



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Site Name: Rockwell Apartment

Property Address: 14521 E Rockwell Ave, Spokane Valley WA 99216

Facility Site No.: N/A

Cleanup Site No.: N/A

County Assessor's Parcel Number (s): 45022.5301, 45022.5302, 45022.5401, and 45022.5402

Subject: Sampling Activities Summary and Variance Report

This memorandum summarizes the sampling activities conducted in accordance with the approved Sampling and Analysis Plan (SAP) and documents any variances from the original plan, along with the reasons for those deviations, and the sampling results.

Summary of Activities

Sampling was conducted as outlined in the SAP, with samples collected from designated locations at a depth of 12-18 inches. All efforts were made to adhere to the established protocols and achieve the intended sample volume and quality. Figure 1 includes the updated sampling locations with latitude and longitude information.

The soil samples were analyzed using the Department of Ecology (Ecology) internal handheld XRF equipment. An XRF (X-ray fluorescence) is a non-destructive analytical technique used to determine the elemental composition of materials. All soil samples were processed using a USA Standard Test Sieve ASTM E-11 Specification size 0.0787 inches.

Sampling Results

The sample results for arsenic (As) and lead (Pb) concentrations can be found in Table 1. A review of the data reveals that the majority of the samples have arsenic levels exceeding the MTCA Method A cleanup level of 20 ppm, with 20 samples identified as non-compliant. Additionally, elevated lead levels were observed in three distinct sample locations, each exceeding the MTCA Method A cleanup threshold of 250 ppm. These findings highlight the presence of significant contamination in terms of both arsenic and lead across the sampled locations. Samples exceeding these levels may require further evaluation or remedial action.

Variances from the Original Sampling Plan

While the sampling effort was generally consistent with the SAP, the following variances occurred:

1. **Reduction in Samples per Location:** The original plan called for multiple samples per location. However, due to the presence of significant cobble at narrow depth ranges, it was not feasible to collect sufficient sample volumes at some locations. As a result, sampling was limited to one sample per location. This adjustment was necessary to ensure that the collected material met analytical requirements and avoided compromising the representativeness of the samples.
2. **Depth Consistency:** Samples were collected uniformly within the planned depth range of 12-18 inches, ensuring consistency across all sampling locations.

Justification for Variances

The decision to reduce the number of samples per location was based on site-specific challenges encountered during field activities. The significant presence of cobble impeded our ability to obtain adequate sample volume at the planned depth intervals. This issue was evaluated in the field, and it was determined that reducing the number of samples was the most practical approach to achieve the objectives of the SAP while maintaining the integrity of the data.

Conclusion

Despite the noted variances, the sampling activities were conducted in accordance with the SAP to the extent possible, and the deviations were justified based on field conditions. We believe the collected samples provide a reliable basis for subsequent analysis and reporting.

Please let me know if you require additional details or have further questions regarding the sampling activities.

Sincerely,

Kailey Schrum P.E. (she/her)

Site Manager

Toxics Cleanup Program

Washington State Department of Ecology, Eastern Regional Office

Location and Site Maps: See Attached Figure 1, and Table 2

Figure 1: Rockwell Apartments Site and actual soil locations.



Table 1: Detailed XRF Sampling Results

Sample #	Lat	Long	Time	Depth (inches)	As (ppm)	Pb (ppm)
1	47.69669 N	117.21062 W	9:08 AM	12	11	79
2	47.69667 N	117.21039 W	9:22 AM	13	26	129
3	47.69669 N	117.21053 W	9:32 AM	12	25	258
4	47.69656 N	117.21054 W	9:47 AM	13	43	351
5	47.69654 N	117.21067 W	10:07 AM	12	48	127
6	47.69653 N	117.21041 W	10:14 AM	14	27	188
7	47.69623 N	117.21068 W	10:30 AM	13	63	132
8	47.69617 N	117.21058 W	10:39 AM	14	22	309
9	47.6961 N	117.21073 W	10:48 AM	14	57	157
10	47.69602 N	117.21057 W	10:57 AM	18	14	144
11	47.69595 N	117.21069 W	11:09 AM	15	29	164
12	47.69669 N	117.20959 W	12:49 PM	14	22	79
13	47.69661 N	117.20947 W	12:36 PM	14	58	115
14	47.69668 N	117.20932 W	12:23 PM	12	34	114
15	47.69614 N	117.20943 W	11:57 AM	13	48	129
16	47.69616 N	117.20921 W	12:10 PM	13	39	116
17	47.69607 N	117.20936 W	11:44 AM	15	21	86
18	47.69603 N	117.20926 W	11:37 AM	13	37	134
19	47.69595 N	117.20941 W	11:21 AM	14	49	114
20	47.69594 N	117.20917 W	11:29 AM	16	29	119
21	47.69627 N	117.21005 W	1:18 PM	14	57	124
22	47.69627 N	117.20989 W	1:06 PM	15	55	145
MTCA Method A					20	250