

May 22, 2008

Mr. David Gibson Les Schwab Tire Centers 646 NW Madras Highway Prineville, Oregon 97754

RE: Groundwater Monitoring Event – First Quarter 2008 Les Schwab Tire Center 2311 Commercial Avenue Anacortes, Washington RGI Project # 2007-092B

Dear Mr. Gibson:

This letter report documents The Riley Group Inc.'s (RGI's) field protocols and findings associated with the sampling of the groundwater dewatering well (EW-1) located at the former Wallgren's Les Schwab in Anacortes, Washington (referred to hereafter as the Site).

Authorization to implement the scope of work outlined in this quarterly groundwater monitoring report was provided by you (Client) on August 27, 2007.

SITE LOCATION & DESCRIPTION

The Site, located at 2311 Commercial Avenue is currently occupied by a Les Schwab Tires Center. RGI understands that the subject Site is currently owned by Les Schwab Tire Centers Corporate.

In November 2007, RGI conducted an interim cleanup action for soil and groundwater at the subject Site associated with a petroleum release from a leaking hydraulic hoist. The remedial excavation initially contained floating free-product oil-range TPH on the groundwater surface. Following the remedial activities, Wallgren's contractor installed a 4-inch diameter groundwater extraction well (EW-1) in the former source area to remove floating free-product oil and to monitor groundwater quality at the Site. Following multiple groundwater extraction events performed by Wallgren's contractor, RGI collected a groundwater sample from the well on December 17, 2007. The sample was analyzed for diesel- and oil-range total petroleum hydrocarbons (TPH). Analytical results showed oil TPH concentrations of 100 ug/L, below the Model Toxics Control Act (MTCA) Method A Groundwater Cleanup Level of 500 *ug/L*. Diesel-range TPH was not detected in the groundwater sample.

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PROJECT OBJECTIVES

2

The objective of this project was to perform groundwater sampling on the on-site groundwater extraction well to document groundwater quality in the former source area. Based on historical data, the contaminant of concern is oil-range TPH.

DEWATERING WELL SAMPLING EVENT

GROUNDWATER WELL DEVELOPMENT AND SAMPLE COLLECTION

On February 7, 2008, RGI developed and sampled the groundwater extraction well, EW-1, at the Site (Figures 2 & 3). Upon arrival, we noted that the extraction well annulus was covered with a damaged plastic cap. It appeared that the cracked well cap occurred from impacts from daily shop activities. RGI attempted to replace the broken well cap. Well purging and sampling protocols for this project are discussed below.

RGI used a clear bailer to determine the presence, or absence, of free product in the well. Visible free product was not encountered. Depth to groundwater, recorded using an electronic water level indicator, was 4.50 feet below ground surface (bgs).

The groundwater well was purged using a disposable plastic bailer. Groundwater was purged from the well until successive groundwater parameter readings stabilized or until three well volumes were removed, whichever was greater.

Following purging activities, the well was left to recharge to at least 80% of its original water level prior to sampling. The well was sampled using a disposable plastic bailer.

The groundwater sample was collected in laboratory-supplied 500 milliliter amber bottles. Sample containers were placed in an ice-chilled cooler and transported to the analytical laboratory under proper chain-of-custody documentation.

LABORATORY ANALYSIS

Groundwater sample H1-01 was submitted to Friedman & Bruya, Inc. of Seattle, Washington, and analyzed for the following:

Diesel- and Oil-Range TPH (TPH-Dx) using Northwest Test Method NWTPH-Dx with silica gel cleanup¹.

A copy of the laboratory report and sample chain-of-custody are attached to this letter report (Appendix A).

¹ Silica gel filtration prior to analysis removes biogenic material that may interfere with diesel- and oilrange analyses, potentially yielding falsely elevated results.

LABORATORY ANALYSIS

Groundwater sample EW1-Q2 was submitted to Friedman & Bruya, Inc. of Seattle, Washington, and analyzed for the following contaminant of concern:

Diesel- and Oil-Range TPH (TPH-Dx) using Northwest Test Method NWTPH-Dx with silica gel cleanup¹.

A copy of the laboratory report and sample chain-of-custody are attached to this letter report (Appendix A).

¹ Silica gel filtration prior to analysis removes biogenic material that may interfere with diesel- and oilrange analyses, potentially yielding falsely elevated results.

FINDINGS

Analytical results and the MTCA Method A Groundwater Cleanup Levels for the contaminants of concern are summarized in Table 1. Oil-range TPH was detected at a concentration of 13,000 μ g/L which exceeds the MTCA Method A Cleanup Level of 500 μ g/L.

PROJECT LIMITATIONS

Work for this project was performed, and this report prepared, in accordance with generally accepted professional practices for the nature and conditions of work completed in same or similar locations at the present time. RGI's results and findings from the select area do not necessarily reflect soil or groundwater conditions underlying other areas of the Site not investigated. RGI reserves the right to modify its conclusions and/or recommendations as new data and information is made available. No legal or other warranty, expressed or implied, is made.

Any questions regarding our work or this report, the presentation of information, or interpretation of data are welcome and should be referred to the undersigned.

Sincerely yours,

Jason Cass. L.G.

Senior Geologist

Paul D. Riley, LG, LHG Principal



Attachments:

Figures 1, 2 & 3 Table 1 Analytical Laboratory Report

Report Distribution:

Mr. David Gibson, Les Schwab, Inc. (two copies & electronic pdf)

3

THE RILEY GROUP, INC.







Table 1. Summary of Groundwater Sample Results. Anacortes Les Schwab 2311 Commercial Avenue, Anacortes, Washington The Riley Group, Inc. Project #2007-092B Depth to Sample Sample Number Groundwater **Diesel TPH** Oil TPH Date (feet bgs) Initial December 2007, Sampling Event 12/17/2007 3.5 ND H1-01 100 1st Quarter, 2008, Sampling Event 2/7/2008 H1-01 4.5 810 260 **MTCA Method A Cleanup Levels** 500 500 Groundwater samples collected from the dewatering well were collected by The Riley Group, Inc. using a disposable plastic bailer. Unless otherwise noted, all analytical results are given in micrograms per liter (ug/L), equivalent to parts per billion feet bgs = feet below grade surface. Diesel TPH, diesel range total petroleum hydrocarbons determined using Ecology Test Method NWTPH-Dx with silica gel cleanup. Oil TPH, heavy oil range total petroleum hydrocarbons determined using Ecology Test Method NWTPH-Dx with silica gel cleanup.

ND, non-detect, contaminant not detected at noted analytical detection limit.

--, Not analyzed or not applicable.

Bold and shaded concentrations (if any) exceed MTCA Method A Groundwater Cleanup Levels.

MTCA, Washington State Department of Ecology Model Toxics Control Act (WAC 173-340-900, Table 720-1).

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 12, 2008

Jason Cass, Project Manager The Riley Group, Inc. 17522 Bothell Way NE, Suite A Bothell, WA 98011

Dear Mr. Cass:

Included are the results from the testing of material submitted on May 8, 2008 from the 2007-092B Anacortes Les Schwab, F&BI 805070 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.

paul

Michael Erdahl Project Manager

Enclosures TRG0512R.DOC

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on May 8, 2008 by Friedman & Bruya, Inc. from the The Riley Group, Inc. 2007-092B Anacortes Les Schwab, F&BI 805070 project. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	<u>The Riley Group, Inc.</u>
805070-01	$\overline{\mathrm{EW1}}$ - $\mathbf{Q2}$

All quality control requirements were acceptable.

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Date of Report: 05/12/08 Date Received: 05/08/08 Project: 2007-092B Anacortes Les Schwab, F&BI 805070 Date Extracted: 05/08/08 Date Analyzed: 05/09/08

RESULTS FROM THE ANALYSIS OF THE WATER 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 as ug/L (ppb)

<u>Sample ID</u> Laboratory ID	Diesel Range (C10-C25)	Motor Oil Range (C25-C36)	Surrogate <u>(% Recovery)</u> (Limit 50-150)
EW1-Q2 d 805070-01 1/5	5,000 x	13,000	108
Method Blank	<50	<250	86

ENVIRONMENTAL CHEMISTS

Date of Report: 05/12/08 Date Received: 05/08/08 Project: 2007-092B Anacortes Les Schwab, F&BI 805070

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

Laboratory Code:	Laboratory Control	Sample	Silica Gel			
			Percent	$\mathbf{Percent}$		
	Reporting	Spike	Recovery	Recovery	Acceptance	RPD
Analyte	Units	Level	LCS	LCSD	Criteria	(Limit 20)
Diesel Extended	ug/L (ppb)	2,500	95	109	70-130	14

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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 probablility.

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 - The analyte indicated was found in the method blank. The result should be considered an estimate.

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 - The sample was extracted outside of holding time. Results should be considered estimates.

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 - The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The pattern of peaks present is not indicative of diesel.

y - The pattern of peaks present is not indicative of motor oil.

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