204132
Date Extracted:	04/11/22	Lab ID:	204132-05
Date Analyzed:	04/11/22	Data File:	204132-05.065
Matrix:	Soil	Instrument:	ICPMS2
Units: Analyte:	mg/kg (ppm) Dry Weight Concentration mg/kg (ppm)	Operator:	AR

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID:	TP3-9'	Client:	Zipper Geo Associates, LLC
Date Received:	04/11/22	Project:	Cle Elum 2577, F&BI 204132
Date Extracted:	04/11/22	Lab ID:	204132-06
Date Analyzed:	04/11/22	Data File:	204132-06.066
Matrix:	Soil	Instrument:	ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	AR
Analyte: Lead	Concentration mg/kg (ppm) 3.66		

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	TP4-3' 04/11/22 04/11/22 04/11/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-07 204132-07.067 ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	AR
Analyte:	Concentration mg/kg (ppm)		
Lead	5.14		

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID:	TP4-8'	Client:	Zipper Geo Associates, LLC
Date Received:	04/11/22	Project:	Cle Elum 2577, F&BI 204132
Date Extracted:	04/11/22	Lab ID:	204132-08
Date Analyzed:	04/11/22	Data File:	204132-08.068
Matrix:	Soil	Instrument:	ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	AR
Analyte: Lead	Concentration mg/kg (ppm) 3.38		

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	TP5-10' 04/11/22 04/11/22 04/11/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-09 204132-09.071 ICPMS2
Units: Analyte:	mg/kg (ppm) Dry Weight Concentration mg/kg (ppm)	Operator:	AR

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	TP6-10' 04/11/22 04/11/22 04/11/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-10 204132-10.072 ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	AR
Analyte:	Concentration mg/kg (ppm)		
Lead	3.67		

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	TP7-10' 04/11/22 04/11/22 04/11/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-11 204132-11.073 ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	AR
Analyte:	Concentration mg/kg (ppm)		
Lead	4.01		

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix: Units:	TP8-6' 04/11/22 04/11/22 04/11/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-12 204132-12.074 ICPMS2
	mg/kg (ppm) Dry Weight Concentration	Operator:	AR
Analyte:	mg/kg (ppm)		

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID:	Method Blank	Client:	Zipper Geo Associates, LLC
Date Received:	NA	Project:	Cle Elum 2577, F&BI 204132
Date Extracted:	04/11/22	Lab ID:	I2-276 mb
Date Analyzed:	04/11/22	Data File:	I2-276 mb.051
Matrix:	Soil	Instrument:	ICPMS2
Units: Analyte: Lead	mg/kg (ppm) Dry Weight Concentration mg/kg (ppm) <1	Operator:	AR

ENVIRONMENTAL CHEMISTS

Analysis For Volatile Compounds By EPA Method 8260D Dual Acquisition LL

Client Sample ID: Date Received: Date Extracted: Date Analyzed: Matrix: Units:	TP1-10' 04/11/22 04/13/22 04/13/22 Soil mg/kg (ppn	n) Dry Weight	Client: Project: Lab ID: Data File: Instrument: Operator:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-02 1/0.25 041333.D GCMS13 WE
Surrogates: 1,2-Dichloroethane Toluene-d8 4-Bromofluorobenz		% Recovery: 101 101 98	Lower Limit: 84 86 90	Upper Limit: 118 117 112
Compounds:		Concentration mg/kg (ppm)		
Hexane Methyl t-butyl ethe 1,2-Dichloroethane Benzene Toluene 1,2-Dibromoethane Ethylbenzene Total Xylenes Naphthalene	(EDC)	< 0.25 < 0.001 < 0.002 < 0.001 0.0027 < 0.005 0.0014 0.010 < 0.005		

ENVIRONMENTAL CHEMISTS

Analysis For Volatile Compounds By EPA Method 8260D Dual Acquisition LL

Client Sample ID: Date Received: Date Extracted: Date Analyzed: Matrix: Units:	TP2-8' 04/11/22 04/13/22 04/13/22 Soil mg/kg (ppm	n) Dry Weight	Client: Project: Lab ID: Data File: Instrument: Operator:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-04 1/0.25 041334.D GCMS13 WE
			Lower	Upper
Surrogates:		% Recovery:	Limit:	Limit:
1,2-Dichloroethane	-d4	97	84	118
Toluene-d8		102	86	117
4-Bromofluorobenz	ene	100	90	112
Compounds:		Concentration mg/kg (ppm)		
Hexane		< 0.25		
Methyl t-butyl ethe	er (MTBE)	< 0.001		
1,2-Dichloroethane	(EDC)	< 0.002		
Benzene		< 0.001		
Toluene		0.0032		
1,2-Dibromoethane	(EDB)	< 0.005		
Ethylbenzene		< 0.001		
Total Xylenes		< 0.003		

< 0.005

Naphthalene

ENVIRONMENTAL CHEMISTS

Analysis For Volatile Compounds By EPA Method 8260D Dual Acquisition LL

Client Sample ID: Date Received: Date Extracted: Date Analyzed: Matrix: Units:	TP3-4' 04/11/22 04/13/22 04/13/22 Soil mg/kg (ppn	n) Dry Weight	Client: Project: Lab ID: Data File: Instrument: Operator:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 204132-05 1/0.25 041335.D GCMS13 WE
Surrogates: 1,2-Dichloroethane Toluene-d8 4-Bromofluorobenz		% Recovery: 96 94 97	Lower Limit: 84 86 90	Upper Limit: 118 117 112
Compounds:		Concentration mg/kg (ppm)		
Hexane Methyl t-butyl ethe 1,2-Dichloroethane Benzene Toluene 1,2-Dibromoethane Ethylbenzene Total Xylenes Naphthalene	(EDC)	$\begin{array}{c} < 0.25 \\ < 0.001 \\ < 0.002 \\ < 0.001 \\ 0.0026 \\ < 0.005 \\ < 0.001 \\ < 0.003 \\ < 0.005 \end{array}$		

ENVIRONMENTAL CHEMISTS

Analysis For Volatile Compounds By EPA Method 8260D Dual Acquisition LL

Client Sample ID: Date Received: Date Extracted: Date Analyzed: Matrix: Units:	Method Bla Not Applica 04/13/22 04/13/22 Soil mg/kg (ppm		Client: Project: Lab ID: Data File: Instrument: Operator:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 204132 02-0775 mb 1/0.25 041308.D GCMS13 WE
			Lower	Upper
Surrogates:		% Recovery:	Limit:	Limit:
1,2-Dichloroethane	e-d4	96	84	118
Toluene-d8		101	86	117
4-Bromofluorobenzene		101	90	112
Compounds:		Concentration mg/kg (ppm)		
Hexane		< 0.25		
Methyl t-butyl ethe	er (MTBE)	< 0.001		
1,2-Dichloroethane (EDC)		< 0.002		
Benzene		< 0.001		
Toluene		< 0.001		
1,2-Dibromoethane	e (EDB)	< 0.005		
Ethylbenzene		< 0.001		
Total Xylenes		< 0.003		

< 0.005

Naphthalene

ENVIRONMENTAL CHEMISTS

Date of Report: 04/18/22 Date Received: 04/11/22 Project: Cle Elum 2577, F&BI 204132

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR BENZENE, TOLUENE, ETHYLBENZENE, XYLENES, AND TPH AS GASOLINE USING EPA METHOD 8021B AND NWTPH-Gx

Laboratory Code: 204147-07 (Duplicate)

	Reporting	Sample Result	Duplicate Result	RPD
Analyte	Units	(Wet Wt)	(Wet Wt)	(Limit 20)
Benzene	mg/kg (ppm)	< 0.02	< 0.02	nm
Toluene	mg/kg (ppm)	< 0.02	< 0.02	nm
Ethylbenzene	mg/kg (ppm)	< 0.02	< 0.02	nm
Xylenes	mg/kg (ppm)	< 0.06	< 0.06	nm
Gasoline	mg/kg (ppm)	<5	<5	nm

Laboratory Code: Laboratory Control Sample

			Percent	
	Reporting	Spike	Recovery	Acceptance
Analyte	Units	Level	LCS	Criteria
Benzene	mg/kg (ppm)	0.5	89	69-120
Toluene	mg/kg (ppm)	0.5	89	70-117
Ethylbenzene	mg/kg (ppm)	0.5	90	65 - 123
Xylenes	mg/kg (ppm)	1.5	89	66-120
Gasoline	mg/kg (ppm)	20	90	71-131

ENVIRONMENTAL CHEMISTS

Date of Report: 04/18/22 Date Received: 04/11/22 Project: Cle Elum 2577, F&BI 204132

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

Laboratory Code: 204130-01 (Matrix Spike)											
			Sample	Percent	Percent						
	Reporting	Spike	Result	Recovery	Recovery	Acceptance	RPD				
Analyte	Units	Level	(Wet Wt)	MS	MSD	Criteria	(Limit 20)				
Diesel Extended	mg/kg (ppm)	5,000	<50	102	110	73-135	8				
Laboratory Code: I	Laboratory Contro	ol Sampl	e								
			Percent								
	Reporting	Spike	Recovery	Acceptar	nce						
Analyte	Units	Level	LCS	Criteria	a						
Diesel Extended	mg/kg (ppm)	5,000	104	74-139	<u> </u>						

ENVIRONMENTAL CHEMISTS

Date of Report: 04/18/22 Date Received: 04/11/22 Project: Cle Elum 2577, F&BI 204132

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR TOTAL METALS USING EPA METHOD 6020B

Laboratory Code	``````````````````````````````````````	1	Sample	Percent	Percent		
	Reporting	Spike	Result	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	(Wet wt)	MS	MSD	Criteria	(Limit 20)
Lead	mg/kg (ppm)	50	4.05	87	91	75 - 125	4

Laboratory Code: Laboratory Control Sample

			Percent	
	Reporting	Spike	Recovery	Acceptance
Analyte	Units	Level	LCS	Criteria
Lead	mg/kg (ppm)	50	96	80-120

ENVIRONMENTAL CHEMISTS

Date of Report: 04/18/22 Date Received: 04/11/22 Project: Cle Elum 2577, F&BI 204132

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR VOLATILES BY EPA METHOD 8260D

Laboratory Code: 204162-01 (Matrix Spike)

Laboratory Code: 204102-01	manix opine)		Sample	Percent	Percent		
	Reporting	Spike	Result	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	(Wet wt)	MS	MSD	Criteria	(Limit 20)
Hexane	mg/kg (ppm)	1	< 0.25	79	65	10-137	19
Methyl t-butyl ether (MTBE)	mg/kg (ppm)	1	< 0.05	92	87	21 - 145	6
1,2-Dichloroethane (EDC)	mg/kg (ppm)	1	< 0.05	84	78	12 - 160	7
Benzene	mg/kg (ppm)	1	< 0.03	80	73	29 - 129	9
Toluene	mg/kg (ppm)	1	< 0.05	93	80	35 - 130	15
1,2-Dibromoethane (EDB)	mg/kg (ppm)	1	< 0.05	95	84	28 - 142	12
Ethylbenzene	mg/kg (ppm)	1	< 0.05	95	81	32 - 137	16
Total Xylenes	mg/kg (ppm)	3	< 0.15	94	82	34-136	14
Naphthalene	mg/kg (ppm)	1	< 0.05	106	87	14 - 157	20

Laboratory Code: Laboratory Control Sample

	I I I I I I I I		Percent	
	Reporting	Spike	Recovery	Acceptance
Analyte	Units	Level	LCS	Criteria
Hexane	mg/kg (ppm)	1	100	43-142
Methyl t-butyl ether (MTBE)	mg/kg (ppm)	1	109	60 - 123
1,2-Dichloroethane (EDC)	mg/kg (ppm)	1	101	56 - 135
Benzene	mg/kg (ppm)	1	96	71 - 118
Toluene	mg/kg (ppm)	1	112	66 - 126
1,2-Dibromoethane (EDB)	mg/kg (ppm)	1	115	74 - 132
Ethylbenzene	mg/kg (ppm)	1	115	64-123
Total Xylenes	mg/kg (ppm)	3	113	78 - 122
Naphthalene	mg/kg (ppm)	1	123	63-140

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.

 ${\rm J}$ - 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.

			Friedman & Bruya, Inc. Ph (906) 985-8989	ζ.	TP6-10'	TPS-10'	TP4-8'	TP4-3'	» TP3-9'	TP3-4"	102-8,	TP2-25	TO1-10'	TP1-3.5	Sample ID		City, State, ZIP PhoneE	CompanyAddress	204132 Report To Kull
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Friedman & Bruya, Inc Analytical Report# 205052

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

May 11, 2022

Sean Donnan, Project Manager Zipper Geo Associates, LLC 19019 36th Ave W, Suite E Lynnwood, WA 98036

Dear Mr Donnan:

Included are the results from the testing of material submitted on May 4, 2022 from the Cle Elum 2577, F&BI 205052 project. There are 14 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 c: Kaelin Newman, Elizabeth Cobb ZGA0511R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on May 4, 2022 by Friedman & Bruya, Inc. from the Zipper Geo Associates, LLC Cle Elum 2577, F&BI 205052 project. Samples were logged in under the laboratory ID's listed below.

<u>Laboratory ID</u>	Zipper Geo Associates, LLC
205052 -01	UST-NSW-7.5'
205052 -02	UST-ESW-7.5'
205052 -03	UST-SSW-7.5'
205052 -04	UST-WSW-7.5'
205052 -05	UST-B1-10.5'
205052 -06	UST-B2-10'

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/11/22 Date Received: 05/04/22 Project: Cle Elum 2577, F&BI 205052 Date Extracted: 05/06/22 Date Analyzed: 05/09/22

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR BENZENE, TOLUENE, ETHYLBENZENE, XYLENES AND TPH AS GASOLINE USING METHODS 8021B AND NWTPH-Gx

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

<u>Sample ID</u> Laboratory ID	<u>Benzene</u>	<u>Toluene</u>	Ethyl <u>Benzene</u>	Total <u>Xylenes</u>	Gasoline <u>Range</u>	Surrogate (<u>% Recovery)</u> (Limit 50-150)
UST-NSW-7.5' 205052-01	< 0.02	< 0.02	< 0.02	< 0.06	<5	81
UST-ESW-7.5' 205052-02	< 0.02	< 0.02	< 0.02	<0.06	<5	99
UST-SSW-7.5' 205052-03	< 0.02	< 0.02	< 0.02	<0.06	<5	99
UST-WSW-7.5' 205052-04	< 0.02	< 0.02	< 0.02	< 0.06	<5	99
UST-B1-10.5' 205052-05	< 0.02	0.040	< 0.02	<0.06	<5	98
UST-B2-10' 205052-06	< 0.02	< 0.02	< 0.02	< 0.06	<5	99
Method Blank 02-905 MB	< 0.02	< 0.02	< 0.02	< 0.06	<5	99

ENVIRONMENTAL CHEMISTS

Date of Report: 05/11/22 Date Received: 05/04/22 Project: Cle Elum 2577, F&BI 205052 Date Extracted: 05/04/22 Date Analyzed: 05/04/22

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND RESIDUAL RANGE USING METHOD NWTPH-Dx

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

Sumorato

<u>Sample ID</u> Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate (% Recovery) (Limit 48-168)
UST-NSW-7.5' ²⁰⁵⁰⁵²⁻⁰¹	<50	<250	92
UST-ESW-7.5' 205052-02	<50	<250	88
UST-SSW-7.5' 205052-03	100 x	750	92
UST-WSW-7.5' 205052-04	<50	<250	92
UST-B1-10.5' 205052-05	<50	<250	89
UST-B2-10' 205052-06	<50	<250	92
Method Blank 02-1063 MB	<50	<250	90

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	UST-NSW-7.5' 05/04/22 05/05/22 05/06/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 205052 205052-01 205052-01.084 ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	SP
Analyte:	Concentration mg/kg (ppm)		

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	UST-ESW-7.5' 05/04/22 05/05/22 05/06/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 205052 205052-02 205052-02.091 ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	SP
Analyte:	Concentration mg/kg (ppm)		

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID:	UST-SSW-7.5'	Client:	Zipper Geo Associates, LLC
Date Received:	05/04/22	Project:	Cle Elum 2577, F&BI 205052
Date Extracted:	05/05/22	Lab ID:	205052-03
Date Analyzed:	05/06/22	Data File:	205052-03.092
Matrix:	Soil	Instrument:	ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	SP
Analyte: Lead	Concentration mg/kg (ppm) 28.6	oporation.	51

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID:	UST-WSW-7.5'	Client:	Zipper Geo Associates, LLC
Date Received:	05/04/22	Project:	Cle Elum 2577, F&BI 205052
Date Extracted:	05/05/22	Lab ID:	205052-04
Date Analyzed:	05/06/22	Data File:	205052-04.093
Matrix:	Soil	Instrument:	ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	SP
Analyte:	Concentration mg/kg (ppm)	Operator:	Sr

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID:	UST-B1-10.5'	Client:	Zipper Geo Associates, LLC
Date Received:	05/04/22	Project:	Cle Elum 2577, F&BI 205052
Date Extracted:	05/05/22	Lab ID:	205052-05
Date Analyzed:	05/06/22	Data File:	205052-05.094
Matrix:	Soil	Instrument:	ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	SP
Analyte: Lead	Concentration mg/kg (ppm) 6.97	operator.	51

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID:	UST-B2-10'	Client:	Zipper Geo Associates, LLC
Date Received:	05/04/22	Project:	Cle Elum 2577, F&BI 205052
Date Extracted:	05/05/22	Lab ID:	205052-06
Date Analyzed:	05/06/22	Data File:	205052-06.095
Matrix:	Soil	Instrument:	ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	SP
Analyte:	Concentration mg/kg (ppm)	oporatori	

Lead

ENVIRONMENTAL CHEMISTS

Analysis For Total Metals By EPA Method 6020B

Client ID: Date Received: Date Extracted: Date Analyzed: Matrix:	Method Blank NA 05/05/22 05/05/22 Soil	Client: Project: Lab ID: Data File: Instrument:	Zipper Geo Associates, LLC Cle Elum 2577, F&BI 205052 I2-334 mb I2-334 mb.047 ICPMS2
Units:	mg/kg (ppm) Dry Weight	Operator:	SP
Analyte:	Concentration mg/kg (ppm)		
Lead	<1		

ENVIRONMENTAL CHEMISTS

Date of Report: 05/11/22 Date Received: 05/04/22 Project: Cle Elum 2577, F&BI 205052

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR BENZENE, TOLUENE, ETHYLBENZENE, XYLENES, AND TPH AS GASOLINE USING EPA METHOD 8021B AND NWTPH-Gx

Laboratory Code: 205064-04 (Duplicate)

Analyte	Reporting Units	Sample Result (Wet Wt)	Duplicate Result (Wet Wt)	RPD (Limit 20)
Benzene	mg/kg (ppm)	< 0.02	< 0.02	nm
Toluene	mg/kg (ppm)	< 0.02	< 0.02	nm
Ethylbenzene	mg/kg (ppm)	< 0.02	< 0.02	nm
Xylenes	mg/kg (ppm)	< 0.06	< 0.06	nm
Gasoline	mg/kg (ppm)	<5	<5	nm

Laboratory Code: Laboratory Control Sample

			Percent	
	Reporting	Spike	Recovery	Acceptance
Analyte	Units	Level	LCS	Criteria
Benzene	mg/kg (ppm)	0.5	92	69-120
Toluene	mg/kg (ppm)	0.5	92	70-117
Ethylbenzene	mg/kg (ppm)	0.5	96	65 - 123
Xylenes	mg/kg (ppm)	1.5	93	66-120
Gasoline	mg/kg (ppm)	20	130	71-131

ENVIRONMENTAL CHEMISTS

Date of Report: 05/11/22 Date Received: 05/04/22 Project: Cle Elum 2577, F&BI 205052

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

Laboratory Code: 2	05052-01 (Matrix	x Spike)					
			Sample	Percent	Percent		
	Reporting	Spike	Result	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	(Wet Wt)	MS	MSD	Criteria	(Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	67	105	111	73-135	6
Laboratory Code: L	aboratory Contro	ol Sampl	e				
			Percent				
	Reporting	Spike	Recovery	Acceptan	ice		
Analyte	Units	Level	LCS	Criteria	a		
Diesel Extended	mg/kg (ppm)	5,000	108	74-139	1		

ENVIRONMENTAL CHEMISTS

Date of Report: 05/11/22 Date Received: 05/04/22 Project: Cle Elum 2577, F&BI 205052

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR TOTAL METALS USING EPA METHOD 6020B

Laboratory Code: 205054-02 x5 (Matrix Spike)

			Sample	Percent	Percent		
	Reporting	Spike	Result	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	(Wet wt)	MS	MSD	Criteria	(Limit 20)
Lead	mg/kg (ppm)	50	<5	92	91	75 - 125	1

Laboratory Code: Laboratory Control Sample

	oue. Laboratory com	p	Percent	
	Reporting	Spike	Recovery	Acceptance
Analyte	Units	Level	LCS	Criteria
Lead	mg/kg (ppm)	50	94	80-120

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.

 ${\rm J}$ - 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.

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Department Decision Recommendation G&W Oil & Wood, FSID 4658443 December 13, 2012

Department Decision Recommendation

Site: G&W Oil & Wood FSID#4658443 CITY: Cle Elum County:

County: Kittitas

In keeping with the requirement of WAC 173-340-310 (5) I recommend that this site receive a No Further Action (NFA).

Supporting Criteria:

A UST Site Assessment Report, June 28, 1999 details the removal of two UST's [6K gasoline and 12K diesel], closure in place of two UST's [capacity not stated] partially under an existing building, and removal of related piping and pumps/dispensers.

The construction activities occurred during May 1999. The in-place closure of the USTs had limited soil sampling conducted to verify that contamination was not present. Groundwater was not encountered in any excavation to a final excavated depth of 12 feet. All confirmatory sampling from the tank removal, piping/dispensers, and closed-in-place tanks indicated concentrations below current MTCA cleanup levels.

An additional cleanup for another site on the property occurred in 2008. This cleanup received a No Further Action in 2010 after demonstrating both soil and groundwater below cleanup levels. Based on the lack of groundwater contamination, it can be reasonably concluded that the 1999 closed-in-place tanks did not leak significantly to warrant additional cleanup actions.

This Department Decision Recommendation should be reviewed and re-evaluated based on any new information about this site.

WRIN LEANER Investigator(s rint and sign name(s)

DATE:

Section Manager

DATE:



NFA Opinion Letter Pacific Pride Card Lock, FSID 4658443, VCP CE0332 November 8, 2010



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY 15 W Yakima Ave, Ste 200 • Yakima, WA 9**8**902-3452 • (5**9**) 575-2490

November 8, 2010

Mr. Jeff James James Oil Company 666 Griffin Avenue Enumclaw, WA 98022

Re: No Further Action at the following Site:

- Site Name: Pacific Pride (formerly G&W Oil and Wood Inc.)
- Site Address: 903 West 1st, Cle Elum, WA 98922
- Facility/Site ID: 4658443
- VCP Project #: CE0332

Dear Mr. James:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Pacific Pride, Facility #4658443 (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and it's implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Sites described below. The Site is defined by the nature and extent of contamination associated with the following release:

• Petroleum hydrocarbons (Diesel and Heavy Oil) into the Site's soil as depicted in enclosure A and reported in <u>Final Cleanup Report, Pacific Pride Fueling Facility</u>, DLH Environmental Consulting, July 29, 2010.

A detailed description and diagram of the Site, as currently known to Ecology, is contained in the <u>Final Cleanup Report</u>, <u>Pacific Pride Fueling Facility</u>, DLH Environmental Consulting, July 29, 2010.

Please note that a parcel of real property can be affected by multiple sites. At this time, a second site is located on this parcel and described in <u>Site Assessment Report: Underground Storage</u> <u>Tank Removal & Soil Remediation</u>, Assessment and Remediation Consulting Services (ARCS), June 28, 1999. This site has **not received** a No Further Action from Ecology and was not reviewed as part of this VCP application.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

- 1. <u>Soil Boring and Groundwater Sampling Report</u>, Former Pacific Pride Fueling Station, 903 1st Street West, Cle Elum, WA 98922, White Shield, Inc., August 22, 2008
- 2. <u>Soil Boring and Groundwater Sampling Report</u>, Former Pacific Pride Fueling Station, 903 1st Street West, Cle Elum, WA 98922, White Shield, Inc., November 30, 2009
- 3. <u>Final Cleanup Report</u>, Pacific Pride Fueling Station, Half-Acre Portion of Kittitas County Parcel #263835, 903 W. 1st Street West, Cle Elum, WA 98922, DLH Environmental Consulting, July 29, 2010

These documents are kept at the Central Regional Office of Ecology (CRO) for review by appointment only. You can make an appointment by calling the CRO resource contact, Roger Johnson, at 509-454-7658.

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

Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined the characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described in the documents listed above.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels you established for the Site meet the substantive requirements of MTCA.

a. Cleanup levels.

Soil: Diesel and Heavy Oil, MTCA Method A cleanup level of 2000 mg/kg The MTCA Method A cleanup level is a conservative cleanup level based on unrestricted land use and protection of human health.

The Terrestrial Ecological unrestricted land use soil concentration value from Table 749-2 for protection of ecological resources is 460 mg/kg for Diesel. Under WAC 173-340-7492, the simplified terrestrial ecological evaluation can be ended at a site where not more than 350 square feet of total area soil contamination remains. In a September 10, 2010 email from DLH Environmental Consulting, the consultant estimates that less than 350 square feet of contamination remains at this site.

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA. The cleanup resulted in the removal and excavation of all contaminated soil above MTCA Method A cleanup levels and treatment/disposal of contaminated soil at CEMEX Soil Remediation, Everett, WA.

Adequate sampling was performed to characterize, excavate, and treat/dispose of the contaminated soil; focused confirmatory sampling in the excavation was adequate to professionally confirm cleanup of the site.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Confirmed and Suspected Contaminated Sites List
- Leaking Underground Storage Tank List

Limitations of the Opinion

1. Opinion does not settle liability with the state.

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

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

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (CE0332).

For more information about the VCP and the cleanup process, please visit our web site: <u>www.</u> <u>ecy.wa.gov/programs/tcp/vcp/vcpmain.htm</u>. If you have any questions about this opinion or the termination of the Agreement, please contact me at (509) 457-7127.

Sincerely,

nie Bound Norman Hepner, PE

Environmental Engineer CRO Toxics Cleanup Program

cc: Estate of Wayne A. Hill c/o Renee Hill, Personal Representative Dolores Mitchell, VCP Financial Manager



Final Cleanup Report Pacific Pride Fueling Facility 903 W. 1st Street, Cle Elum, WA prepared by DLH Environmental Consulting July 29, 2010

FINAL CLEANUP REPORT



PACIFIC PRIDE FUELING FACILITY HALF-ACRE PORTION OF KITTITAS COUNTY PARCEL # 263835 903 W. 1ST STREET CLE ELUM, WASHINGTON 98922

SUBMITTED TO:

JEFF JAMES JAMES OIL COMPANY 666 GRIFFIN AVENUE ENUMCLAW, WASHINGTON 98022

PRERARED BY: Donna Hewitt L.G.

DLH ENVIRONMENTAL CONSULTING 2400 NW 80TH STREET PMB 114 SEATTLE, WASHINGTON 98117

JULY 29, 2010

RECEIVED

AUG 30 2010 DEPARTMENT OF ECOLOGY - CENTRAL REGIONAL OFFICE

DLH ENVIRONMENTAL CONSULTING SEATTLE, WASHINGTON 206-632-3123
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1.0 BACKGROUND

The subject site (referred to in this report as the "Site") is identified as an approximate ¹/₂ acre area in the center of property currently owned by the Estate of Wayne A. Hill. James Oil leased the "Site" from on or about November 24, 1988 through September 30, 2009. The Estate of Wayne A. Hill property is identified as a 3.39 acre parcel located at 903 W. 1st Street in Cle Elum, Washington. According to the Kittitas County Assessor's office, the parcel number for the Hill property is #263835, and is legally described as: SEC. 27; TWP. 20; RGE. 15; PTN. NE1/4 SW1/4 & PTN. NW1/4 SW1/4 (PTN SURVEY B30/P203) PTN VAC RANGER STATION RD (ORD 1194).

The Pacific Pride fueling facility was constructed in 1999 as a cooperative effort of James Oil Company, Inc. and Wayne A. Hill. The "Site" was constructed in late1998. The fueling facility consisted of two above ground fuel storage tanks (AST's), dispensers, turbines, monitoring equipment, TLS, Pacific Pride Fuel Controller, a canopy and various piping and electrical equipment associated with the fueling process.

According to Mr. James all of the above ground equipment including the AST's, turbines, dispensers, TLS, Pacific Pride Fuel Controller, and above ground piping and electrical was owned by James Oil Company. Also, according to Mr. James, Wayne Hill, (now the Estate of Wayne A. Hill), purchased and owned all below ground piping and electrical, sumps, islands, canopy, and fueling slabs.

James Oil's use of the "Site" terminated at the end of September 2009. According to Jeff James, the above ground equipment, owned by James Oil, was removed in the first ten days of October 2009 by James Oil. The Estate owned property was removed in April 2010. James Oil and the Estate are now working cooperatively to clean up the site and receive and NFA letter.

On November 5, 2007, White Shield, Inc. (WSI) was retained to conduct a site visit at 903 W. 1st Street in Cle Elum, Washington with Ms. Renee Hill, Trustee for the Wayne A. Hill estate (property owner). Subsequently, WSI was retained in 2008 and 2009 to collect soil and water samples to assess the potential of hydrocarbon releases associated with the Pacific Pride Fueling Facility. The characterization of the soil documented in the WSI reports (Appendices E and F) indicated that diesel/heavy oil in the soil was confirmed above the current MTCA limits of 2000 ppm. Detailed information with regard to site information, soil sample locations, and subsurface soil conditions can be found in the WSI reports located in the above-mentioned appendices of this report.

2.0 PROJECT DESCRIPTION/SCOPE OF WORK

The scope of work for this project consisted of overseeing the removal of a concrete pad located on the "Site"; the removal of remaining fuel product piping, vent lines, and other fueling facility materials located underneath the concrete pad; the removal of confirmed impacted soil; and the investigation of stained soil areas adjacent to the concrete pad that were discovered during previous studies. DLH Environmental Consulting (DLH) was retained by James Oil Company (property lessee) to provide oversite of the afore mentioned tasks and to collect the required soil samples during initial excavation and to collect confirmational soil samples once the impacted soils were removed. DLH was responsible for taking all soil samples to the project laboratory for analysis. The project laboratory was Friedman & Bruya, Inc. located in Seattle, Washington.

In addition to the work conducted by DLH, a representative of Pacific Groundwater Group (PGG) was onsite during this project on behalf of the property owner Estate of Wayne A. Hill. PGG also took soil samples for analysis and has provided that information in Appendix G.

3.0 "SITE" CONDITIONS

The "Site" consists of a leveled area north of W. 1st Street. It consists of a large concrete pad surrounded by a mixture of asphalt and gravel access roads on the north, south and east, and graveled and relatively leveled property on the west where the former ASTs were located. There is a cemetery to the northwest, a few buildings/garages to the east, a logging company equipment storage yard to the west, and an on-ramp to Interstate I-90 located directly south. The vacant buildings/garages to the logging company equipment storage yard to the west are on the Estate of Wayne A. Hill property. The property and surrounding topography slope gently south/southeast toward the Yakima river. The property is approximately 2000 feet above sea level.

Prior to the decommissioning of the fueling facility in September 2009 there was a large canopy covering the concrete pad. The canopy was removed as a part of the decommissioning but the concrete footings that held the canopy were left in place underneath the concrete pad. During the removal of impacted soils the southern concrete footing was removed.

3.1 "Site" Soils

"Site" soils are basically described as a mixture of brownish sands and gravels with some silt. In several areas, there was dark reddish silty soil, and in other areas there were indications of fill materials such as old wood, wood chips, and other debris. More detailed soil data can be found in the White Shield, Inc. reports located in Appendices F and G and as documented by PGG In Appendix G.

3.2 Groundwater

Groundwater information noted in previous WSI reports (Appendix E and F) indicate that groundwater could be approximately 30 feet below ground level and flow direction could be toward the Yakima River located approximately 3/8 mile to the southeast.

Groundwater samples were collected from 2- temporary wells on October 29, 2009 by both White Shield, Inc. and DLH (see Appendix F). Results of that study indicated that gasoline, BTEX, and diesel were not detected above the laboratory reporting limits. No groundwater was encountered during the excavation activities of this current project.

3.3 Removal Activities

On April 27, 2010, both DLH Environmental Consulting and Pacific Groundwater Group representatives were onsite to conduct "Site" removal activities. Demolition and soil excavation services were provided by a HAZWOPER - trained excavator operator. The concrete pad was removed and soil was excavated starting at the north side of the concrete pad area, then along the west side of the concrete pad area. Both of these areas were noted in the former WSI reports as being suspected of having hydrocarbon contamination (stained soil and stains on the concrete pad). Once those areas had been excavated and soil samples collected for analysis, we proceeded to remove the soil in and around the former fuel dispenser locations and the associated product lines. All fueling system equipment had been removed from the ground up prior to this scope of work. What materials remained were underneath the concrete pad. Fuel dispensers had been removed only to the top of the concrete and therefore the spill buckets and product piping were still in place.

James Oil Company / Estate of Wayne A. Hill	July 29, 2010
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Green "Environ" flexible product piping was found under the concrete pad area still attached to the remaining fuel dispenser system. This is a double-walled product and was found to contain small amounts of free product (diesel). The free product was found contained in the secondary (interstitial) containment, which could possibly indicate that the product lines had failed. This free product, approximately 2-3 gallons, was disposed of in 55-gallon drums located onsite that had been formerly used for soil cuttings during drilling activities. Also at this time, all of the soil in the 55-gallon drums was emptied into a dump truck along with other excavated materials for disposal.

The soil around these product pipes, including pea gravel used as backfill, was also removed and disposed of. During the rest of the day and the following day (April 28, 2010) soil was continually removed, loaded into dump trucks, and transported to CEMEX soil facility in Everett, WA.

After the initial impacted areas were dug out, sampled, and analyzed and after analysis was received from the project laboratory, additional soil was removed on May 18, 2010. The main area of concern at that time was diesel-impacted soil in and around the southern concrete canopy footing. A fuel dispenser had been located north of this footing and if the dispenser or product lines associated with this dispenser leaked and the sump failed, it is likely that the leaking product would come into contact with this concrete footing and migrate downward along the footing. The bottom of the footing was approximately 9 -10 feet below ground level. The footing was removed and properly disposed of (see Appendix D) and soil was continually excavated in and around this area until confirmational soil sampling was completed.

For the purpose of this report the "Site" is divided into the following four areas. Please refer to the figures in Appendix A to see area locations.

- Area A: the northern portion of the "Site"
- Area B: the western portion of the "Site"
- Area C: the south-central portion of the "Site" (this is where most of the impacted soil was removed surrounding a large concrete canopy footing)
- Area D: the southeast portion of the "Site".

3.4 Hydrocarbon Testing

Soil samples were collected for the analysis of both NWTPH-Dx, NWTPH-Gx and BTEX. However, the chromatograms generated from the NWTPH-Dx analysis indicated that no gasoline or BTEX was present, and therefore the samples were not analyzed for gasoline or BTEX. All EPA-established sample-handling protocols, including chain of custody procedures, were observed during the course of the project.

The following three tables document the soil sampling and analysis. Refer to the figures located in Appendix A for additional data and sample locations.

	Table A
Soil Samples	Collected on 4/27/2010 - Analytical Results

SAMPLE #	SAMPLE LOCATION Refer to drawings located in Appendix A. Discrete samples unless otherwise noted	ANALYSIS	RESULTS In parts per million (ppm) unless noted					
42710-01	Area A: composite sample along northwest corner of excavation area, 1.5 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
42710-02	Area A: 2-3 ft southwest of sample # 01, 2 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oll < 250					
42710-03	Area A: composite sample along the northeast corner of the excavated area, 2 ft bgl	NWTPH-Dx	Diesel 1,300 Heavy oil 4,500					
42710-04	Area A: south of sample # 03, 3.5 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
42710-05	Area B: 5 ft east of the western edge of the area, 7 ft bgl. East of sample #-06	NWTPH-Dx	Diesel 1,700 Heavy oil <250					
42710-06	Area B: sidewall sample 3 ft bgl. On the western edge of the site area	NWTPH-Dx	Diesel 3,200 Heavy oil < 250					
Stock 1	Area A: composite stockpiled soils generated during excavation activities from samples 01, 02, 03, and 04	NWTPH-Dx	Diesel 1,200 Heavy oil <250					
Stock 2	Area B: composite stockpiled soils generated during excavation activities from samples 05 and 06	NWTPH-Dx	Diesel 3,700 Heavy oil < 250					

 NWTPH
 =
 Washington Total Petroleum Hydrocarbon

 Dx
 =
 Hydrocarbon identification for diesel and motor oil range C10-C36

 None Detected
 =
 < 50 ppm (diesel range), < 250 ppm (motor oil range)</td>

 bgl
 =
 below ground level

 MTCA Cleanup for Diesel and Heavy Oil is 2000 ppm

SAMPLE #	SAMPLE LOCATION Refer to drawings located in Appendix A. Discrete samples unless otherwise noted	ANALYSIS	RESULTS in parts per million (ppm) unless noted					
42810-07	Area C: below concrete canopy footing, 9 ft bgl	NWTPH-Dx	Diesel 90 Heavy oil < 250					
42810-08	Area D: composite sidewall sample, 2 ft bgl, after minor excavation	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
42810-09	Area C: below canopy footing, 13 ft bgl	NWTPH-Dx	Diesel 4,400 Heavy oil < 250					
42810-10	Area C: north sidewall	NWTPH-Dx	Diesel 400 Heavy oil < 250					
42810-11	Area C: west sidewall, 12 ft bgl	NWTPH-Dx	Diesel 750 Heavy oil < 250					
42810-12	Area C: east sidewall, 12 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
42810-13	Area C: south sidewall, 13 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
stock 3	Area C: composite sample of soil excavated from Area C	NWTPH-Dx	Diesel 320 Heavy oil 590					
42810-14	Area C: bottom of excavation- sidewall sample (eastern portion), 13 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
42810-15	Area B: south sidewall sample after excavation, 4 ft bgl.	NWTPH-Dx	Diesel < 50 Heavy oil < 250					

Table B Soil Samples Collected on 4/28/2010 - Analytical Results

NWTPH=Washington Total Petroleum HydrocarbonDx=Hydrocarbon Identification for diesel and motor oil range C10-C36None Detected=<50 ppm (diesel range), < 250 ppm (motor oil range)</td>bgl=below ground levelMTCA Cleanup for Diesel and Heavy Oil is 2000 ppm

T	ab	le	С		
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Final Confirmational Soil Samples Collected on 5/18/2010 - Analytical Results

SAMPLE #	SAMPLE LOCATION Refer to drawings located in Appendix A. Discrete samples unless otherwise noted	ANALYSIS	RESULTS in parts per million (ppm) unless noted					
51810-16	Area C: bottom of excavation, 17 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
51810-17	Area C: west sidewall of excavation, 14 ft bgl	NWTPH-Dx	Diesel 500 Heavy oil < 250					
51810-18	Area C: south sidewall of excavation, 13 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
51810-19	Area C: east sidewall of excavation, 14 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
51810-20	Area C: bottom of excavation- sidewall sample on southeast corner of excavation, 14 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
51810-21	Area C: north sidewall of excavation, 14 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
51810-22	Area D: sidewall sample on southeast side excavation, 2 ft bgl, after over-excavation of stained area	NWTPH-Dx	Diesel 96 Heavy oil 400					
51810-23	Area B: west sidewall sample of Area B after over-excavation, 7 ft bgl	NWTPH-Dx	Diesel < 50 Heavy oil < 250					
51810-24	Area A: material under asphalt on north side of Area A, after over- excavation	NWTPH-Dx	Diesel 190 Heavy oil 470					
51810-25	Area A: material under sample #24 on north side of Area A, after over-excavation	NWTPH-Dx	Diesel 2700 * Heavy oil 5600 *					
51810-26	Area A: material under sample #25 on north side of Area A, after over-excavation	NWTPH-Dx	Diesel < 50 Heavy oil < 250					

 NWTPH
 =
 Washington Total Petroleum Hydrocarbon

 Dx
 =
 Hydrocarbon identification for diesel and motor oil range C10-C36

 None Detected
 =
 < 50 ppm (diesel range), < 250 ppm (motor oil range)</td>

 bgl
 =
 below ground level

 MTCA Cleanup for Diesel and Heavy Oll is 2000 ppm

* A duplicate sample of this material was collected and analyzed by PGG and found to be below cleanup levels (Appendix G).

4.0 CONCLUSIONS

Based on laboratory analysis of the soil samples collected during this project, diesel and heavy oil impacted soil associated with the James Oil Company - Pacific Pride Fueling Facility "Site" has been removed and properly disposed of. Specifically the "Site" is identified as the approximate ½ acre area in the center of property currently owned by Estate of Wayne A Hill. And, the Estate's property is identified as a 3.39 acre parcel located at 903 W. 1st Street in Cle Elum, Washington. According to the Kittitas County Assessors office, the parcel number for the Hill property is #263835 and is described as being in the Northeast 1/4, Southwest 1/4, Section 27, Township 20 North, Range 15 East.

The following materials were removed from the "Site":

- Diesel-impacted soil: 1066.97 tons of diesel-impacted soil were disposed of at CEMEX soil remediation facility located in Everett, Washington. This included soil cuttings from previous studies that had been stored in 55-gallon steel drums. Once the soil from the drums was removed, the drums were disposed of at ICS-WA located in Seattle, Washington. NOTE: The impacted soil contained both Diesel and Heavy oil range hydrocarbons.
- Diesel- impacted concrete: One diesel-impacted concrete footing was disposed of at the Kittitas solid waste facility in Ellensburg, Washington.
- Non-impacted concrete: Concrete from the concrete pad located at the "Site" was disposed of at the Kittitas solid waste facility in Ellensburg, Washington.
- PVC product lines and miscellaneous construction debris associated with the fueling system were either removed and taken to the local dump or re-used by Jeff James at another fueling facility.

Stained concrete and soil noted in previous WSI reports have been excavated and impacted soils and impacted concrete have been removed and properly disposed. Any stained soil or concrete outside of the "Site" area is beyond the scope of, and exempt from, this study and report.

5.0 RECOMMENDATIONS

Based on the conclusions that all of the hydrocarbon impacted soil associated with the James Oil Company / Estate of Wayne A. Hill - Pacific Pride Fueling Facility "Site" as identified in this report has been removed and no recommendations will be made at this time.

6.0 LIMITATIONS

This report has been prepared for specific application to this project in a manner consistent with the level of care and skill normally exercised by members of the environmental science profession currently practicing under similar conditions in the area. DLH Environmental Consulting shall not be responsible for conditions or consequences arising from relevant facts that were withheld, concealed, or not fully disclosed at the time this evaluation was performed.

Recommendations and conclusions contained in this report are based on the evaluation of technical information made available and reviewed during the course of this survey.

The findings, conclusions and recommendations stated in this report apply exclusively to the "Site" formerly leased by James Oil Company as indicated in the report and no

James Oil Company / Estate of Wayne A. Hill	July 29, 2010
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other areas of the Estate's property. This report in no way confirms that the Estate's property surrounding the "Site" is free of contamination. This report is solely based on field observations, soil sample collection, and analysis of the soil collected. Since the "Site" was a leased portion of a larger piece of property, this report in no way can be used for any other portions of the Estate of Wayne A Hill property. No other warranty, expressed or implied, is made concerning the professional conclusions or recommendations, except as specifically noted in this report.

DLH Environmental Consulting has no control over the accuracy of information provided by outside consultants, contractors, and agencies and, therefore, disclaims responsibility for any inaccuracies incurred. The underlying philosophy in formulating the conclusions and recommendations was to reduce uncertainties regarding the property and pertaining to environmental hazards, to the degree possible. Therefore, the results of this assessment should be viewed as reasonably accurate estimates, given the project limitations of the existing environmental condition of the property.

This report is for the exclusive use of James Oil Company, the Estate of Wayne A. Hill and their representatives and the Washington State Department of Ecology (WDOE) as necessary. If new information becomes available as a result of future site work, which may include excavations, borings, studies, etc., DLH Environmental Consulting reserves the right to reevaluate the conclusions of this report and to provide amendments as required. This report covers the soil removal activities that took place in April and May 2010.

APPENDIX A

SITE MAP

SITE FIGURES

SITE PHOTOGRAPHS















Site facing east Sphalt removal along north border of tank pump area

V

Facing west, asphalt removal

















Facing north, concrete canopy footing removed (upper right)

Overexcavation along southeast corner concrete footing excavation to the right

Concrete footing excavation placement of physiciar to temporary backful

APPENDIX B LABORATORY REPORTS CHROMATOGRAMS CHAIN OF CUSTODY FORMS

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

May 4, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included are the results from the testing of material submitted on April 27, 2010 from the James Oil, F&BI 004289 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 have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0504R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on April 27, 2010 by Friedman & Bruya, Inc. from the DLH Environmental Consulting James Oil, F&BI 004289 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	DLH Environmental Consulting
004289-01	42710-01
004289-02	42710-02
004289-03	42710-03
004289-04	42710-04
004289-05	42710-05
004289-06	42710-06
004289-07	Stock1
004289-08	Stock2

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/27/10 Project: James Oil, F&BI 004289 Date Extracted: 04/28/10 Date Analyzed: 04/28/10 and 04/29/10

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)

Sample ID	Diesel Range	Motor Oil Range	Surrogate (% Recovery)
Laboratory ID	(C10-C25)	(C25-C36)	(Limit 50-150)
42710-01 004289-01	<50	<250	92
42710-02 004289-02	<50	<250	84
42710-03 004289-03	1,300 x	4,500	94
42710-04 004289-04	<50	<250	92
42710-05 004289-05	1,700	<250	88
42710-06 004289-06	3,200	<250	91
Stock1 004289-07	1,200	<250	93
Stock2 004289-08	3,700	<250	86
Method Blank 00-0626 MB	<50	<250	86

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/27/10 Project: James Oil, F&BI 004289

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

Laboratory Code:	004303-06 (Matr	ix Spike)					
Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	101	94	63-146	7
Laboratory Code:	Laboratory Cont	rol Samp	le Percent				
Analyte	Reporting Units	Spike Level	Recovery LCS	Acceptan Criteria			
Diesel Extended	mg/kg (ppm)	5,000	93	79-144			

3

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.

 $\operatorname{pr}-\operatorname{The}$ 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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Company DLH environmental Consulting Address 2400 NW 80 14 St Pmb #114				PROJECT NAME/NO. PO # James Oil								Standard (2 Weeks) RUSH Rush charges authorized by:					<i>r</i> :						
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Sample ID	Lab ID	Date	Time	Sam	ple Type	# of containers	TPH-Diesel	TPH-Gasoline	BTEX by 8021B	VOCs by 8260	SVOCs by 8270	HFS							Notes				
42710-01	OLA.E	7/27/10	1:41	Soil		5		<										Side to the Mon		51			
1. 02	OA A-E	1	1:49			1	Y														COMPOS	14@1.	61
03	03A-G		1:54				X											Compa	Wall No	•51			
- 04	OY A.E		2:20				X		12	2								2.5'					
05	05 A.E		2:54		-		X						1					7'					
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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

May 6, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included is the amended report from the testing of material submitted on April 27, 2010 from the James Oil, F&BI 004289 project. The sample chromatograms have been included, and the case narrative updated.

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

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0504R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

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004289-02	42710-02			
004289-03	42710-03			
004289-04	42710-04			
004289-05	42710-05			
004289-06	42710-06			
004289-07	Stock1			
004289-08	Stock2			

No gasoline was seen in the diesel chromatograms. Per the chain of custody, the samples were not analyzed for NWTPH-Gx/8021B.

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/27/10 Project: James Oil, F&BI 004289 Date Extracted: 04/28/10 Date Analyzed: 04/28/10 and 04/29/10

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Results Reported as mg/kg (ppm)

Sample ID	Diesel Range	Motor Oil Range	Surrogate (% Recovery)
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42710-02 004289-02	<50	<250	84
42710-03 004289-03	1,300 x	4,500	94
42710-04 004289-04	<50	<250	92
42710-05 004289-05	1,700	<250	88
42710-06 004289-06	3,200	<250	91
Stock1 004289-07	1,200	<250	93
Stock2 004289-08	3,700	<250	86
Method Blank 00-0626 MB	<50	<250	86

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/27/10 Project: James Oil, F&BI 004289

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

Laboratory Code:	004303-06 (Matr	ix Spike)	(Wet wt)	Percent	Percent		
Analyte	Reporting Units	Spike Level	Sample Result	Recovery MS	Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	101	94	63-146	7
Laboratory Code:	Laboratory Cont	rol Sampl	le Percent		,		
Analyte	Reporting Units	Spike Level	Recovery LCS	Acceptanc Criteria			
Diesel Extended	mg/kg (ppm)	5,000	93	79-144			

3

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

May 18, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included is the amended report from the testing of material submitted on April 27, 2010 from the James Oil, F&BI 004289 project. Per your request, the qualifier on the diesel detection of sample 42710-03 was further explained in the case narrative.

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

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0504R.DOC

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

May 4, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included are the results from the testing of material submitted on April 27, 2010 from the James Oil, F&BI 004289 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 have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0504R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on April 27, 2010 by Friedman & Bruya, Inc. from the DLH Environmental Consulting James Oil, F&BI 004289 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	DLH Environmental Consulting
004289-01	42710-01
004289-02	42710-02
004289-03	42710-03
004289-04	42710-04
004289-05	42710-05
004289-06	42710-06
004289-07	Stock1
004289-08	Stock2

No gasoline was seen in the diesel chromatograms. Per the chain of custody, the samples were not analyzed for NWTPH-Gx/8021B.

The diesel result in sample 42710-03 is due to carryover from motor oil range material.

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/27/10 Project: James Oil, F&BI 004289 Date Extracted: 04/28/10 Date Analyzed: 04/28/10 and 04/29/10

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	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate (% Recovery) (Limit 50-150)
42710-01 004289-01	<50	<250	92
42710-02 004289-02	<50	<250	84
42710-03 004289-03	1,300 x	4,500	94
42710-04 004289-04	<50	<250	92
42710-05 004289-05	1,700	<250	88
42710-06 004289-06	3,200	<250	91
Stock1 004289-07	1,200	<250	93
Stock2 004289-08	3,700	<250	86
Method Blank 00-0626 MB	<50	<250	86

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/27/10 Project: James Oil, F&BI 004289

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

Laboratory Code:	004303-06 (Matr	ix Spike)					
Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	101	94	63-146	7
Laboratory Code:	Laboratory Cont	rol Sampl					
Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptanc Criteria	e		
Diesel Extended	mg/kg (ppm)	5,000	93	79-144			

3

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.

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

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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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1-	rt To		Address AND NW	City, State, ZIP Su Hle,	Phone # 206-632-3133 Fax #_		Sample ID	42710-01	, 02	M C	04	50	V ce	Stock /	Stock2		Friedman & Bruya, Inc.	3012 16th Avenue West	Seattle, WA 98119-	Ph. (206) 285-8282	Fax (206) 283-5044

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

May 4, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included are the results from the testing of material submitted on April 28, 2010 from the James Oil, F&BI 004308 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 have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0504R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on April 28, 2010 by Friedman & Bruya, Inc. from the DLH Environmental Consulting James Oil, F&BI 004308 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	DLH Environmental Consulting
004308-01	42810-07
004308-02	42810-08
004308-03	42810-09
004308-04	42810-10
004308-05	42810-11
004308-06	42810-12
004308-07	42810-13
004308-08	42810-14
004308-09	42810-15
004308-10	Stock 3

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/28/10 Project: James Oil, F&BI 004308 Date Extracted: 04/29/10 Date Analyzed: 04/29/10

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)

Sumorato

<u>Sample ID</u> Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate (<u>% Recovery</u>) (Limit 50-150)
42810-07 004308-01	90	<250	99
42810-08 004308-02	<50	<250	99
42810-09 004308-03	4,400	<250	91
42810-10 004308-04	400	<250	88
42810-11 004308-05	750	<250	91
42810-12 004308-06	<50	<250	97
42810-13 004308-07	<50	<250	91
Stock 3 004308-10	320	590	92
Method Blank 00-0629 MB	<50	<250	88

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/28/10 Project: James Oil, F&BI 004308 Date Extracted: 04/29/10 Date Analyzed: 04/29/10

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx Sample Extracts Passed Through a Silica Gel Column Prior to Analysis Results Reported on a Dry Weight Basis Results Reported as mg/kg (ppm)

C.

<u>Sample ID</u> Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate (<u>% Recovery</u>) (Limit 50-150)
42810-14 004308-08	<50	<250	87
42810-15 004308-09	<50	<250	89
Method Blank 00-0629 MB	<50	<250	84

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/28/10 Project: James Oil, F&BI 004308

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

Laboratory Code:	004308-08 (Matri	x Spike)					
Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	110	98	73-135	12
Laboratory Code:	Laboratory Contr	ol Sampl	e				
			Percent				
Analyte	Reporting Units	Spike Level	Recovery LCS	7 Accepta Criter			
Diesel Extended	mg/kg (ppm)	5,000	96	74-13	39		

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/28/10 Project: James Oil, F&BI 004308

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

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	99	96	73-135	3
Laboratory Code:	Laboratory Contr	ol Sampl	e Silica Gel Percent				
Analyte	Reporting Units	Spike Level	Recovery LCS	Accepta Criter			
Diesel Extended	mg/kg (ppm)	5,000	94	74-13			

ENVIRONMENTAL CHEMISTS

Data Qualifiers & Definitions

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

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

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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

May 6, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included is the amended report from the testing of material submitted on April 28, 2010 from the James Oil, F&BI 004308 project. The sample chromatograms have been included, and the case narrative updated.

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

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0504R.DOC

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

May 4, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included are the results from the testing of material submitted on April 28, 2010 from the James Oil, F&BI 004308 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 have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0504R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on April 28, 2010 by Friedman & Bruya, Inc. from the DLH Environmental Consulting James Oil, F&BI 004308 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	DLH Environmental Consulting
004308-01	42810-07
004308-02	42810-08
004308-03	42810-09
004308-04	42810-10
004308-05	42810-11
004308-06	42810-12
004308-07	42810-13
004308-08	42810-14
004308-09	42810-15
004308-10	Stock 3

No gasoline was seen in the diesel chromatograms. Per the chain of custody, the samples were not analyzed for NWTPH-Gx/8021B.

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/28/10 Project: James Oil, F&BI 004308 Date Extracted: 04/29/10 Date Analyzed: 04/29/10

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)

Sample ID Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
42810-07 004308-01	90	<250	99
42810-08 004308-02	<50	<250	99
42810-09 004308-03	4,400	<250	91
42810-10 004308-04	400	<250	88
42810-11 004308-05	750	<250	91
42810-12 004308-06	<50	<250	97
42810-13 004308-07	<50	<250	91
Stock 3 004308-10	320	590	92
Method Blank 00-0629 MB	<50	<250	88

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/28/10 Project: James Oil, F&BI 004308 Date Extracted: 04/29/10 Date Analyzed: 04/29/10

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx Sample Extracts Passed Through a Silica Gel Column Prior to Analysis Results Reported on a Dry Weight Basis Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
42810-14 004308-08	<50	<250	87
42810-15 004308-09	<50	<250	89
Method Blank 00-0629 MB	<50	<250	84

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/28/10 Project: James Oil, F&BI 004308

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

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)	
Diesel Extended	mg/kg (ppm)	5,000	<50	110	98	73-135	12	
Laboratory Code:	Laboratory Contr	ol Sampl	e Percent					
Analyte	Reporting Units	Spike Level	Recovery LCS	Accepta Crite				
Diesel Extended	mg/kg (ppm)	5,000	96	74-13	39			

ENVIRONMENTAL CHEMISTS

Date of Report: 05/04/10 Date Received: 04/28/10 Project: James Oil, F&BI 004308

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

Laboratory Code:	004308-08 (Matri	x Spike)	Silica Gel (Wet wt)	Percent	Percent		
Analyte	Reporting Units	Spike Level	Sample Result	Recovery MS	Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	99	96	73-135	3
Laboratory Code: 1	Laboratory Contr	ol Sampl	e Silica Gel Percent				
Analyte	Reporting Units	Spike Level	Recovery LCS	Accepta Crite			
Diesel Extended	mg/kg (ppm)	5,000	94	74-13	39		

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

May 13, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included are the results from the testing of material submitted on April 28, 2010 from the James Oil, F&BI 004307 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 have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0513R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on April 28, 2010 by Friedman & Bruya, Inc. from the DLH Environmental Consulting James Oil, F&BI 004307 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID 004307-01 004307-02 004307-03 DLH Environmental Consulting DUP-042810-pgg03 DUP-042810-pgg04 DUP-042810-pgg05

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/13/10 Date Received: 04/28/10 Project: James Oil, F&BI 004307 Date Extracted: 05/10/10 Date Analyzed: 05/11/10

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)

Comment

Sample ID Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate (% Recovery) (Limit 50-150)
DUP-042810-pgg03 004307-01	130	310	90
DUP-042810-pgg04 004307-02	240 x	1,400	100
DUP-042810-pgg05 004307-03	500	<250	93
Method Blank 00-681 MB	<50	<250	91

ENVIRONMENTAL CHEMISTS

Date of Report: 05/13/10 Date Received: 04/28/10 Project: James Oil, F&BI 004307

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

Laboratory Code:	005060-03 (Matri	x Spike)						
Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)	
Diesel Extended	mg/kg (ppm)	5,000	<50	94	96	73-135	2	
Laboratory Code:	Laboratory Contr	ol Sampl	le					
			Percent	t				
	Reporting	Spike	Recover	y Accepta	ance			
Analyte	Units	Level	LCS	Crite				
Diesel Extended	mg/kg (ppm)	5,000	96	74-13	39			

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.

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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

May 24, 2010

Donna Hewitt, Project Manager DLH Environmental Consulting 2400 NW 80th St., 114 Seattle, WA 98117-4449

Dear Ms. Hewitt:

Included are the results from the testing of material submitted on May 18, 2010 from the James Oil, F&BI 005157 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 have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl Project Manager

Enclosures DLH0524R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on May 18, 2010 by Friedman & Bruya, Inc. from the DLH Environmental Consulting James Oil, F&BI 005157 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	DLH Environmental Consulting
005157-01	51810-16
005157-02	51810-17
005157-03	51810-18
005157-04	51810-19
005157-05	51810-20
005157-06	51810-21
005157-07	51810-22
005157-08	51810-23
005157-09	51810-24
005157-10	51810-25
005157-11	51810-26

No gasoline was seen in the diesel chromatograms. Per the chain of custody, the samples were not analyzed for NWTPH-Gx/8021B.

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/24/10 Date Received: 05/18/10 Project: James Oil, F&BI 005157 Date Extracted: 05/19/10 Date Analyzed: 05/19/10 and 05/20/10

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)

Sample ID Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
51810-16 005157-01	<50	<250	89
51810-17 005157-02	500	<250	91
51810-18 005157-03	<50	<250	96
51810-19 005157-04	<50	<250	92
51810-20 005157-05	<50	<250	92
51810-21 005157-06	<50	<250	92
51810-22 005157-07	96 x	400	92
51810-23 005157-08	<50	<250	92
51810-24 005157-09	190 x	470	90
51810-25 005157-10	2,700 x	5,600	93
51810-26 005157-11	<50	<250	85
Method Blank 00-0766 MB	<50	<250	89

ENVIRONMENTAL CHEMISTS

Date of Report: 05/24/10 Date Received: 05/18/10 Project: James Oil, F&BI 005157

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

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	100	99	63-146	1
Laboratory Code:	Laboratory Contr	rol Sampl	e Percent				
Analyte	Reporting Units	Spike Level	Recovery LCS	Acceptan Criteria			
Diesel Extended	mg/kg (ppm)	5,000	99	79-144			

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.

 $\rm pc-The\ sample\ was\ received\ in\ a\ container\ not\ approved\ by\ the\ method.$ 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.























Send Report To DDMA KWH Company DLH ENVIYONMENAL CONSULTING Address 3400 NW 80th St PHIB ALLY City, State, ZIP Seq HU, WH, 98117 City, State, ZIP Seq HU, WH, 98117 Phone # 206 632 - 3123 Baren allhenvironment. Phone # 206 632 - 3123 Baren allhenvironment. Sample ID Lab ID Date Time 51810 - 16 01 5/16/0 51810 - 17 02 17 02 18/10 20 91 1723	Lewitt SAMPLERS SAMPLERS SAMPLERS IN PROJECT N 134 PMB 4114 W14, 98117 REMARKS Community REMARKS Community REMARKS Commun	1 Ime	SAMPLERS Signatures PROJECT NAMERYOO. Ta Wea REMARKS Near 10 REMARKS Near 10 Apol - Countain 10 Sample Type contain			Chronaldgram			# Od	Ruyh o	TURNAROUND TIME TURNAROUND TIME Standard (2 Weeks) A Bush charges authorized by: SAMPLE DISPOSAL Dispose after 30 days Return samples	of D TIME
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Company DLH ENVIYONNWING (CONSULTING Address 2400 NW 8074 St PMB #114 City, State, ZIP Seq HU, W14, 98117 City, State, ZIP Seq HU, W14, 98117 Phone # 206 652-3123 Baset AllhENVIRONNWILL Sample ID Lab ID Date Time Time Sample ID Lab ID Date Time 3151	tutury tury t Time J:55	N 2 7 2	ners R. CD	A C C S S S S S S S S S S S S S S S S S	AOC ² P ^A 8560	grad	PO#	Rush chan	Rush charges authorized by: SAMPLE DISPOSA Chierone after 30 days	by:
City, State, ZIP Sea HL, WH, GY117 REMARKS Phone # 20 b: b52 - 3123 Rever allo environment. Com Sample ID Lab ID Date Time Sample Type 51 & 10 - 20 & 11 & 5/18/0 & 0:55 & Soil	Time Time	X8		A 2 S S S S S S S S S S S S S S S S S S	VOCs by 8260	gra	1	Disno	SAMPLE DISPO	
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Seattle, WA 98119-2029 Received by: Ph. (206) 285-8282 Relinquished by:	J	Mic	hard Enda	71		-	4 Km		S/14/20	
	-	-				+	S. mnles received at d	receive		2

APPENDIX C

SOIL DISPOSAL DATA

DLH ENVIRONMENTAL CONSULTING SEATTLE, WASHINGTON 206-632-3123

Delivery Ticket(s)

Delivery Ticket Request: 8045979645

Location: 1876	MES OIL COMPANY INC	18/6 Qty: 37.3	50481	155
	RETT WA 98213	LE G 113.940 T 39,240 N 74,700	17.80 33.88 Itermined Tan	TON 56.97 19.62 37.35
Carrier: Achicle: 2251255 KS17 Received:	HKAS HERR		CHARGE API	1.18 pm

You are viewing ticket #1 of 4 ticket(s) on-line. If you require further delivery information, please contact your CEMEX representative.

Delivery Ticket Request: 8045979647

Total impacted Sail Total 97 Tows 1066.97

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De	livery	110	ket	(S)	

Page	2	of 3
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Location: Customer:	1876 3148668	JAMES OIL COMPANY INC	_	Qty: 36.6	8 0	5/18/2010
TO EVERE Job# : P.O. :	PACIFIC PR		G T N	LB 113,900 40,440 73,360 1M	18.34 33.28 anca Weight	TON 56.90 20.22 36.68
Product CLASS 3 St 113800	1192508 DIL DUMPED	BY TON		oday Loads. Xday Oty:		2.00 74 03
Carrier:	Desta on	KSB69T,K&S MCCANN	1	FUEL SUR	HARGE A	PPLIES
Vehicle: Received:	_//	A DECOV 1, INDEX 1994-C-MININ Pagebio on or balance the 150-bit sectority stimming by obta of passings. But in a pagebio on or balance the 150-bit sectority Strengt by obta of passings. But in a page of the sectority of particular to the sectority of the set as (pagebio of the sectority of the sectority of the set as many the sectority of the sectority of the set		nantainilly offer bush road Ion Comfare, Yally's Gad Nya Raya Raya garabada	IN OUT	2:40 pm 3:03 pm
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If you re	Yo quire further	bu are viewing ticket #2 of 4 ticked delivery information, please conta Delivery Ticket Request: 804	ct y	our CEME	X represen	tative.
-	Call	Remediation	4	876	0404	150

Location: Customer:	1876 3148668		OMPANY INC		Qty: 42.96	05	/18/2010
Order:		EVERETT	WA 98213		LB	NTON	TOM
	ST ST CLE E	UM .		G	125,480	56.92	62.74
TO EVERE	I SOILS			T	39,580	17.95	19,79
Job# : F.O. :	PACIFIC PI	DINE		N	85,900	38.96	42.95
Product	1192508	ALC .				ermined Tar	and the second second
ILASE 3 SA	oil Dumpeo	BY TON			iday Loads: Xaay Oty:		3 00 118 98
Carrier. Vehicle:	2251181	KS235LKaSING	CANN		FUEL SURCH	ARGE AP	PLIES
Received:	_ /	Vale	A	-	_	IN OLT	4,12 pm

You are viewing ticket #3 of 4 ticket(s) on-line.

If you require further delivery information, please contact your CEMEX representative.

	MEX Ev	il Remediation erett, WA 98213			1876	048	160
Location: Customer:	1876 3148668	JAMES OIL CON	PANYINC	_	Qty: 39.08	06	18/2010
Order:	ST ST CLE EL	EVERETT	WA 96213	1	LB	Mildu	TON
TO EVERET		UN		G	119,200	54.07	59.60
	IT SUILS			T	41,040	18.62	20.52
lob#:				N	78,160	35.45	39 08
2.G. 1	PACIFIC PI			-		temined Ta	
Product	1192508 DIL DUMPED	DV TOL		-			
LAGE 0 SI					day Loads:		4 00
			_		iday Qiy:		156 06
Carrier:				5	FUEL SURCI	HARGE AF	PLIES
/ehicle:	2251224	KS215T KAS MCCA	INN	-			
Received:	the	STRON	AND			IN	4.42 pm
(), merpegife gracifies that frances has gracifies there to make the prints of your sealing the calific	phile publics service all y man chan on allerary 8 class encorporation from William, Ad. A 3105 Add. Frank Article William Art State and Article William Art State and Article	ni provinio se na kolimariti na 13 ku al iku ramatu (na kapra konzena: Duyarita pranovanje terrendeti (na Lanvery Tamar (Tuyanatari) – Scalar od pr n provinstva apreze ka may aranterilarna odbo	Honory Via dalla of puckhasa Shok add ovell Population, Yong, Store S Samana Man via Samana Irina and Condense Par Agenerati	Tanto e Later rei	na Condition, Solar 3 Galler Jahr Condition, Solar 3 Galler Jahr Condition, Solar 3 Galler	and way she up, a name at it are, and Sales 's Or an informate inter-south	nder lender, mierte me Gesennen: 2 von verse, al
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If you require further delivery information, please contact your CEMEX representative.

Delivery Ticket(s)

Page 1 of 1

Denter I Indict Request. 004077004.	Deliverv	Ticket	Request:	8045995525
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		mediation t, WA 98213		•	1876	048	162
Location: Customer:		AMES OIL COM			Qty: 30.12	05	/19/2010
Order:	and a second second	ERETT	WA 98213		LB	WTan	TON
	T ST CLE ELUM			3	100.900	45 77	50.45
TOEVERET	ISULS			T	40,660	18.44	20.33
Job#:	PACIFIC PRIDE		-	N	60,240	27 32	30.12
P.O. : Product:	1192508					wal Weight	
	L DUMPED BY	TON:		Te	day Loads.		2.00
AFTER HOU	RS DUMP 05.18	20.			iday Oty:		57 83
Carrier.				-			5) (FF
Vehicle:	2251253 KS2	OTT KAS MCCAP	IN		FUEL SURCH	IARGE AP	PLIES
Received:	AGAL	WS h	imp 3/	8	12210	IN OUT	7.47 am
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Original		E REVERSE SID					

If you require further delivery information, please contact your CEMEX representative.

Delivery Ticket(s)

	Soil Remediation Everett, WA 98213	18760	0479	967
Location: 1876 Customer: 3146	5668 JAMES OIL COMPANY INC	Qty: 36.89	04	/28/2010
Order: 100 NORTH OAKS TO EVERETT SOI Job# :		LB G 114.700 I 40,920 N 73.780	MTen 52.03 18.56 33.47	TON 57 35 20.46 36.89
P.O.: PAC Product: 1192		, Litedet	ermined Tar	re .
	CIL DUMPED BY TON	Today Leads Today Qty:		1 CO 36.89
Carrier:	1182 KS369T.K&S MOCANN	FUEL SURCH	ARGE AP	PLIES
Vehicle: 2251 Received:	FULL MA		IN OUT	7.11 am
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Original If you require (CEMEX Ocation: 1876 Sustomer: 31486 Order: 00 NORTH OAKS O EVERETT SOIL ob# : 2.0.: PAC (Product: 11925	SEE REVERSE SIDE FOR PRODU You are viewing ticket #1 of 5 tick further delivery information, please cont Delivery Ticket Request: 804 Soil Remediation Everett, WA 98213 368 JAMES OIL COMPANY INC EVERETT WA 98213 AVE CLE EL S FIC PRIDE 508 DIL DUMPED BY TON	tet(s) on-line. act your CEME2 15752491 1876(Qty: 30.63 LB G 109,500 T 39,240 N 61.260 Predet 7 ct/ay Locas:	C represer 047 04 04 04 04 04 04 04 04 04 04 04 04 04	968 1/28/2010 TCN 50.25 19 62 30.63 TP 2 00 67.52

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Page 1 of 4

You are viewing ticket #2 of 5 ticket(s) on-line.

If you require further delivery information, please contact your CEMEX representative.

De	livery	Ticket	Request:	804575250	ſ
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	MEX EV	il Remediation erett, WA 9821			1876	0479	970
Location: Customer.	1876 3148668	JAMES OIL CO	OMPANY INC		Qty: 26.83	0	1/28/2010
Order:		EVERETT	WA 90	213	LB	MTon	TOM
100 NORTH	CAKS AVE	CLE EL		6	92,100	41.78	46.05
TO EVEREN	TSOILS			G	38,440	17,44	19 22
Job# :						24 34	26.83
P.O. :	FAC FIC PI	RIDE		N	53,660	nual Weight	
Product	1192508				Ma	unsi angilin	
SERV,CI.45	S 3 SOIL DL	IMPED BY TON		T	aday Loads:		3 00
STEVE FOR	D 35			Te	oday Qty:		94.35
Carner:				-	FUEL SURC	HARGE AF	PLIES
Vehicle:	2034263	1876-1.EVERETT	SOIL GENERI				
Received:	4	KEVE-	K	1		IN	7.13 am
And more adapted as	A R.L. OR ATTORNOOD STOCK IN A R.L. OR ATTORNOOD IN A STOCK IN A STATE OF A STATE OF A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE OF A STATE OF A STATE OF A STATE A STATE OF A STATE A STATE OF A STATE	na parenta en veze pro ter 1640 pri d'anno un les natures d'arres à promoté d'adant des Frances I seus d'Arresterard à Salar et a capacitation que de la part en activitation	rith redoverse the cash or suscham and Gooth multicators, a tare, Suit di accurate per Changes Tarata ut di accurate per Changes Tarata ut di accurate per Changes Tarata ut	Bow seconds of ra Second force- o Createry upp in	teeradally adar losis rearran ala Conditore, Baller's Cardad angel Payes operation, con	OUT	7,29 am Inder Inster oberts Inter Commission Internation
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If you require further delivery information, please contact your CEMEX representative.

Delivery Ticket Request: 8045752721

Location: Customer:	1876 3148668	JAMES OIL COMPANY INC	Qty: 33.3	1 04	/28/2010
TO EVERE Joh# : P.O. : Preduct:	PAC FIC 9 1192508		G 107,600 T 40,920 M 66,680	аттол 48.81 18.56 30.25 etermined Ta	тон 53.80 20.46 33.34 ле 4.00 127.69
Carrier: Vehicle: Received:	2251182	KESSERT, KS,S MCCANN	FUEL SUR	CHARGE AF	'FLIE5 1.16 pm
Original	nali, ankaj escrendo pra deg Interpri Estat encorporato h mitera), kaj a Aufa suk contento alteraren en enfectioni una fu	SEE REVERSE SIDE FOR PRODU		OUT RMATION	1. TCJ (2711) mitratikovskie, statu at. napr Carringvalice e roznik herceit, si
If you re		You are viewing ticket #4 of 5 ticker er delivery information, please con Delivery Ticket Request: 80	tact your CEME	X represen	tative.
		oil Remediation		6047	076

Location: Customer:	1876 3148668	JAMES OIL C				Ny: 27.68	04	L/2B/2010
Order:		EVERETT	WA	98213		LB	WIGD	TON
100 NORTH		CLE EL			a	94,600	42.91	47.30
TO EVERET	TSOILS				1	39,240	17.60	19.62
Jab# :					M	55 360	25 11	27.68
P.O. :	PAC FIC P	RIDE			- NO	the data the free of	20 11 termined Ta	
Product.	119?508				-	Prede		10
SERV, CLAS	S 3 SOIL DI	INDED BY TON			To	day Loads		5.00
					To	day Qty:		155 37
Carrier: Vehicle:	2251255	K8171T, K85 MG	RANN		L	FUEL SURC	HARGE AP	PLIES
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If you require further delivery information, please contact your CEMEX representative.

Delivery Ticket(s)

Delivery Ticket Request: 8045768203

Location: Customer:	1876 3148668	JAMES OIL COMPANY INC		Qty: 15.76	04	/29/2010
Order. 100 NORTH TO EVERE Job# : P.O. : Product:	OAKS AVE IT SOILS PAC FIC PI 1192508	EVERETT WA 98213 CLE EL	G F N To	LB 59.280 27,760 31,520	MTon 26.89 12.59 14.30 wal Weight	TON 29.64 13.88 15.76 1.00 15.76
Carrier:	2251182	KS269T.K&S MCCANN	E	FUEL SURC	ARGE AP	PLIES
Vehicle: Received:	2231102	Kene				6:32 am

You are viewing ticket #1 of 3 ticket(s) on-line.

If you require further delivery information, please contact your CEMEX representative.

Delivery Ticket Request: 8045768206

Delivery Ticket(s)

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Page	2	OI	.5
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	COLUMN ADDRESS TO	oil Remediation verett, WA 98213		1876	047	978
Location: Customer:	1876 3148568	JAMES OIL COMPANY		Qty: 31.78	04	4/29/2010
Order: 100 NORTH TO EVERET Job# : P.O. : Product:		E CLE EL	A 98213 G T N	39,580 63,360	MT on 46.78 17.95 28.83 rual Weight	TON 51.57 19.79 31.78
		UMPED BY TON		'eday Leads: 'eday Qty:	L	2 00 47 54
Carrier: Vehicle:	2251181	KS235T, K&S MGCANN	F	FUEL SURCI	HARGE A	PLIES
Received:	1	Michel a	sall/		IN	7.15 am
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You are viewing ticket #3 of 3 ticket(s) on-line. If you require further delivery information, please contact your CEMEX representative.

APPENDIX D

CONCRETE AND DRUM DISPOSAL DATA

DLH ENVIRONMENTAL CONSULTING SEATTLE, WASHINGTON 206-632-3123

clean concrete

Spampede Sand and Gravel, LLC PO BOX 1691 .Woodinville, WA 96072 20

20-3659073 Fhone 509-656-3160

Site ID: 11 Scampede Sand and Gravel ReFrint of Ticket: 6659 Load: .1 HARDI Hardline Construction (HARDI) HARDI HARDLINE CONSTRUCTION Account: Vehicle: HARDI (Edited) CC Clein Concrete 19009 Clean Concrete From Material: JAMES OIL Joh: EO#: Grays 107,350 lb 53.78 tn K Tare 58,880 lb 34.44 tn K Gross 107,580 lb Date May 17, 10 14:19 38 NET 38,700 1b 19.95 th Rate . \$ 5.00/TN Minimus Charge \$ 86.75 Material \$ 20,00 \$ 0.06 Env Fee (0.00/un) MAIN ST CLE ELUM \$ 0.00 Env Pee (0.00 ea) \$ 7.74 Sales Tax (8.0%) -----

GRAND TOTAL

\$ 104.49

Due on Account Received By:

TO:9P6749585

Concrete footing disposal!

KITTITAS COUNTY SOLID WASTE 925 INDUSTRIAL WAY ELLENSBURG, WA 98926 (509) 962-7542

RECEIPT

-----Bill Acct:000666 HARDLINE CONSTRUCTION, LLC Haul Acct:000666 HARDLINE CONSTRUCTION, LLC

SITE:RY Ryeg DATE:05/11/10 TIME IN:12:14 TIME OUT:12:14 TRUCK:HAR01	ass Landfill TICKET#:3000978 ID IN:MLP ID OUT:MLP
PO:	

	LBS	TONS
GROSS :	00	0.00
TARE :	00	0.00
NET:	00	0.00

6.00

----MATERIAL: CDL - Ryegrass RATE: \$7.00/CY

VOL:

TIP FEE: 42.00 0.00 SPEC FEE: TAX FEE: 1.51 TOTAL FRE: \$43.51

SHANE

NOTE: Job-James Oil

****************** REPRINTED TICKET *******************



55 GAL. CLOSED TOP

10.8/0

Misc

UN>.9

Deheader

EMPTY CONTAINER **Receiving Record**

45345

	LLC nion St., Montebello, CA 90640 323-724-8507	Customer: Ja M	les Oil	DATE: <u>9 - 14 - 10</u>
640 Bas	, LLC (Denver) seline, Brighton, CO 80601 303-659-5095	Received From:		Driver:
2021 N	, LLC (SLC) . Redwood Rd., S.L.C., Utah 84116 801-322-3529	Address:		Ref. Doc.:
	, LLC st Avenue South, Seattle, WA 98108 206-763-2345	City: <u>Eman</u>	chaw, CeA	Inv./CM#:

EMPTY CONTAINER CERTIFICATION

I hereby certify that these containers are "Empty" as required in the California's Title 26, Div 22 Section 66261.7 and 40 CFR 261.7 hazardous material regulations, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49CFR 173.29 ("SEE REVERSE").

Date: =

Customer's Signature Without your signature, we cannot accept your drums.

55 GAL. OPEN TOP UN HB OT HB OTLL OT LB OTHER CT 30 GAL. OT 11 MISC. SM. SIZES POLY OT CT IBC 275 YEAR HEREIN 330 PARTS LIDS RINGS SCRAP CT OT A POLY 30 0,00 00 **Rejects/Returns** 3 **Total Drums**

Please Note: Although our driver has counted and described your containers, these containers will be rechecked at our plant. We will notify you of any changes.

Remarks:

Date: 5-14. 10 Driver's Signature:

Hend Ellel.

Trailer	Leave Customer	Arrive Plant
1		e 1
41		1.0

tomer
10

CUSTOMER

APPENDIX E

PREVIOUS REPORT WHITE SHIELD, INC. 8/22/2008

DLH ENVIRONMENTAL CONSULTING SEATTLE, WASHINGTON 206-632-3123

Soil Boring and Sampling Report

Pacific Pride Fueling Station

903 1ST Street West

Cle Elum, Washington 98922

August 22, 2008

Submitted To:

Renee Hill Trustee for Estate of Wayne A. Hill P. O. Box 368 Cle Elum, WA 98922

Prepared By:

White Shield, Inc. 1520 140th Ave. NE, Suite 100 Bellevue, WA 98005 425-641-7800 office 425-641-7734 fax Email: <u>wsib@whiteshield.com</u> http: <u>www.whiteshield.com</u>

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1.0 INTRODUCTION

White Shield, Inc. (WSI) has prepared this report for Renee Hill, the Trustee for the Estate of Wayne A Hill, to document activities that occurred during the drilling and sampling of five soil borings located at the Pacific Pride fueling facility located at 903 1st Street West, Cle Elum, Washington (Figure 1). The Estate leases a portion of the property to James Oil Company for use as a commercial fueling facility. The purpose of the investigation was to determine if the soil and groundwater have been impacted by petroleum hydrocarbons from spills and releases at the site.

2.0 SITE LOCATION AND BACKGROUND

According to the Kittitas County Assessor's Office, the site is approximately 3.39-acres in size, located at 903 1st Street West in Cle Elum, Kittitas County, Washington (Figure 1) and is owned by the Estate of Wayne A Hill. The Assessor's Office parcel number for the site is 263835. This address is described as being in the Northeast ¼, Southwest ¼, Section 27, Township 20 North, Range 15 east. The parcel is bordered on the south by the I-90 westbound access road, to the east by a Chevron fueling station, the Cle Elum City Cemetery to the north and a logging company equipment storage yard to the west.

James Oil Company currently leases approximately ½ acre of the parcel in the center of the parcel for the Pacific Pride commercial fueling facility. The leased portion of the site contains three fuel-dispensing islands with two associated satellite fuel nozzles under a canopy and two aboveground fuel storage tanks (Figure 2) (Photograph 1 in Appendix A). The tanks are divided tanks and contain unleaded gasoline, "road" diesel and "off-road" diesel fuel. According to the Assessor's office, the site has been a commercial fueling station for over 20 years. The original station was in the eastern portion of the parcel but was moved to the central portion of the parcel in 1999 when Mr. James leased the property. According to Ms Renee Hill, the original underground storage tanks at the "old " station were decommissioned and given a "No Further Action" determination from the Washington State Department of Ecology.

On November 5, 2007, White Shield met with Ms Hill at the site to discuss her concerns regarding the potential for spills and leaks she had observed to contaminate the soil and/or groundwater beneath the site. At the time of the visit, White Shield observed several areas of stained soil adjacent to the concrete fueling pad as well as areas of staining and cracking on the concrete pad (Photographs 2 through 6 in Appendix A).

Based on the visual observations made on November 5, 2007, White Shield made the following conclusion:

 The potential for soil and groundwater contamination was high and the best way to determine if there is a problem would be to drill borings and sample both the soil and groundwater.

On April 22, 2008, White Shield received authorization to drill and sample six borings at the site near the current fueling facility pending the Estate reaching an agreement with Mr. James regarding site access.

Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington



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On June 26th and 27th, 2008, White Shield oversaw the drilling and sampling of five boreholes. The number of borings was reduced from six to five because only five borings could be completed in the two days that the access agreement allowed for drilling. The borings were not advanced to groundwater below 20 feet because according to Mr. James, the Access Agreement did not permit drilling more than 20 feet bgs.

3.0 METHODOLOGY

3.1 Utility Location

Prior to any site activity White Shield notified the "one-call" public utility notification service of the planned activities. This free service notifies all of the public and private utility companies in the area as well as Kittias County and the City of Cle Elum of the planned activities so they can mark the locations of their utilities in the public right-of-ways. White Shield also contracted with Utilities Plus, a private utility locating service, to locate the private utilities on the site and attempt to locate the fuel distribution piping.

3.2 Soil Bore Drilling and Sampling

On June 26 and 27th, 2008, White Shield oversaw the drilling and sampling of five bore holes at the site. The locations of the boreholes (Figure 2) were based on visual observations made during the November 5, 2007 visit, the anticipated direction of groundwater flow (to the south), and the location of utilities and piping (water, electric, sewer, fuel distribution piping). They were also placed in areas anticipated to have the potential for the highest concentration of contaminants.

The drilling was conducted by using a hollow-stem auger drill rig operated by Cascade Drilling of Woodinville, Washington at the locations shown in Figure 2 (Photographs 7 and 8 in Appendix A). Because boring B-2 was located adjacent to the fuel distribution piping beneath the concrete pad, the first four feet of the boring was advanced using a vacuum truck operated by Cascade Drilling to remove the soil (Photograph 9 in Appendix A). Once a depth below the fuel distribution piping was reached, the hollow stem auger completed the boring. All White Shield borings were advanced to a maximum depth of 20 feet below ground surface (bgs).

During site activities, Mr. Jeff James was present to observe the drilling and sampling. In addition, Mr. James contracted with Kennedy Jenks Consultants to have a representative on site to observe the drilling and to collect select split samples of the soils White Shield collected for chemical analysis. The representative from Kennedy Jenks Consultants was Mr. Dean Malte.

Because the White Shield sample from borehole B-5 at 2.5 feet bgs contained TPH-Dx greater than the MTCA Method A cleanup level, Mr. James decided to excavate a second hole approximately one foot away to the south and collect a sample at 2.5 feet bgs (Figure 2). Mr. James also decided to collect samples from a third location, B-5B, approximately one foot west of Boring B-5 (Figure 2) at both the surface and at 2.5 feet

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bgs (Photographs 10 and 11 in Appendix A). In addition, White Shield also collected a sample of the composited soils removed from Mr. James excavation (Sample B-5-Pile).

3.2.1 Soil Sampling Methods

During drilling, the soils were sampled every $2\frac{1}{2}$ feet using a two-inch diameter splitspoon sampler driven ahead of the auger (Photograph 12 in Appendix A). The samples were field screened using an organic vapor analyzer with a flame ionization detector to estimate the concentration of organic vapors, as well as visual, and olfactory observations. Based on the field screening, a minimum of two samples were collected from each borehole for chemical analysis.

At each sample location within the borings, samples were collected using EPA Method 5035 for volatile samples. For this method a disposable "EasyDraw Syringe®" was used to collect approximately 5 grams of soil for transfer into a pre-weighed 40-milliliter (ml) sample vial. One 125 ml sample jar was also collected at each location for analysis of moisture content and diesel Range Organics (DRO). Each sample was labeled with the borehole number, the sample depth, and the date and time the sample was collected. The samples were then placed in a cooler with ice for delivery to an onsite mobile laboratory operated by Libby Environmental Chemistry of Olympia, Washington for analysis.

All samples were analyzed for gasoline range organics (GRO) including benzene, toluene, ethylbenzene and xylenes (BTEX) and/or for diesel range organics (DRO). The samples for GRO and BTEX were analyzed by Method NWTPH-Gx and EPA Method 8021B, respectively. Samples for DRO were analyzed by Method NWTPH-Dx.

A geologist licensed in the State of Washington was present at the drill rig for the purposes of logging samples, monitoring drilling operations, recording soil and groundwater data, preparing boring logs and collecting soil samples.

The geologist maintained a field log and/or drilling logs during field activities. The field log was maintained on weather-resistant log forms. All data generated during the investigation and any comments or other notes were entered directly into the field log or on drilling logs.

The lithologic log recorded by the geologist during the advancement of each of the boreholes was based on visual inspection of the soil samples supplemented by comments and observations of the driller. The boring logs are presented in Appendix B. Materials were classified using the Unified Soil Classification System and described according to the American Society for Testing and Materials D2488-69, "Description of Soils (Visual Manual Procedure)".

The following information was logged for each boring:

- Boring identification number;
- Name of Driller;
- Name of Geologist;
- Method of Drilling;

- Sampling method, depth, time, and date;
- Organic Vapor Analyzer (OVA) readings (where taken);
- Borehole location;
- Detailed soil descriptions using the Unified Soil Classification System, including soil moisture/saturation condition;
- Depth at which each distinct stratum was encountered (where discernable);
- Depth at which groundwater was first encountered while drilling;
- Depth of static water level (where discernable);
- Depth of the completed soil borings;
- Date started and finished
- Project number; and
- Record of Sample interval.

3.2.2 Decontamination Methods

Before drilling, all drill pipe was steam cleaned to remove potential contaminants. All non-disposable sampling tools were cleaned using an Alcolnox® soap solution and rinsed with de-ionized water after each sample was taken.

3.3 Quality Control

Samples were collected according to industry protocols for the collection, documentation, and handling of samples. Descriptions of soils and sampling depths were carefully logged in the field, and the drillers and geologist confirmed sample depth as each sample was collected. Boring location maps were completed prior to leaving the site to document sampling locations.

Soil samples were placed into pre-cleaned laboratory provided sample containers. The sealed containers were then placed in "Zip-Loc" bags to protect the labels and to prevent potential contamination of the ice chests. Upon sampling, all samples were placed immediately into ice chests containing ice.

All sample labels were checked for accuracy and compared with the Chain-of-Custody documentation, to provide sample documentation QC. Samples were transported and submitted under standard Chain-of-Custody protocols, and were kept refrigerated until delivery to the project laboratory (Libby Environmental Chemistry Laboratory). The laboratory provided standard QA/QC, which included: surrogate recoveries for each sample, method blank results, duplicate analyses, matrix or blank spiked analyses, and duplicate spiked analyses.

3.4 Investigation Derived Waste

Investigation derived waste for this project consisted of excess soil removed from the borings, and rinsate from decontamination. These wastes were separated and placed into fifty five-gallon drums. The drums were stored on site in a locked building not part of the leased property until laboratory results were received from the laboratory. Once the results were received, White Shield, Inc. will arrange for disposal.

4.0 RESULTS AND CONCLUSIONS

The following sections of this report present the results and conclusions from the sampling of soil borehole drillings at Pacific Pride Fueling Station Property located at 903 1st Street West in Cle Elum, Washington. Field activities were completed at the subject site on June 26th and 27th 2008. These activities consisted of:

- Drilling, five soil boreholes at the site (Figure 2),
- Collecting soil samples from the boreholes.
- Collecting split samples from additional samples collected by Kennedy Jenks at Boring locations B-5A and B-5B.

4.1 Site Geologic and Hydrogeologic Conditions

The site is at an elevation of approximately 2000 feet. The topography slopes gently to the south and southeast toward the Yakima River approximately three eighths of a mile to the south and southeast. Based on the topography, it is anticipated that the groundwater flow direction is to south and southeast toward the river. The soils encountered in the borings typically consisted of sandy gravel and cobbles with some silt. Groundwater was not encountered in the borings, although the soil was very damp to wet at approximately 17 to 20 feet bgs (Appendix B).

4.2 Soil and Groundwater Sampling

4.2.1 Soil Sample Results

Ten soil samples were collected from the borings drilled with the auger. Four additional samples were collected as split samples from samples collected by Kennedy Jenks in the vicinity of Boring B-5. Table 1 shows the results of the analyses. The complete laboratory data sheets are attached in Appendix C. TPH-G, benzene and toluene were not detected in any of the samples analyzed. Total xylenes were detected in sample B-5-2.5 at a level of 0.49 mg/kg, well below the State of Washington Model Toxics Control Act (MTCA) Method A cleanup standard of 9 mg/kg (Table 1).

TPH-Dx compounds were detected below the MTCA cleanup standard of 2,000 mg/kg in samples B-3-15 (197 mg/kg), B-5-15 (947 mg/kg) and S-5B-PILE (854 mg/kg) (Table 1). The TPH-DX compounds in samples B-5-2.5 and B-5B-SUR were detected above the MTCA Method A cleanup standard at 11,900 mg/kg and 5,680 mg/kg respectively. Sample B-5B-SUR was a sample of soil collected from the surface at the location of Boring B-5B dug by Mr. James with a posthole digger and a hand auger. This hole and an additional hole B-5A were dug by Mr. James because he did not have a split sample from the White Shield borehole B-5 at 2.5 feet bgs.

Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington

					NW TPH-Gx	Volatila Aromatia Hudroaarbana			oons	NW	TPH-Dx
Sample Number	Soil Sample Location	Date Analyzed	Sample Depth	Gasoline (mg/kg)		Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylene (mg/kg)		Oil (mg/kg)	
						Γ., 1				120	
B-1-2	Bore Hole B-1	6/27/2008	2'	ND	ND	ND	ND	ND	ND	ND	
B-1-17.5	Bore Hole B-1	6/27/2008	17.5'	ND	ND	ND	ND	ND	ND	ND	
B-2-5	Bore Hole B-2	6/27/2008	5'	ND	ND	ND	ND	ND	ND	ND	
B-2-20	Bore Hole B-2	6/27/2008	20'	ND	ND	ND	ND	ND	ND	ND	
B-3-2	Bore Hole B-3	6/27/2008	2'	ND	ND	ND	ND	ND	ND	ND	
B-3-15	Bore Hole B-3	6/27/2008	15'	ND	ND	ND	ND	ND	197	ND	
B-4-7.5	Bore Hole B-4	6/27/2008	7.5'	ND	ND	ND	ND	ND	ND	ND	
B-4-17.5	Bore Hole B-4	6/27/2008	17.5'	ND	ND	ND	ND	ND	ND	ND	
B-5-2.5	Bore Hole B-5	6/27/2008	2.5'	·ND	ND	ND	ND	0.49	11900*	ND	
B-5-15	Bore Hole B-5	6/27/2008	15'	ND	ND	ND	ND	ND	947	ND	
B-5A-2.5**	Bore Hole B-5A	6/27/2008	2.5'	ND	ND	ND	ND	ND	ND	ND	
B-5B-SUR**	Bore Hole B-5B	6/30/2008	Surface	ND	ND	ND	ND	ND	5680*	ND	
S-5B-2.5**	Bore Hole B-5B	6/30/2008	2.5'	NA	NA	NA	NA	NA	ND	ND	
S-5B-Pile**	Bore Hole B-5B	6/30/2008	Pile	NA	NA	NA-	NA	NA	854	ND	
M	I	nup Standards		30	0.03	7	6	9	2000	Heavy Oil 2000/Miner Oil 4000	
	Practical Quantit	ation Limit		10	0.02	0.1	0.05	0.15	25	40	

Table 1 - Soil Analysis Results

* Note: Product appears to be weathered Diesel. ** Samples are split samples from holes dug and sampled by Mr. Jeff James

ND: Indicates not detected

NA: Indicates not analyzed

The soils in the vicinity of borehole B-5 at 2.5 feet bgs were varied in composition. In Boring B-5 at 2.5 feet bgs, the soil was a brown sandy gravel with wood fragments. In excavation B-5A the soil at 2.5 feet bgs was a brown sandy gravel without the wood fragments. In excavation B-5B, the soil at the surface was a dark gray sandy gravel with a strong diesel odor. This changed to a reddish brown coarse sand with brick fragments at 2.5 feet bgs. The variation in the soils in this area is to be expected since it was reported that the area was filled with wood and construction debris when the site was constructed.

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4.3 Conclusions

A minimum of two discrete soil samples were collected from each soil boring at the Pacific Pride Fueling Station in Cle Elum, Washington. With the exception of the area near Boring B-5, the results of the soil samples did not reveal the presence of gasoline or diesel range organics above the MTCA Method A cleanup levels.

The sample results from Boring B-5 and the nearby-excavated holes revealed that diesel contamination above the MTCA Method A cleanup levels is present to at least 2.5 feet bgs. The sample collected from borehole B-5 at 15 feet revealed the presence of diesel range organics but below the MTCA cleanup levels. Because samples collected by Mr. James and split by White Shield did not detect DRO at 2.5 feet bgs but did detect DRO at the surface, and because the soil material at each sample location was varied in composition, White Shield concludes that the contamination most likely is heterogeneously distributed in the soils.

Groundwater was not encountered and therefore not sampled in any of the borings drilled at the site. However, because the soil was very damp to wet at approximately 17 to 20 feet bgs, groundwater is anticipated to be located above 25 to 30 feet bgs.

5.0 RECOMMENDATIONS

Based on the conclusions, White Shield makes the following recommendations:

- Notify the Washington State Department of Ecology of the Sample Results Because at least one of the soil samples at boring B-5 contained levels of diesel range organics above the MTCA Method A Cleanup Levels, the Washington State Department of Ecology needs to be notified of the findings within 90 days per WAC 173-340-300 (2)(a). Submittal of this report to Ecology's Central Regional Office will satisfy the notification requirements.
- Clean Up the Contaminated Soil in the Vicinity of Boring B-5 White Shield recommends that the soil in the vicinity of Boring B-5 that is above the MTCA Cleanup Levels be excavated and disposed of. It is not anticipated that the volume of soils to be removed would be very large. Upon excavation the remaining soils on the sidewalls and base of the excavation should be re-sampled and analyzed for diesel range and gasoline range organics.
- Obtain Groundwater Samples at the Site.

Because groundwater samples could not be obtained and the soils near the base of Borings B-5 and B-3 were wet and contained Diesel Range Organics, it is recommended that additional borings be installed to sample groundwater. At least three borings should be drilled in order to determine groundwater flow direction and gradient. One well should be in the anticipated up gradient direction and two borings in the down gradient direction.

Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington

6.0 LIMITATIONS

In performing our professional services, WSI uses a degree of care ordinarily exercised under similar circumstances by members of our profession. No warranty, expressed or implied, is made or intended. Our conclusions and recommendations, developed from our field and laboratory investigation reported herein, are based upon this firm's understanding of the project and are in concurrence with generally accepted practice. Should questions arise from this report please contact White Shield Inc. at 425-641-7800 or 503-547-0100.

David R. Polink

David R. Polivka P.G./ P.HG. Environmental Services Manager



Topt W. Fricke

Stuart Fricke Principal-in-Charge

Soil Boring and Sampling Report Pacific Pride fueling Station *Cle Elum, Washington*

August 25, 2008

APPENDIX A

Photographs

Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington



Photograph 1 - Cle Elum Pacific Pride Site Overview Looking Southwest



Photograph 2 – Staining in Soil Southeast of Fueling Pad, November 5, 2007 (South of Boring Location B-5)

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Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington



Photograph 3 - Staining and Spillage on Soil and Concrete, November 5, 2007 (Near Boring Location B-3)



Photograph 4 – Staining and Cracking in Concrete November 5, 2007 (West side of Pump Islands Near Boring Location B-2)

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Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington



Photograph 5 - Staining in Soil, November 5, 2007 (Boring location B-5)



Photograph 6 - Staining and Cracking in Concrete, November 5, 2007 on East Side of the Pump Islands

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Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington

August 22, 2008



Photograph 7 – Hollow Stem Auger Drilling at Boring B - 1

Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington



Photograph 8 - Hollow stem Auger Drilling at Boring B-1





Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington

August 22, 2008



Photograph 10 - Mr. James excavating Borehole B-5A

Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington



Photograph 11 - Mr. James excavating Borehole B-5B



Photograph 12 - Split Spoon Sampler with Soil from Boring B-1

Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington August 22, 2008

APPENDIX A

Boring Logs

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roject: ocation rilling amplin	Cle El n: Cle E Method ig Method	Elum, d: Aug hod:	acific Pride WA Jer 2" Split Spoo			Renee Hill Cascade Drilling			Bolehole No.: B- Date: 6/26/2005 Logged By: DRF Reference Elevation:Ground Surfac Groundwater Level: N
D E P T H (11)	T I M E	A M P L	S A M No. P L	Blow Count (blows par 1/2 foot)	Graphic Log/	GEOLOGICAL DESCRIPTION AND CLASSIFICATION	O D O R	OVA (ppm)	
1 1 1 1	1047	X	B-1-2	10/20/30		Asphalt Driveway Brown Sandy Silt (moist-dry), some gravel, some black rock fragments 3" Brown fine and sandy gravel - gravelly sand	none	0	
5_		X		50 for 6"		Brown sandy gravel (dry) (some fine silt)	none	o	
1 1 1	×	X		50 for 6"		Same	none	0	
<u>10</u>		X		50 for 6"		Same			
1 - 1		X	-	50 for 6"		Brown sandy gravel (some silt) (moist)	none	a 0	
15_	1120	X		50 for 4*		Brown sandy gravel (some fine sill) (moist)	none	a 0	
1 1 1	1139	X	B-1-17.5	50 for 6"		Brown sand - coarse, sandy gravel, (some silt) (wet) Kennedy Jenks Environmental Consulting Splits Sample 8-1-17.5			
20_		X		50 for 6*		Boring Terminated at 20.5' and backfilled with Bentonite			
25									

Location Drilling Samplin	Cle El n: Cle I Methor ng Meti	Elum Elum d: Au hod:	Pacific Pride , WA ger 2" Split Spo	on		Renee Hill Cascade Drilling			Bolehole No.: B-2 Date: 6/27/2008 Logged By: DRP Reference Elevation:Ground Surface Groundwater Level: NA
0 E P T H (ft)	T I M E	м	A M No. P L	Blow Count (blows per 1/2 foot)	Graphic Log/	GEOLOGICAL DESCRIPTION AND CLASSIFICATION	O D O R	OVA (ppm)	
1 1 1					3'	5" Concrete 3/8 Minus gravel Peagravel Boulder removed by Cascade Drilling Vacuum truck	none	0	
- 5_	1448	Ň	, В-2-5	25/50 for 6"		Brown sandy gravel (some fine silt) (moist)	none	0	
1 1 1		X		50 for 6"	×	Same	none	0	
<u>10</u>	1526	M		50 for 6"		Same	none	0	
-		X		50 for 6"		Refusal at 12', Drill pulls out, goes back down. Brown sandy gravel (some silt), (Gravel to 2")	none	0	
10		X		50 for 6"		Brown sandy gravel (some silt) (moist)	none	a 0	,
20_	1634	X		50 for 6"		Brown sandy gravel (some silt) (moist - dry)			
	1644	X	B-2-20	50 for 6"		Brown sandy gravel (slightly more silt) Boring Terminated at 21' and backfilled with Bentonite			
25_			-						

Location Drilling	Cle El n: Cle I Metho	lum Pa Elum, d: Aug	acific Pride WA	n		Renee Hill Cascade Drilling	Bolehole No.: B-3 Date: 6/27/2008 Logged By: DRP Reference Elevation:Ground Surface Groundwater Level: NA		
D E 9 T H (ft)	T I M E	S S A A P F L L	A Na.	Blow Count (blows per 1/2 foot)	Graphic Log/	GEOLOGICAL DESCRIPTION AND CLASSIFICATION	O D O R	OVA (ppm)	
1						1" Minus Gravel and fine Sand	-		
1	1143	X	B-3-2	10/10/50 for 6"		Brown clayey silt (moist), (some roots)	none	0	
 5_ 		X		30/50 for 6"		Brown sandy gravel	none	0	
-		X	4	50 for 6*		Brown coarse sandy gravel,some (quartz gravel and some silt)	none	0	
<u>10</u>		X		50 for 6"		1" Recovery (moist to wet)			
		X		50 for 6*		Brown coarse sandy gravel (some silt) (wet)	none	. 0	
15	1210	X	B-3-15	50 for 5"		Less silt (wet)	non	a 0.6	
		X		50 for 5"			non	e 0.4	6 E
20	121	Ne	B-2-20	No Recovery		·			
1 1						Boring Terminated at 21 feet and backfilled with bentonite			
25_									

Location Drilling M	Cle Elu Cle E Cle E	Ium, ¹ Ium, ¹ : Aug od: 2	cific Pride WA	n		Renee Hill Cascade Drilling		•	Bolehole No.: B-4 Date: 6/26/2008 Logged By: DRP Reference Elevation:Ground Surface Groundwater Level: NA
D E P T H (ft)	T I M E	SAMPLE	No.	Blow Count (blows per 1/2 foot)	Graphic Log/	GEOLOGICAL DESCRIPTION AND CLASSIFICATION	O D O R	OVA (ppm)	
	845	X		20/50 for 6"		Brown sandy gravel (gravel to 2" size) Much gravel and cobbles	none	0	
5	855	X		70 for 6"			none	0	
	905	×	B-4-7.5	50 for 6"			none	0	
<u>10</u>	915	×		50 for 6"		Red brown sandy gravel (gravel to 2" to 4") (dry)	none	0	
-	923	×		50 for 5"		Brown coarse sandy gravel (moist)	none	0	
15_		X		50 for 6"		Brown coarse sandy gravel, (wet to moist) (gravel to 2" diameter).	none	0	
	941	X	B-4-17.5	50 for 6*			none	0.2	
20	1002	X		50 for 6"		Brown coarse sandy gravel (moist)	non	e 0	
						Boring Terminated at 21.5' and backfilled with bentonite			

HILL 0055

- ALL			
IOG	OF	BOREHC	
200	UF.	DURENU	

oject No.:208-023-01 oject Cle Elum Pacific Pride Ication: Cle Elum, WA	Client: Renee Hill	Bolehole No.: 8-5 Date: 6/27/2008
illing Method: Auger Impling Method: 2" Split Spoon	Driller: Cascade Drilling	Logged By: DRP Reference Elevation:Ground Surface Groundwater Level: NA
D T S S Blow E I A A Count P M M No. (blows) F E P P per 4 L L 1/2 foot) 10 E E	Graphic Log/ GEOLOGICAL DESCRIPTION D (ppm) AND CLASSIFICATION R	
	3/8 Minus gravel with sand (dry)	
- 1011 B-5-2.5 3/2/1	Brown sandy gravel with wood fragments slight 0	
	Brown sandy gravel (gravel to 2" diameter) (dry) slight 0	
- 50 for 6"	Brown sandy gravel (moist) 0	
50 for 6*	Brown coarse sandy gravel (wet) none 0	
- 50 for 6*	none 0	
5_ 1030 🔀 B-5-15 50 for 3*	Brown sandy gravel (some gray silt layers) slight 4 (cobbles to 2" diameter)	
	Brown sandy gravel (some brown silt) (wet) none 0 Driller says no water in hole	
0_ 1045 ∑ 50 for 6*	Brown coarse sandy gravel (gravel to 2* diameter) (Wet) No water in hole	
	Boring terminated at 21' and backfilled with bentonite	
25_		

Soil Boring and Sampling Report Pacific Pride Fueling Station Cle Elum, Washington August 22, 2008

APPENDIX A

Laboratory Data Sheets

HILL 0057



Libby Environmental, Inc.

4139 Libby Road N.E., Olympia, WA 98506-2518

July 2, 2008

Dave Polivka Whiteshield, Inc. 1520 140TH Avenue NE Bellevue, WA 98005

Dear Mr. Polivka:

Please find enclosed the analytical data report for the Cle Elum Pacific Pride Project located in Cle Elum, Washington, Mobile Lab Services were conducted on June 27, 2008. Soil samples were analyzed for BTEX by EPA Method 8021B, Gasoline by NWTPH-Gx, and Diesel & Oil by NWTPH-Dx/Dx Extended,

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. An invoice for this analytical work is also enclosed. All soil samples are reported on a dry weight basis.

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. Chileut President Libby Environmental, Inc.

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

CLE ELUM PACIFIC PRIDE PROJECT Cle Elum. Washington Whiteshield Environmental. Inc. Client Project #208-023-01

Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8021B) in Soil

Sample Number	Date Analyzed	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Gasoline (mg/kg)	. Surrogate Recovery (%)
Method Blank	6/27/08	nd	nd	nd	nd	nd	117
I.CS	6/27/08	97%	117%				113
B-4-7.5	6/27/08	nd	nd	nd	nd	nd	74
B-4-17.5	6/27/08	nd	nd	nd	nd	nd	75
B-4-17.5 Dup	6/27/08	nd	nd	nd	nd	nd	80
B-1-2	6/27/08	nd	nd	nd	nd	nd	84
B-1-17.5	6/27/08	nd	nd	nd	nd	nd	80
B-5-2.5	6/27/08	nd	nd	nd	0.49	nd	67
B-5-15	6/27/08	nd	nd	nd	nd	nd	81
B-3-2	6/27/08	nd	nd	nd	nd	nd	130
B-3-15	6/27/08	nd	nd	nd	nd	nd	73
B-2-5	6/27/08	nd	nd	nd	nd	nd	82
B-2-20	6/27/08	nd	nd	nd	nd	nd	78
B-5A-2.5	6/27/08	nd	nd	nd	nd	nd	73
B-5B-SUR	6/27/08	nd	nd	nd	nd	nd	74
B-4-17.5 MS	6/27/08	115%	132%				123
Practical Quanti	tation Limit	0.02	0.10	0.05	0.15	10	

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

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chileutt

CLE ELUM PACIFIC PRIDE PROJECT Cle Elum, Washington Whiteshield Environmental, Inc. Client Project #208-023-01

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

Sample Number	Date Analyzed	Surrogate Recovery (%)	Diesel (mg'kg)	Mineral Oil (mg/kg)	Oil (mg/kg)
Method Blank	6/27/2008	89	nd	nd	nd
B-4-7.5	6/27/2008	99	nd	nd	nd
B-4-17.5	6/27/2008	92	nd	nd	nd
B-1-2	6/27/2008	92	nd	nd	nd
B-1-2 Dup	6/27/2008	103	nd	nd	nd
B-1-17.5	6/27/2008	98	nd	nd	nd
B-5-2.5	6/27/2008	int	11900 *	nd	nd
B-5-15	6/27/2008	int	947 *	nd	nd
B-3-2	6/27/2008	135	nd	nd	nd
B-3-15	6/27/2008	126	197 *	nd	, nd
B-2-5	6/27/2008	107	nd	nd	nd
B-2-20	6/27/2008	100	nd	nd	nd
B-5A-2.5	6/27/2008	91	nd	nd	nd
Practical Quanti	tation Limit		25	40	40

"int" Indicates that interference prevents determination.

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

ANALYSES PERFORMED BY: Sherry Chilcutt

CLE ELUM PACIFIC PRIDE PROJECT Cle Elum, Washington Whiteshield Environmental, Inc. Client Project #208-023-01

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

Sample Number	Date Analyzed	Surrogate Recovery (%)	Diesel (mg/kg)	Mineral Oil (mg/kg)	Oil (mg/kg)
Method Blank	6/30/2008	93	nd	nd	nd
B-5B-SUR	6/30/2008	int	5680 *	nd	nd
B-5B-SUR Dup	6/30/2008	int	6810 E *	nd	nd
S-5B-2.5	6/30/2008	83	nd	nd	nd
S-SB-Pile	6/30/2008	int	854 *	nd	nd
Practical Quantit	ation Limit		25	40	40

* Product appears to be weathered Diesel.

"nd" Indicates not detected at the listed detection limits.

"int" Indicates that interference prevents determination.

E Concentration is above linear calibration range and is an estimate ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chilcutt

APPENDIX F

PREVIOUS GROUNDWATER REPORT WHITE SHIELD, INC. 11/30/2009

DLH ENVIRONMENTAL CONSULTING SEATTLE, WASHINGTON 206-632-3123

Soil Boring and Groundwater Sampling Report

Former Pacific Pride Fueling Station

903 1ST Street West

Cle Elum, Washington 98922

November 30, 2009

Submitted To:

Renee Hill Trustee for Estate of Wayne A. Hill P. O. Box 368 Cle Elum, WA 98922

White Shield Project # 208-023-03

Prepared By:



White Shield, Inc. 23412 68th Avenue Kent, Washington 98032 253-867-6070 office 253-867-6075 fax Email: <u>wsib@whiteshield.com</u> http: <u>www.whiteshield.com</u>

Soil Boring and Groundwater Sampling Report Former Pacific Pride Fueling Station Cle Elum, Washington

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1.0 INTRODUCTION

White Shield, Inc. (WSI) has prepared this report for Renee Hill, the Trustee for the Estate of Wayne A. Hill, to document activities that occurred during the attempted drilling of four borings and the sampling of groundwater from those borings at the former Pacific Pride fueling facility located at 903 1st Street West, Cle Elum, Washington (Figure 1). The Estate formerly leased a portion of the property to James Oil Company for use as a commercial fueling facility. The purpose of the investigation was to determine if the groundwater beneath the site has been impacted by petroleum hydrocarbons from spills and releases at the site. A previous investigation by White Shield in June 2008 revealed the presence of petroleum hydrocarbons in the soil above the State of Washington Model Toxics Control Act (MTCA) Method A cleanup levels in a portion of the site.

2.0 SITE LOCATION AND BACKGROUND

According to the Kittitas County Assessor's Office, the site is approximately 3.39-acres in size, located at 903 1st Street West in Cle Elum, Kittitas County, Washington (Figure 1) and is owned by the Estate of Wayne A. Hill. The Assessor's Office parcel number for the site is 263835. This address is described as being in the Northeast ¼, Southwest ¼, Section 27, Township 20 North, Range 15 East. The parcel is bordered on the south by the I-90 westbound access road, to the east by a Chevron fueling station, the Cle Elum City Cemetery to the north and a logging company equipment storage yard to the west.

Until September 30, 2009, James Oil Company leased approximately ½ acre of the parcel in the center of the parcel for a Pacific Pride commercial fueling facility. The leased portion of the site contained three fuel-dispensing islands with two associated satellite fuel nozzles under a canopy and two aboveground fuel storage tanks (Figure 2). The tanks were "divided" tanks and contained unleaded gasoline, "road" diesel, and "off-road" diesel fuel. According to the Assessor's office, the site has been a commercial fueling station for over 20 years. The original station was in the eastern portion of the parcel but was moved to the central portion of the parcel in 1999 when Mr. James leased the property. According to Ms. Renee Hill, the original underground storage tanks at the "old" station were decommissioned and given a "No Further Action" determination from the Washington State Department of Ecology.

On November 5, 2007, White Shield met with Ms. Hill at the site to discuss her concerns regarding the potential for spills and leaks she had observed to contaminate the soil and/or groundwater beneath the site. At the time of the visit, White Shield observed several areas of stained soil adjacent to the concrete fueling pad as well as areas of staining and cracking on the concrete pad.

Based on the visual observations made on November 5, 2007, White Shield made the following conclusion:

 The potential for soil and groundwater contamination was high and the best way to determine if there is a problem would be to drill borings and sample both the soil and groundwater.

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Soil Boring and Groundwater Sampling Report Former Pacific Pride Fueling Station Cle Elum, Washington



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Soil Boring and Groundwater Sampling Report Former Pacific Pride Fueling Station Cle Elum, Washington

On June 26 and 27, 2008, White Shield oversaw the drilling and sampling of five boreholes. The borings were not advanced to groundwater below 20 feet because according to Mr. James, the Access Agreement did not permit drilling more than 20 feet bgs.

On October 28, 2008, White Shield submitted a proposal to drill four additional borings at the site to the depth of groundwater and sample the groundwater beneath the site. For various reasons related to legal actions being taken by the Estate and Mr. James, the soil boring and the sampling of the groundwater did not take place until October 29, 2009.

3.0 METHODOLOGY

3.1 Utility Location

Prior to any site activity White Shield notified the "one-call" public utility notification service of the planned activities. This free service notifies all of the public and private utility companies in the area as well as Kittitas County and the City of Cle Elum of the planned activities so they can mark the locations of their utilities in the public right-of-ways. White Shield also contracted with Utilities Plus, a private utility locating service, to locate the private utilities on the site and attempt to locate the fuel distribution piping.

3.2 Soil Boring and Groundwater Sampling

On October 29, 2009, White Shield oversaw the attempted drilling of four borings and the groundwater sampling of two borings. The locations of the boreholes (Figure 2) were based on observations made during the June 2008 investigation, the anticipated direction of groundwater flow (to the south), and the location of utilities and piping (water, electric, sewer, fuel distribution piping). They were also placed in areas anticipated to have the potential for the highest concentration of contaminants.

The drilling was conducted by using a hollow-stem auger drill rig operated by Cascade Drilling of Woodinville, Washington at the locations shown in Figure 2. At boring B-6W, located at the southern edge of the property, groundwater was encountered at a depth of approximately 30 feet bgs. Because of the gravel encountered beneath the site, drilling was difficult. At boring locations B-1W, B-5W, the boreholes could not be advanced to groundwater at the target depth of 30 feet bgs. Several attempts were made at each of those two locations and the deepest depth obtainable was 17 feet bgs.

During site activities, Mr. Jeff James was present to observe the drilling and sampling. In addition, Mr. James contracted with DLH Environmental to have a representative on site to observe the drilling and to collect duplicate samples of the water White Shield collected for chemical analysis. The representative from DLH Environmental was Ms Donna Hewitt.

3.2.1 Water Sampling Methods

At borings B-6 W and B-1W, the soils were sampled for lithologic description every 2½ feet using a two-inch diameter split-spoon sampler driven ahead of the auger. The soil at borings B-3W and B-5W were not sampled because the nature

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Soil Boring and Groundwater Sampling Report Former Pacific Pride Fueling Station Cle Elum, Washington

> of the soils was consistent across the site and because the borings were adjacent to previous soil borings where soils had been sampled for chemical analysis.

At each location where groundwater was encountered, a temporary PVC well was constructed within the auger and the auger pulled up slightly to reveal the well screen. The well was constructed of 2-inch diameter PVC 0.010-inch slot screen and solid riser pipe. To assist with the filtering of suspended solids within the temporary well sand was placed around the outside of the screen. In an attempt to remove silt, the influence of drilling, and yield a representative sample of the groundwater, each well was initially purged using a disposable bailer. This was followed by purging using a peristaltic pump and tubing lowered down the well casing. The water in boring B-6W appeared to clear during purging; however, the water in boring B-3W did not. This may be a result of a differing amount of finer grained soils at that location. Based on the analytical results discussed below, the suspended sediment in the water from the well did not have an effect on the representativeness sample.

After purging, the groundwater from each of the two borings was sampled by filling clean laboratory provided bottles using the peristaltic pump and polyethylene tubing that was dedicated to each boring. The sample bottles consisted of one 1-liter amber bottle and two 40-milliliter vials for each sample.

Each sample was labeled with the borehole number and the date and the time, the sample was collected. After sampling, the samples were placed in a cooler with ice for delivery to the analytical laboratory (Libby Environmental Chemistry of Olympia, Washington) for analysis. At boring B-6W a second set of sample bottles were collected as a "blind" duplicate sample and labeled B-2W.

All samples were analyzed for gasoline range organics (GRO) including Benzene, Toluene, Ethylbenzene And Xylenes (BTEX) and/or for diesel range organics (DRO). The samples for GRO and BTEX were analyzed by Method NWTPH-Gx and EPA Method 8021B, respectively. Samples for DRO were analyzed by Method NWTPH-Dx.

A geologist licensed in the State of Washington was present at the drill rig for the purposes of logging samples, monitoring drilling operations, recording soil and groundwater data, preparing boring logs, and collecting water samples. The geologist maintained a field log and/or drilling logs during field activities.

The lithologic log recorded by the geologist during the advancement of each of the boreholes was based on visual inspection of the soil samples supplemented by comments and observations of the driller.

3.2.2 Decontamination Methods

Prior to drilling, all drill pipe was steam cleaned to remove potential contaminants. All non-disposable sampling tools were cleaned using an Alcolnox® soap solution and rinsed with de-ionized water.

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3.3 Quality Control

Samples were collected according to industry protocols for the collection, documentation, and handling of samples. In the field:

- Each boring was purged in an attempt to remove silt, the influence of drilling, and yield a representative sample of the groundwater
- Samples were collected using dedicated tubing to prevent potential crosscontamination.
- · Samples were placed into pre-cleaned laboratory provided sample containers.
- A "blind" duplicate sample was collected to check laboratory precision. Boring location maps were completed prior to leaving the site to document sampling locations.
- Samples were placed immediately into ice chests containing ice.

All sample labels were checked for accuracy and compared with the Chain-of-Custody documentation to provide sample documentation QC. Samples were transported and submitted under standard Chain-of-Custody protocols, and were kept refrigerated until delivery to the project laboratory (Libby Environmental Chemistry Laboratory). The laboratory provided standard QA/QC, which included: surrogate recoveries for each sample, method blank results, duplicate analyses, matrix or blank spiked analyses, and duplicate spiked analyses.

3.4 Investigation Derived Waste

Investigation derived waste for this project consisted of excess soil removed from the borings, purge water from purging the borings, and rinsate from decontamination. These wastes were separated and placed into fifty-five gallon drums. The drums were stored on site until laboratory results were received from the laboratory. Once the results were received, White Shield, Inc. arranged for disposal.

4.0 RESULTS AND CONCLUSIONS

The following sections of this report present the results and conclusions from the sampling of groundwater from two borings at the former Pacific Pride Fueling Station Property located at 903 1st Street West in Cle Elum, Washington. Field activities were completed at the subject site on October 29, 2009. These activities consisted of:

- Attempting to drill, four boreholes to groundwater at the site (Figure 2),
- Collecting water samples from two of the boreholes.

4.1 Site Geologic and Hydrogeologic Conditions

The site is at an elevation of approximately 2000 feet. The topography slopes gently to the south and southeast toward the Yakima River approximately three eighths of a mile to the south and southeast. Based on the topography, it is anticipated that the groundwater flow direction is to south and southeast toward the river. The soils encountered in the borings typically consisted of sandy gravel and cobbles with some silt. Because of the gravel and cobbles, and the difficult drilling two borings could be advanced to

C:\Documents and Settings\dpolivka\My Documents\208-023-03 Cle Elum Pacific Pride Groundwater sampling\Draft Cle Elum GW rpi.doc groundwater (borings B-3W and B-6W). Groundwater was measured at 29.31 feet bgs in boring B-6W and at 27.40 feet bgs in boring B-3W.

4.2 Soil and Groundwater Sampling

4.2.1 Groundwater Sample Results

Three groundwater samples were collected from the borings drilled with the auger. One sample was a "blind" duplicate at boring B-6W. One sample was collected from near the southern most portion of the property in what was anticipated to be in a direction down-gradient from the former activities at the site. The second sample was collected near a former satellite fueling station and the aboveground fuel storage tanks (Figure 2). Table 1 shows the results of the analyses. The complete laboratory data sheets are attached in Appendix A. Petroleum hydrocarbons were not detected in any of the samples analyzed.

				NW TPH- Gx	Vola	NWTPH-Dx			
Sample Number	Soil Sample Location	Date Analyzed	Sample Depth	Gasoline (ug/l)	Benze ne (ug/l)	Toluene (ug/l)	Ethylbenzene (ug/l)	Xylene (ug/l)	Diesel (ug/l)
B-6W	Borehole B-6W	11/02/2009	30'	ND	ND	ND	ND	ND	ND
B-2W	Borehole B-6W	11/02/2009	30'	ND	ND	ND	ND	ND	ND
B-3W	Borehole B-3W	11/02/2009	30'	ND	ND	ND	ND	ND	ND
MT	CA Method A Clear	nup Standards		800/1000*	5	1,000	700	1,000	500
	Practical Quantita		100	1	2	1	3	200	

Table 1 - Groundwater Analysis Results

Sample B-2W is a blind duplicate of Sample B-6W

ND: Indicates not detected

For TPH Gasoline, 800 ug/l is the cleanup standard if benzene is present; 1000 ug/l is the standard if benzene is not present

5.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the results of this investigation, White Shield concludes that groundwater beneath the former Pacific Pride Fueling Station in Cle Elum, Washington occurs at a depth of approximately 30 feet bgs with an apparent flow direction to the south. Groundwater samples collected from two locations where contamination was most likely to be found at the site (down-gradient of the activities at the site and near the former aboveground fuel storage tanks) did not reveal the presence of gasoline or diesel range organics in the groundwater beneath the site.

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Soil Boring and Groundwater Sampling Report Former Pacific Pride Fueling Station Cle Elum, Washington

Based on the sample results, it is White Shield's opinion that unless additional information is discovered indicating potential groundwater contamination, no further action is needed regarding groundwater at the site.

6.0 LIMITATIONS

In performing our professional services, WSI uses a degree of care ordinarily exercised under similar circumstances by members of our profession. No warranty, expressed or implied, is made or intended. Our conclusions and recommendations, developed from our field and laboratory investigation reported herein, are based upon this firm's understanding of the project and are in concurrence with generally accepted practice. Should questions arise from this report please contact White Shield Inc. at 253-867-6070 or 503-547-0100.

David R. Polinka

David R. Polivka P.G./ P.HG. Environmental Services Manager

Toget W. Fricke

Stuart Fricke Principal-in-Charge



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November 30, 2009

APPENDIX A

Laboratory Data Sheets

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Libby Environmental, Inc.

4139 Libby Road N.E., Olympia, WA 98506-2518

November 5, 2009

Dave Polivka White Shield, Inc. 23412 68th Avenue South Kent, WA 98032

Dear Mr. Polivka:

Please find enclosed the analytical data report for the Pacific Pride Project located in Cle Elum, Washington. Water samples were analyzed for Gasoline by NWTPH-Gx and BTEX by EPA Method 8260B and Diesel by NWTPH-Dx on November 2, 2009.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. An invoice for this analytical work is included.

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,

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Sherry L. Chilcutt President Libby Environmental, Inc.

Phone (360) 352-2110 Fax (360) 352-4154 « libbyenv@aol.com

PACIFIC PRIDE PROJECT Cle Elum, WA Whiteshield Client Project #208-023-02 Libby Project No.L091031-1

Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8021B) in Water

Sample Number	Date Analyzed	Benzene (ug/l)	Toluene (ug/l)	Ethylbenzene (ug/l)	Xylenes (ug/l)	Gasoline (ug/l)	Surrogate Recovery (%)
Method Blank	11/2/09	nd	nd	nd	nd	nd	105
LCS	11/2/09	98%	102%				109
B-6W	11/2/09	nd	nd	nd	nd	nd	108
B-2W	11/2/09	nd	nd	nd	nd	nd	109
B-3W	11/2/09	nd	nd	nd	nd	nd	117
Trip Blank	11/2/09	nd	nd	nd	nd	nd	125
Trip Blank dup	11/2/09	nd	nd	nd	nd	nd	112
MS	11/2/09	98%	102%				107
Practical Quantit	ation Limit	1	2	1	3	100	

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

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

ANALYSES PERFORMED BY: Deanna M. Donovan

PACIFIC PRIDE PROJECT Cle Elum, Washington White Shield Inc. Client Project #208-023-02 Libby Project No.L091031-1

Analyses of Diesel (NWTPH-Dx) in Water

Sample	Date	Surrogate	Diese
Number	Analyzed	Recovery (%)	(ug/l)
Method Blank	11/2/2009	102	nd
B-6W	11/2/2009	100	nd
B-2W	11/2/2009	97	nd
B-3W	11/2/2009	101	nd
Trip Blank	11/2/2009	106	nd
B-6W Dup.	11/2/2009	95	nd
Practical Quantitation Limit			200

"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: Athanasius Shaw

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ALC: NO

APPENDIX G

No.

PACIFIC GROUNDWATER GROUP SAMPLING, ANALYSIS AND SUPPLEMENTAL DATA 2010

DLH ENVIRONMENTAL CONSULTING SEATTLE, WASHINGTON 206-632-3123

 Subj:
 FW: James Oil results

 Date:
 5/26/2010 2:16:17 P.M. Pacific Daylight Time

 From:
 janet@PGWG.COM

 To:
 Dlhenvironmental@aol.com, jamesoil.jeff@skynetbb.com

 CC:
 inger@PGWG.COM

Hi, Donna.

Please find attached our analytical results for the most recent cleanup at James Oil. According to Inger, sample PGG-07 is the split sample for your sample 51810-25. I understand that the sample is primarily hard-packed gravel, roadbase. So, it makes sense that sample variability is high because only the fines can be collected as sample and, further, only fines are analyzed by the lab. It is likely a nonissue because the PGG result illustrates that the roadbase material does not exceed, even if it was considered "soil" and therefore subject to the cleanup level. On other sites, my Ecology site managers have stated that soil cleanup levels do not apply to roadbase.

The reason we called Mike Erdahl was to find out if 51810-25 would benefit from silica gel cleanup to remove biogenic hydrocarbons. Based on a visual look, he thinks not. So, I am wondering how to handle your one exceedance. You could consider referring to our sample and state the following logic:

1. the material is roadbase, so MTCA soil cleanup levels may not apply

2. the material is compacted gravel, so any analysis of it is biased low because only fines could be sampled or analyzed

3. the second sample of the same material does not exceed the cleanup level indicating the exceeding concentration is not confirmed

The above logic is probably sufficient to address the analytical result. We could, though, do more such as:

1, do silica gel cleanup and reanalyze

2. analyze another aliquot of the sample to re-confirm

Your thoughts? I know your conceptual model is that this sample was collected outside of James Oil's fueling, traffic, and parking areas, but I was wondering how you intend to address this exceedance in your report.

I look forward to hearing from you.

Kind regards,

Janet Knox LG | Principal Environmental Geochemist | Pacific Groundwater Group | (206) 329-0141 | www.pgwg.com

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

May 24, 2010

Janet Knox, Project Manger Pacific Groundwater Group 2377 Eastlake Ave East Seattle, WA 98102

Dear Ms. Knox:

Included are the results from the testing of material submitted on May 20, 2010 from the James Oil, F&BI 005188 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 PGG0524R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on May 20, 2010 by Friedman & Bruya, Inc. from the Pacific Groundwater Group James Oil, F&BI 005188 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Pacific Groundwater Group					
005188-01	051810-PGG06					
005188-02	051810-PGG07					
005188-03	051810-PGG08					

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/24/10 Date Received: 05/20/10 Project: James Oil, F&BI 005188 Date Extracted: 05/21/10 Date Analyzed: 05/21/10

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	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
051810-PGG07 005188-02	130 x	380	97
Method Blank 00-0788 MB2	<50	<250	91

ENVIRONMENTAL CHEMISTS

Date of Report: 05/24/10 Date Received: 05/20/10 Project: James Oil, F&BI 005188

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

Laboratory Code:	005186-03 (Mat	rix Spike)				
Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	96	105	63-146	9
Laboratory Code:	Laboratory Con	trol Sam	ple Percent				
Analyte	Reporting Units	Spike Level	Recovery LCS	Acceptar Criteri			
Diesel Extended	mg/kg (ppm)	5,000	95	79-144	4		

3

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.

Ic - 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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Date of Report: 05/25/10 Date Received: 05/20/10 Project: James Oil, F&BI 005188 Date Extracted: 05/25/10 Date Analyzed: 05/25/10

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)

Sample ID Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate (% Recovery) (Limit 50-150)
051810-PGG06 ⁰⁰⁵¹⁸⁸⁻⁰¹	<50	<250	92
051810-PGG08 005188-03	<50	<250	87
Method Blank 00-0798 MB2	<50	<250	92
Subj:James Oil - PGG related figure/lab reports.Date:6/7/2010 4:03:34 P.M. Pacific Daylight TimeFrom:inger@PGWG.COMTo:Dlhenvironmental@aol.comCC:janet@PGWG.COM, jamesoil.jeff@skynetbb.com

Hi Donna -

Janet asked me to email you an internal figure we've generated, brief descriptions of sample locations (I think this is a repeat of information you already have), and copies of our analytical results (which I believe you also already have). Regardless, here it is in one package.

The following bullets summarize analytical results of the soil samples collected by PGG at the James Oil site. All samples were "splits" with DLH samples with the exception of sample 42810-PGG01. Analytical results are attached. A draft site figure that presents the approximate sample locations is also attached.

Donna – for my reference I've included DLH sample locations (from a figure you provided earlier on plus observations on May 18, 2010) – but I think I may be missing one floor sample location from the south-east corner. On the figure "Phase 1 Excavation" is the excavation in April; Phase 2 is the excavation in May 2010.

Sample 42810-PGG01

Soil sample collected near the south canopy piling at a depth of about 3 feet BEFORE further soil was
excavated in this area. This sample represents soil that was observed to "flow" out of the side of the partial
excavation at the end of April 27, 2010 site work. Further soil was excavated from this area on April 28,
2010 and May 18, 2010.

Sample 42810-PGG02 (split with DLH)

 Sample collected from the south canopy piling excavation after the limits of excavation in this area had been reached on April 28, 2010. Specifically, soil sample collected near the bottom of the east sidewall of the excavation in this area. Further excavation did not occur in this area after the sample was collected on April 28, 2010; however, the excavation was deepened and re-sampled on May 18, 2010.

Sample 42810-PGG03 (split with DLH)

 Soil sample collected near the "B5 area" where stained soil had been observed and documented in earlier White Shield reports. Specifically, this soil sample was collected from the floor of the excavation in the unpaved area south-east of the former concrete slab. Further excavation did not occur in this area after the sample was collected on April 28, 2010.

Sample 42810-PGG04 (split with DLH)

 Soil sample collected near the "B5 area" where stained soil had been observed and documented in earlier White Shield reports. Specifically, this soil sample was collected from the south sidewall of the excavation in the unpaved area south-east of the former concrete slab. Further excavation did not occur in this area after the sample was collected on April 28, 2010; however additional excavation and re-sampling in this area occurred on May 18, 2010.

Sample 42810-PGG05 (split with DLH)

 Soil sample collected near the south-western area of the former concrete pad in an area where the former concrete pad met the asphalt driveway. Stained soil was visible when concrete and asphalt were removed from this area so additional soil was removed. The soil sample was collected from the floor of the excavation. Further excavation did not occur in this area after the sample was collected on April 28, 2010.

Sample 051810-PGG06 (split with DLH)

 Soil sample collected from the north-east sidewall following re-excavation in the vicinity of DLH#3 on May 18, 2010. Specifically, the soil sample was collected from soil underlying the asphalt.

Sample 051810-PGG07 (split with DLH)

 Soil sample collected from the north-east sidewall following re-excavation in the vicinity of DLH#3 on May 18, 2010. Specifically, the soil sample was collected from the gray layer.

Sample 051810-PGG08 (split with DLH)

 Soil sample collected from the north-east sidewall following re-excavation in the vicinity of DLH#3 on May 18, 2010. Specifically, the soil sample was collected beneath the gray layer.

Inger

Inger Jackson | Hydrogeologist | Pacific Groundwater Group | (206) 329-0141

Wednesday, June 16, 2010 AOL: Dlhenvironmental



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

May 24, 2010

Janet Knox, Project Manger Pacific Groundwater Group 2377 Eastlake Ave East Seattle, WA 98102

Dear Ms. Knox:

Included are the results from the testing of material submitted on May 20, 2010 from the James Oil, F&BI 005188 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 PGG0524R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on May 20, 2010 by Friedman & Bruya, Inc. from the Pacific Groundwater Group James Oil, F&BI 005188 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Pacific Groundwater Group
005188-01	051810-PGG06
005188-02	051810-PGG07
005188-03	051810-PGG08

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/24/10 Date Received: 05/20/10 Project: James Oil, F&BI 005188 Date Extracted: 05/21/10 Date Analyzed: 05/21/10

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	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
051810-PGG07 005188-02	130 x	380	97
Method Blank 00-0788 MB2	<50	<250	91

ENVIRONMENTAL CHEMISTS

Date of Report: 05/24/10 Date Received: 05/20/10 Project: James Oil, F&BI 005188

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

Laboratory Code:	005186-03 (Mat	rix Spike)				
Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	96	105	63-146	9
Laboratory Code:	Laboratory Con	trol Sam	ple Percent				
Analyte	Reporting Units	Spike Level	Recovery LCS	Acceptar Criteri			
Diesel Extended	mg/kg (ppm)	5,000	95	79-144	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.

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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.

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

 $\ensuremath{\text{pr}}$ – 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

May 26, 2010

Janet Knox, Project Manger Pacific Groundwater Group 2377 Eastlake Ave East Seattle, WA 98102

Dear Ms. Knox:

Included are the additional results from the testing of material submitted on May 20, 2010 from the James Oil, F&BI 005188 project. There are 4 pages included in this report.

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 c: Inger Jackson PGG0526R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on May 20, 2010 by Friedman & Bruya, Inc. from the Pacific Groundwater Group James Oil, F&BI 005188 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Pacific Groundwater Group
005188-01	051810-PGG06
005188-02	051810-PGG07
005188-03	051810-PGG08

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/26/10 Date Received: 05/20/10 Project: James Oil, F&BI 005188 Date Extracted: 05/25/10 Date Analyzed: 05/25/10

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	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
051810-PGG06 005188-01	<50	<250	92
051810-PGG08 005188-03	<50	<250	87
Method Blank 00-0798 MB2	<50	<250	92

ENVIRONMENTAL CHEMISTS

Date of Report: 05/26/10 Date Received: 05/20/10 Project: James Oil, F&BI 005188

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

Laboratory Code:	005194-04 (Matr	ix Spike)				
Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	97	98	73-135	1
Laboratory Code:	Laboratory Cont	crol Samj	ple Percen	ıt			
Analyte	Reporting Units	Spike Level	Recove LCS				
Diesel Extended	mg/kg (ppm)	5,000	98	74-13	39		

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.

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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.

Ic - 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.

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

 $\ensuremath{\text{pr}}$ – 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.

Send Report To Company Tay Collage Address 2377 Factors	Summinster Grup	SAMPLERS (signature) & MALTIN PROJECT NAME/NO. PO #	Page #of TURNAROUND TIME Standard (2 Weeks) RUSH Rush charges authorized by:
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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

May 7, 2010

Janet Knox, Project Manger Pacific Groundwater Group 2377 Eastlake Ave East Seattle, WA 98102

Dear Ms. Knox:

Included are the results from the testing of material submitted on April 29, 2010 from the James Oil JK1001.02, F&BI 004318 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.

Michael Erdahl Project Manager

Enclosures PGG0507R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on April 29, 2010 by Friedman & Bruya, Inc. from the Pacific Groundwater Group James Oil JK1001.02, F&BI 004318 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Pacific Groundwater Group
004318-01	42810-PGG01
004318-02	42810-PGG02
004318-03	42810-PGG03
004318-04	42810-PGG04
004318-05	42810-PGG05

All quality control requirements were acceptable.

ENVIRONMENTAL CHEMISTS

Date of Report: 05/07/10 Date Received: 04/29/10 Project: James Oil JK1001.02, F&BI 004318 Date Extracted: 04/30/10 Date Analyzed: 05/03/10

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	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate (<u>% Recovery</u>) (Limit 50-150)
42810-PGG01 004318-01	4,000	900	98
42810-PGG02 004318-02	<50	<250	95
42810-PGG05 004318-05	<50	<250	95
Method Blank 00-0627 MB2	<50	<250	97

ENVIRONMENTAL CHEMISTS

Date of Report: 05/07/10 Date Received: 04/29/10 Project: James Oil JK1001.02, F&BI 004318 Date Extracted: 04/30/10 Date Analyzed: 05/03/10

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx Sample Extracts Passed Through a Silica Gel Column Prior to Analysis Results Reported on a Dry Weight Basis

Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate (% Recovery) (Limit 50-150)
42810-PGG03 004318-03	540	1,400	86
42810-PGG04 004318-04	380 x	2,200	89
Method Blank 00-0627 MB2	<50	<250	102

ENVIRONMENTAL CHEMISTS

Date of Report: 05/07/10 Date Received: 04/29/10 Project: James Oil JK1001.02, F&BI 004318

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

Laboratory Code:	004274-06 (Matu	rix Spike)				
Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	96	92	63-146	4
Laboratory Code:	Laboratory Con	trol Sam	ple Percent				
Analyte	Reporting Units	Spike Level	Recovery				
Diesel Extended	mg/kg (ppm)	5,000	96	79-14	4		

ENVIRONMENTAL CHEMISTS

Date of Report: 05/07/10 Date Received: 04/29/10 Project: James Oil JK1001.02, F&BI 004318

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

Laboratory Code:	004274-06 (Matr	ix Spike)	Silica Gel (Wet wt)	Percent	Percent		
Analyte	Reporting Units	Spike Level	Sample Result	Recovery MS	Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	98	99	73-135	1
Laboratory Code:	Laboratory Cont	rol Samp	ole Silica C Percen				
Analyte	Reporting Units	Spike Level	Recover LCS	ry Accept Crite			
Diesel Extended	mg/kg (ppm)	5,000	95	74-13	39		

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.

Ic - 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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Site Assessment Report: Underground Storage Tank Removal & Soil Remediation Pacific Pride Facility (G&W Oil and Wood, Inc.) 903 West First Street, Cle Ellum, WA Assessment and Remediation Consulting Services (ARCS) June 28, 1999



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Underground Storage Tank Removal & Soil Remediation

Prepared for:

Pacific Pride Facility (G&W Oil and Wood, Inc.) 903 West First Street Cle Ellum, Washington 98922

#100082 U8109

ARCS

On Behalf of:

James Oil Company, Inc. 666 Griffin Avenue Enumclaw, Washington 98022

Date:

June 28, 1999

Prepared By:

Assessment and Remediation Consulting Services (ARCS) 475 SE Sycamore Lane Issaquah, Washington 98027 (425) 837-0220 443- 3130

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Eric K. Chapman, CHMM Principal / Environmental Scientist

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Attachments

Attachment A – Ecology Notifications and Local Permits

Attachment B - Tank Cleaning Certificate

Attachment C - Laboratory Data Sheets with Chain-of Custody Documentation

Attachment D - Photographs

EXECUTIVE SUMMARY

This report documents the closure of four USTs at the Pacific Pride card lock fueling facility in Cle Elum, Washington. Two of the USTs were removed and the other two were closed in-place due to their location beneath an existing building.

Visual and olfactory indications of contamination were present in soils surrounding the diesel UST and beneath the fuel island area. Contaminated soils were excavated from these areas and stockpiled on site for treatment using landfarming and bioremediation techniques.

Analytical results of soil samples collected from the gasoline UST excavation, piping trench, and fuel island found that concentrations of gasoline-range TPH and BTEX were not detected. Diesel-range TPH was detected in the diesel UST excavation, but at concentrations that were below the Ecology clean up levels. Heavy oil was identified in soils collected from the base of the diesel UST excavation at concentrations that slightly exceed the Ecology cleanup levels.

The majority of contamination has been removed from the affected areas of the site. Ground water was not encountered in any of the excavations, the deepest of which was advanced to 12 feet bsg. Any remaining petroleum hydrocarbons in the soil will naturally attenuate, and should not pose any adverse risk to human health or the environment.

1.0 INTRODUCTION

This report documents the closure of four underground storage tanks (USTs) at the Pacific Pride facility located at 903 West 1st Street in Cle Elum, Washington. The USTs included two 6,000-gallon gasoline storage tanks, a 2,000-gallon gasoline storage tank, a 12,000-gallon diesel fuel tank. The site has been used as a card lock fueling facility for the past several years.

Presented in this report is a description of the methods used to remove the USTs, sample collection procedures, a summary of laboratory analytical results, and conclusions and recommendations. Included as attachments to this report are site diagrams, tank cleaning certificates, laboratory data sheets. and photographs.

1.1 Site Information

The subject site is located at 903 West 1st Street in Cle Elum, Washington (see Vicinity Map). The site is a Pacific Pride card lock fueling station operated by James Oil Company. The owner of the property is Mr. Wayne Hill, P.O. Box 369, Cle Elum, WA 98932.

Existing structures on the site at the time of the UST closures included an automotive garage/office building, a storage building, and a new card lock fueling facility with aboveground storage tanks. The property consists of several acres of land located on the north side of West 1st Street. The local topography slopes to the south/southeast toward the Yakima River.

One of the 6,000-gallon gasoline USTs and the 12,000-gallon diesel UST were located on the south side of the property, near the existing fence line. The other two USTs were located beneath the garage/office building, as indicated on the Site Diagram. The two USTs located beneath the building were closed in-place, and the other two tanks were removed. Each tank was connected to piping that lead to a central fueling island as indicated on the Site Diagram. Pumps and piping were removed as part of the UST closures.

1.2 UST Contractor and Site Assessor Information

Gator Foaming of Sumner, Washington supervised the UST closure activities. Ms. Elizabeth Carter of Gator Foaming was the on-site UST Decommissioning Supervisor. Eric Chapman of Assessment and Remediation Consulting Services (ARCS) conducted the UST site assessment activities and prepared this report (IFCI Certification # 32-US-32003003).

2.0 FIELD ACTIVITIES

This section describes the UST closure and site assessment activities conducted at the site. Notification to remove the tanks was sent to the Department of Ecology in December 1998. Permits to remove the tanks were obtained from the Kittitas County Department of Building and Fire Safety. Copies of the Ecology notification and local permits are presented in Attachment A.

2.1 Diesel and Gasoline UST Removals

The UST closures were conducted on May 18, 1999. Residual fuel remaining in the tanks was removed by Pacific Pride and then tanks were cleaned and rinsed by Coastal Tank Cleaning, Inc. A tank cleaning certificate is present in Attachment B. The two tanks scheduled for removal were then inerted using solid carbon dioxide (dry ice). Once the vapors inside of the tank were below the lower explosive limit, the tanks were removed.

The 6,000-gallon gasoline tank and 12,000-gallon diesel tank were both partially exposed, with approximately 2/3 of the tank buried below surface grade (see photographs). A track-mounted excavator was used to excavate soil from the north side of each tank to allow for removal. As soils were excavated, a photo-ionization detector (PID) was used to monitor organic vapors. No organic vapors were detected in soils excavated from the sides of the gasoline or diesel USTs. In addition, no staining or petroleum odors were observed in the excavated soils.

The USTs were removed using the excavator and placed on a level area near the excavations. The exteriors of the USTs were visually inspected for indications of holes or corrosion that may have allowed a release of product. No holes or excessive corrosion were observed on the exterior of either UST. The tanks were cut on site and the metal was later taken off-site for disposal.

Soil samples were collected from the base and sidewalls of the UST excavations as described in a later section of this report. No visual or olfactory indications of contamination were observed in the gasoline UST excavation. There were, however, indications of petroleum-contamination in the diesel UST excavation. A further discussion of the extent of contamination is discussed in a separate section of this report.

2.2 In-Place Closure of Gasoline USTs

The two gasoline USTs located beneath the west building were closed in-place by filling them with concrete slurry. Before the tanks were filled, residual fuel was removed and the tanks were cleaned and rinsed as described previously. Concrete slurry was then pumped into the tanks until they were completely filled. The fill neck and surrounding box of each tank were also filled with slurry. Site assessment activities conducted in support the in-place closures are described in Section 2.5.

2.3 Removal of Piping and Fuel Island

Each UST was connected to the former fuel island via underground piping. The piping from the gasoline UST located in the south side of the property was constructed of fiberglass. Piping connected to the other USTs was constructed of single-wall steel. All accessible piping was removed.

Piping from the two USTs that were closed in place was directed through an area that contained a septic drain field and underground utilities (electricity and water). The piping in this area was cut and left in place.

The fueling area consisted of a central island that included three pumps; two pumps for diesel and one for gasoline. There were also two satellite diesel pumps located on either side of the fueling pad (see Site Diagram). The ground surface in the fueling area was covered with asphalt and concrete.

Soils beneath the center island pumps and satellite pumps exhibited petroleum odors and staining. The contamination appeared to be limited to the area immediately surrounding and beneath the central fuel island, and directly beneath the satellite pumps. The contaminated material was excavated and stockpiled at a separate location on the property for remediation. Soil remediation activities are described in Section 2.4. Site assessment activities associated with the fuel island are described in section 2.5.

2.4 Soil Remediation Activities

Soils from the diesel fuel UST area and the fuel island were excavated until indications of contamination diminished. Excavated soils were monitored using a PID and visual observations. Once the limits of contamination were achieved, soil samples were collected from the affected areas and submitted for laboratory analysis, as described in Section 2.5.

The excavated soils were loaded into dump trucks and then stockpiled on plastic sheeting at a separate location on the property. Soils will be treated with a bioremediation material and land-farmed until contaminant concentrations meet the appropriate Model Toxics Control Act (MTCA) soil cleanup levels.

2.5 Site Assessment Activities

2.5.1 Gasoline Diesel UST Removals

ARCS personnel monitored soils excavated from around the gasoline and diesel USTs for organic vapors using a photo ionization detector (PID) calibrated to an isobutylene standard. Headspace readings of selected samples were measured by placing a portion of the sample into a resealable plastic bag and allowing the sample to warm for approximately 15 minutes. The probe of the PID was then inserted into the headspace of the plastic bag to measure vapors that accumulated above the soil. The PID measurements were recorded in a field notebook.

Headspace measurements of soil samples collected from the base and sidewalls of the excavation were also recorded. Based on PID measurements, no organic vapors were present in soil samples collected from the gasoline UST area.

Soils encountered in the excavations were characterized as gravelly sand with cobbles. The soil was dry to a depth of 6 to 7 feet, then became moist with finer-grained sands and some silt present. Ground water was not encountered at the final excavated depth of 12 feet bsg.

Low-level organic vapor concentrations were detected in soil samples collected from the base and south sidewall of the diesel UST excavation. Because diesel fuel has a lower volatility than gasoline, PID measurements are not as accurate for field screening. In addition, the contamination present in the soils exhibited odors more like used motor oil. There were also several used oil filters and oil containers observed discarded behind the tank, indicating that used motor oil may have been dumped in this area. Soils were excavated from the south sidewall and base of the excavation until petroleum odors and staining diminished. Ground water was not encountered in the excavation at the final depth of 12 feet bsg.

Discreet soil samples were collected from the base and sidewalls of each excavation. Samples were collected directly from the bucket of the excavator by pushing the laboratory-supplied sample container into the soil until it was filled. The sample container was then sealed, labeled and placed in an ice-filled cooler pending transport for analysis. Soil sampling locations are indicated on the Site Diagram. Laboratory methods and results are presented in Section 3.0.

2.5.2 In-Place Closure of Gasoline USTs

Soils near the in-place USTs closures were assessed by advancing test pits near the tanks. The test pits were completed using a track-mounted excavator. Soil samples collected from the test pits were screened for organic vapors using a PID and submitted for laboratory analysis.

The first test pit was advanced on the east side of the USTs, as indicated on the Site Diagram. At approximately 4 feet below surface grade (bsg), the excavator encountered an immovable object that may have been an underground utility, boulder, or one of the USTs. Because of known utilities located south and further east of the tanks, it was not possible to complete another test pit in the area.

The second test pit (GT2-TP) was completed on the north side of the USTs, approximately 2 feet from the fill tubes. The test pit was advanced to a depth of 8 feet bsg. A discreet soil sample was collected from between 7 and 8 feet bsg. No organic vapors were detected in the sample. One sample (GT2-TP-7) was submitted for laboratory analysis. The soil sample was collected following the procedure described previously. Laboratory analytical methods and results are presented in Section 3.0.

3.0 LABORATORY ANALYTICAL METHODS AND RESULTS

3.1 Laboratory Analytical Methods

Soil samples collected during the UST closures were analyzed by TEG Northwest of Bellevue, Washington. Samples collected from the gasoline UST excavation, piping trenches, fuel pump areas, and test pit were analyzed for gasoline-range total petroleum hydrocarbons (TPH-G) and benzene, toluene, ethyl benzene, and xylenes (BTEX) using Washington State Method WTPH-G and EPA Method 8021B, respectively.

Samples collected from the diesel UST excavation, piping trench, and beneath the fuel pumps were analyzed for diesel-range total petroleum hydrocarbons (TPH-D) using Washington State Method WTPH-D extended. Method WTPH-D extended identifies kerosene, jet fuel, diesel, fuel oil, and heavy oil. Soil analytical results are summarized in the following section. Laboratory data sheets and chain-of-custody documentation are presented in Attachment C.

3.2 Analytical Results

Analytical results of soil samples collected during the UST closures are summarized in the Table 1.

		Analysis Parameter (mg/kg)							
Sample ID	Description	TPH-D	TPH-G	Benzene	Toluene	Ethyl Benzene	Xylenes		
GT1-Base-6	Gasoline tank 1 – excavation base at 6 feet bsg.	-4	nd ³	nd	nd	nd	nd		
GT1-SSW-5	Gasoline tank 1 – excavation south sidewall at 5 feet bsg.		nd	nd	nd	nd	nd		
GT1-NSW-5	Gasoline tank 1 – excavation north sidewall at 5 feet bsg.	1.549	nd	nd	nd	nd	nd		
GT1-ESW-5	Gasoline tank 1 – excavation east sidewall at 5 feet bsg.	<u>م</u>	nd	nd	nd	nd	nd		
GDISP-8	Gasoline dispenser at 8 feet bsg.		nd	nd	nd	nd	nd		
D1-DISP-8	Diesel dispenser #1 at 8 feet bsg.	nd	-			-	-		

Table 1 Soil Analytical Results – James Oil
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Sample ID	Description	TPH-D	TPH-G	Benzene	Toluene	Ethyl Benzene	Xylenes
D2-DISP-8	Diesel dispenser #2 at 8 feet bsg.	-	nd	nd	nd	nd	nd
DSDISP1-3	Diesel satellite dispenser #1 at 3 feet bsg.	-	nd	nd	nd	nd	nd
DSISP2-3	Diesel satellite dispenser #2 at 3 feet bsg.	nd	nd	nd	nd	nd	nd
DTWBASE-10	Diesel UST excavation west base at 10 feet bsg.	93	-	-	4	4	14
DTEBASE-10	Diesel UST excavation east base at 10 feet bsg.	67	4	1.4	6	÷	74
DTESW-7	Diesel UST excavation east sidewall at 10 feet bsg.	nd	xæ i		8	-	2.4
DTSSW-7	Diesel UST excavation south sidewall at 10 feet bsg.	160 / 360 ⁵	-4	-	4	645	644
DTNSW-7	Diesel UST excavation north sidewall at 10 feet bsg.	58 / 86	-	1.14		-	
DT-Trench-3	Diesel piping trench at 3 feet bsg.	nd	ä	ас. С	19	- -	30 1
GT-Trench-3	Gasoline piping trench at 3 feet bsg.	1,52	nd	nd	nd	nd	nd
GT2-TP-7	Gasoline tank (in- place closures) test pit at 7 feet bsg.	- Her	nd	nd	nd	nd	nd
Laboratory Meth	od Detection Limits ¹	20	5	0.05	0.05	0.05	0.05
Ecology Cleanu	o Levels ²	200	100	0.5	40	20	20

Table 1 – continued -

Notes:

1 Laboratory method detection limits. See laboratory data sheets for additional information.

2 Ecology Model Toxics Control Act (MTCA) Method A Cleanup Levels – Soil (Chapter 173-360-740(2)(a)(i) WAC.

3 ND = Not detected at or above the laboratory method detection limits. See laboratory data sheets for detection limits.

4 -- = Not analyzed for specified parameter.

5 Results indicate concentrations of diesel (first number) and heavy oil identified in sample.

The laboratory analysis results indicate that gasoline-range TPH and BTEX was not detected in any of the samples submitted for analysis. Diesel-range TPH was detected in samples collected from the diesel UST excavation, but not above the Ecology Method A soil cleanup levels. However, heavy oil-range TPH was detected above the Method A cleanup levels in the sample collected from the south sidewall of the diesel UST excavation.

4.0 CONCLUSIONS AND RECOMMENDATIONS

This report documents the closure of four USTs at the Pacific Pride card lock fueling facility in Cle Elum, Washington. Two of the USTs were removed and the other two were closed in-place due to their location beneath an existing building.

Visual and olfactory indications of contamination were present in soils surrounding the diesel UST and beneath the fuel island area. Contaminated soils were excavated from these areas and stockpiled on site for treatment using landfarming and bioremediation techniques.

Analytical results of soil samples collected from the gasoline UST excavation, piping trench, and fuel island found that concentrations of gasoline-range TPH and BTEX were not detected. Diesel-range TPH was detected in the diesel UST excavation, but at concentrations that were below the Ecology clean up levels. Heavy oil was identified in soils collected from the base of the diesel UST excavation at concentrations that slightly exceed the Ecology cleanup levels.

The majority of contamination has been removed from the affected areas of the site. Ground water was not encountered in any of the excavations, the deepest of which was advanced to 12 feet bsg. Any remaining petroleum hydrocarbons in the soil will naturally attenuate with time, and should not pose any adverse risk to human health or the environment.

Contaminated soils removed from the excavation areas have been stockpiled and will be treated with a commercial bioremediation material and then landfarmed to reduce contaminant levels. The soils should be sampled in approximately three to six months to document the contaminant concentrations and determine if any further actions are necessary.

5.0 STANDARD LIMITATIONS

The work completed by ARCS in support of this project was conducted in accordance with professional standards applicable in the industry today. ARCS is not responsible for the methods or means utilized by the site owner or contractor, and we assume no liability for existing conditions at the site. With underground storage tank systems there is always the possibility of differing conditions outside of the areas investigated. The conclusions made in this report are based on the data collected at the time of the UST closures. This information should not be construed as legal advice.





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ATTACHMENT B

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May 17-89 12:338 Coast 1 Tank Cleaning 206 624 \$766

223 02-CO-AS-71-2028E

Phone (206) 624-9843 Fes No (200) 924 9766

Coastal Tank Cleaning, Inc.

3801 7th Avenue South, Seattle, Washington 98108

TO: James Oil Company

THIS LETTER IS TO CERTIFY THAT COASTAL TANK CLEANING, INC. HAS STRIPPED AND RINSED WITH SDAPY WATER THE BELOW LISTED TANKS IN ORDER TO ALLOW THE TANKS TO BE INERTED.

DATED THIS 16th DAY OF February, 1999

AUTHORIZED SIGNATURE:

Manage

1- 12,000 gallon dissel tank 2- 6,000 gallon gasoline tanks 1- 2,000 gallor gasoline tank

1

ATTACHMENT C

TRANSGLOBAL ENVIRONMENTAL GEOSCIENCES NORTHWEST, INC.

800 Sleater-Kinney SE, PMB #262 Lacey, Washington 98503-1127

Mobile Environmental Laboratories Environmental Sampling Services Telephone: (360) 459-4670 Fax: (360) 459-3432

June 2, 1999

Eric Chapman ARCS Assessment and Remediation Construction 475 SE Sycamore Lane Issaquah, WA 98027

Dear Mr. Chapman:

Please find enclosed the analytical data report for the James Oil Project in Cle Ellum, Washington. Soil samples were analyzed for Diesel and Oil by NWTPH-Dx/Dx Extended, Gasoline by NWTPH-Gx, and BTEX by Method 8021B on May 19, 1999.

The results of these analyses are summarized in the attached table. All soil values are reported on a dry weight basis. Applicable detection limits and QA/QC data are included. An invoice for this analytical work is also enclosed.

TEG Northwest appreciates the opportunity to have provided analytical services to ARCS 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,

Shey 2 Child

Sherry L. Chilcutt Vice President

QA/QC FOR ANALYTICAL METHODS

GENERAL

The TEG Northwest Laboratory quality assurance and quality control (QA/QC) procedures are conducted following the guidelines and objectives which meet or exceed certification/-accreditation requirements of California DOHS, Washington DOE, and Oregon DEQ. The Quality Control Program is a consistent set of procedures which assures data quality through the use of appropriate blanks, replicate analyses, surrogate spikes, and matrix spikes, and with the use of reference standards that meet or exceed EPA standards.

When analyses are taking place on-site with the mobile lab, the need for Field Blanks or Travel/Trip Blanks is eliminated. If there is going to be a delay before sample preparation for analysis, the sample is stored at 4^o C.

ANALYTICAL METHODS

TEG Northwest Labs use analytical methodologies which are in conformity with U. S. Environmental Protection Agency (EPA), Washington DOE, and Oregon DEQ methodologies. When necessary and appropriate due to the nature or composition of the sample, TEG may use variations of the methods which are consistent with recognized standards or variations used by the industry and government laboratories.

TPH-Gasoline, TPH-Diesel (Gasoline and/or Diesel, Modified EPA 8015, NWTPH-Gx and NWTPH-Dx)

A check standard is run at the beginning of the day. 1) A close standard is run at the end of the day. 2) Both open and close standards must be within 15% of the continuing calibration curve value. All samples are prepared with a surrogate spike, and the recovery must be between 65% and 135% unless high sample concentrations interfere with the determination of the recovery percentage. A duplicate sample is run at a rate of 1 per 10 samples. At least 1 method blank is run per 20 samples analyzed.

Purgeable Volatile Aromatics (BTEX, EPA 602/8020)

A check standard is run at the beginning of the day. The check standard is run at the end of the day. Both open and close standards must be within 15% of the continuing calibration curve value. All samples are prepared with a surrogate spike, and the recovery must be between 65% and 135% unless high sample concentrations interfere with the determination of the recovery percentage. At least 1 method blank is run per day.

TEG Job Number:	S90519-2
Client:	ARCS
Client Job Name:	James Oil
Client Job Number:	99-27

Analytical Results						
NWTPH-Gx / BTEX (8020)		MTH BLK	LCS	GT1-BASE-6	GT1-SSW-5	GT1-NSW-5
Matrix	Soil	Soil	Soil	Soil	Soil	Soi
Date extracted	Reporting	05/19/99	05/19/99	05/19/99	05/19/99	05/19/99
Date analyzed	Limits	05/20/99	05/20/99	05/20/99	05/20/99	05/20/99
NWTPH-Gx, mg/kg						
Mineral spirits/Stoddard solvent	5.0	nd		nd	nd	n
Gasoline	5.0	nd		nd	nd	n
BTEX (8020), µg/kg Benzene	50	nd	86%	nd	nd	n
Toluene	50	nd	86%	nd	nd	n
Ethylbenzene	50	nd		nd	nd	na
Xylenes	50	nd		nd	nd	na
Surrogate recoveries:						
Trifluorotoluene		86%	87%	95%	94%	98%
Bromofluorobenzene		89%	96%	95%	93%	979

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 65% TO 135%

TEG Job Number:	S90519-2
Client:	ARCS
Client Job Name:	James Oil
Client Job Number:	99-27

Analytical Results					DUPL	
NWTPH-Gx / BTEX (8020)		GT1ESW-5	GDISP-8	DSDISP2-3	DSDISP2-3	GTTRENCH-3
Matrix	Soil	Soil	Soil	Soil	Soil	Soil
Date extracted	Reporting	05/19/99	05/19/99	05/19/99	05/19/99	05/19/99
Date analyzed	Limits	05/20/99	05/20/99	05/20/99	05/20/99	05/20/99
NWTPH-Gx, mg/kg						
Mineral spirits/Stoddard solvent	5.0	nd	nd	nd	nd	nd
Gasoline	5.0	nd	nd	nd	nd	nd
BTEX (8020), µg/kg						
Benzene	50	nd	nd	nd	nd	nd
Toluene	50	nd	nd	nd	nd	nd
Ethylbenzene	50	nd	nd	nd	nd	nd
Xylenes	50	nd	nd	nd	nd	nd
Surrogate recoveries:						
Trifluorotoluene		87%	87%	98%	94%	95%
Bromofluorobenzene		90%	85%	98%	99%	99%

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 65% TO 135%

S90519-2
ARCS
James Oil
99-27

Analytical Results			MS	MSD	RPD
NWTPH-Gx / BTEX (8020)		GT2-TP-7	GT2-TP-7	GT2-TP-7	GT2-TP-7
Matrix	Soil	Soil	Soil	Soil	Soi
Date extracted	Reporting	05/19/99	05/19/99	05/19/99	05/19/99
Date analyzed	Limits	05/20/99	05/20/99	05/20/99	05/20/99
NWTPH-Gx, mg/kg					
Mineral spirits/Stoddard solvent	5.0	nd			
Gasoline	5.0	nd			
BTEX (8020), µg/kg					
Benzene	50	nd	103%	105%	2%
Toluene	50	nd	104%	109%	5%
Ethylbenzene	50	nd			
Xylenes	50	nd			
Surrogate recoveries:					
Trifluorotoluene		95%	101%	94%	
Bromofluorobenzene		101%	99%	96%	

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 65% TO 135%

TEG Job Number:	S90519-2
Client:	ARCS
Client Job Name:	James Oil
Client Job Number:	99-27

Analytical Results							DUPI
WWTPH-Dx, mg/kg		MTH BLK	D1DISP-8	D2DISP-8	DSDISP1-3	DSDISP2-3	
Vlatrix	Soil	Soil	Soil	Soil	Soil	Soil	Soi
Date extracted	Reporting	05/19/99	05/19/99	05/19/99	05/19/99	05/19/99	05/19/99
Date analyzed	Limits	05/19/99	05/19/99	05/19/99	05/19/99	05/19/99	05/19/99
Noisture, %				6.51.57.67		00/10/00	03/13/35
Kerosene/Jet fuel	20	nd	nd	nd	nd	nd	nc
Diesel/Fuel oil	20	nd	nd	nd	nd	nd	nc
Heavy oil	50	nd	nd	nd	nd	nd	nd
Surrogate recoveries:							
luorobiphenyl		93%	96%	96%	96%	97%	97%
-Terphenyl		102%	101%	104%	108%	109%	110%

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 65% TO 135%

S90519-2
ARCS
James Oil
99-27

Analytical Results

NWTPH-Dx, mg/kg		DTWBASE-10	DTEBASE-10	DTESW-7	DTSSW-7	DTNSW-7
Matrix	Soil	Soil	Soil	Soil	Soil	Soi
Date extracted	Reporting	05/19/99	05/19/99	05/19/99	05/19/99	05/19/99
Date analyzed	Limits	05/19/99	05/19/99	05/19/99	05/19/99	05/19/99
Moisture, %		12%	12%	7%	12%	11%
Kerosene/Jet fuel	20	nd	nd	nd	nd	nd
Diesel/Fuel oil	20	93	67	nd	160	58
Heavy oil	50	nd	nd	nd	360	86
Surrogate recoveries:						
Fluorobiphenyl		96%	93%	92%	94%	93%
o-Terphenyl		115%	114%	113%	119%	117%

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 65% TO 135%

TEG Job Number:	S90519-2
Client:	ARCS
Client Job Name:	James Oil
Client Job Number:	99-27

Analytical Results

NWTPH-Dx, mg/kg	Т	TRENCH-3
Matrix	Soil	Soil
Date extracted	Reporting	05/19/99
Date analyzed	Limits	05/19/99
Moisture, %		9%
Kerosene/Jet fuel	20	nd
Diesel/Fuel oil	20	nd
Heavy oil	50	nd
Surrogate recoveries:		
Fluorobiphenyl		98%
o-Terphenyl		114%

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis Acceptable Recovery limits: 65% TO 135%

ARCS	ARCS			DATE: 7 - 14 - 59	PAGE /	OF /
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RELINQUISHED BY (Signature)	DATE/TIME	HECEIVED BY (signature)	DAIE/IIME CHAINOT	SEALS INTACT? Y/N/NA	5 Days	
	SAMPLE DISPOS	SAMPLE DISPOSAL INSTRUCTIONS	RECEIVE	RECEIVED GOOD COND./COLD		
		Distant Distant	NOTES:			

ATTACHMENT D



Photograph 1: View of gasoline and diesel USTs located on the east side of the property, looking west.



<u>Photograph 2</u>: View of the 6,000-gallon gasoline UST being removed from the excavation, looking west.

-1



Photograph 3: View of the gasoline UST excavation after removal of the tank.



<u>Photograph 4</u>: View of the 12,000-gallon diesel UST after removal from the excavation, looking southwest.



Photograph 5: View of the fueling area looking northeast.



Photograph 6: View of the pump island, looking west..



<u>Photograph 7</u>: View of area excavated beneath the pump island, looking northwest.



<u>Photograph 8</u>: View of the area excavated beneath the pump island, looking east.



<u>Photograph 9</u>: View of the piping trenches for the gasoline and diesel USTs, looking southwest.



Photograph 10: View of the test pit completed near the in-place UST closures.