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**LIMITED SITE CLEANUP
at the
BP-PIT STOP
Naches, Washington**

Prepared for:

Mr. Steve Jones
10121 Hwy. 12
Naches, WA 98937

Prepared by:

Peter Trabusiner
Engineer

NORTHWEST ENVIROCON, INC.
210 N. Perry Street, Suite B
Kennewick, WA 99336
(509) 736-1187

Limited Site Cleanup

Client: Steve Jones
10121 Hwy 12
Naches, Washington 98937

Point of Contact: Mr. Steve Jones

Property: BP Pit Stop
Hwy 12
Naches, Washington 98937

Key Site Manager:
Employer/Title: Steve Jones
Owner

S.I.C. Code: 5541, 5141

Major Commercial Activity: Gasoline Service Station
Groceries General

Environmental
Assessor: Peter Trabusiner

Project Number: 48-000-000

Report Date: June 20, 1998

EXECUTIVE SUMMARY

The subject property is situated at 10121 Highway 12, at the intersection with Naches Avenue in Naches Yakima County, Washington. The property consists of one parcel of land approximately 20,000 square feet in size. A BP Gasoline Service Station with Convenience Store including a Video Rental and Fast-food service occupies the subject Property.

As a result of on-site visual and physical inspection, interviews, records research, historical document review, and investigations of reported Federal and State environmental information databases, this Assessment has revealed no obvious evidence of potential environmental risks or recognized environmental conditions indicating the presence of hazardous conditions that could potentially impact the property with the exception of:

- Three petroleum underground storage tanks (UST's) are located on the subject property. These tanks were installed when the station was constructed, and had been upgraded in 1992. The tanks are registered with the State of Washington, Department of Ecology. The tanks and the system comply in every aspect to the requirements and DOE regulations, which have a compliance deadline of December 1998. The tanks are lined Steel tanks with corrosion control system, spill containment, stage one vapor control, and DW piping. Inventory control, leak detection and tank monitoring are conducted with an ECO-1500 electronic monitoring system with status printout every hour. This practice is sufficient and in compliance with DOE regulations to date.

It is common knowledge that any gas station will have some localized surface spillage at some point, which is unavoidable due to the type of business conducted.

SITE HISTORY

In 1997 Mr. Sam Bissel, the owner of the subject property contracted Northwest Envirocon to conduct a limited site investigation of an area southeast of the station building. The area to be investigated was the former location of a dispenser island for diesel. The dispenser was abandoned some time ago, and White Shield, Inc. had already conducted a site remediation limited to this location, in 1991.

P. Trabusiner, an employee and engineer with NWE conducted a subsurface site investigation in 1997. The EMFLUX® Passive, Non-Invasive, Soil-Gas Survey method was chosen for this investigation. The EMFLUX® survey provides excellent information, which yields substantial savings in both drilling costs and time.

The on-site soil-gas survey found evidence for contamination with petroleum products in the investigated area, which was already identified in 1991 during site closure activities by White Shield, Inc.

The subject property was sold in June of 1997 to Mr. Steve Jones. Mr. Jones contracted with NWE in May of 1997 to clean up the contaminated area.

In May of 1998, NWE supervised soil excavation at this location. The client provided the excavation contractor.

The remedial action consisted of excavating the petroleum impacted soil to the vertical and lateral extent where field screening instruments and direct observation indicated obviously stained, odiferous and discolored soil. Lab analysis of selected, representative soil samples confirmed that target Matrix Levels have been attained or had been exceeded (BP-3, BP-4, and BP-5). Contaminated soil (approximately 150 cubic yards of impacted soil) from the bottom and the sidewalls of the excavation was stockpiled on site before being transported to the Anderson Landfill in Yakima.

The excavation was backfilled with clean material (Sample #BP-P) from the adjoining property. The remainder of the property was visual inspected on May 11, and we found no obvious evidence for suspicious spills or stains which could pose potential environmental risks, nor environmental conditions indicating the presence of hazardous conditions, were observed. Based on the information available to date, we believe that there is no risk to the environment from existing conditions at the subject site.

It is common knowledge that any gas station will have some localized surface spillage at some point, which is unavoidable due to the type of business conducted.

Laboratory report in the appendix.

SITE ASSESSMENT OVERVIEW

Purpose:

The purpose of this site assessment was to investigate, review, assess, and evaluate--through historical research, document and record review, visual and physical observations, and subsurface investigation by a trained assessor--the presence or likely existence of:

- Contamination by hazardous materials, generally recognized environmental contaminants, visible pollutants, underground contaminants, and asbestos-containing materials.
- A brief overview, evaluation, and assessment of the severity of the current potential environmental risk based upon known standards or applicable regulations.

Protocol:

The procedure for this Environmental Site Assessment was to perform in practical and reasonable steps, employing currently available technology, existing regulations, and generally acceptable engineering practices, an investigation to ascertain the possibility, presence, or absence of environmental releases or threatened releases as limited by the Scope of Work.

Objectives:

- To attempt to accomplish all appropriate inquiry into ownership and uses of the property consistent with good commercial or customary practice, in an effort to minimize liability.
- To conduct an investigation of the property that will assist ownership's positioning within the "safe harbor" section of the Federal Superfund liability in 42 U.S.C. §9601(35).
- To provide environmental information that will assist in evaluating ownership's risk of potential loss or value impairment of the security interest, due to environmental defects. To provide information for decisions and operational limitations concerning the National Pollution Contingency Plan under CERCLA, Lender Liability Final Rule 40 CFR Part 300 XI.

Although this limited Assessment cannot absolutely quantify and qualify every possible past and present environmental risk, the assessment does provide a partial information basis for reasonable decision making regarding the potential for environmental liabilities and risk, based upon the current site-specific situation, assessment limitations, and methods of evaluation.

GENERAL SITE RECONNAISSANCE OVERVIEW

Northwest Envirocon Inc. was retained by Mr. Steve Jones, the owner of the subject property in Naches, Washington, to perform limited Site cleanup and Site Assessment of the subject property. The site is known as the BP Pit Stop. No prior environmental site assessment is available for the property. The on-site inspection was conducted on May 10, and 11, 1998, by Mr. Peter Trabusiner. Mr. Trabusiner is an engineer and employee of Northwest Envirocon. The weather was sunny and temperatures were in the seventies.

We also inspected the locations of the submersible pumps, line leak/tank monitors, fill pipes with spill containment, vent pipes, and each of the dispenser pumps. The visual and olfactory inspection in these areas revealed no evidence of leaks or spillage. Visual inspection of the site showed no indication of discharges or spills.

Field testing during the inspection was done by utilizing the "headspace" field screening method to detect the volatiles as measured by a Combustible Gas Instrument (CGI).

Soils are contained inside a sealed glass container and exposed to a heat source. The volatile components in the soil evaporate and are contained within the "headspace." The Teflon probe of the CGI is inserted through the seal and the gasses are extracted and measured within the CGI.

The measurements identified no VOC's.

No odor or visual discoloration of the soils was noted within the accessible areas.

SUBJECT PROPERTY SITE DESCRIPTION

Physical Setting Source:

Source of reference is a current United States Geological Survey (USGS) 7.5 Minute Topographic Quadrangle (quad) Map containing the subject property. The USGS 7.5 minute quad map has an approximate scale of 1" to 2,000 feet, show physical features such as wetlands, water bodies, roadways, mines, and buildings. The USGS 7.5 quad map is considered to be the only Standard Physical Setting Source, and is sufficient as a single reference.

The property consists of one parcel of land with improvements. The subject property is situated at the central part of Naches, and the elevation is approximately feet. For further geographic reference the subject property is situated at the intersection of Hwy. 12 and Naches Avenue, about 1,000 feet north of the Naches River, which is the only major surface, water body in the area. The surrounding area is commercially developed with residential development to the south.

Visual Description:

The property is one parcel of land, with a square building located along the westerly property line of the site. The site is flat, with light slope from northwest to southeast. About 15% percent of the property is structures, about 50% is paved parking, and traffic areas, and the remaining area is gravel parking and traffic area. The site is accessible from south and west, and is bordered by Naches Avenue to the west, the Forest Service to the east, Highway 12 to the south, and the owner's residence to the north. No landscaping or vegetation of any kind is on the property.

The store building is one level, concrete block and wood framing, slab on grade construction, with gable roof decked with metal panes. A sidewalk and concrete curbs are along the intersection.

The gasoline station is a newer facility with an attached square canopy. The canopy is a steel-frame construction with aluminum fascia about six feet wide and bearing the illuminated gasoline brand logo on all sides. The canopy protects the fueling island with two multiple dispenser units (MPDs). The USTs tank-field is located to the northeast of the canopy. The visual impression of the subject Property is that of a well-maintained and clean facility.

Surface Characteristics:

The site is flat with light slope from southeast to northwest. No vegetation is located at the property. All structures are located at the westerly part of the site. No suspicious spills or stains were present, and any pools, drains, sumps, pits, ponds, ditches, catch basins, or drywells were encountered at the time of our inspection.

The storm water flow gradient is to the south-southeast.

Subsurface and Hydrological Characteristics:

Source: Soil Survey of Yakima County Area, Washington. USDA, Soil Conservation Service, 1973.

The review of U.S. Soil Conservation Corps data indicates that the subject property is underlain by Yakima gravelly silt loam, 0 to 3 percent slopes.

Yakima Series consists of very deep, somewhat excessively drained soils formed in mixed alluvium on bottomlands. These soils have a grayish-brown, gravelly, fine sandy loam surface layer to 13 inches. The underlying material is brown, loamy, fine sand 11 inches thick. Beneath this is grayish-brown, very gravelly loamy sand that extends to 60 inches or more.

The average annual precipitation is 7 to 14 inches, the average annual air temperature is about 51 degrees F, and the average frost-free season is 130 to 180 days.

It should be noted that the characterization previously described is merely a generalization extrapolated from available soil data. In actuality, the subsurface of the subject property has possibly been modified by cuts and fills for building foundation and underground utilities.

While precise information on groundwater depth on the site is unavailable, according to Mr. Gene Potts of the County Water Resource Department, the groundwater level is 15 to 18 feet in the area of the property. Specific well log information was not required in the scope of work.

The groundwater flow gradient follows the topographic to the southeast or towards the Naches River.

Business Operations Description:

The business operations conducted on the subject property at the present time are limited to: The gasoline service station, the RV service station, the grocery store, fast food and the video rental.

Materials/Products Handling and Storage:

MSDS (Material Safety Data Sheets) are on file in the manager's office, and are accessible during office hours.

No bulk chemicals are stored on the site. The fuel station is TEXACO brand and sells a variety of petroleum products used for motor vehicles, e.g., motor oil, transmission fluid, brake fluid, etc. Only small quantities of these materials in original containers (quarts) are stored on-site.

At the time of investigation, there was no evidence of hazardous spills on the site.

Potable Water Supply and Sewer Service:

The water and sewer service is provided by the City of Naches and is of typical type and construction for this area and building application. No dry well is located at the subject property. The storm water run-off is diverted to neighbor properties to the east and the Highway to the south.

Storage Tanks - Above and Below Ground:

There are three USTs located on the site.

These UST's are steel with an interior liner, corrosion protected, with the following storage capacity:

<u>ID</u>	<u>Size</u>	<u>Contents</u>	<u>Year upgraded</u>
1	8,000	Reg. Gas	1992
2	2,500	Premium	1992
3	2,500	Diesel	1992

A Unified Business Permit as required by the Department of Ecology, WAC 173-360-130, covers the tanks.

All requirements to comply with the DOE/USTs Regulations by 1998 are fulfilled. Corrosion protection, spill and overfill protection, stage one vapor-recovery, automatic inventory control and leak detection for tanks and associated piping is installed. The operator is conducting Daily Inventory Control and Monthly Reconciliation.

No leaks have been detected through the monitoring activities to date and the facilities and procedures appear to be sufficient and up-to-date.

Waste Stream Processing and Disposal:

All waste issues must be related to RCRA definitions and regulations:

Waste Management:

Solid Waste: defined as garbage, refuse, sludge, and other discarded material including solid, liquid, semi-solid, and contained gaseous waste, per RCRA Section 1004(27), 42 USC 6903(27). Basically, any material that is discharged is a solid waste. The exclusions are solid waste discharges regulated as point sources under the CWA, and nuclear waste as defined in 40 CFR 261.4(a).

Hazardous Waste: defined as a solid waste which, due to quantity, concentration, or other characteristics, may cause an increase in mortality or illness, or may pose a hazard to human health of the environment, per RCRA Section 1004(5), 42 USC 6903(5).

Regulated Substance: defined as a substance that is (1) regulated under RCRA via direct definition, or (2) regulated under CERCLA or the Clean Air Act, that may become subject to RCRA regulations as a result of the CERCLA classification.

Disposal: defined as the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazard waste or constituent thereof may enter the environment or be emitted into the air or discharged into the waters, including ground waters, per RCRA Section 1004(3), 42 USC 6903(3).

Small Quantity Waste Storage:

No waste is stored on the Property over 90 days.

Waste Dumpsters:

Domestic wastes generated at the site are stored in a Dumpster located at the northeast corner of the building. The Dumpster is constructed of steel with two hinged plastic lids. It is supplied and serviced by the local Waste Management, Inc.

At the time of inspection the dumpster appeared to be in good condition with no obvious signs of spillage or leakage. The area around the location of the dumpster also appeared to be free of signs of staining.

Wastewater, Stormwater Discharges:

All point source discharges regulated by the Clean Water Act (CWA) are subject to the applicable water quality-based standards as established in the National Pollutant Discharge Elimination System (NPDES) codification 40 CFR Subpart D §131.36. Additionally, CWA Sections 402 (p)(1) and (p)(2) have created categories of storm water discharges within Permit Issuance and Permit Compliance Deadlines for Phase I Storm Water Discharges effective October 1, 1993, that may also be applicable to the subject Property (as detailed in the Federal Register, Volume 57, Number 244). Depending upon the outcome of EPA-initiated notice and comment revisions actions for further rule making clarification, the subject Property may be required to submit a NPDES initial storm water discharge permit under 40 CFR §122.26 or 40 CFR Chapter I - Preamble Appendix A.

However, based upon information supplied during interviews and review of the relevant documents supplied to the Assessor, no requirements for NPDES permitting currently applicable to the subject property, were discovered.

Adjacent and Adjoining Properties - General Description:

The setting of the subject property is in the central area of Naches, in a predominantly commercial area. There is some residential development to the north.

Adjoining Properties:

- North Residential development
- South Highway 12 and commercial development
- East Office building for the Forest Service
- West Naches Avenue and Chevron Gasoline Station

Adjacent and Adjoining Properties Materials Storage:

No suspect waste-disposal or storage practices were observed on the adjacent or adjoining properties, during a visual inspection.

Adjacent and Adjoining Properties Wastestream Disposal:

At time of our inspection, no inappropriate disposal practices were observed at any of the businesses.

Air Quality: Indoor and Visible Emissions:

No noticeable indoor air contaminants or obnoxious smells, or visible emissions were observed at the time of inspection.

Asbestos-Containing Building Materials:

During the visual and physical observations of the subject Property, the following suspect Asbestos Containing Building Materials (ACBM) were observed:

- Roofing material, linoleum, drywall and joint compound, and sealing mastic.

ACBMs as defined in NESHAP 61.141, may be classified as suspect regulated asbestos-containing materials. Prior to demolition, renovation, or any other activity that may disturb these materials, either an accredited Building Inspector should perform an inspection or the materials should be handled as asbestos containing.

Formaldehyde:

Formaldehyde is an extremely popular chemical used in a variety of both building materials and furnishing products. Currently national usage is estimated in the billions of pounds per year. EPA has now classified formaldehyde as a "probable human carcinogen" suspected of inducing cancer in humans. Studies have shown that after installation, indoor formaldehyde levels require years of decline and reach residual background levels. During the off-gassing process, the indoor levels can be a significant source of irritation to hypersensitive individuals.

The formaldehyde product investigated within the scope of this Assessment is urea-formaldehyde foam insulation (UFFI), used in the 1970's primarily as wall cavity insulation. The release potential of UFFI from wall cavities is dependent upon factors such as water-damaged walls, unpainted wall surfaces, or cracked paint or wall covering. While interior air sampling and analysis is the only conclusive method to delineate formaldehyde concentrations, visual and physical inspection of the subject property and interviews indicate no potential for UFFI contamination.

Lead-Based Paint:

In 1978, the Federal Government banned the use of lead-based paint in residential applications; however, use in general industry continued at a decreased rate to the present. Lead-based paint presents a hazard through inhalation or ingestion of paint chips or vapor fumes. The greatest cumulative health threat is to young children, and for this reason the Department of Housing and Urban Development (HUD) has promulgated lead standards and survey requirements for buildings affected by HUD funding. This HUD regulation is the only Federal requirement for lead-based paint hazard management applicable to privately owned structures.

OSHA exposure standards 29 CFR 1910.1025 are applicable to general industry, but address business operations rather than facility condition. Therefore, within the context of regulatory compliance for OSHA and assuming HUD standards to be usage-based, the subject property considering the current usage, does not appear to require further lead-based paint response, regardless of the potential for existence of lead-based paint.

Lead in Drinking Water:

Based upon the age of the building, there is a low potential for the interior plumbing to contain lead in the pipes or lead-based solder, based upon construction standards before 1987 (40 CFR 141.11). The presence or absence of elevated lead concentrations in the water can only be confirmed through laboratory testing.

However, no current Federal regulations require individual property owners to test for lead in drinking water.

PCB-Containing Exterior Electrical Transformers:

Electrical transformers have the potential to contain polychlorinated biphenyls (PCBs). There are no electrical transformers located on the subject property. The closest electrical transformer is located on the adjoining property to the northwest.

PCB-Containing Fluorescent Light Fixture Ballasts:

Based upon the age of the existing structure and the number and appearance of the suspended fluorescent light fixtures, the potential exists for the ballasts inside the light fixtures to contain polychlorinated biphenyls (PCBs). It would be prudent to identify the chemical content of the ballasts if they are found to be leaking, require replacement, or are subject to disposal.

PCB-Containing Interior Capacitors, Equipment, or Electrical Transformers:

There is no electrical transformer or suspect electrical equipment on the subject property.

Radon:

Radon is emitted by the natural breakdown and radioactive decay of uranium in rocks and soils which then enters buildings through cracks in the foundation, sump pumps, areas around drainage pipes, and other openings. In addition, radon may enter a structure as a water contaminant, natural-gas contaminant, or off-gas byproduct of building materials. Once inside an enclosed space, radon can accumulate.

Radon has been declared by the EPA as the second leading contributor to lung cancer, after smoking. EPA guidelines for the highest acceptable level of radon are 4 picocuries per liter (pCi/l). At this level, the estimated number of lung-cancer deaths due to radon exposure is 13-50 out of 1,000. An EPA survey of indoor radon concentrations in 11,000 homes from Arizona to Massachusetts revealed that radon levels exceeded the EPA's action level of 4 pCi/l in 1 out of 3. Yet another study in 10 other states found that 1 in 5 homes exceeded the 4 pCi/l level.

No visual estimation technique exists that accurately predicts the potential radon risk within a building. The radon risk is a function of site location, soil composition, building construction, foundation integrity, and previous landfill practices. Actual physical testing of a building is the only way to accurately determine the radon levels. Radon health risks can be controlled by recognizing the potential for a problem, by testing, and by reduction of radon levels in the building.

The EPA has assigned each of the 3141 counties in the United States to one of the three Radon Zones:

Zone 1 Predicted average indoor screening level	>than 4pCi/L
Zone 2 Predicted average indoor screening level	>=2 pCi/L and<= 4pCi/L
Zone 3 Predicted average indoor screening level	< 2 pCi/L

Yakima County:

Radon Zone Level: 2

Potential Adjacent and Adjoining Property Contamination Receptors:

Environmentally sensitive receptors were investigated within 1,000 feet of the borders of the subject property. Sensitive receptors are materials or structures particularly susceptible to environmental damage or stress from migrating contamination. The major receptor groups investigated were water supplies, surface water bodies, residential structures, and other public receptors. The property is located in a mixed residential commercial area, with buildings within 1,000 feet on all sides of the site.

Railroad Right-of-Way:

No railroad right-of-way is located adjacent or adjoining to the property.

Storage Tanks - Above and Below Ground:

There are three USTs located on the site.

These UST's are steel with interior lining, corrosion protected, with the following storage capacity:

<u>ID</u>	<u>Size</u>	<u>Contents</u>	<u>Year</u>
1	8,000	Reg. Gas	unknown
2	2,500	Premium	unknown
3	2,500	Diesel	unknown

A Unified Business Permit as required by the Department of Ecology, WAC 173-360-130, covers the tanks.

These tanks were installed during the construction of the new facility and were upgraded in 1992. All requirements to comply with the DOE/USTs Regulations by 1998 are fulfilled. Corrosion protection, spill and overfill protection, stage one vapor-recovery, automatic inventory control and leak detection for tanks and associated piping is installed. The operator is conducting Daily Inventory Control and Monthly Reconciliation.

No leaks have been detected through the monitoring activities to date and the facilities and procedures appear to be sufficient and up-to-date.

SUBSURFACE INVESTIGATION

Methodology:

The removal action consisted of excavating the impacted soil to the vertical and lateral extent where field screening and direct observation indicated obviously stained, or odiferous soil. No groundwater was evident during the excavation. The obviously contaminated material was temporarily stockpiled on plastic, bermed and covered with plastic, until disposal at the Anderson Rock and Demolition Pit in Yakima landfill was permitted.

Mr. Trabusiner, an Engineer with NWE, conducted soil sampling. Discrete grab samples were collected at the bottom at about ten (10) feet bgs., and composite samples were taken at the sidewalls of the excavation. The samples were placed in four ounce glass containers with Teflon lined lids. The samples were stored in a cool environment until released, with a chain-of-custody, to the laboratory. The sampling tools (wooden spatulas) were disposed of after each sample.

Field testing was done by utilizing the "head space" field screening method to detect the volatiles as measured by a Combustible Gas Instrument (CGI).

Soils are contained inside a sealed glass container and exposed to a heat source (hot water). The volatile components in the soil evaporate and are contained within the "head space." The Teflon probe of the CGI is inserted through the seal and the gasses are extracted and measured within the CGI.

Analysis of the soil samples taken during the site closure activities was conducted by On Site Environmental, Inc. in Redmond, Washington, an EPA and State of Washington accredited laboratory.

Results from these samples are contained in the following table

SAMPLE ID.	LOCATION	NWTPH-HCID-mg/Kg		
		Gasoline	Diesel Heavy Oils	
BP-1	S/E-Wall	ND	730	72
BP-2	N/W-Wall	ND	190	91
BP-3	Bottom Exc.	ND	ND	ND
BP-4	N/W-Wall	ND	ND	ND
BP-5	S/E-Wall	ND	ND	ND

Stockpile for Disposal and Fill from Site

BP-P	Disposal	ND	4200	86
BP-P	Fill	ND	ND	ND

All samples were tested for the presence of total hydrocarbons in the soil (Method WA-TPH-HCID) followed by quantification. HCID or Hydrocarbon Identification is a general purpose screening method for the presence of high level contamination of most organic compounds. If petroleum contamination is present, HCID is useful to determine the type (i.e. gasoline, diesel, and waste oil) and approximate concentration.

RESULTS

The removal action consisted of excavating the impacted soil to the vertical and lateral extent where field screening and direct observation indicated obviously stained, or odiferous soil. The obviously contaminated material (Sample #BP-P1 4,200/ppm diesel) was temporarily stockpiled on plastic, bermed and covered with plastic, until disposal at the Anderson Rock and Demolition Pit in Yakima landfill was permitted. The disposal permit was applied for at the Yakima Health Department with Mr. Art Mc Ewen.

No petroleum hydrocarbon contamination was detected by WA-TPH-HCID in the confirmation samples (Sample #BP-3, BP-4, and BP-5) from the excavation.

Conclusions:

The excavated area is ready for backfill with clean material and the surface can be restored. Lab analysis of selected, representative soil samples confirmed that CLLs had been obtained at the specific area. No petroleum hydrocarbon contamination was detected by WA-TPH-HCID in the confirmation samples (BP-3, BP-4, and BP-5) from the excavation. Laboratory report in the appendix.

Statement of Quality Assurance:

I have performed this assessment in accordance with generally accepted environmental practices and procedures, as of the date of this report. I have employed the degree of care and skill ordinarily exercised under similar circumstances by reputable environmental professionals practicing in this area. The conclusions contained within this assessment are based upon site conditions I readily observed or were reasonably ascertainable and present at the time of my Site inspection.

The conclusions and recommendations stated in this report are based upon my personal observations and also upon information provided by others. I have no reason to suspect or believe that the information provided is inaccurate.

Signature of Environmental Professional- Peter H. Trabusiner



Engineer

Environmental Assessment Report Limitations:

The enclosed limited, site specific, Assessment has been performed for the exclusive use Mr. Steve Jones, or agents specified by him, for the transaction at issue concerning the property located at 10121 Hwy. 12, in Naches, Washington.

This assessment has been performed in accordance with generally accepted environmental practices and procedures, as of the date of the report. All services have been performed employing that degree of care and skill ordinarily exercised under similar circumstances by reputable environmental technologists practicing in this, or similar localities. No other warranty or guarantee, expressed or implied, is made or offered.

The conclusions and recommendations stated in this report are based upon observations made by employees of Northwest Envirocon, Inc. and also upon information provided by others. We have no reason to suspect or believe that the information provided is inaccurate. However, we cannot be held responsible for the accuracy of the information provided to us by others. The scope of this assessment does not purport to encompass every report, record, or other form of documentation relevant to the property being evaluated.

This assessment does not include or address reasonably ascertainable Environmental Liens currently recorded against the subject property.

The observations in this assessment are based upon site conditions readily visible and present at the time of our site inspection and subsurface investigation. This site investigation addresses conditions of subsurface soil, groundwater, or underground storage tanks, as specifically mentioned. This limited Site Assessment does not attempt to forecast future site conditions.

457-6500
122 S. 1st St. — YAKIMA

For all your energy needs

Yakima
7 N. 3rd St.
575-3100

Sunnyside
500 E. Edison Ave.
837-8410

Toppenish
503 S. Elm St.
865-4605



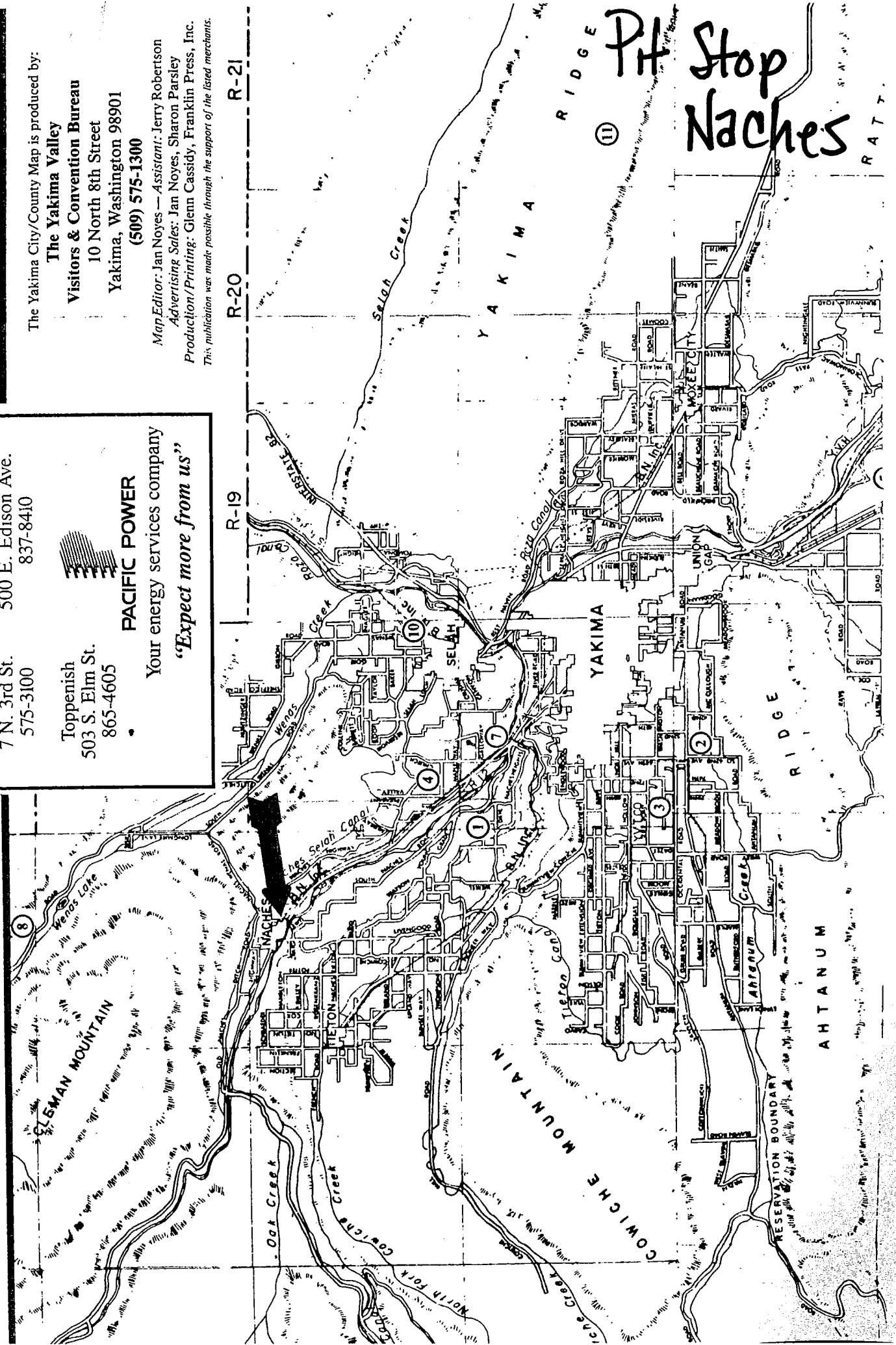
PACIFIC POWER

Your energy services company
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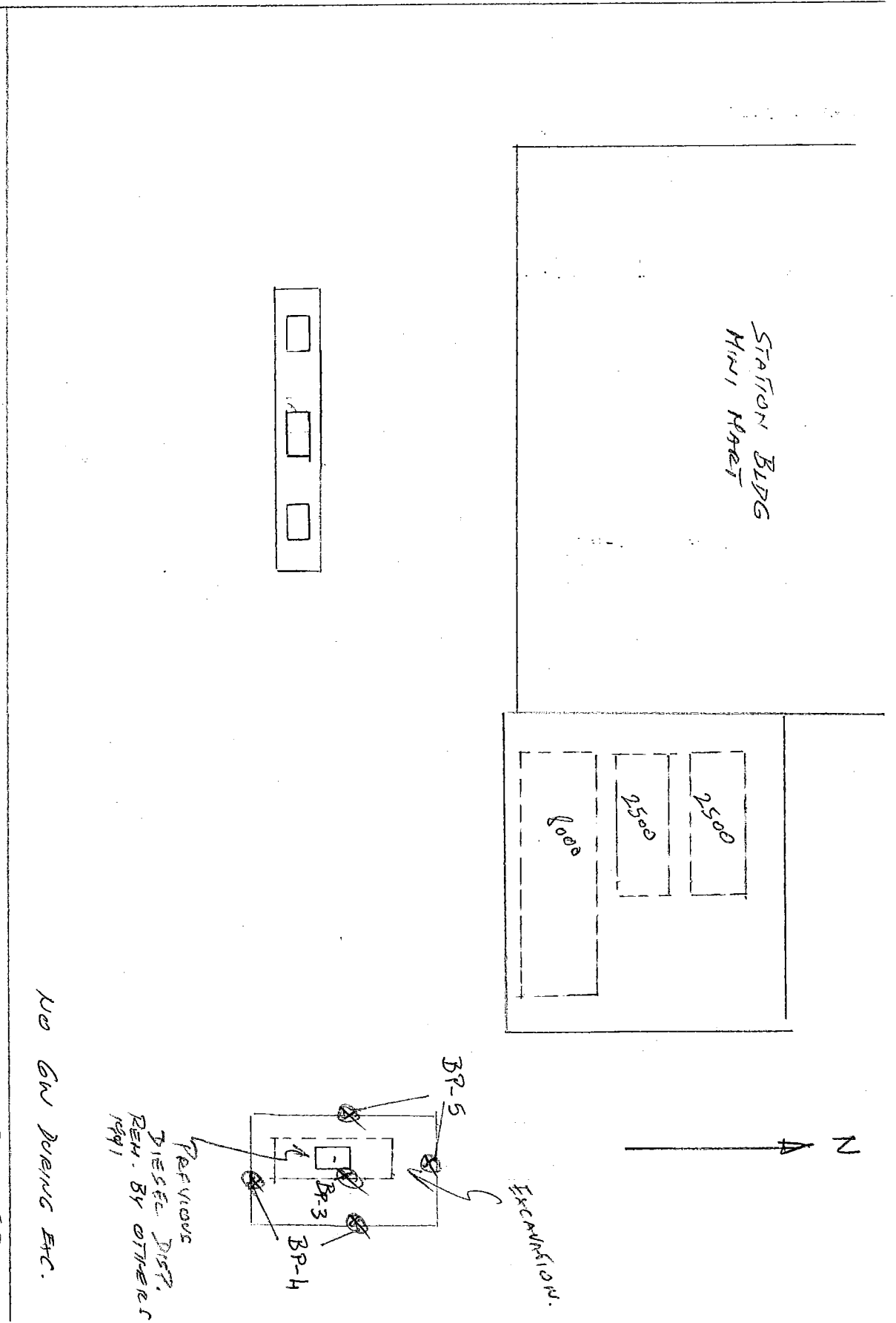
A restored country general store offering the freshest products and unusual Open 7 days a week
Paul & Amy McDonald
Phone

The Yakima City/County Map is produced by:
**The Yakima Valley
Visitors & Convention Bureau**
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NACHES RD.



HWY 12

CENRUP NACHES PI-STOP.

6-12-98 COMP. S-wms

BP-1 - 730 mg/kg DIELEC

BP-2 - 190 mg/kg -

6-18-98

BP-3 = ND } COMP. S-wms

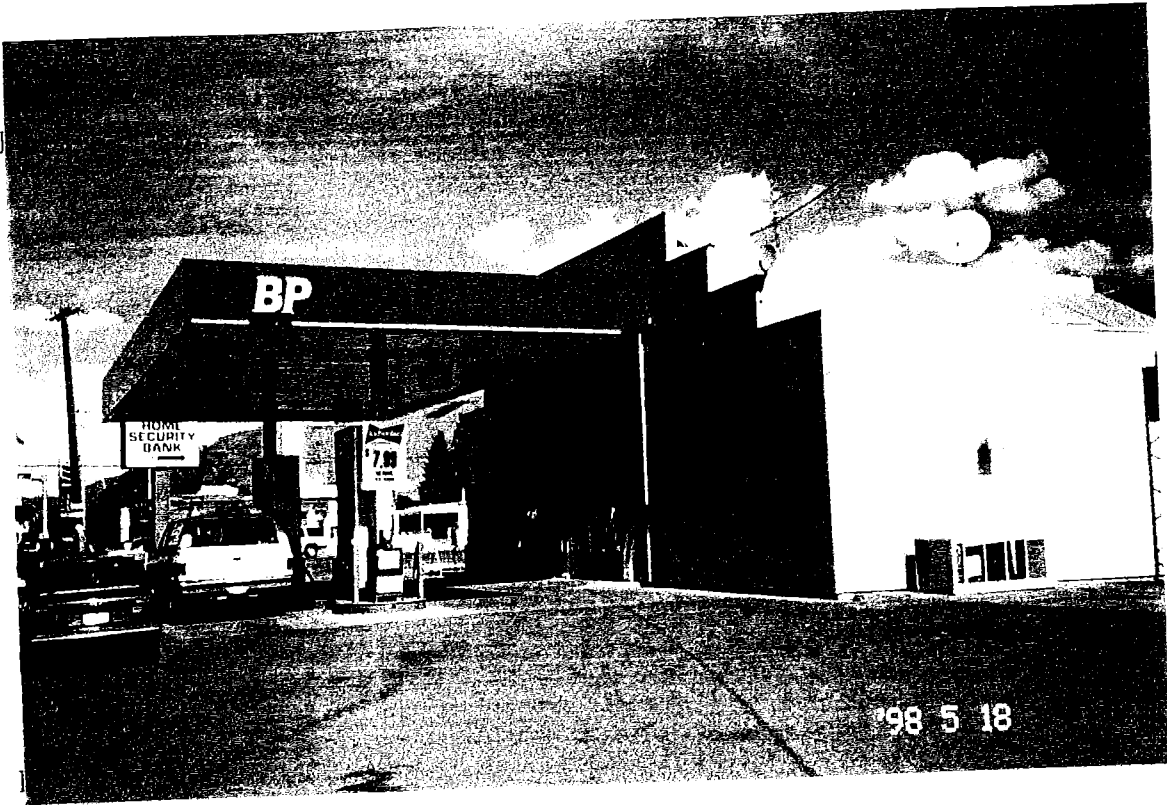
BP-4 = ND } COMP. S-wms

BP-5 = ND } BOTTOM OF EXC.

NO GW DRIVING ETC.

PREVIOUS
DIESEL DISP.
REM. BY OTHERS
1991

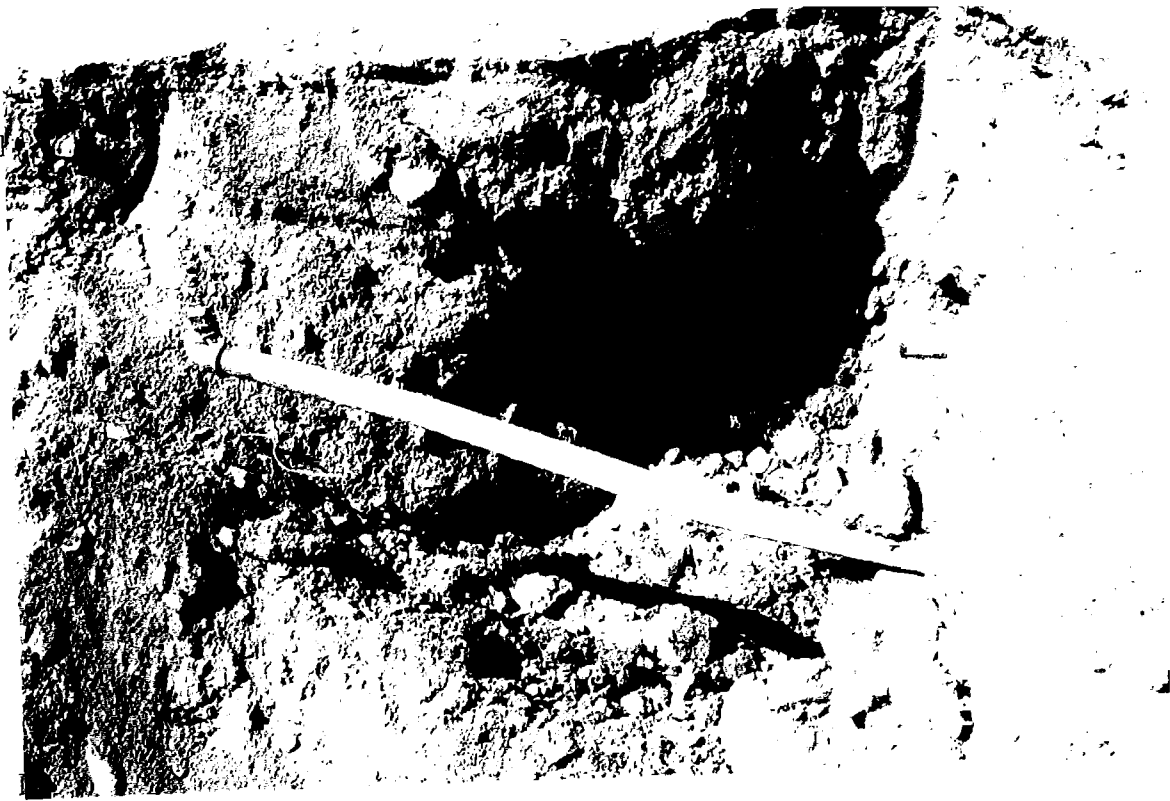
Excavation.



BP GASOLINE STATION IN NACHES, WASHINGTON.



EXCAVATION OF CONTAMINATED SOIL AT THE FORMER DISPENSER ISLAND.



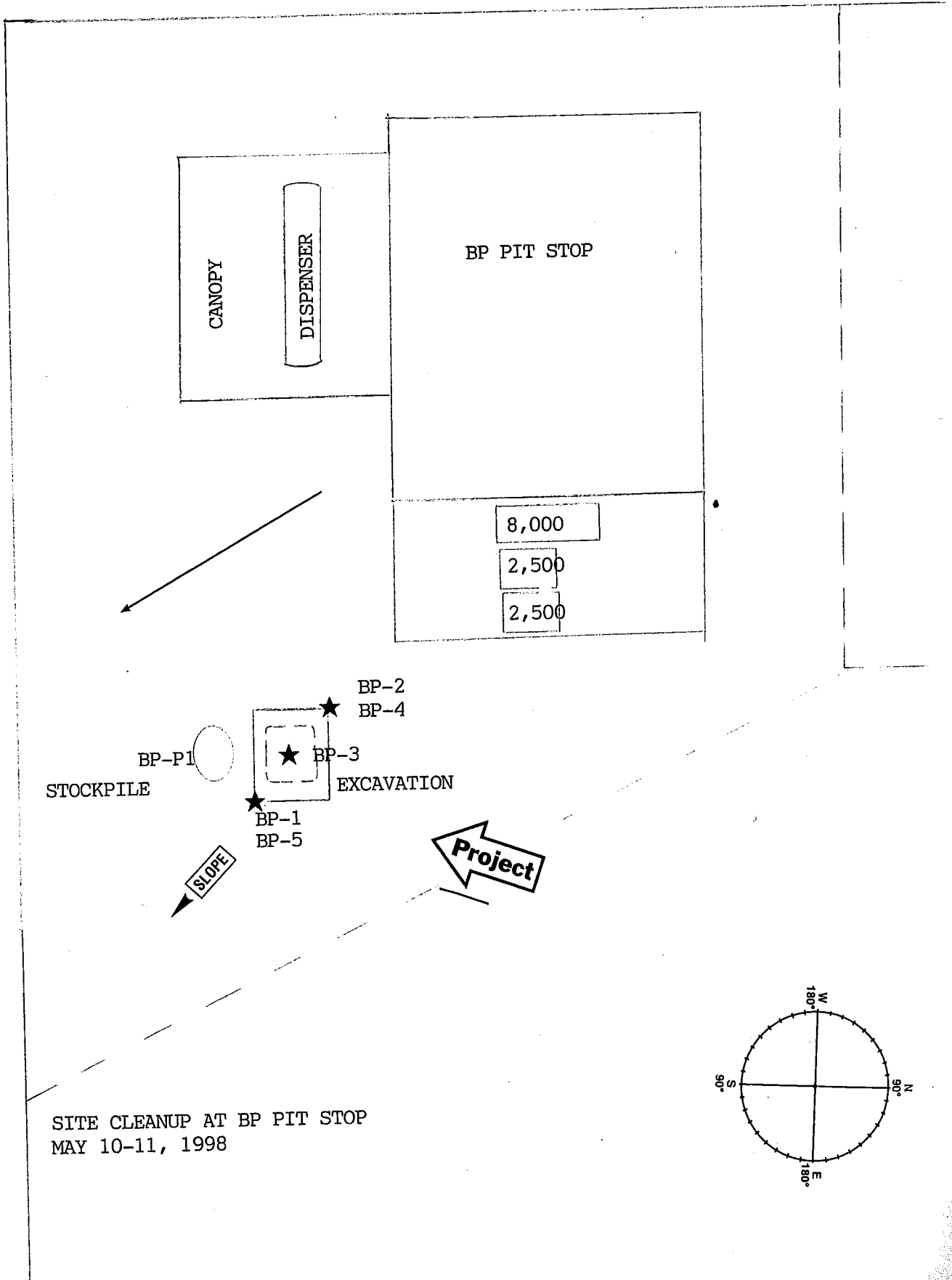
OLD PRODUCT LINES DURING EXCAVATION.



BACKFILLING WITH CLEAN MATERIAL AFTER EXCAVATION OF CONTAMINATED SOIL AT THE FORMER DISPENSER ISLAND.

NACHES AVENUE

HWY 12



SITE CLEANUP AT BP PIT STOP
MAY 10-11, 1998



**OnSite
Environmental Inc.**

Analytical Testing and Mobile Laboratory Services

May 27, 1998

Peter Trabusiner
Northwest Envirocon
210 N. Perry, Suite B
Kennewick, WA 99336

Re: Analytical Data for Project BP Pit Stop/Naches
Laboratory Reference No. 9805-140

Dear Peter:

Enclosed are the analytical results and associated quality control data for samples submitted on May 22, 1998.

The standard policy of OnSite Environmental Inc., is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

David Baumeister
Project Chemist

Enclosures

Date of Report: May 27, 1998
 Samples Submitted: May 22, 1998
 Lab Traveler: 05-140
 Project: BP Pit Stop/Naches

NWTPH-HCID

Date Extracted: 5-22-98
 Date Analyzed: 5-22-98

Matrix: Soil
 Units: mg/Kg (ppm)

Client ID:	BP-1 E+S	BP-2 N+W	BP-3 CTR.
Lab ID:	05-140-01	05-140-02	05-140-03
Gas C7-C12:	ND	ND	ND
PQL:	29	28	27
Diesel Fuel C12-C24:	Diesel Fuel #2	Light Oil	ND
PQL:	58	56	54
Heavy Oil C24-C34:	ND	ND	ND
PQL:	120	110	110
Surrogate Recovery:			
o-Terphenyl	134%	113%	110%

Flags:

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

NWTPH-HCID

Date Extracted: 5-22-98
Date Analyzed: 5-22-98

Matrix: Soil
Units: mg/Kg (ppm)

Client ID: BP-P1 ST. PILE
Lab ID: 05-140-05

Gas C7-C12: ND
PQL: 28

Diesel Fuel C12-C24: Diesel Fuel #2
PQL: 57

Heavy Oil C24-C34: ND
PQL: 110

Surrogate Recovery:
o-Terphenyl ---

Flags: F

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

**NWTPH-HCID
METHOD BLANK QUALITY CONTROL**

Date Extracted: 5-22-98
Date Analyzed: 5-22-98

Matrix: Soil
Units: mg/Kg (ppm)

Lab ID: MB0522S1

Gas C7-C12: ND
PQL: 25

Diesel Fuel C12-C24: ND
PQL: 50

Heavy Oil C24-C34: ND
PQL: 100

Surrogate Recovery:
o-Terphenyl 118%

Flags

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

NWTPH-Dx

Date Extracted: 5-22-98
Date Analyzed: 5-22-98

Matrix: Soil
Units: mg/Kg (ppm)

Client ID: BP-P ST-PILE
Lab ID: 05-140-04

Diesel Fuel C12-C24: ND
PQL: 28

Oil C24-C34: ND
PQL: 57

Surrogate Recovery:
o-Terphenyl 93%

Flags:

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

NWTPH-Dx
METHOD BLANK QUALITY CONTROL

Date Extracted: 5-22-98
Date Analyzed: 5-22-98

Matrix: Soil
Units: mg/Kg (ppm)

Lab ID: MB0522S1

Diesel Fuel C12-C24: ND
PQL: 25

Oil C24-C34: ND
PQL: 50

Surrogate Recovery: 100%
o-Terphenyl

Flags:

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

NWTPH-Dx
DUPLICATE QUALITY CONTROL

Date Extracted: 5-21-98
Date Analyzed: 5-22-98

Matrix: Soil
Units: mg/Kg (ppm)

Lab ID: 05-137-04 05-137-04 DUP

Diesel Fuel C12-C24: 355 237

PQL: 25 25

RPD: 40

Surrogate Recovery:
o-Terphenyl 110% 92%

Flags:

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

NWTPH-Dx
SB/SBD QUALITY CONTROL

Date Extracted: 5-22-98
Date Analyzed: 5-22-98

Matrix: Soil
Units: mg/Kg (ppm)

Lab ID: SB0522S1 SB0522S1DUP

Diesel Fuel C12-C24: 97.9 92.2

PQL: 25 25

% Recovery 98 92

RPD: 6.0

Surrogate Recovery: 120% 118%
o-Terphenyl

Date of Report: May 27, 1998
 Samples Submitted: May 22, 1998
 Lab Traveler: 05-140
 Project: BP Pit Stop/Naches

NWTPH-Dx

Date Extracted: 5-26-98
 Date Analyzed: 5-26-98

Matrix: Soil
 Units: mg/Kg (ppm)

Client ID:	BP-1 E+S	BP-2 N+W	BP-P1 ST. PILE
Lab ID:	05-140-01	05-140-02	05-140-05
Diesel Fuel C12-C24:	730	190	4200
PQL:	29	28	28
Oil C24-C34:	72	91	86
PQL:	58	56	57
Surrogate Recovery:			
o-Terphenyl	141%	98%	---
Flags:	P	P	F,P

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

NWTPH-Dx
METHOD BLANK QUALITY CONTROL

Date Extracted: 5-26-98
Date Analyzed: 5-26-98

Matrix: Soil
Units: mg/Kg (ppm)

Lab ID: MB0526S1

Diesel Fuel C12-C24: ND
PQL: 25

Oil C24-C34: ND
PQL: 50

Surrogate Recovery:
o-Terphenyl 110%

Flags:

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

NWTPH-Dx
DUPLICATE QUALITY CONTROL

Date Extracted: 5-26-98
Date Analyzed: 5-26-98

Matrix: Soil
Units: mg/Kg (ppm)

Lab ID: 05-152-03 05-152-03 DUP

Diesel Fuel C12-C24: ND ND
PQL: 25 25

RPD: N/A

Surrogate Recovery:
o-Terphenyl 86% 98%

Flags:

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

NWTPH-Dx
SB/SBD QUALITY CONTROL

Date Extracted: 5-26-98
Date Analyzed: 5-26-98

Matrix: Soil
Units: mg/Kg (ppm)

Spike Level: 100 ppm

Lab ID: SB0526S1 SB0526S1 DUP

Diesel Fuel C12-C24: 87.0 87.2

PQL: 25 25

Percent Recovery: 87 87

RPD: 0.23

Surrogate Recovery:
o-Terphenyl 114% 118%

Flags:

Date of Report: May 27, 1998
Samples Submitted: May 22, 1998
Lab Traveler: 05-140
Project: BP Pit Stop/Naches

Date Analyzed: 5-22-98

% MOISTURE

Client ID	Lab ID	% Moisture
BP-1 E+S	05-140-01	14
BP-2 N+W	05-140-02	11
BP-3 CTR.	05-140-03	7.0
BP-P ST. PILE	05-140-04	12
BP-P1 ST. PILE	05-140-05	12



DATA QUALIFIERS AND ABBREVIATIONS

- A - Due to high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
- B - The analyte indicated was also found in the blank sample.
- C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
- D - Data from 1:_____ dilution.
- E - The value reported exceeds the quantitation range, and is an estimate.
- F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
- G - Insufficient sample quantity for duplicate analysis.
- J - The value reported was below the practical quantitation limit. The value is an estimate.
- K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
- L - Quantitated from C7-C34 as diesel fuel #2.
- M - Predominantly _____ range hydrocarbons present in the sample.
- N - Hydrocarbons in the gasoline range (C7-toluene) are present in the sample which are elevating the diesel result.
- O - Hydrocarbons in the heavy oil range (>C24) are present in the sample which are elevating the diesel result.
- P - Hydrocarbons in the diesel range (C12-C24) are present in the sample which are elevating the oil result.
- Q - The RPD of the results between the two columns is greater than 25.
- R - Hydrocarbons outside the defined gasoline range are present in the sample and are elevating the gasoline result.
- S - Surrogate recovery data is not available due to the necessary dilution of the sample.
- T - The sample chromatogram is not similar to a typical _____.
- U - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
- V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
- Y - Acid Cleaned.
- Z - Interferences were present which prevented the quantitation of the analyte below the detection limit reported.
- ND - Not Detected
MRL - Method Reporting Limit
PQL - Practical Quantitation

OnSite Environmental Inc.
 14924 NE 31st Circle • Redmond, WA 98052
 Fax: (425) 885-4603 • Phone: (425) 883-3881

Company: **NWE**
 Project No.: **N/A**
 Project Name: **BP Pit Stop/Naches**
 Project Manager: **P. Trabussiner**

Project Chemist: **OAS** Laboratory No. _____
 Requested Analysis

Turn Around Requested (Check One)
 Same Day
 24 Hours
 48 Hours
 Standard
 (other) _____

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	# of Cont.	NWTPH-HCID	NWTPH-GX/BTEX	NWTPH-DX	Volatiles by 8240/624/8260	Halogenated Volatiles by 8260	Semivolatiles by 8270/625	PAHs by 8270/625	PCBs by 8081/608	Total RCRA Metals (8)	TCLP Metals	VPH	EPH	% Moisture	
1	BP-1 E+S	5-19-98	11:15	Soil	1	X		X											X
2	BP-2 N+W	5-19	11:25	-	1	X		X											X
3	BP-3 CTR.	5-19	11:45	-	1	X													X
4	BP-7 ST.714	5-19	12:05	-	1	X													X
5	BP-P1 -4-	5-19	13:05	-	1	X		X											X

RECEIVED BY: **P. Trabussiner** DATE: **5-21-98**
 FIRM: **NWE** TIME: **15:00**
 RECEIVED BY: **Fedex** TIME: **15:01**
 RECEIVED BY: **Kristen Koch** DATE: **5/22/98**
 FIRM: **OSE** TIME: **9:35**
 DATE REVIEWED: _____

COMMENTS: **No P.O. # Needed**
(X) Added by P. Trabussiner 5/24/98



**OnSite
Environmental Inc.**

Analytical Testing and Mobile Laboratory Services

June 4, 1998

Peter Trabusiner
Northwest Envirocon
210 N. Perry, Suite B
Kennewick, WA 99336

Re: Analytical Data for Project BP Pit Stop Naches
Laboratory Reference No. 9806-013

Dear Peter:

Enclosed are the analytical results and associated quality control data for samples submitted on June 3, 1998.

The standard policy of OnSite Environmental Inc., is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

David Baumeister
Project Chemist

Enclosures

Date of Report: June 4, 1998
Samples Submitted: June 3, 1998
Lab Traveler: 06-013
Project: BP Pit Stop Naches

NWTPH-HCID

Date Extracted: 6-3-98
Date Analyzed: 6-3-98

Matrix: Soil
Units: mg/Kg (ppm)

Client ID:	BP-4 N+W	BP-5 E+S
Lab ID:	06-013-01	06-013-02

Gas C7-C12:	ND	ND
PQL:	30	30

Diesel Fuel C12-C24:	ND	ND
PQL:	60	60

Heavy Oil C24-C34:	ND	ND
PQL:	120	120

Surrogate Recovery:		
o-Terphenyl	95%	94%

Flags:

Date of Report: June 4, 1998
Samples Submitted: June 3, 1998
Lab Traveler: 06-013
Project: BP Pit Stop Naches

**NWTPH-HCID
METHOD BLANK QUALITY CONTROL**

Date Extracted: 6-3-98
Date Analyzed: 6-3-98

Matrix: Soil
Units: mg/Kg (ppm)

Lab ID: MB0603S1

Gas C7-C12: ND
PQL: 25

Diesel Fuel C12-C24: ND
PQL: 50

Heavy Oil C24-C34: ND
PQL: 100

Surrogate Recovery:
o-Terphenyl 96%

Flags

Date of Report: June 4, 1998
Samples Submitted: June 3, 1998
Lab Traveler: 06-013
Project: BP Pit Stop Naches

Date Analyzed: 6-3-98

% MOISTURE

Client ID	Lab ID	% Moisture
BP-4 N+W	06-013-01	17
BP-5 E+S	06-013-02	17



OnSite Environmental Inc.

DATA QUALIFIERS AND ABBREVIATIONS

- A - Due to high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
- B - The analyte indicated was also found in the blank sample.
- C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
- D - Data from 1:____ dilution.
- E - The value reported exceeds the quantitation range, and is an estimate.
- F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
- G - Insufficient sample quantity for duplicate analysis.
- J - The value reported was below the practical quantitation limit. The value is an estimate.
- K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
- L - Quantitated from C7-C34 as diesel fuel #2.
- M - Predominantly _____ range hydrocarbons present in the sample.
- N - Hydrocarbons in the gasoline range (C7-toluene) are present in the sample which are elevating the diesel result.
- O - Hydrocarbons in the heavy oil range (>C24) are present in the sample which are elevating the diesel result.
- P - Hydrocarbons in the diesel range (C12-C24) are present in the sample which are elevating the oil result.
- Q - The RPD of the results between the two columns is greater than 25.
- R - Hydrocarbons outside the defined gasoline range are present in the sample and are elevating the gasoline result.
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- V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
- Y - Acid Cleaned.
- Z - Interferences were present which prevented the quantitation of the analyte below the detection limit reported.
- ND - Not Detected
MRL - Method Reporting Limit
PQL - Practical Quantitation

Chain of Custody

OnSite Environmental Inc.

14924 NE 31st Circle • Redmond, WA 98052
 Fax: (425) 885-4603 • Phone: (425) 883-3881

Company: NWE

Project No.: N/A

Project Name: BP PIT STOP NACHES

Project Manager: P. TRABUISNER

Turn Around Requested (Check One)

Same Day

24 Hours

48 Hours

Standard

(other) _____

Project Chemist: DAB

Laboratory No. _____

Requested Analysis _____

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	# of Cont.	NWTPH-HCID	NWTPH-G/BTEX	NWTPH-DX	Volatiles by 8240/624/8260	Halogenated Volatiles by 8260	Semivolatiles by 8270/625	PAHs by 8270/625	PCBs by 8081/608	Total RCRA Metals (8)	TCLP Metals	VPH	EPH	% Moisture			
1	BP-4 N+W	5-14-97	12:35	SoilC	1	X													X		
2	BP-5 E+S	5-19-97	12:46	SoilC	1	X													X		

RELINQUISHED BY: P. Trabuisner DATE: 6-2-98 TIME: 14:02

FIRM: NWE

RECEIVED BY: FEDEx DATE: 6-2-98 TIME: 14:03

RELINQUISHED BY: _____ DATE: _____ TIME: _____

FIRM: _____

RECEIVED BY: Matthew Koch DATE: 6/3/98 TIME: 9:15

FIRM: OSR

REVIEWED BY: _____ DATE REVIEWED: _____

COMMENTS: _____

APPENDIX A

FIELD FORM FOR THE ASSESSMENT OF UNDERGROUND STORAGE TANKS



P.O. BOX 477
GRANDVIEW, WA
98930
(509) 882-1144

Project name: Pit Stop

Project number: BIS-0191

US EPA 11-17-91

Location: CORNER Naches & Hwy 12 NW 1/4 SW 1/4, Sec 3, T. 14 N., R. 17 E., W.M.

Field Personnel: DAVE GREEN, Red Heit Weather: Mostly Cloudy, WARM Date: 5/10/91

Tank Contents: Regular gas Size: 2,000 gal Condition: NOT KNOWN

Tank Contents: Unleaded gas Size: 2,500 gal Condition: NOT KNOWN

Tank Contents: Unleaded gas Size: 2,500 gal Condition: NOT KNOWN, PREVIOUSLY DIESEL

Tank Contents: _____ Size: _____ Condition: _____

Tank Contents: _____ Size: _____ Condition: _____

Ambient vapors: AZ TOV Vapors in excavation: YES Odors: DIESEL & GASOLINE

Soil texture and structures: VERY POORLY SORTED RIVER GRAVELS UP TO 2' IN DIAMETER
Average 5" APPROX 10% - 15% OVER 1' DIAMETER

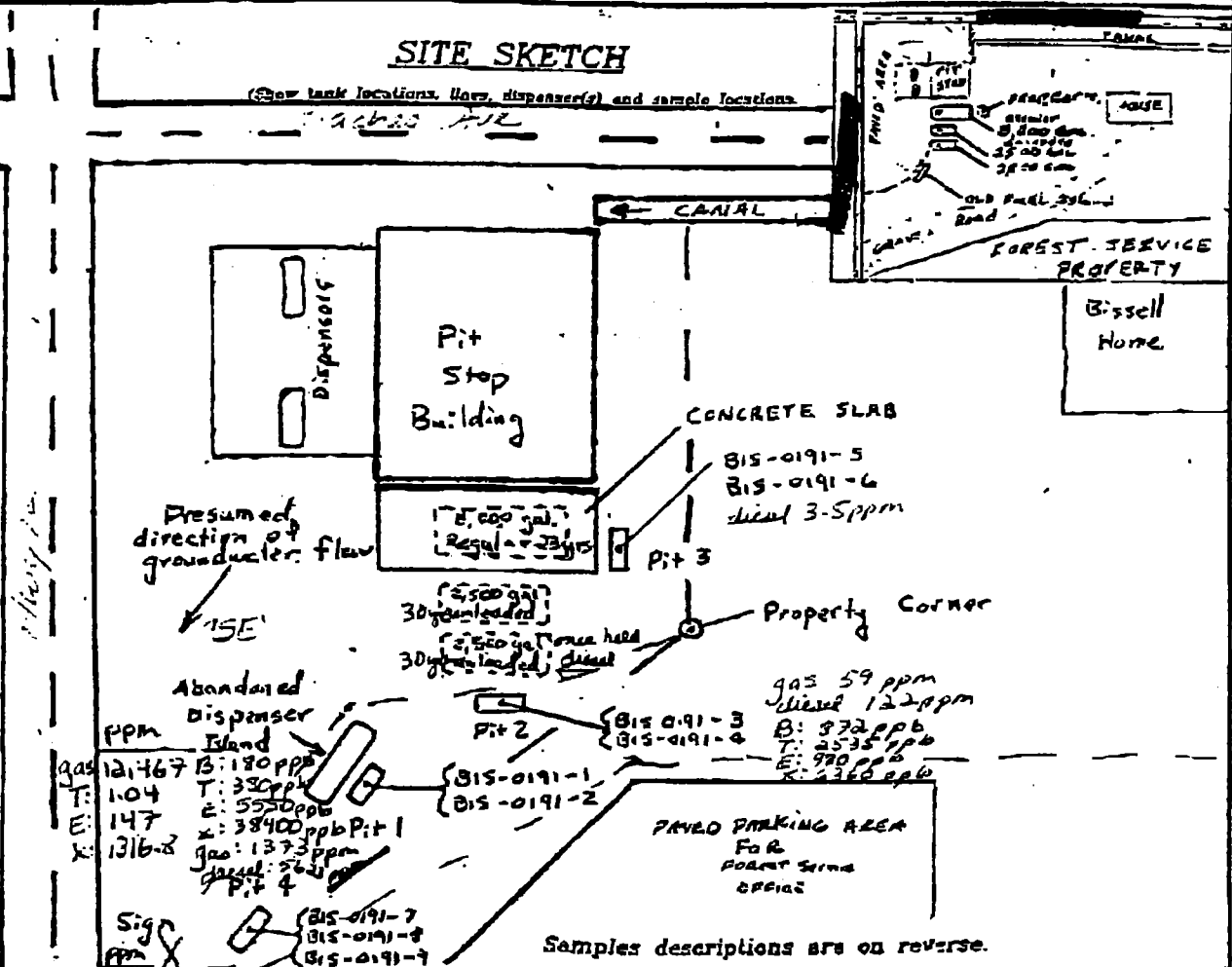
Visual contamination: STAINED GREY ~ 1 1/2' ABOVE GROUND WATER Screening method: F.I.D.

SITE SKETCH

(Show tank locations, UWS, dispenser(s) and sample locations)

North Direction

gas
377



Samples descriptions are on reverse.

I certify that the work performed and sampling methods used meet regulatory requirements as set forth by the U.S. Environmental Protection Agency and the Washington State Department of Ecology.

Site Assessor: [Signature] Date: 5-10-91

Approximate scale: Not to Scale

Depth to groundwater ~ 13' x: 57