

August 25, 2005
Project 001.0200.00001

Mr. Jerome O'Leary
ARD LLC
1201 Pacific Avenue, Suite 1400
Tacoma, Washington 98402

Mr. Brian Engelking
ARD LLC
4411 Point Fosdick Road, Suite 301
Gig Harbor, Washington 98335

Re: Remediation of Soil Beneath Railcar, Former Auburn Auto Wrecking Yard
Property, Northeast Corner of 6th Street SE and A Street SE, Auburn, Washington

Dear Jerome and Brian:

SLR International Corp (SLR) has prepared this report to present the results of the recent soil excavation activities that were conducted beneath the former railcar at the above-referenced property (the "site"). The purpose of the excavation was to remove any surface soil that contained metals (cadmium and lead) and semi-volatile petroleum hydrocarbon concentrations above the Model Toxics Control Act (MTCA) Method A cleanup levels¹.

Background

The site is located at the northeast corner of the intersection of A Street Southeast and 6th Street Southeast in Auburn Washington. The location of the site is shown on Figure 1. The site consists of two tax lots (182105-9184 and 182105-9253). The address of tax lot 182105-9184 is 524 A Street Southeast and the address of tax lot 182105-9253 is 512 A Street Southeast. The site has been vacant since approximately 1989.

The results of previous environmental investigations showed that the surface soil throughout most of the site contained lead and cadmium concentrations above the Method A cleanup levels. The lead and cadmium concentrations typically decreased with depth to below the Method A cleanup levels by 12 inches below ground surface (bgs). Petroleum

¹ Chapter 173-340 WAC, Model Toxics Control Act Regulation, Method A Cleanup Levels. Amended February 12, 2001.

hydrocarbons in the diesel and oil ranges were also detected in the surface soil; however, the concentrations were below the Method A cleanup levels in all of the analyzed samples, except for one composite sample. The results of the previous investigation activities were presented in Orion Environmental Services' report, *Modified Phase I Environmental Assessment, Bates Wrecking Yard, 512 and 524 A Street Southeast, Auburn, Washington*, dated September 21, 2001, and in Associated Earth Sciences, Inc.'s report, *Phase II Environmental Site Assessment, Proposed Jack in the Box Site, Auburn, Washington*, dated February 19, 2004.

During May and June 2005, the surface soil that contained lead, cadmium, and petroleum hydrocarbon concentrations greater than the Method A cleanup levels was effectively removed by excavation methods. A total of 3,292 tons of soil were excavated and hauled off-site for disposal. The only potentially impacted area at the site that could not be excavated was located beneath a former railcar that was used for storage. The results of the excavation activities were presented in SLR's *Soil Remediation Report, Former Auburn Auto Wrecking Yard Property, Northeast Corner of 6th Street SE and A Street SE, Auburn, Washington*, dated June 22, 2005.

Demolition and Excavation Activities

Prior to June 2005, there were two abandoned and dilapidated buildings (a house and a former office/shop building) in the western part of the site. The former railcar was located along the eastern end of the former office/shop building. In late June 2005, the buildings and the railcar were demolished, and the debris was hauled off-site for disposal. The locations of the former buildings and railcar are shown on Figure 2. Prior to and during the demolition, visual inspections of the concrete floor of the former office/shop building showed that there were no hoists, sumps, pipes, or drains in the floor. The concrete was in good condition with limited staining. There were also no pipes or drains in the concrete floor of the basement of the house.

On June 29, 2005, Wayne Construction excavated the soil beneath the railcar to a depth of approximately 4 inches below ground surface (bgs). SLR personnel collected a soil sample (designated G5-4) from the excavation area, near the northern end of previous soil excavation grid cell G5. The location of the soil sample is shown on Figure 2. Prior to collecting the sample, SLR screened the soil at the base of the excavation for the presence of petroleum hydrocarbons by using odors and visual appearance (staining). There was no evidence of petroleum hydrocarbons in the soil beneath the railcar.

The soil sample was submitted to Friedman & Bruya, Inc. (F&B) in Seattle, Washington, for chemical analysis. The sample was analyzed for cadmium and lead by EPA Method 6010. The analytical results showed that sample contained a lead concentration [62 milligrams per kilogram (mg/kg)] that was below the Method A cleanup level (250 mg/kg). The sample did not contain a cadmium concentration above the method reporting limit (MRL). A copy of the laboratory report is attached.

During surface grading of the western part of the site to construct a Jack in the Box restaurant, Wayne Construction encountered two 500-gallon underground tanks at a depth of less than 6 inches bgs. The tanks were located side-by-side in previous soil excavation grid cells E9 and E10 (Figure 2). SLR was not on site during the removal of the tanks; however, the site owners stated that the tanks were empty, and there were no noticeable corrosion or holes in either tank. The tanks were removed and disposed off-site at the Marine Vacuum Service, Inc., facility in Seattle, Washington. On June 29, 2005, the tank excavation was extended to a depth of approximately 6 feet bgs and there was no evidence of petroleum hydrocarbons in the soil. SLR collected two composite soil samples (designated Tank Ex NW Wall 4' and Tank Ex SE Wall 4') from the sidewalls of the excavation and one discrete sample (designated Tank Ex Bottom 6') from the floor of the excavation for laboratory analysis. The samples were submitted to F&B for analysis of hydrocarbon identification by Ecology Method NWTPH-HCID, and for lead and cadmium. The analytical results showed that the samples did not contain petroleum hydrocarbon, lead, or cadmium concentrations above the MRLs. A copy of the laboratory report is attached.

A total of approximately 40 cubic yards of soil were excavated from beneath the railcar and from the tank excavation. In accordance with Waste Management requirements, SLR collected one composite soil sample (designated SP-RRC) from the stockpiled excavated soil for analysis. The sample was submitted to F&B for analysis of TCLP lead and TCLP cadmium. The TCLP concentrations in the sample were below the maximum allowable concentrations for the toxicity characteristic [1 milligram per liter (mg/L) for cadmium and 5 mg/L for lead]²; therefore, the excavated soil was classified as non-hazardous waste. A copy of the laboratory report is attached. The excavated soil was hauled to the Columbia Ridge Landfill in Arlington, Oregon, for disposal.

² Chapter 173-303 WAC, Dangerous Waste Regulations, Toxicity Characteristics List. Amended June 2000.

Mr. O'Leary and Mr. Engelking
August 25, 2005
Page 4

Project 001.0200.00001

Conclusions

After demolition, the soil beneath the former railcar was excavated to a depth of approximately 4 inches bgs. The excavation sample analytical results showed that the remaining soil beneath the railcar contains lead and cadmium concentrations below the Method A cleanup levels. Based on the April 2005 pre-excavation sample results and the final excavation sample results from the May and June excavation activities, the remediation effectively removed the impacted soil at the site.

If you have any questions, please call me at (425) 402-8800.

Sincerely,

SLR International Corp



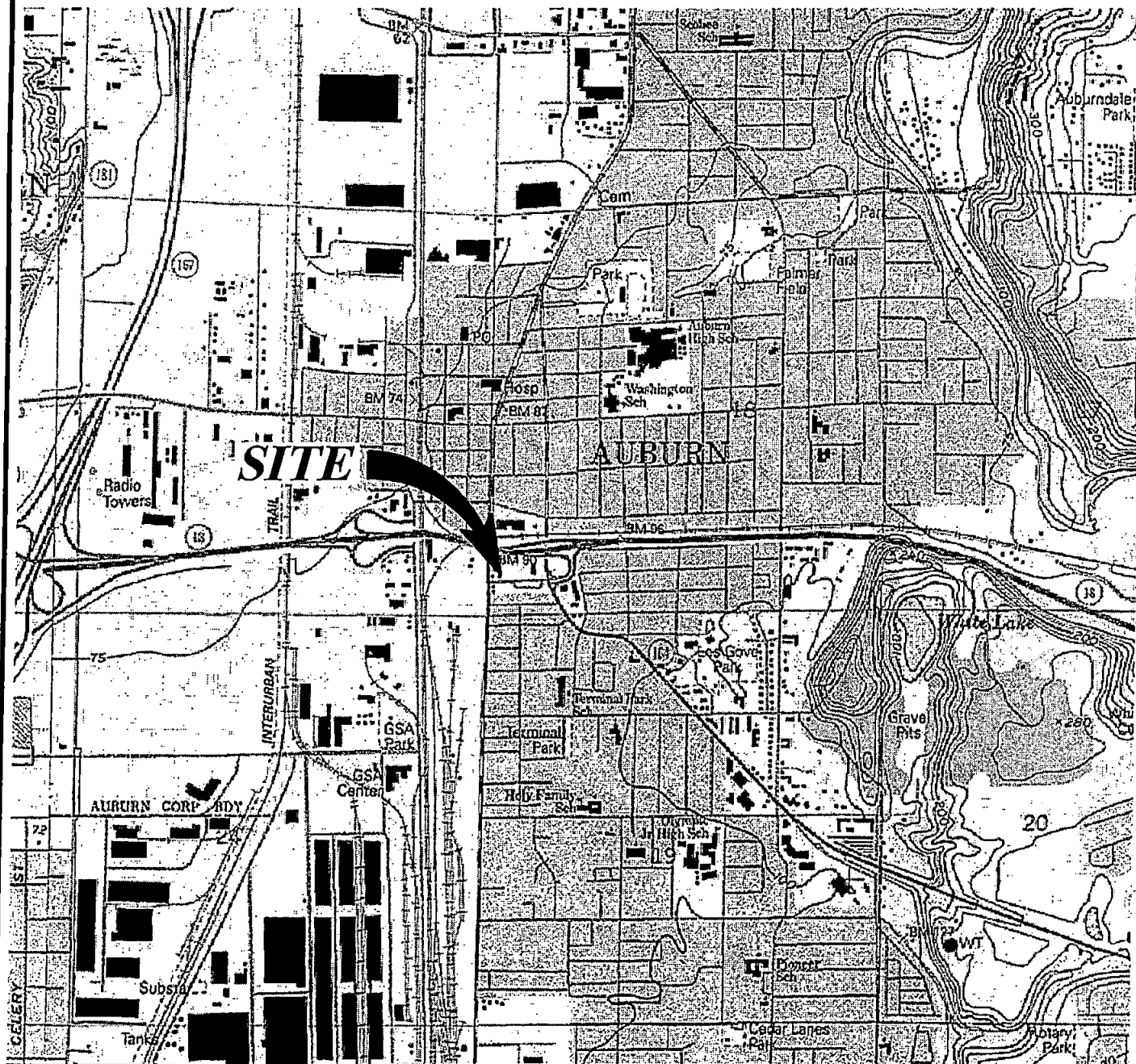
Michael D. Staton, R.G.
Principal Geologist

Attachments: Limitations
Figures 1 and 2
Laboratory Reports

LIMITATIONS

The services reflected in this report were performed consistent with generally accepted professional consulting principals and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This information is solely for the use of our client unless otherwise noted. Any reliance on this information by a third party is at such party's sole risk.

Opinions and recommendations contained herein apply to conditions existing when services were performed and are intended only for the client, purposes, location, timeframes, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, nor the use of segregated portions of this report.



0 2000 4000
SCALE IN FEET

SLR

SLR International Corp

22122 20th AVE SE
BLDG. H, SUITE 150
BOTHELL, WA 98021

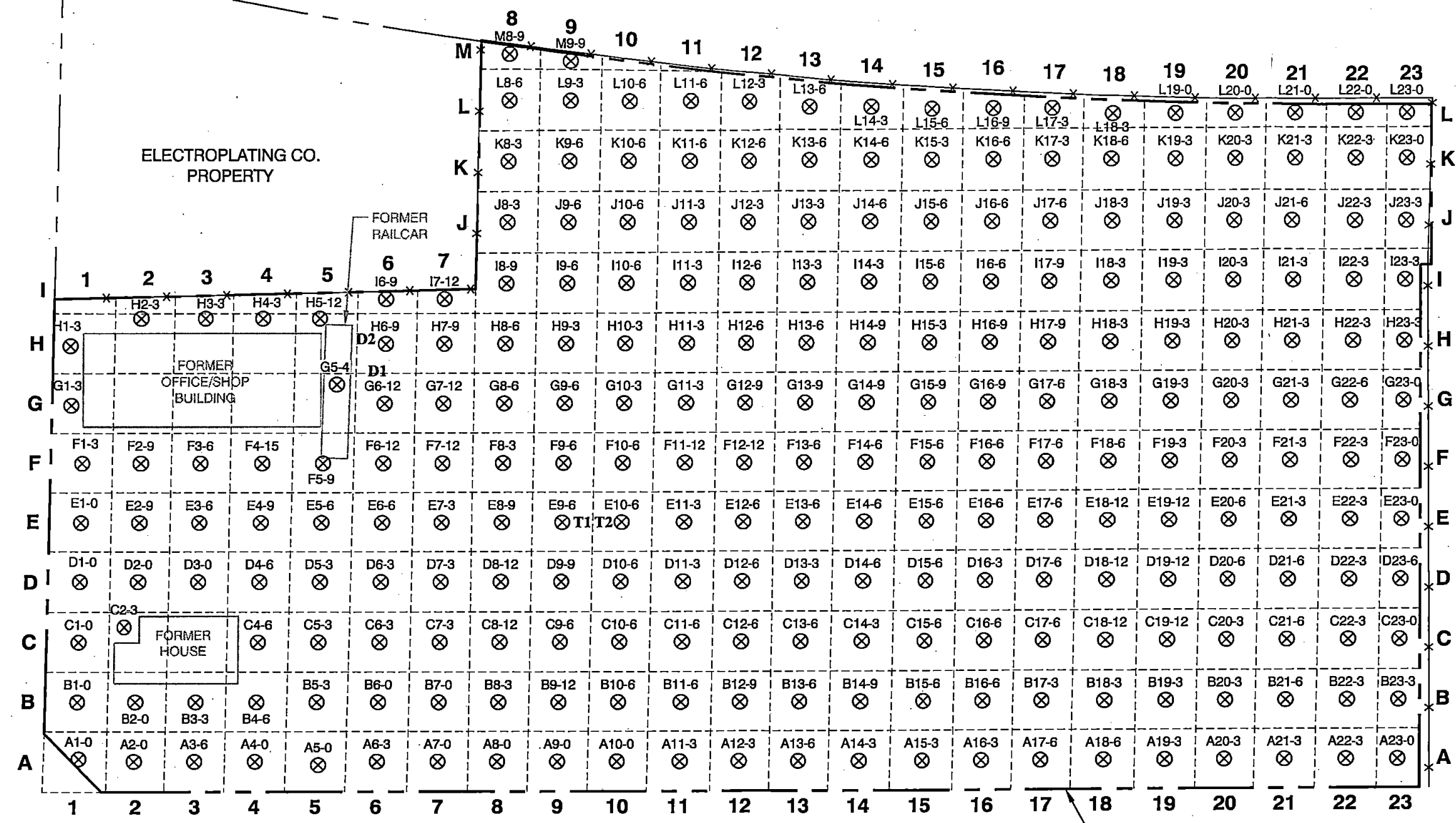
T: 425-402-8800
F: 425-402-8488

DATE 06/04
DWN. BDT
APPR. *mds*
REVIS.
PROJECT NO.
001.0200.00001

FIGURE 1
FORMER AUBURN AUTO WRECKING YARD PROPERTY
AUBURN, WASHINGTON

SITE LOCATION MAP

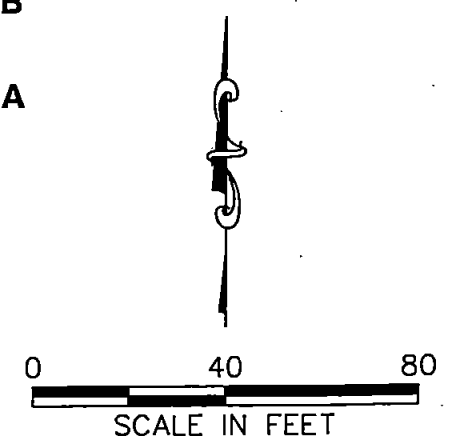
A STREET SE




6TH STREET SE

LEGEND

- D11-3 ⊗ EXCAVATION SOIL SAMPLE LOCATION AND FINAL SAMPLE DESIGNATION
- *— CHAIN LINK FENCE
- D1 APPROXIMATE LOCATION OF BURIED DRUM #1
- D2 APPROXIMATE LOCATION OF BURIED DRUM #2
- T1 APPROXIMATE LOCATION OF UNDERGROUND TANK #1
- T2 APPROXIMATE LOCATION OF UNDERGROUND TANK #2



 SLR International Corp	22122 20th AVE SE BLDG. H, SUITE 150 BOTHELL, WA 98021	DATE 08/05 DWN. BDT APPR. <i>ms</i> REVIS. PROJECT NO. 001.0200.00001	FIGURE 2 FORMER AUBURN AUTO WRECKING YARD PROPERTY AUBURN, WASHINGTON
	T: 425-402-8800 F: 425-402-8488		EXCAVATION SAMPLE LOCATIONS

FRIEDMAN & BRUYA, INC.

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

July 5, 2005

Mike Staton, Project Manager
SLR International Corp.
22122 20th Ave. SE., H-150
Bothell, WA 98021


Dear Mr. Staton:

Included are the results from the testing of material submitted on June 29, 2005 from the Auburn Auto Wrecking, 001.0200.00001, F&BI 506334 project. There are 3 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.



Charlene Morrow
Chemist

Enclosures
SLR0705R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 07/05/05

Date Received: 06/29/05

Project: Auburn Auto Wrecking, 001.0200.00001, F&BI 506334

Date Extracted: 06/30/05

Date Analyzed: 06/30/05

**RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES
FOR GASOLINE, DIESEL AND HEAVY OIL BY NWTPH-HCID
Results Reported as Not Detected (ND) or Detected (D)**

THE DATA PROVIDED BELOW WAS PERFORMED PER THE GUIDELINES ESTABLISHED BY
THE WASHINGTON DEPARTMENT OF ECOLOGY AND WERE NOT DESIGNED TO
PROVIDE INFORMATION WITH REGARDS TO THE ACTUAL IDENTIFICATION
OF ANY MATERIAL PRESENT

<u>Sample ID</u> Laboratory ID	<u>Gasoline</u>	<u>Diesel</u>	<u>Heavy Oil</u>	<u>Surrogate</u> (% Recovery)
Tank Ex NW Wall 4' 506334-01	ND	ND	ND	97
Tank Ex SE Wall 4' 506334-02	ND	ND	ND	99
Tank Ex Bottom 6' 506334-03	ND	ND	ND	95
Method Blank	ND	ND	ND	100

ND - Material not detected at or above 20 mg/kg gas, 50 mg/kg diesel and 100 mg/kg heavy oil.

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 07/05/05

Date Received: 06/29/05

Project: Auburn Auto Wrecking, 001.0200.00001, F&BI 506334

Date Extracted: 06/30/05

Date Analyzed: 06/30/05

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES
FOR TOTAL METALS
BY EPA METHOD 6010

Results Reported on a Dry Weight Basis

Results Reported as $\mu\text{g/g}$ (ppm)

<u>Sample ID</u> Laboratory ID	<u>Cadmium</u>	<u>Lead</u>
Tank Ex NW Wall 4' 506334-01	<1.0	<2.0
Tank Ex SE Wall 4' 506334-02	<1.0	<2.0
Tank Ex Bottom 6' 506334-03	<1.0	<2.0
G5-4 506334-04	<1.0	62
SP-RRC 506334-05	1.1	270 ve
Method Blank	<1.0	<2.0

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

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 07/05/05

Date Received: 06/29/05

Project: Auburn Auto Wrecking, 001.0200.00001, F&BI 506334

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL METALS BY EPA METHOD 6010

Laboratory Code: 506334-05 (Duplicate)

Analyte	Reporting Units	Sample Result	Duplicate Result	Relative Percent Difference	RPD (Limit 20)
Cadmium	µg/g (ppm)	1.1	1.1	0	0-20
Lead	µg/g (ppm)	270 ve	270 ve	0	0-20

Laboratory Code: 506334-05 (Matrix Spike)

Analyte	Reporting Units	Spike Level	Sample Result	Percent Recovery MS	Control Limits
Cadmium	µg/g (ppm)	25	1.1	91	50-150
Lead	µg/g (ppm)	50	270 ve	ai	50-150

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Cadmium	µg/g (ppm)	25	89	70-130
Lead	µg/g (ppm)	50	87	70-130

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

ai - The amount spiked was insufficient to give meaningful recovery data.


BT

Phone # (425) 402-8800 Fax # (425) 402-8488

REMARKS

- ☐ Will call with instructions

Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029
Ph. (206) 285-8282
Fax (206) 283-5044

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by: 	Ian Young	SLR	6/2/05	1545
Received by:	VINH VO	FBI	6-29-05	1545
Relinquished by:				
Received by:				

FRIEDMAN & BRUYA, INC.

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

July 19, 2005

Mike Staton, Project Manager
SLR International Corp.
22122 20th Ave. SE., H-150
Bothell, WA 98021

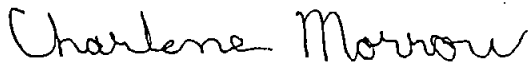
Dear Mr. Staton:

Included are the results from the additional testing of material submitted on June 29, 2005 from the Auburn Auto Wrecking, 001.0200.00001, F&BI 506334 project. There are 2 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.



Charlene Morrow
Chemist

Enclosures
SLR0719R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 07/19/05

Date Received: 06/29/05

Project: Auburn Auto Wrecking, 001.0200.00001, F&BI 506334

Date Extracted: 07/14/05

Date Analyzed: 07/14/05

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES
FOR TCLP METALS IN ACCORDANCE WITH
40 CFR PART 261

Results Reported as mg/L (ppm)

<u>Sample ID</u>	<u>Cadmium</u>	<u>Lead</u>
Laboratory ID		
SP-RRC	<0.1	<0.5
506334-05		
Method Blank	<0.1	<0.5
<i>TCLP Limits</i>	<i>1.0</i>	<i>5.0</i>

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 07/19/05

Date Received: 06/29/05

Project: Auburn Auto Wrecking, 001.0200.00001, F&BI 506334

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TCLP METALS IN ACCORDANCE WITH 40 CFR PART 261

Laboratory Code: 509078-01/02 (Duplicate)

Analyte	Reporting Units	Sample Result	Duplicate Result	Relative Percent Difference	RPD (Limit 20)
Cadmium	mg/L (ppm)	0.7	0.8	13	0-20
Lead	mg/L (ppm)	<0.5	<0.5	nm	0-20

Laboratory Code: 509078-01/02 (Matrix Spike)

Analyte	Reporting Units	Spike Level	Sample Result	Percent Recovery MS	Control Limits
Cadmium	mg/L (ppm)	5	0.7	115	50-150
Lead	mg/L (ppm)	10	<0.5	194	50-150

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Cadmium	mg/L (ppm)	5	92	70-130
Lead	mg/L (ppm)	10	90	70-130

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

506334

SAMPLE CHAIN OF CUSTODY

CM 06/29/05

BT

Send Report To Mike Staton
 Company SLR
 Address 22122 20th Ave SE Suite H-150
 City, State, ZIP Bothell, WA 98021
 Phone # (425) 402-8800 Fax # (425) 402-8488

SAMPLERS (signature)

PROJECT NAME/NO.

Auburn Auto Wrecking
 001.0200.00001

PO #

REMARKS

Page # 1 of 1

TURNAROUND TIME

☐ Standard (2 Weeks)☒ RUSH 24 hrs

Rush charges authorized by:

Im Young

SAMPLE DISPOSAL

☐ Dispose after 30 days☐ Return samples☐ Will call with instructions

Sample ID	Lab ID	Date	Time	Sample Type	# of containers	ANALYSES REQUESTED											Notes
						TPH-Diesel	TPH-Gasoline	BTEX by 8021B	VOCs by 8260	SVOCs by 8270	HFS	HClD	Total Lead	Total Cadmium	TCLP Pb/Cd	per Mike d.	
Tank Ex NW Well 4'	01	6/29/05	1430	S	1							X	X	X			
Tank Ex SE Well 4'	02											X					
Tank Ex Bottom 6'	03											X					
per Jan y. 6-30-05 RRC-0 G5-4	04		1445														
SP-RRC	05		1450														

Friedman & Bruya, Inc.
 3012 16th Avenue West
 Seattle, WA 98119-2029
 Ph. (206) 285-8282
 Fax (206) 283-5044

SIGNATURE		PRINT NAME		COMPANY		DATE	TIME
Relinquished by:				SLR		6/29/05	1545
Received by:			VINH VO	FBI		6-29-05	1545
Relinquished by:							
Received by:							