UST SUMMARY OF JH KELLY SITE - 821 Third Avenue, Longview, WA 98632

In a pro-active response to notices from local environmental contractors regarding pending legislation (such legislation was subsequently outlined in a DOE Memo dated September 13, 1989, attached as **Exhibit A**), JH Kelly, the operator of the site located at 821 Third Avenue in Longview, WA, contracted with AcuTest to pressure test its two USTs (One 10,000 gallon for unleaded fuel and One 4,000 gallon diesel tank, collectively, the "Tanks") on July 15, 1989. The results of that testing are attached as **Exhibit B** and reflect that the Tanks passed in all regards and were not leaking. For reference purposes, the Tanks were installed in 1982.

Concurrent with the above-described pro-active pressure testing, on August 15, 1989, JH Kelly contracted with SRH Environmental Management to perform limited test pit and soil sampling adjacent to the Tanks to determine if any of JH Kelly's fueling activities (e.g., spillage) resulted in contamination. The results of that testing were released on September 1, 1989 and are attached as **Exhibit C**. The report concluded "No concentrations of BTXE were detected in the sample above the detection limit for the analytical method. Based on the results of this investigation…, there is no evidence of substantial gasoline contamination in the subsurface environments around the fueling island."

Following the above testing, JH Kelly continued operation of the Tanks on a limited basis, but ultimately concluded that they were better served through outside fuel vendors such as Wilcox & Flegel. As a result, JH Kelly retained Pacific Northern Environmental ("PNE") to decommission and remove the Tanks and conduct a site assessment concurrent with their removal efforts. The decommissioning commenced on November 13, 1991. During the excavation and sampling, PNE noted levels of hydrocarbons above Washington DOE Method A Clean Up levels. The DOE was immediately notified of potential release, and on the attached letter of November 19, 1991, PNE summarizes the work plan adopted to clean up the site (**Exhibit D**). This work plan was provided to the DOE. On November 20, 1991, JH Kelly received the attached letter (**Exhibit E**) from Patricia Martin of the DOE acknowledging the report by JH Kelly and providing further instructions regarding reporting and clean-up. Ms. Martin's letter incorrectly characterizes the Tanks as LUSTs, but there is no evidence that the Tanks ever leaked and in fact, all the contractors who were active in the decommissioning of the Tanks suggested that any contamination most likely originated from overfills at the fueling pumps and/or potential backflows from the adjacent slough/dike -- which is not owned by JH Kelly and has historically had recorded levels of contamination. These facts were relayed to DOE on numerous occasions but the agency has continued to mislabel the site as a LUST for nearly 25 years. PNE and JHK completed their work plan for the removal of contaminated soil and ground water pumping. A copy of PNE's Closure Report dated December 1, 1991 is attached as **Exhibit F**.

DOE's Patricia Martin maintained regular contract with JH Kelly through August 5, 1993, and during this period JH Kelly provided sampling reports to DOE from Columbia Analytical Services on January 17, 1992 (**Exhibit G**), June 3, 1992 (**Exhibit H**) and July 16, 1993 (**Exhibit I**). The levels of potential contaminants decreased significantly and, in the July 16, 1993 transmittal letter to DOE, JH Kelly asked Ms. Martin if the testing could stop. In a letter dated August 5, 1993 (**Exhibit J**), Ms. Martin advised JH Kelly that the site would be "recorded on the DOE database as a conducted clean-up." She

also advised that a "No Further Action" status could be obtained through a fee-based service headed by Dick Heggen at DOE. JH Kelly promptly contacted Dick Heggen and submitted its $1,000 fee to the DOE. Despite submitting a comprehensive Independent Remedial Action Plan Summary ("IRAP") on August 16, 1993 (**Exhibit K**), the only response JH Kelly received from Mr. Heggen and DOE was a cursory two-sentence fax on August 17, 1993 (presumably drafted even before receipt or review of the materials in **Exhibit K**). See **Exhibit L**. JH Kelly attempted communications with Mr. Heggen and Ms. Martin several times over the following year, all to no avail. No further information was ever supplied by DOE regarding our Independent Remedial Action Plan Summary or our request for NFA status.

In 1996, the owners of the site were re-financing the property. The lenders asked about potential clean-up activities, and they were provided all of the information included in this summary. At their request, JH Kelly commissioned another set of sampling on April 4, 1996. A copy of the lab results from Columbia Analytical Services is attached as **Exhibit M**. These results reflected non-detects for gasoline and diesel, though there was a reading of 279 ppb for "Other" in the report. Because the sample was taken during a period of high rains and overflows from a slough adjacent to the property, our consultants opined that the "Other" reading may have been impacted by water from the slough (which had a long history of contamination). The results were submitted to the DOE on April 18, 1996. Again, there was no response from the DOE.

Fast forward **ten years**, with no follow-up or communication from the DOE. The site is again undergoing a re-finance and change in insurance carriers. JH Kelly again submits this summary data to its lender and carrier, and, out of an abundance of caution, commissions another round of sampling at the Tanks monitoring well **AND** in the adjacent (non-owned) slough/ditch. The results of that testing are dated May 11, 2006 and are attached as **Exhibit N**. The lab report reflects non-detects in ALL samples. These results were submitted to Bob Warren at DOE on September 28, 2006, along with a cover email from Mark Fleischauer of JH Kelly recounting the lengthy history of the site and asking, again, what was needed for NFA status. Mr. Fleischauer received no response to his inquiry and accordingly, re-sent the email on October 16, 2006. **See Exhibit O**. On October 17, 2006, Mr. Fleischauer finally heard back from Mr. Warren, but rather than commenting on the site history or prior submissions, Mr. Warren simply provided a link to the Voluntary Clean-Up Program. Mr. Fleischauer left follow-up messages with Mr. Warren inquiring as to the status of JH Kelly's IRAP from 1993, but no further information or guidance was offered by Mr. Warren regarding these inquiries.

Fast forward another six+ years, with no follow-up or communication from the DOE. On March 11, 2013, DOE does not contact Mr. Fleischauer or any of the other parties who have attempted to work with DOE over the prior 22 years. Instead, DOE sends that attached Early Notice Letter (**Exhibit P**) to the owners of the site. The letter properly notes that the site was designated as "Reported Cleaned Up," but then incorrectly indicated that the owners did not enter into Ecology's Independent Remedial Action Plan (which they did). The letter had an ominous tone and was not well received given JH Kelly's pro-active efforts over the prior twenty plus years. Accordingly, JH Kelly's Mark Fleischauer promptly emailed the author of the letter (Scott Rose) See **Exhibit Q**. Mr. Rose responded promptly, apologized, expressed a desire to "put this one to bed with minimal effort," and then passed it off to Paul Turner. As you can see from the attached email thread (**Exhibit R**), Mr. Turner promised to look into the matter and

have something "written up for Scott by Thursday of this week - April 25, 2013." We received no further communication from Mr. Turner or Mr. Rose. However, in early January 0f 2014, we did receive the attached letter (**Exhibit S**) from DOE's Cris Mathews telling us that Kirsten Alveraz of DOE would be conducting a Site Hazard Analysis of the site because our site was on the "Confirmed or Suspected Contamination" list. There was absolutely no mention of any of the prior correspondence. Mark Fleischauer promptly commenced email communication with Chris Mathews (**See Exhibit T**), but Cris ultimately deferred to Mr. Rose and Mr. Turner, both of whom failed to continue or close-out their promised communication with JH Kelly in 2013 (as summarized above).

Fast forward another two years, and we get the attached letter (**Exhibit U**) from Kirsten Alvarez of the DOE telling us that our site has the second highest hazard ranking and that we've been put on the bad boys list. Mr. Fleischauer promptly communicated with Ms. Alvarez. She admitted to us that she was unaware of the prior history or correspondence on the site and that ***none of it was reviewed as part of DOE's comprehensive SHA process***. Ms. Alvarez was cordial and responsive, but she ultimately said she had nothing to do with clean ups or NFAs and pointed us back to VCP as the successor program to the IRAP which we so diligently tried to complete in the 1990. That's where are today. You can imagine we are quite frustrated with the DOE at this point, and we are extremely upset that you've chosen to list us a bad player and high risk for the world to see -- even though your own examiners acknowledge they didn't review the entire record before issuing a guilty verdict. We respectfully ask that you act on this matter once and for all. Please remove us from your list, and issue a formal NFA letter. To get the ball rolling, we have attached another set of recent independent sampling from both the monitoring well AND the adjacent slough/dike (which again, is not part of the property). See **Exhibit V**. For the record, again, non-detects on all counts.

EXHIBITS

A.) DOE Memorandum dated September 13, 1989

B.) AcuTest Test Results dated July 15, 1989

C.) SRH Soil Testing Results dated September 1, 1989

D.) Pacific Northern Environmental Adopted Work Plan dated November 19, 1991

E.) November 20, 1991 Letter from Patricia Martin of the DOE

F.) Pacific Norther Environmental's Closure Report dated December 1, 1991

G.) Columbia Analytical Services Sampling Report under cover from JH Kelly dated January 17, 1992

H.) Columbia Analytical Services Sampling Report under cover from JH Kelly dated June 3, 1992

I.) Columbia Analytical Services Sampling Report under cover from JH Kelly dated July 16, 1993

J.) August 5, 1993 Letter from Patricia Martin of the DOE

K.) Independent Remedial Action Plan Summary dated August 16, 1993

L.) August 17, 1993 Facsimile from Dick Heggen of the DOE

M.) Columbia Analytical Services Sampling Report dated April 4, 1996

N.) Columbia Analytical Services Sampling Report dated May 11, 2006

O.) September 28, 2006 Email from Mark Fleischauer to Bob Warren at the DOE

P.) March 11, 2013 DOE Early Notice Letter

Q.) April 22, 2013 Email from Mark Fleischauer to Scott Rose

R.) Email string dated April 22 – 23, 2013 between Paul Turner and Mark Fleischauer

S.) December 11, 2013 Letter from Cris Mathews of the DOE

T.) Email string dated February 4, 2014 between Mark Fleischauer, Cris Mathews, Kirsten Alvarez, etc.

U.) February 2, 2016 Site Hazard Assessment from Kirsten Alvarez of the DOE

V.) ALS Environmental Sampling Report dated April 22, 2016

Exhibit

A

CHRISTINE O. GREGOIRE
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

September 13, 1989

TO: Underground Storage Tank Owners

FROM: Department of Ecology Storage Tank Section

SUBJECT: State Regulation of Underground Storage Tanks

The Washington State Legislature passed House Bill 1086 during the 1989 legislative session. This bill directs the Department of Ecology to adopt rules for the regulation of underground storage tanks, including standards for new tanks and requirements for upgrading existing underground storage systems. The state regulations must be at least as stringent as the federal rules which took effect in December of 1988. Once these rules are in place, the Department of Ecology will seek federal approval of the program so that the state will have primary authority for underground tank regulation in Washington.

The new legislation also establishes a fee on tanks to pay for the new regulatory program. The fee will be $60 for each tank in the 1990 and 1991 fiscal years (that is, for the period from July 1, 1989 through June 30, 1990 and the period from July 1, 1990 through June 30, 1991). The first billing will take place in November, 1989. The fee will increase to $75 per tank for the 1992 fiscal year and cannot be increased thereafter without approval of the legislature. Any tank not <u>permanently</u> closed at the time of the billing is subject to the fee.

An Ecology FOCUS sheet is enclosed which explains more details of the new law and the rule development process. The FOCUS sheet also includes the answers to some questions you may have about the new program. We hope this information is useful.

If you are the owner of a facility where a leaseholder or franchisee will actually be responsible for paying the fee for the tanks, please make sure that the responsible individual receives this information. This mailing is being directed only to the <u>reported</u> <u>owners</u> of underground storage tanks.

WASHINGTON STATE DEPARTMENT OF ECOLOGY

Focus
UNDERGROUND STORAGE TANKS

1989 Legislation Creates New State Regulatory Program

Background Concerning the New Law

Federal rules for underground storage tanks recently took effect, establishing requirements for new and existing tanks which store petroleum and other hazardous substances. These rules are necessary to protect the environment, and particularly groundwater, from being contaminated as a result of tank or piping leaks. Certain tanks are exempt from the rules, including heating fuel tanks and small motor fuel tanks at farms and residences.

Congress intended that authority for the federal program be delegated to the states. The 1989 State Legislature passed House Bill 1086, requiring Ecology to establish a program at least as strict as the federal rules so the state can receive this authority.

Annual Tank Fees Will Support the New Program

The new legislation requires tank owners to pay an annual tank fee to support the regulatory program. These fees will fund preparation of the new rules, technical support and information for the regulated community, management of the tank data base, and administration and enforcement of the program.

In November 1989, tank owners will be billed $60 per tank. This will pay for the period from July 1, 1989 to June 30, 1990. The next billing will take place in April of 1990, for the period from July 1, 1990 to June 30, 1991. This will establish a permit-type system, with the annual fee due by July 1 of each year, to pay for the following fiscal year. The fee will increase to $75 in 1991.

Scope and Timing of State Rule Development Process

Ecology must prepare several different rules, and they are to be adopted by July 1, 1990. The new regulations will address:

- **Technical Requirements** – These will include new tank standards and requirements for upgrading, operating and closing tanks, as well as for detecting and reporting leaks and spills.
- **Financial Responsibility** – All regulated tank owners will need to have the means (generally through some form of insurance) to pay the costs of cleanup and damages if one of their tanks leaks.
- **Local Delegation** – The new law emphasizes delegation of all or part of the program to local authorities; jurisdictions wishing to protect environmentally sensitive areas may establish programs more strict than the state program, if certain criteria are met.
- **Program Administration** – These rules will address compliance monitoring, enforcement, public participation, and revenue sharing with local jurisdictions which operate their own programs.
- **Tank Tagging** – Tanks which are in compliance with the new rules will receive a "tag" or certificate which must be visibly displayed. Tanks without the tag cannot receive product.
- **Certification** – Ecology is given the authority to certify people who perform various tank activities, such as installation and closure.

Public Involvement

Ecology is committed to involving the public in the rule development process, and will make an effort to inform concerned parties of public meetings or hearings. An advisory committee is also being established to assist with rule development, to ensure that the concerns of a broad range of interested parties are addressed. This committee will include representatives of the petroleum industry (including dealers and distributors) and a variety of other business interests, as well as representatives of environmental groups and local governments.

Emphasis is on Education and Technical Assistance

As this new program is implemented, Ecology recognizes the need to focus on offering education and technical assistance to help tank owners and operators comply with the rules. Therefore, our primary emphasis will be on providing assistance and education so that people will have the information they need to meet the new requirements.

Questions and Answers about the New Program

Q: Do I have to pay a fee?

A: If your regulated tank has not been permanently closed at the time the fee is assessed, a fee will be required. Closure must now be accompanied by a site investigation to determine whether a leak has occurred.

Q: When do I have to comply?

A: Under federal rules, tanks twenty-five years old or older (and those for which the age is unknown) must comply with the federal leak detection requirements by December 22, 1989. State rules will not take effect before July 1, 1990.

Q: When will I get my tank tag so that I can receive product?

A: Although rules for tank tagging will be part of the regulations which take effect on July 1, 1990, the compliance date will be sometime later (possibly January 1, 1991). This will enable Ecology to ensure that all tanks in compliance have received their "tag," and will provide time to educate the regulated community and product distributors regarding the law.

Q: How do I identify certified contractors?

A: Ecology's certification program will not be in effect until late in 1991, at the earliest, so there will be no state-certified contractors until then. Lists of contractors who perform tank-related activities, but for which no endorsement is made, may be obtained from Ecology by calling the numbers listed below.

For More Information

Publications which summarize the federal rules presently in effect, and copies of House Bill 1086, are available from Ecology. In Washington State, please call 1-800-826-7716; outside the state, call (206) 459-6293.

State of Washington
DEPARTMENT OF ECOLOGY
PV-11, Olympia, WA 98504-8711

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WA

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H METER 323299

J.H.KELLY, INC.
821 3RD AVENUE BOX 2038
LONGVIEW, WA.
98632

Exhibit

B

ACUTEST

July 21, 1989

Mr. John Jabusch
Petroleum Services Unlimited
340-C Oregon Way
Longview, WA 98632

Test No. : 890715
Test Date : July 15, 1989
Location : J. H. Kelly
Longview, WA

Dear Mr. Jabusch:

A precision test was performed on tanks at the above location using the LEAK COMPUTER® System. We have reviewed the data produced in conjunction with this test for purposes of verifying the results and certifying the tank systems. The testing was performed in accordance with AcuTest protocol, and therefore satisfies all requirements for such testing as set forth by NFPA 329-87 and USEPA 40 CFR part 280.

The results of testing are shown on the following page, and indicate whether the full systems, including the tank and associated piping, or just the individual tank passed or failed. Included with the report are computer printouts of the data compiled during the last hour of each test. Each printout shows leak rate, and the confidence level (three times standard deviation) of that leak rate. This information is stored in a permanent file if future verification of test results is needed.

QUALITY ASSURANCE BY:

Ronald L. Uher
A/T #019

TEST CERTIFIED BY:

D. G. Van Delinder
A/T #049

ACUTEST CORPORATION 1141 BRITTMOORE ROAD HOUSTON, TEXAS 77043
(713) ACUTEST (800) 992-8884 (713) 228-8378

Test No. : 890715
Test Date : July 15, 1989
Location : J. H. Kelly
Longview, WA

TEST RESULTS

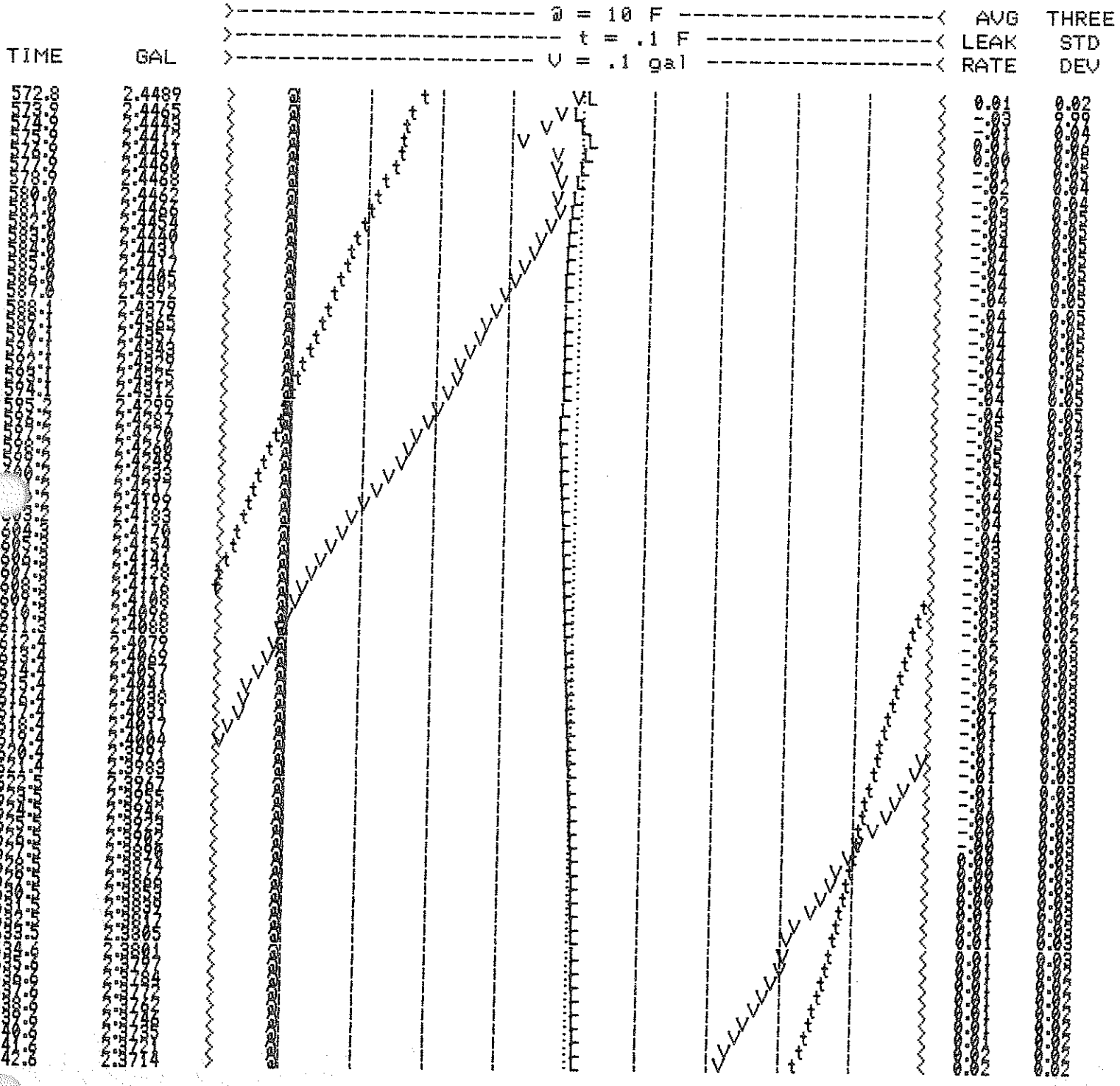
PRODUCT	VOLUME (GAL)	WATER IN TANK (INCHES)	HIGH LEVEL LEAK RATE (GPH)	LOW LEVEL LEAK RATE (GPH)	FULL SYSTEM	TANK ONLY
DIESEL	3,954	0	0.01 @ 20″	-0.02 @ 8″	PASS	PASS
NOLEAD	10,103	.25	-0.02 @ 20″	-0.02 @ 15″	PASS	PASS

SUCTION PRODUCT LINE TEST

DIESEL: Tight at a level of 20″ above tank top.
NOLEAD: Tight at a level of 20″ above tank top.

STRIP CHART FOR DATA RECORD: 89071513.A20 OF 3954 GALLON DIESEL TANK
LOCATION: J H KELLY LV WA TEST OPERATOR: HAGDAHL

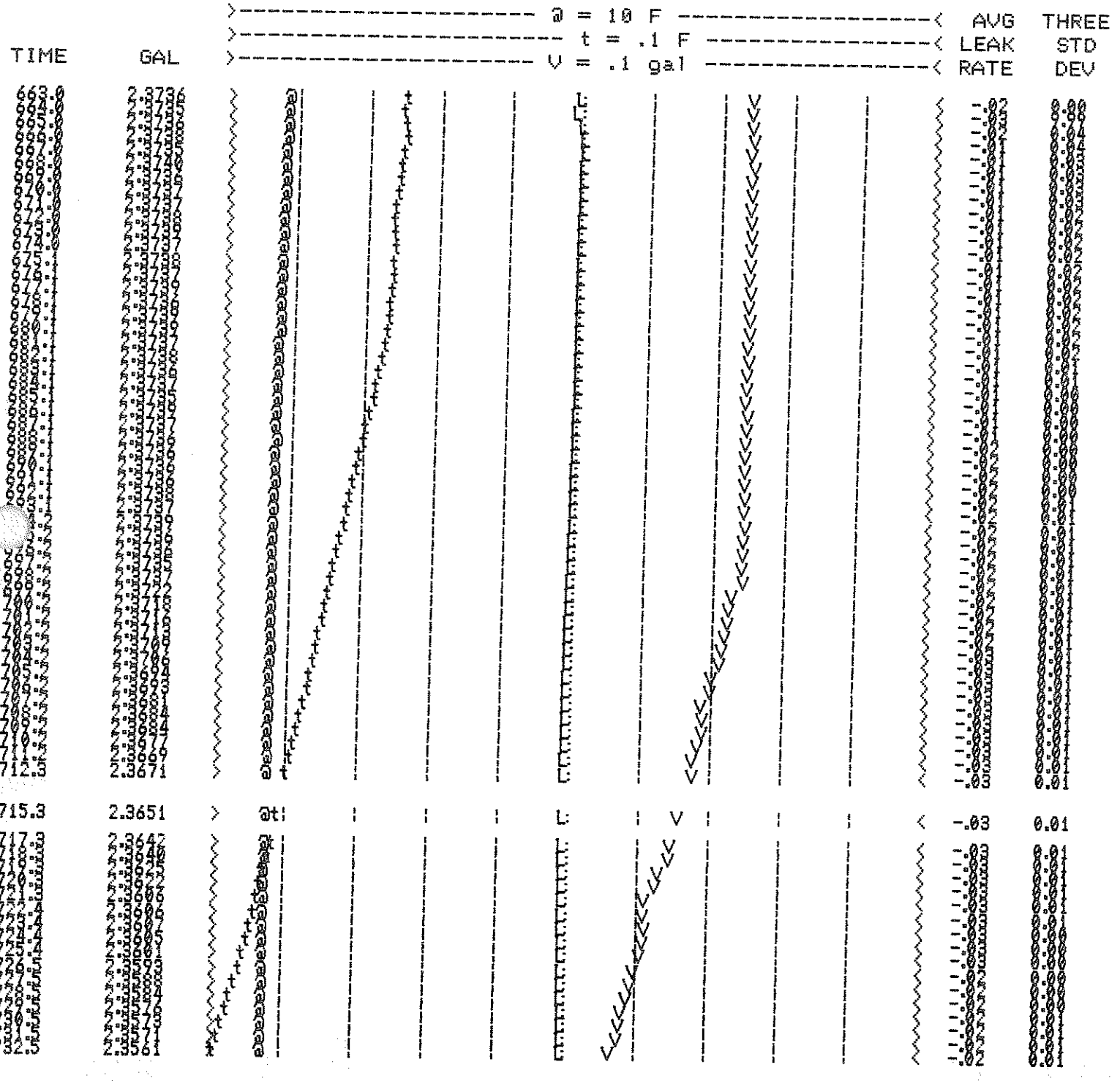
LEAK RATE AVG OF 20 CYCLES; LINE FEED: 6 IN/HR; TOTAL TEST TIME: 72.8 MIN
DENSITY: .87 TANK TEMP @ START: 70 F COE: .000448



END OF STRIP CHART 89071513.A20
DATA COLLECTED ON LEAK COMPUTER S/N 88121904

STRIP CHART FOR DATA RECORD: 89071514.A08 OF 3954 GALLON DIESEL TANK
LOCATION: J H KELLY LV WA TEST OPERATOR: HAGDAHL

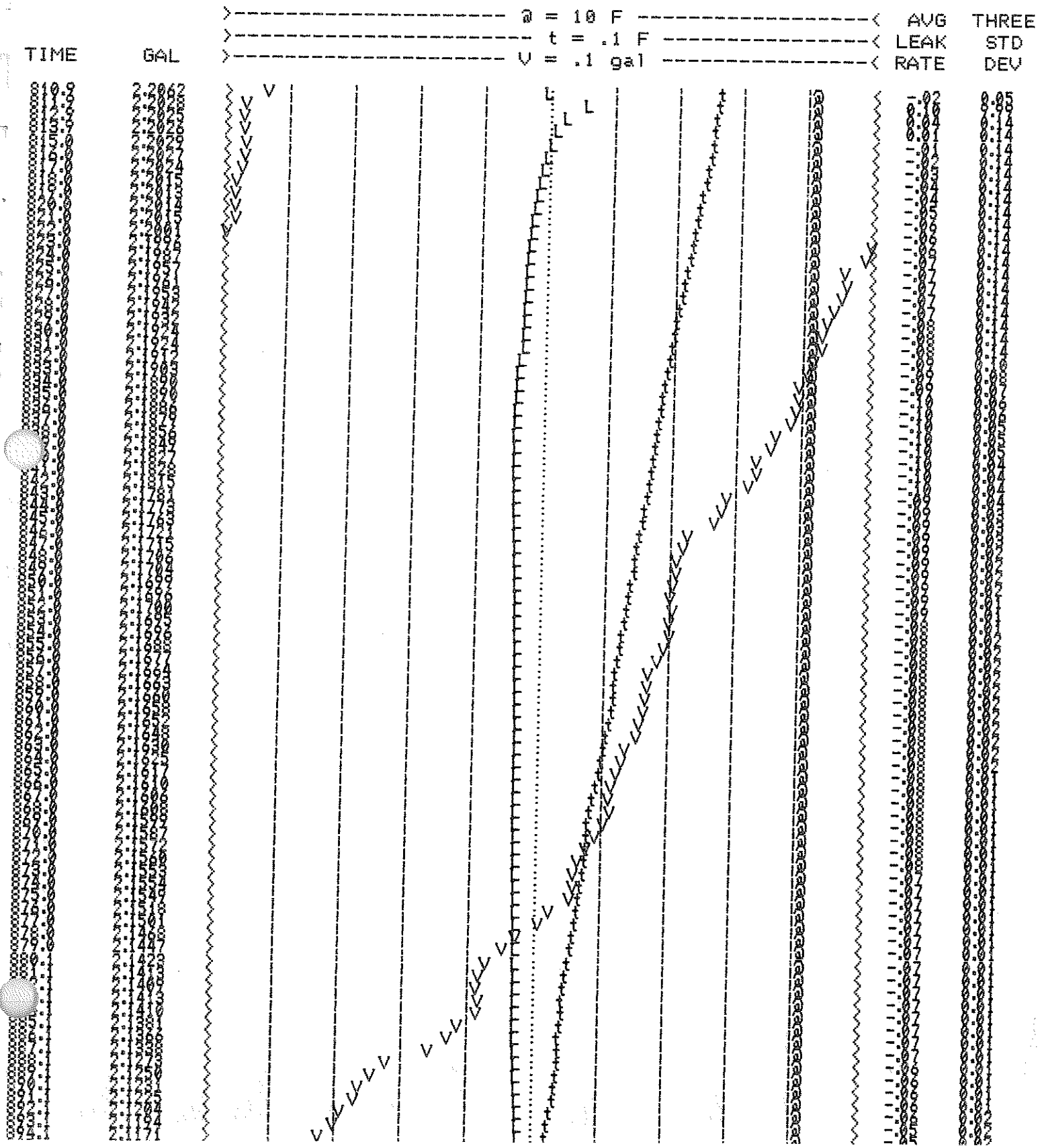
LEAK RATE AVG OF 20 CYCLES; LINE FEED: 6 IN/HR; TOTAL TEST TIME: 70.6 MIN
DENSITY: .86 TANK TEMP @ START: 70 F COE: .000448

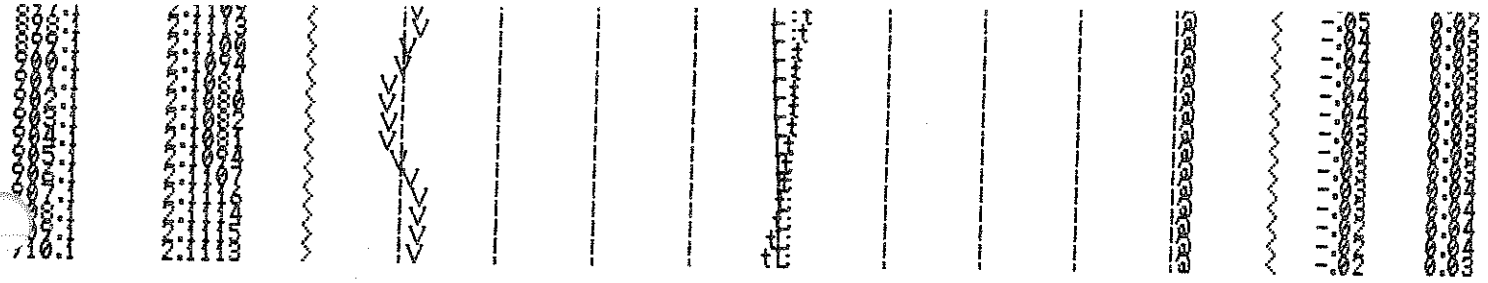


END OF STRIP CHART 89071514.A08
DATA COLLECTED ON LEAK COMPUTER S/N 88121904

STRIP CHART FOR DATA RECORD: 89071515.B19 OF 10103 GALLON NOLEAD TANK
LOCATION: J H KELLY LV WA TEST OPERATOR: HAGDAHL

LEAK RATE AVG OF 20 CYCLES; LINE FEED: 6 IN/HR; TOTAL TEST TIME: 181.6 MIN
DENSITY: .74 TANK TEMP @ START: 69 F COE: .000679

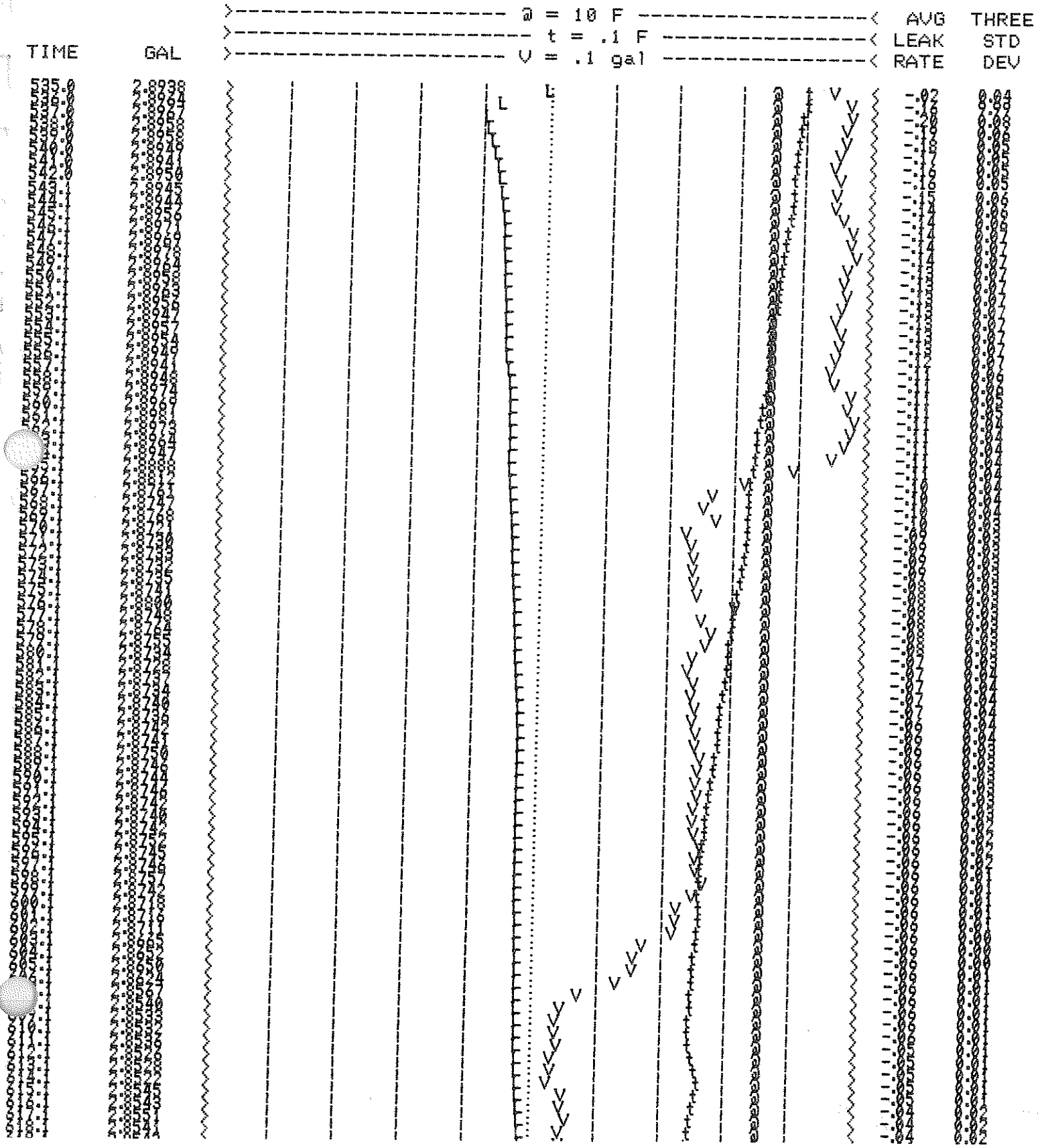


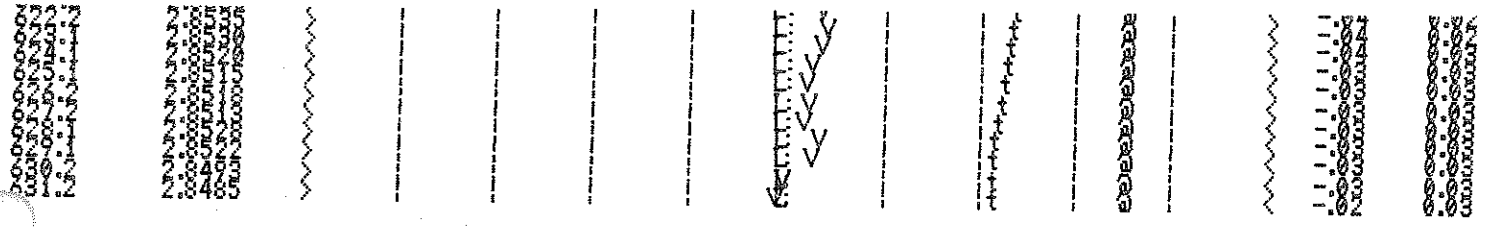


END OF STRIP CHART 89071515.B19
DATA COLLECTED ON LEAK COMPUTER S/N 88121904

STRIP CHART FOR DATA RECORD: 89071619.B15 OF 10103 GALLON NOLEAD TANK
LOCATION: J H KELLY LV WA TEST OPERATOR: HAGDAHL

LEAK RATE AVG OF 20 CYCLES; LINE FEED: 6 IN/HR; TOTAL TEST TIME: 99.2 MIN
DENSITY: .77 TANK TEMP @ START: 68 F COE: .000679





END OF STRIP CHART 89071619.B15
DATA COLLECTED ON LEAK COMPUTER S/N 88121904

Exhibit

C

REPORT ON

SOIL SAMPLING AND ANALYSES

J.H. KELLY COMPANY
LONGVIEW, WASHINGTON

September 1, 1989

Prepared For:

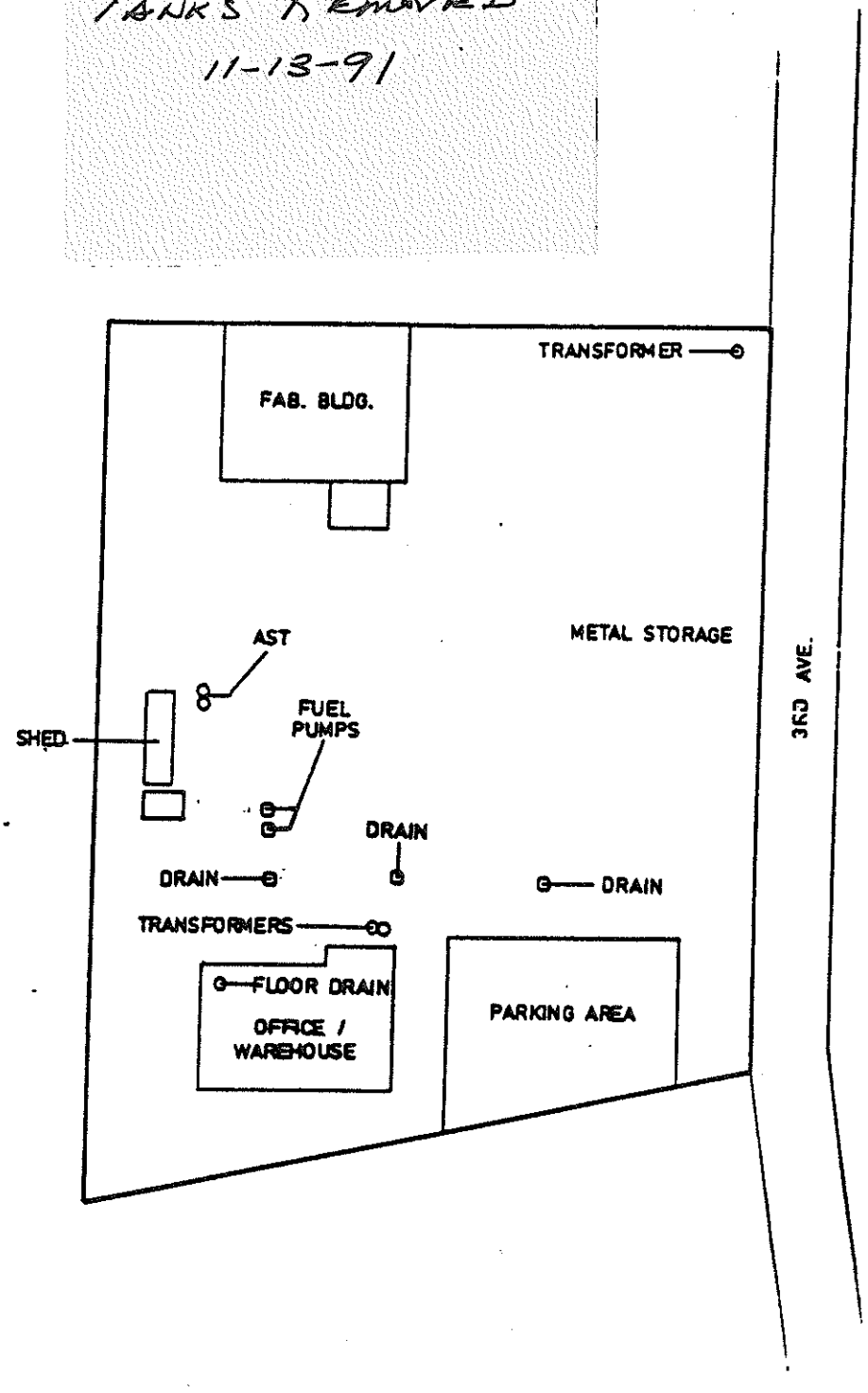
J.H. Kelly Company
821 3rd Avenue
Longview, Washington 98632

(BANKRUPT)

Prepared By:

SRH Environmental Management
12245 N.E. Whitaker Way (NOT THEIR ADDRESS)
Portland, Oregon 97230
(503) 252-8316 (DISCONNECTED)
c/o Ross Simmons

UNDER GROUND FUEL TANKS REMOVED 11-13-91



DATE	8/15/89	SRH GROUP	SRH Environmental Management 12245 N.E. Whitaker Way Portland, Or 97230	SCALE N/A
PROJECT NO.	1535-1			
DRAWN BY	SMS	JH KELLY CO. SITE MAP		FIGURE 2
APPROVED BY	ROA			

REPORT ON

SOIL SAMPLING AND ANALYSES

J.H. KELLY COMPANY
LONGVIEW, WASHINGTON

SRH
GROUP

Introduction

SRH Environmental Management was retained by J.H. Kelly Company of Longview, Washington to perform a limited test pit and soil sampling program in the material handling yard of the J.H. Kelly facility located at 821 3rd Avenue, Longview, Washington. This investigation was performed as a followup to an earlier investigation described in the "Level 1 Environmental Site Assessment Report," dated August 15, 1989. A soil gas survey performed as part of the earlier investigation identified indications of elevated volatile hydrocarbon levels in a limited area to the north of a fueling island and associated underground storage tanks (UST's). The objective of the test pit investigation was to confirm or disprove the presence of substantial subsurface contamination at the test pit location and to assess the vertical extent of contamination, if present.

This phase of investigation consisted of the sampling and logging one test pit located in the area of concern identified in the August 15 report. The area sampled was immediately north of the concrete apron for the vehicle fueling island. The two soil samples were composited into a single sample for analytical purposes, in order to minimize analytical costs. The water sample was preserved in cold at the SRH offices for future possible analysis. This report summarizes the activities and findings of this investigation.

The observations and interpretations presented in this report are based on the assumption that the conditions do not vary from those found in the single test pit. If any variations are encountered during any further investigations for this project, SRH should be notified so that supplemental interpretations can be made. The observations and interpretations of this report are intended only for the individual sampling site described and must not be extended to adjacent areas.

The findings of this report are valid for the dates and under the conditions of the observations and testing. However, changes in the conditions of the subject property, neighboring properties, or changes in applicable standards can occur with the passage of time, whether they result from natural processes, legislation, or the broadening of knowledge. Accordingly, the observations and findings presented in this report may be invalidated by changes outside of our control.

Sampling Locations and Procedure

The test pit was located immediately adjacent to the northern edge of the fueling island concrete apron. This was in the area identified by the earlier soil gas survey as the location of elevated volatile hydrocarbon levels. The test pit was excavated by Anderson Construction of Longview, Washington, using a rubber-tired backhoe with extending boom. The total depth of the test pit was 18 feet, which carried the pit into the groundwater.

Soils in the top 8.5 feet of the test pit consisted of a demolition fill with chunks of wood, asphalt, concrete, reinforcing bar and bricks. The matrix was a moist, mottled gray mixture of silt, sand and gravel with a small amount of clay. The fill appeared to be free of any visual or olfactory signs of contamination from petroleum, though it had a slight odor of what appeared to be decaying organic material.

Immediately below the fill, and extending to the bottom of the test pit, were native sands and silts, typical of those found throughout the Longview area. The upper portions of the native soil had considerable amounts of grass and roots, indicating it was once the topsoil horizon. There was no visual or olfactory evidence of contamination in the native soils, and no obvious signs of significant contamination observed elsewhere in the test pit.

Two soil samples, one from each of the soil horizons described above, were obtained by transferring soil from the center of undisturbed soil chunks in the backhoe bucket. A dedicated, clean stainless steel spoon was used for each individual sample. Each individual sample was loaded directly into a laboratory cleaned, 8-ounce, clear glass, wide mouth jar fitted with a teflon-lined screw cap lid.

Two water samples were obtained by allowing laboratory cleaned, wide-mouth, clear glass jars to fill by gravity with water from the bottom of the pit. One of the samples was observed in a clear glass jar to determine if hydrocarbon product was floating on the water. An observation of a fiberglass measuring tape placed in the top of the water was also made to determine if a sheen was present which would adhere to the tape. No floating product was observed using either method. The second water sample was placed on ice and preserved for future laboratory analyses, if required.

All containers were filled to maximum capacity to minimize headspace losses and sealed with teflon-lined caps. A clean pair of disposable surgical-type gloves was worn for the collection of each discrete sample. The samples were placed into a cooler with ice immediately following sample collection, and promptly delivered to an offsite analytical laboratory. Chain-of-Custody forms were filled out immediately upon sampling, and accompanied the samples into the laboratory.

Sampling implements were decontaminated by accepted procedure prior to use by scrubbing off all visible particulates with a tap water/TSP/baking soda solution, de-ionized water rinse, hexane rinse, and three further rinses with de-ionized water.

Laboratory Analyses

At the laboratory the two soil samples were combined into a single composite sample for analyses. The composite sample was analyzed for the presence of total petroleum hydrocarbons (TPH) by modified EPA Method 418.1, and for BTXE (benzene, toluene, xylene, ethylbenzene) via EPA method 8020. BTXE are components of gasoline and their presence in soil is indicative of gasoline contamination. No concentrations of BTXE were detected in the sample above the detection limit for the analytical method.

The analyses of the composite soil sample detected 58 parts per million (ppm) TPH.

Copies of the laboratory analysis report and chain-of-custody documents are presented in the Appendix.

Conclusions and Recommendations

The test pit was excavated in the area shown by the earlier soil gas survey to be the site of highest volatile hydrocarbon concentrations. The pit was excavated to a depth of 18 feet, well below the bottom of the nearby UST's. No visual or olfactory evidence of substantial petroleum contamination was observed in the test pit and no contamination was apparent on the groundwater reached near the bottom of the pit. Laboratory analysis for BTXE did not detect the presence of these gasoline constituents which, if present, would indicate the likelihood of leakage or spillage from the nearby tanks. Based on the results of this investigation and the previous soil gas survey, there is no evidence of substantial gasoline contamination in the subsurface environment around the fueling island.

The TPH levels detected in this sample are below levels at which the Washington Department of Ecology typically requires further investigation and/or remediation. This analysis did indicate the presence of some hydrocarbon contamination of the soil in this area. However, the level detected and the limited areal extent identified by the soil gas survey do not indicate the presence of substantial contamination. No numeric cleanup standards currently exist for hydrocarbon contamination. The cleanup standard for petroleum releases onto soil is the absence of visual sheen and/or odor. As noted above, visual or olfactory evidence of contamination was not found during the sampling.

Based on the results of the limited investigation described above and the earlier soil gas survey, no recommendations for further investigation are made.

TABLE 1

SUMMARY OF LABORATORY ANALYSIS RESULTS

SOIL SAMPLING
J.H. Kelly Company
Longview, Washington

Analysis	EPA Method	Test Pit Composite
Total Petroleum Hydrocarbons	418.1	58 PPM
Benzene	8020	ND
Toluene	8020	ND
Xylene	8020	ND
Ethylbenzene	8020	ND

ND = None Detected

APPENDIX

LABORATORY ANALYSIS REPORTS

AND

CHAIN OF CUSTODY DOCUMENTATION

RECEIVED SEP - 5 1989 ✓

COFFEY LABORATORIES, INC.
12423 N.E. WHITAKER WAY
PORTLAND, OR 97230
PHONE: (503) 254-1794
FAX: (503) 254-1452

September 1, 1989
Log # A890823-AB2
PO # 01033

SRH Environmental Management
12245 NE Whitaker Way
Portland, OR 97230
Attention: Dave Brown

Sample(s) Collected: 8/23/89
Sample(s) Received: 8/23/89

Analysis Requested: Total Petroleum Hydrocarbons in soil by modified EPA Method 418.1

SAMPLE ID	SAMPLE RESULTS COMPOSITE
08231535-01, 0930 hrs	58
08231535-02, 1000 hrs	

Detection Limit: 2.0

Results expressed as mg/kg unless otherwise noted.

REPORT CONTINUES

COFFEY LABORATORIES, INC.
12423 N.E. WHITAKER WAY
PORTLAND, OR 97230
PHONE: (503) 254-1794
FAX: (503) 254-1452

Log # A890823-AB2
PO # 01033

SRH Environmental Management
Page 2

Analysis Requested: BTXE in soil by EPA Method 8020, GC/PID

Sample ID: 08231535-01 & 08231535-02

ANALYTE	DETECTION LIMIT	LABORATORY BLANK	COMPOSITE RESULTS
Benzene	0.04	ND	ND
Ethylbenzene	0.04	ND	ND
Toluene	0.04	ND	ND
Total Xylenes	0.08	ND	ND

ND means none detected at or above the detection limit listed.

Results expressed as mg/kg unless otherwise noted.

Sincerely,

Victor A. Perry,
Quality Assurance

Sincerely,

Susan M. Coffey
President

SMC/mlh

12245 NE Wallaker Way
Portland, Ore. 97230
503-252-8316 Fax 503-255-7038

Environmental Management

LAB NAME
LOG # A8908 23-AB2

CHAIN OF CUSTODY RECORD

PROJ. NO.: 1535-3
SITE/LOCATION: J.H. KELLY / LONGVIEW
SAMPLERS (Signature): David E. Bonn

STA. NO.	DATE	TIME	COMP.	GRAB	MATRIX	SAMPLE IDENTIFICATION	NO. OF CONTAINERS	BTXE	TPH	SEAL NO.	SEAL INTACT? (Y or N)	REMARKS (with initials)
TP-1	8/23	9:30		GRAB	SOIL	08231535-01	1	X	X			
TP-1	"	10:00	"		"	08231535-02	1					COMPOSITE

Relinquished by: (Signature/Firm)	Date / Time	Received by: (Signature/Firm)
David E. Bonn	8/23 1408	
	Date / Time	
	Date / Time	Albert Hansler

Relinquished by: (Signature/Firm)	Date / Time	Received by: (Signature/Firm)
	Date / Time	
	Date / Time	

Relinquished by: (Signature/Firm) — Date / Time: 8/23 2:08 pm

Remarks (attachments if necessary)

COFFEY LABORATORIES, INC.

12423 N.E. WHITAKER WAY
PORTLAND, OR 97230
PHONE: (503) 254-1794
FAX: (503) 254-1452

THIS SECTION FOR LABORATORY USE O

LABORATORY LOG # A890823-AB
CUSTABBR: SRH Environ NEW
DUE DATE +10 R P
VERBAL RESULTS Yes Std.
(1)PREPAID? CASH CK#
(2)PAY FOR REL $ PRT PH1$
(3)NET 30 DAY ✓ (4)PROF. COUR

PLEASE FILL IN THE REQUESTED INFORMATION COMPLETELY

LABORATORY REPORT INFORMATION:

COMPANY (or private party) NAME SRH

MAILING ADDRESS:

CITY, STATE, ZIP

REPORT TO ATTENTION OF: Dave Brown PHONE ( ) -

DO YOU NEED VERBAL RESULTS? Yes CALL ✓ PHONE ( ) -

SEND EXTRA COPY OF REPORT TO: ATTN:

MAILING ADDRESS:

EXTRA COPY of REPORT is: For ALL jobs ___, or For this job ONLY ___.

Pickup or Delivery address:

LLING INFORMATION:

DO YOU HAVE A PRICE QUOTE FOR THIS JOB? QUOTE #

LLING ADDRESS:

TY, STATE, ZIP

-LING TO ATTENTION OF: PHONE ( ) -

SEND EXTRA COPY OF BILL TO: ATTN:

MAILING ADDRESS:

EXTRA BILLING REQUEST IS: For ALL jobs ___, or For this job ONLY ___.

DOES YOUR COMPANY USE POHS ? YES ___ NO___ IF NO POH IS REQUIRED, INITAL HERE

POH FOR THIS JOB 01033

'AY NT AUTHORIZATION FOR:

RUSH SURCHARGE (2 X Std. PRICE) SIGN HERE

PRIORITY SURCHARGE (1.5 X Std. PRICE) SIGN HERE

Exhibit

D

Pacific Northern Environmental
dba Petroleum Services Unlimited

P N E

November 19, 1991

"Exhibit A"

Mr. Ted Coons
J.H. Kelly, Inc.
821 Third Avenue
Longview, Washington 98632

Regarding: Soil and groundwater remediation within the excavation created from tank decommissioning activities.

Dear Mr. Coons:

Based on the meeting on with John Jabusch and John Polk yesterday, we have developed the following work plan and budget. The Items listed below will not be considered a complete corrective action, but will provide data to determine if further investigation is required. The data you obtained last year, combined with no gasoline or diesel in the soils indicates you may not have a wide spread problem. If the water sample indicates contamination after pumping the excavation the Department of Ecology may still require additional investigation.

In accordance with regulations, we have notified the State of the release to the groundwater. In our telephone conversation with the Department of Ecolgy we indicated you were going to follow the outlined procedures. Patricia Martin from the Department of Ecology agreed with the outlined scope of work and asked to be kept informed of the progress and data obtained.

On November 13, 1991, Pacific Northern Environmental personnel conducted underground storage tank decommissioning activities at J.H. Kelly, Inc. Soil and groundwater samples collected from the excavation indicate levels of hydrocarbons above washington Department of Ecology Method A Cleanup Levels.

We would like to propose further removal of soil from the excavation and follow-up sampling to confirm hydrocarbon removal. Additional soil samples would be required from the soil stockpile as per Washington Department of Ecology regulations.

In an attempt to decrease to the levels of petroleum hydrocarbons present in groundwater, we propose to pump the groundwater from the excavation and allow the water to recharge. The water would be pumped twice and a ground water sample would be collected and chemically analyzed as per Washington Department of Ecology Regulations.

1081 Columbia Boulevard · Longview, Washington 98632
(206) 423-2245 FAX (206) 423-2272

The proposal will be broken down into five individual items. These items will be subject to change thirty days after submitted, as fees are based on current vendor prices.

The cost proposal is grouped into the following items:

Item 1 Environmental Equipment	$ 292.00
- Monitoring Equipment - Level D Protection - Environmental Van - Polyethylene Sheeting	
Item 2 Site Assessor	$ 440.00
Item 3 Construction Services	$ 457.50
- Hydraulic Excavator with Operator - Rubber Tired Backhoe with Operator - Labor	
Item 4 Dewatering and Disposal	$5,290.00
- Pump and Dispose of Water - Two Inch Water Pump	
Item 5 Sample Analyses - Water Sample (BTEX and TPH) - Soil Samples (BTEX and TPH)	$1,200.00
Total:	$7,679.52

Pacific Northern Environmental's time and materials breakdown is based on Exhibit A of the attached contract. Outside services and materials are charged on a cost + 15% basis.

If you have any questions or require further information, please feel free to call.

Very Truly Yours,

Joseph A. Sturza
Site Assessor/Environmental Engineer

Attached: Terms of Agreement

JAS/D:\PROPOSAL\JHKIICU.WP

Pacific Northern Environmental

dba Petroleum Services Unlimited

P N E

11/1/91

JOB RATES - TIME + MATERIALS

	Environmental	Construction	Service

Professional Labor

Environmental Manager	$ 70.00/Hr
Geologist	$ 55.00/Hr
Technician	$ 40.00/Hr
Clerical	$ 30.00/Hr
Per Diem/Overnight	$100.00/Day/Person

Construction Labor

Foreman	$ 45.00/Hr
Draftsman	$ 40.00/Hr
Operator	$ 40.00/Hr
Laborer - Skilled	$ 37.50/Hr
Per Diem/Overnight	$ 50.00/Day/Person

Environmental Equipment - Service

Environmental Van	$ 50.00/Day
Photo-Vac	$ 75.00/Day
Sample -TPH-BTEX	$200.00/Ea - 48 Hr Turnaround
PH/Cond. Meter	$ 25.00/Day
Steam Cleaner	$100.00/Day
Protective Gear Level D	$ 35.00/Day/Person
C	$ 75.00/Day/Person
B	$150.00/Day/Person

Construction Equipment

Track Hoe w/ Operator	$ 90.00/Hr $400.00/Day
Back Hoe w/ Operator	$ 50.00/Hr $250.00/Day
Compressor 100 CFM	$100.00/Day
Taper Tool	$ 50.00/Day
Concrete Saw - Walk Behind	$111.00/Day
Small Tools	$200.00/Week
Generator	$100.00/Day
Explosion Meter	$ 50.00/Day
Sludge	$200.00/Pail
Pipe Machine	$ 50.00/Day
12 Yd. Dump Truck w/ Operator	$ 59.00/Hr
Compactor - Plate	$ 52.00/Day
Compactor - Dual Drums 34"	$225.00/Day
Mobilization	Cost Plus 15%

Service Labor

Technician	$ 42.50/Hr
Parts	$+20%

This list is not inclusive. Additional rates will be furnished on request. Prices may vary according to size and length of jobs.

1081 Columbia Boulevard · Longview, Washington 98632
(206) 423-2245 FAX (206) 423-2272

Exhibit

E

CHRISTINE O. GREGOIRE
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2353

November 20, 1991

Mr. Ted Coons
J. H. Kelly, Inc.
821 3rd Avenue
Longview, WA 98632

Re: **Requirements for Reporting Environmental Conditions at LUST Contaminated Sites**

Dear Mr. Coons:

Thank you for reporting contamination resulting from a Leaking Underground Storage Tank (LUST) at J. H. Kelly, Inc., 821 3rd Avenue, Longview, WA 98632, to the Department of Ecology (Ecology). Your report was required under Chapter 173-340 Washington Administrative Code (WAC) adopted under the authority of the Model Toxics Control Act [Chapter 70.105D Revised Code of Washington (RCW)] or Initiative 97. The purpose of this letter is to outline the remaining requirements, with which you must comply, in order to satisfy the regulation. For your reference, a copy of the appropriate part (section - 450) of the regulation is enclosed. It can be found in Appendix B (page 78) of the enclosed document, "Guidance for Remediation of Releases from Underground Storage Tanks." I apologize for the technical nature of this letter, but it is necessary in order to provide you a complete picture of what must be done in the near future at your site in order to meet the requirements of the regulation.

Cooperation with Ecology

The Model Toxics Control Act (MTCA) encourages all investigations and cleanups which are protective of human health and the environment. It is the policy of Ecology to work cooperatively with potentially liable persons (PLPs) to accomplish prompt and effective cleanups. Cooperating with Ecology in planning or conducting a remedial action is not an admission of guilt or liability. Ecology's ability to work closely with the many contaminated sites of which we are aware, is very limited.

The MTCA specifies two methods by which cleanups can occur. These are:

1) an independent cleanup with little or no oversight from Ecology, or

2) an investigation and cleanup with regulatory and technical oversight and review.

An independent cleanup allows property owners or operators to make all of the decisions concerning the investigation and cleanup of the site. They retain all liability. The second option allows for technical and regulatory review by Ecology and is formalized by a consent decree or order under Chapter 70.105D RCW. Covenants not to sue are available within the consent decree process. Under these formal processes, Ecology's costs for oversight will be cost recovered from you. Unless you specifically request that the process move forward under a consent decree or order we will assume that you will cleanup the site as an independent. If you request Ecology oversight, your site will be prioritized based upon Ecology's workload and the severity of the contaminants at your site.

Penalty Provisions

If the reports detailed below are not received in a timely manner or if Ecology determines that your actions are not sufficient to protect the environment and human health Ecology may decide to:

* Conduct an emergency cleanup;
* Issue an enforcement action (order);
* Negotiate a cleanup agreement; or
* Rank the site for future action.

Persons who fail to comply with the regulations may be liable for up to three times Ecology's costs, and up to $25,000 penalty per day.

Required Actions

The enclosed document, "Guidance for Remediation of Releases from Underground Storage Tanks," details further reporting requirements. Appendix B of the document describes the information you must report. **Reports are due twenty and ninety days after the release is discovered.** Also in the event that groundwater has been impacted or threatened, a State Remedial Investigation/Feasibility Study will be required. The question of "How clean is clean?" is answered by the cleanup standards found on page 14 of the document.

Financial Assistance

Financial assistance for cleanups is sometimes available in the form of cost sharing or mixed funding. The circumstances under which these funds could become available are:

1) if the cleanup would be achieved faster by this method than would otherwise be done by you without financial assistance; and

2) if the funding will prevent an undue hardship.

Undue hardship is generally defined as bankruptcy or insolvency. In order to receive financial assistance, you will need to enter into a Consent Decree with Ecology. The state cannot pay for previous cleanup work already performed, routine tank closures, or tank improvements. To request financial assistance you should contact Ecology to get the proper application form. Then you should complete the application form, attach tax records for the past three years, and return the package to me. The information provided will be run through a computer program that will help us determine eligibility for cost sharing. Since this funding has limited availability, it is possible that you may be eligible for the funding, but not be funded.

Treatment Options

There are many methods for treating the contaminated soils that have been or will be generated by the cleanup of your site. Chapter 173-340 WAC has established a hierarchy of treatment options that have been developed to give a preference to permanent solutions. These options are applied to both on-site and off-site treatment technology applications. Below is a list of these categories and some examples. It should be noted that this table concerns soil. You should contact Ecology if contaminated groundwater is suspected on your site.

Waste Treatment Technology Categories	**Examples (This is *NOT* all inclusive.)**
Reuse or recycling	Incorporation into asphalt
Destruction or detoxification	1. Bioremediation 2. Thermal desorption 3. Soil venting followed by destruction of the vapors by incineration
Separation or volume reduction, followed by reuse, recycling, destruction, or detoxification	This is separating the contaminated soil from non-contaminated soil then one of the above treatment methods.
Immobilization	Soil vitrification
On-site or off-site disposal at an engineered facility	Disposal at a properly permitted landfill
Isolation or containment	This would be building a vault for the soil and not treating it any further.

Aeration allows the volatiles to escape into the air. Since this method of treatment is mostly a transfer of the contaminants to the air, it is NOT treatment. Therefore, this method is discouraged and in some areas, it is not allowed. Check with the appropriate air pollution authority, mentioned below, for information regarding soil aeration in your area.

Other Governmental Contacts

Several issues that you will deal with in the conduct of this cleanup are under the purview of other governmental agencies. Contaminated soils are usually considered solid waste, as opposed to hazardous waste. In Washington the local Health Districts are the regulators of solid waste. Depending on the method you choose to remediate the contamination at your site, air pollution can be a concern. Three different air pollution authorities exist in this region and each has its own rules about discharge of air pollutants from petroleum cleanup sites. In some communities there are local rules, administered by the local Fire Marshal, that implement parts of the Fire Code. Therefore, you should contact the appropriate authority to assist in determining the correct remedial technique that you will choose. Below is the Health Department, County Fire Marshal, and Air Pollution Authority that have responsibility in your area and their contact persons.

Richard Jones
Cowlitz/Wahkiakum Health District
1516 Hudson
Post Office Box 458
Longview, Washington 98632
Phone: (206) 577-0289

Jerry Strawn
Southwest Washington Air Pollution Control Authority
1308 NE 134th Street, Suite D
Vancouver, Washington 98685
Phone: (206) 574-3058 or 1-800-633-0709

Steve Barber
Cowlitz County Fire Marshal
DCD
207 Fourth Avenue North
Kelso, Washington 98626
Phone: (206) 577-3052

Jack Smith
City of Longview Fire Marshal
Post Office Box 128
Longview, Washington 98632

An initial investigation of your site will be conducted by Ecology personnel within the next 90 days as required by WAC 173-340-310. I will be the Ecology site manager for your site so please direct all reports and questions about this site to me. My telephone number is (206) 586-5562. The address is: Mail Stop LU 11, Post Office Box 47775, Olympia, Washington 98504-7775.

Sincerely,

Patricia L. Martin

Patricia L. Martin
LUST Site Manager
Toxics Cleanup Program

PLM:nm
Enclosures

cc: Richard Jones
Jerry Strawn
Steve Barber
Jack Smith

Exhibit

F

Pacific Northern Environmental

dba Petroleum Services Unlimited

P N E

J.H. KELLY, INC.

CLOSURE REPORT

December 2, 1991

1081 Columbia Boulevard • Longview, Washington 98632

(206) 423-2245 FAX (206) 423-2272

December 2, 1991

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Re: Tank decommissioning activities at J.H. Kelly, Inc. site #002053.

Dear UST Section:

Pacific Northern Environmental was retained by J.H. Kelly, Inc. to conduct tank decommissioning and site assessment activities. The J.H. Kelly, Inc. site is located at 812 Third Avenue in Longview, Washington. A site vicinity map is presented in Figure 1.

The J.H. Kelly, Inc. site operates as a maintenance, fabrication, and contract coordination facility. Prior to decommissioning activities, J.H. Kelly, Inc. operated the following two underground storage tanks at the site:

1. One 4,000 gallon Diesel Tank;

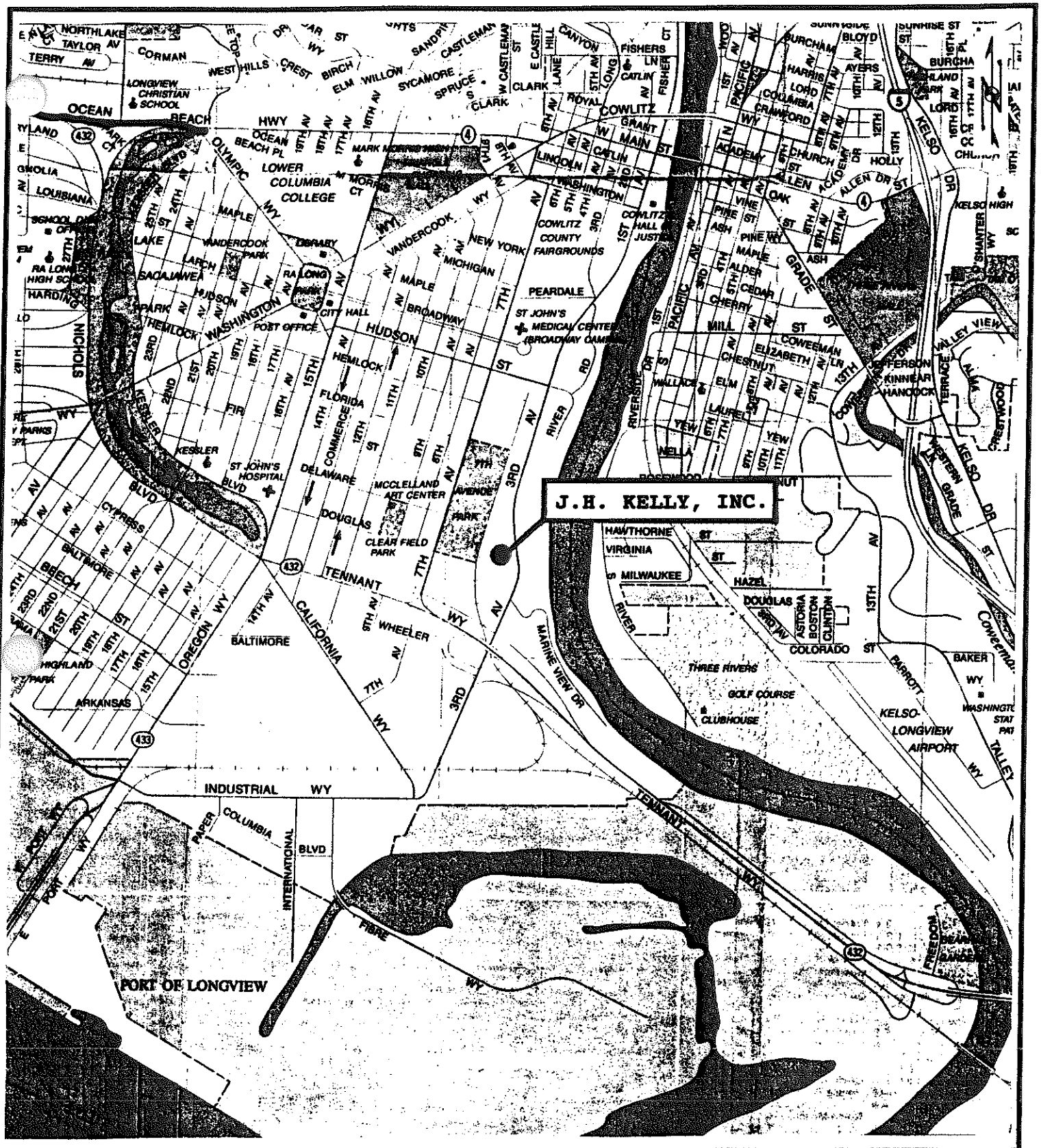
2. One 10,000 gallon Unleaded Gasoline Tank.

The last day of operation of the tanks was 11/12/91.

November 13, 1991

Pacific Northern Environmental was on site to conduct tank decommissioning activities in accordance with Chapter 173-360-385 of the Washington Administrative Codes. The site assessment was conducted in accordance with Chapter 173-360-390 of the Washington Administrative Codes. Activities on site progressed as follows:

- Fuel dispensers were removed. Tank and ancillary equipment locations are presented in Figure 2. Field screening techniques (color, odor, and photo-ionization) indicated petroleum hydrocarbons present in the soil below the former location of the dispensers;

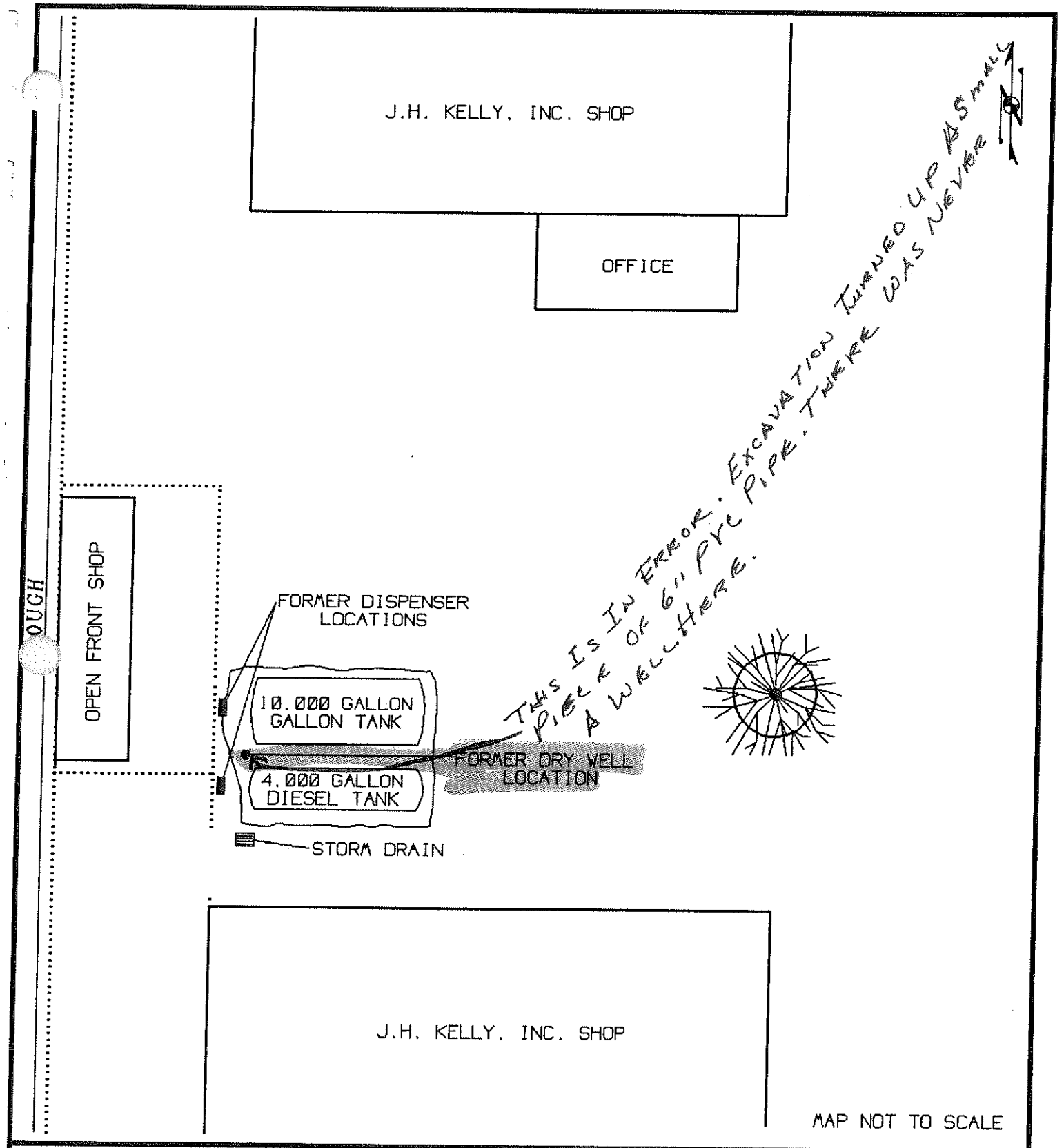


J.H. KELLY, INC.
21 THIRD AVE.
LONGVIEW, WASHINGTON 98632

FIGURE 1

SITE VICINITY MAP

PACIFIC NORTHERN ENVIRONMENTAL



J.H. KELLY, INC.
21 THIRD AVENUE
LONGVIE WASHINGTON 98632

FIGURE 2

SITE FACILTY MAP

PACIFIC NORTHERN ENVIRONMENTAL

- The fill slab was broken with a Komatsu PC 200 LC hydraulic excavator and removed. Field screening techniques indicated a presence of petroleum hydrocarbons in the soil below the fill pad;

- Soil was removed from above and around the gasoline tank. The soil from this area was field screened and stockpiled on polyethylene sheeting, as a presence of petroleum hydrocarbons was indicated. Fill material within the tank nest was moist gray sand;

- Upon removal of soil from the tank excavation, the native soil of the walls was observed. This soil contained pieces of wood, chucks of concrete, chunks of asphalt, and pieces of cable. The color of the soil was dark gray;

- Dry ice was inserted into the gasoline tank to evacuate explosive vapors;

- The gasoline tank was removed from the excavation and the following observations were made:

  - Tank Diameter: 6 feet 3.5 inches
  - Tank Length: 17 feet
  - Approximately 95% of the protective coating was intact.
  - Approximately two inches of water was observed within the excavation. A sheen was observed on this water.

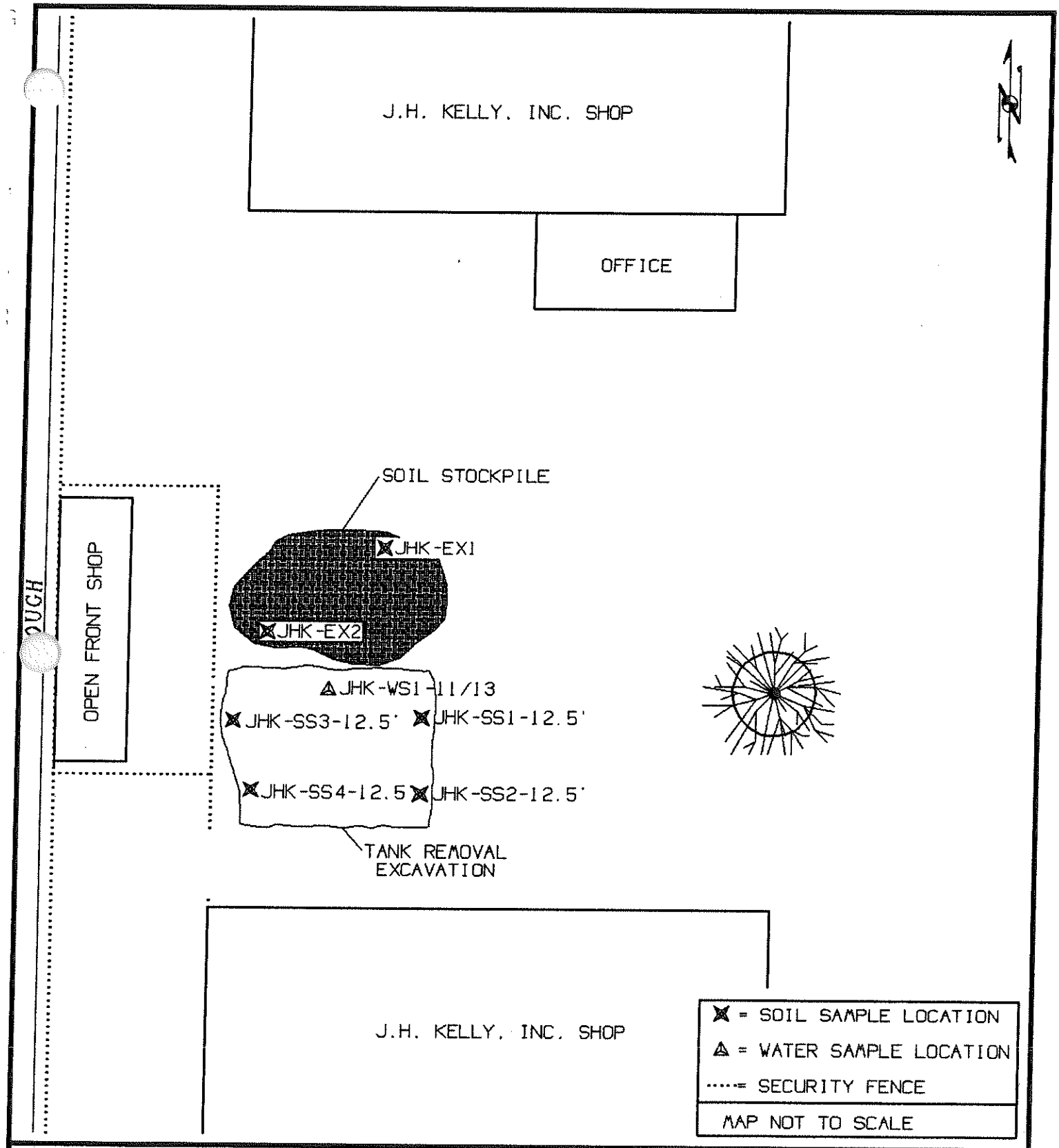
- Photographs were taken of the unleaded gasoline tank.

- Upon removal of the unleaded gasoline tank, excavation of soil above and around the diesel tank commenced. The soil from this area was field screened and stockpiled on polyethylene sheeting, as a presence of petroleum hydrocarbons was indicated.

- The diesel tank was removed from the excavations and the following observations were made:

  - Tank Diameter: 10 feet
  - Tank Length: 17 feet
  - Approximately 95% of the protective coating was intact.

- Soil samples JHK-EX1 and JHK-EX2 were collected from the stockpile of excavated soil. Locations of samples collected on November 13, 1991 are presented in Figure 3.



J.H. KELLY, INC.
21 THIRD AVENUE
LONGVIE WASHINGTON 98632

FIGURE 3

11/13/91
SAMPLE LOCATIONS

PACIFIC NORTHERN ENVIRONMENTAL

The soil stockpile samples were collected directly from the stockpile of excavated material.

Soil samples were collected with stainless steel spoons by personnel wearing clean vinyl gloves. Samples were placed in laboratory cleaned 8-ounce glass sample jars and sealed with teflon lined screw caps. Once sealed, each sample was given a different name and placed in an iced cooler to be maintained at approximately 4 degrees Celsius. Samples were placed under chain-of-custody documentation and hand delivered to Columbia Analytical Services, Inc. in Kelso, Washington.

Upon arrival at Columbia Analytical Services, samples were relinquished to a laboratory technician. The soil samples were chemically analyzed by EPA Method 3550/8015 Modified for Total Petroleum Hydrocarbons. Soil sample results for the soil stockpile are presented in Table 1.

TABLE 1

Total Petroleum Hydrocarbons
EPA Methods 3550/8015 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Diesel	Jet Fuel	Gasoline	Mineral Spirits	Kerosene	Oil*
JHK-EX1	10	190	ND	ND	ND	ND	60
JHK-EX2	10	120	ND	ND	ND	ND	90

MRL - Method Report Limit.
ND - None Detected at or above the method reporting limit.
*** - Quantitated using hydraulic oil as a standard. The MRL for oil is four times the MRL shown above.**

Analyses presented above indicate diesel and oil present in Soil samples JHK-EX1 and JHK-EX2. The levels present are below Washington Department of Ecology Method A Cleanup Levels as outlined in Chapter 173-340-740 of the Washington Administrative Codes (Table 2).

TABLE 2

**Washington Department of Ecology
Method A Cleanup Levels
for Soil**

Compound	Cleanup Level (ppm)
Total Petroleum Hydrocarbons (Gasoline)	100.0
Total Petroleum Hydrocarbons (Diesel)	200.0
Total Petroleum Hydrocarbons (other)	200.0
Benzene	0.5
Toluene	40.0
Ethylbenzene	20.0
Total Xylenes	20.0

Work progressed on site as follows:

- Approximately 800 gallons of water was pumped from the excavation by Cowlitz Clean Sweep of Longview, Washington.
- The water was allowed to recharge into the excavation. Water sample JHK-WS1-11/13 was collected from the recharge water. The water sample location is presented in Figure 3.

The water sample was collected with a decontaminated stainless steel bailer with a teflon bottom valve by personnel wearing clean vinyl gloves. The water sample was placed in a laboratory cleaned 32 ounce amber sample bottle and three 40 milliliter VOAs. The water sample was sealed with teflon lined screw caps. Sample preservation procedures, chain-of-custody, and sample delivery were conducted in the same manner as soil samples.

Upon arrival at Columbia Analytical Services, the water sample was relinquished to a laboratory technician. The water sample was chemically analyzed by EPA Method 3550/8015 Modified for Total Petroleum Hydrocarbons and EPA Method 5030/8020 Modified for benzene, toluene, ethylbenzene, and total xylenes. Results of these analyses are presented in Tables 3 and 4 respectively.

TABLE 3

**Total Petroleum Hydrocarbons
EPA Methods 3550/8015 Modified
microgram/Kilogram (ppb)
Liquid Basis**

Sample	MRL	Diesel	Jet Fuel	Gasoline	Mineral Spirits	Kerosene	Oil*
JHK-WS1-11/13	1000	24,000	ND	130,000	ND	ND	ND

TABLE 4

BTEX Scan
EPA Method 5030/8020 Modified
microgram/Kilogram (ppb)
Liquid Basis

Sample	MRL	Benzene	Toluene	Ethyl Benzene	Total Xylenes
JHK-WS1-11/13	0.05	4,100	18,000	5,300	32,000

MRL - Method Report Limit.
ND - None Detected at or above the method reporting limit.
*** - Quantitated using hydraulic oil as a standard. The MRL for oil is four times the MRL shown above.**

The analyses presented above indicate diesel, gasoline, benzene, toluene, ethylbenzene, and total xylenes above Washington Department of Ecology Method A Cleanup Levels for groundwater. These levels are outlined in Chapter 173-340-720 of the Washington Administrative Codes and presented in Table 5.

TABLE 5

Washington Department of Ecology
Method A Cleanup Levels
for Groundwater

Compound	Cleanup Level (ppb)
Total Petroleum Hydrocarbons	1000.0
Benzene	5.0
Toluene	40.0
Ethylbenzene	30.0
Total Xylenes	20.0

Work progressed on site as follows:

- Soil samples JHK-SS1-12.5', JHK-SS2-12.5', JHK-SS3-12.5' and JHK-SS3-12.5' were collected from the soil-groundwater interface of the excavation walls. Soil sample locations are presented in Figure 3.

The walls of the excavation exceeded four feet in height, making it potentially hazardous for personnel to enter. Thus, samples were collected from excavation locations by removing the soils with a backhoe and gathering the samples from the center of the bucket. Photographs were taken of each sample location.

Sample preservation procedures, chain-of-custody, and sample delivery were conducted in the same manner as soil samples collected from the stockpile of excavated materials.

Upon arrival at Columbia Analytical Services, the excavation soil samples were relinquished to a laboratory technician. The soil samples were Chemically analyzed by EPA Method 3550/8015 Modified for Total Petroleum Hydrocarbons. Soil samples JHK-SS1-12.5′ and JHK-SS3-12.5′ were chemically analyzed by EPA Methods 5030/8020 Modified for benzene, toluene, ethylbenzene, and total xylenes. Results of these analyses are presented in Tables 6 and 7 respectively.

TABLE 6

Total Petroleum Hydrocarbons
EPA Methods 3550/8015 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Diesel	Jet Fuel	Gasoline	Mineral Spirits	Kerosene	Oil*
JHK-SS1-12.5′	10	ND	ND	ND	ND	ND	70
JHK-SS2-12.5′	10	ND	ND	ND	ND	ND	130
JHK-SS3-12.5′	10	ND	ND	ND	ND	ND	480
JHK-SS4-12.5′	10	ND	ND	ND	ND	ND	140

TABLE 7

BTEX Scan
EPA Method 5030/8020 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Benzene	Toluene	Ethyl Benzene	Total Xylenes
JHK-SS1-12.5′	0.05	1.10	<0.10	<0.10	<0.10
JHK-SS3-12.5′	0.05	0.14	ND	ND	0.07

MRL - Method Report Limit.
ND - None Detected at or above the method reporting limit.
*** - Quantitated using hydraulic oil as a standard. The MRL for oil is four times the MRL shown above.**

The analyses presented above indicate oil present in soil sample JHK-SS3-12.5′ is above Washington Department of Ecology Method A Cleanup Levels. In addition, benzene present in oils sample JHK-SS1-12.5′ is above Washington Department of Ecology Method A Cleanup Levels.

November 22, 1991

Pacific Northern Environmental was on site to conduct Independent Interim Cleanup in the area of the tank excavation where previous soil sample analyses indicated Petroleum and BTEX above Method A Cleanup Levels for soil. Activities progressed on site as follows:

- Additional soil was removed from the location where soil sample JHK-SS3-12.5' was previously collected. Soil was removed until field screening techniques indicated no petroleum hydrocarbons were present.

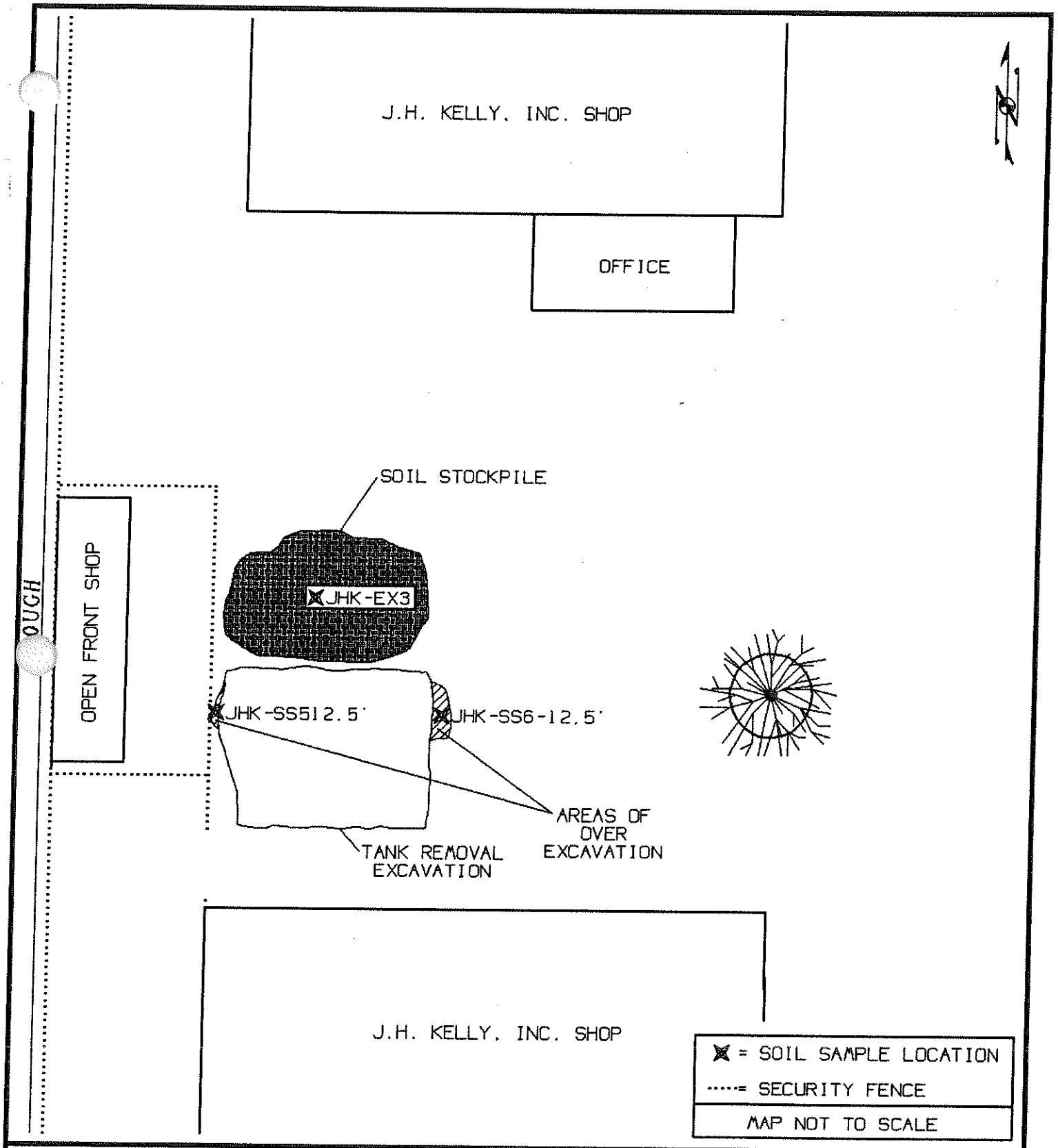
- Soil sample JHK-SS5-12.5 was collected from the above location to confirm the presence or absence of petroleum hydrocarbons. Locations of soil samples collected on November 22, 1991 are presented in Figure 4.

- Additional soil was removed from the location where soil sample JHK-SS1-12.5' was previously collected. Soil was removed until field screening techniques indicated no petroleum hydrocarbons were present.

- Soil sample JHK-SS5-12.5 was collected from the above location to confirm the presence or absence of petroleum hydrocarbons.

- Soil sample JHK-EX3 was collected directly from stockpiled soils.

Soil sample collection and preservation procedures were conducted in the same manner as discussed earlier. Soil samples JHK-SS5-12.5' and JHK-EX3 were chemically analyzed by EPA Method 3550/8015 for Total Petroleum Hydrocarbons. Soil sample JHK-SS6-12.5' was chemically analyzed by 5030/8020 Modified. Sample results are presented in Tables 8 and 9 respectively.



J.H. KELLY, INC.
21 THIRD AVENUE
LONGVIE WASHINGTON 98632

FIGURE 4

11/22/91
SAMPLE LOCATIONS

PACIFIC NORTHERN ENVIRONMENTAL

TABLE 8

Total Petroleum Hydrocarbons
EPA Methods 3550/8015 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Diesel	Jet Fuel	Gasoline	Mineral Spirits	Kerosene	Oil*
JHK-SS5-12.5'	10	ND	ND	ND	ND	ND	70
JHK-EX3	10	120	ND	ND	ND	ND	120

TABLE 9

BTEX Scan
EPA Method 5030/8020 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Benzene	Toluene	Ethyl Benzene	Total Xylenes
JHK-SS6-12.5'	0.05	ND	ND	ND	ND

MRL - Method Report Limit.
ND - None Detected at or above the method reporting limit.
*** - Quantitated using hydraulic oil as a standard. The MRL for oil is four times the MRL shown above.**

The analyses presented above indicate that Petroleum Hydrocarbons were detected in soil samples JHK-SS5-12.5' and JHK-EX3. Hydrocarbons present were not above Washington Department of Ecology Method A Cleanup Levels for soil. No benzene, toluene, ethylbenzene, or total xylenes were detected.

Conclusions

Pacific Northern Environmental concludes that soil within the former under ground storage tank excavation at the J.H. Kelly, Inc. site#002053 is below Washington Department of Ecology Method A Cleanup Levels. The soil stockpiled at the site is also below Washington Department of Ecology Method A Cleanup Levels.

Pacific Northern Environmental concludes that groundwater at the J.H. Kelly, Inc. site is above Washington Method A Cleanup Levels. The compounds present above Method A Cleanup Levels are as follows:

- Diesel (24,000 ppb);
- Gasoline (130,000 ppb);
- Benzene (4,100 ppb);
- Toluene (18,000 ppb);
- Ethylbenzene (5,300 ppb);
- Total Xylenes (32,000 ppb).

Recommendations

Pacific Northern Environmental recommends immediate remediation of ground water at the J.H. Kelly, Inc. site #002053.

Limitations

The conclusions and recommendations presented above are limited to soil and water samples collected at the J.H. Kelly, Inc. site #002053.

If you have any questions or require further information, please feel free to contact me.

Sincerely,

Joseph A. Sturza
Registered Washington Department of Ecology Underground Storage Tank Section Site Assessor

Attachments: Permanent Closure Checklist, Site Assessment Checklist, Tank Disposal Receipt, Photographs, Analytical Results and Chain-of-Custody Documentation.

CC: Ted Coons/J.H. Kelly, Inc.

JAS/D:\REPORT\JHK.WP

CLOSURE CHECKLIST

UNDERGROUND STORAGE TANK
Permanent Closure/Change-In-Service Checklist

The purpose of this form is to certify the proper closure/change-in-service of underground storage tank (UST) systems. These activities must be conducted in accordance with Chapter 173.360 WAC. Washington State UST rules require the tank owner or operator to notify Ecology in writing 30 days prior to closure or change-in-service of tanks. This must be done by completing the 30 Day Notice form (ECY 010-155).

This Permanent Closure Checklist shall be completed and signed by a Licensed Decommissioning Supervisor. The supervisor shall be on site when all tank permanent closure/change-in-service activities are being conducted. The firm which employs the licensed supervisor shall also be licensed by the Washington State Department of Ecology as a Service Provider. If any of the activities listed below have been supervised by a different licensed supervisor, a separate checklist must be filled out and signed by the licensed supervisor performing those activities.

For further information about completing this form, please contact the Department of Ecology UST Program.

A separate checklist must be completed for each UST system (tank and associated piping), except that UST systems at one site may be reported together by completing page 2 of this form separately for each system. The completed checklist should be mailed to the following address within 30 days of the completion of the closure or change-in-service.

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-8711

1. UST SYSTEM OWNER AND LOCATION

Site Owner/Operator: TED COONS; J.H. KELLY, INC.

Owners Address: 821 THIRD AVE (Street) P.O. Box

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

Telephone: (206) 423-5510

Site ID Number (on invoice or available from Ecology if tank is registered): 002053

Site/Business Name: J.H. KELLY, INC.

Site Address: 821 THIRD AVE. (Street) COWLITZ (County)

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

2. TANK PERMANENT CLOSURE/CHANGE-IN-SERVICE PERFORMED BY:

Firm: PACIFIC NORTHERN ENVIRONMENTAL License Number: 5000153

Address: 1081 COLUMBIA BLVD. (Street) P.O. Box

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

Telephone: (206) 423-2245

Licensed Supervisor: JOSEPH A. STRAZA Decommissioning License Number: W001469

This page must be completed separately for each tank permanently closed (decommissioned) or change-in-service at the site. For additional tanks you may photocopy this form prior to completing.

3. TANK CLOSURE/CHANGE-IN-SERVICE INFORMATION

1. Tank ID Number (as registered with Ecology): 1-DIESEL
2. Year installed: 1982
3. Tank capacity in gallons: 4,000
4. Date of last use: 11/12/91
5. Last substance stored: DIESEL FUEL
6. Date of closure/change-in-service: 11/13/91
7. Type of closure: Closure with Tank Removal ☒ In-place Closure ☐ Change-in-Service ☐
8. If in-place closure is used, the tank has been filled with the following substance: _____
9. If change-in-service, indicate new substance stored in tank: _____
10. Local permit(s) (if any) obtained from: _____

Always contact local authorities regarding permit requirements.

11. Has a site assessment been completed? Yes ☒ No ☐

Unless an external release detection system is operating at the time of closure or change in service, and a report is provided as specified in WAC 173-360-390, a site assessment must be conducted. This site assessment must be conducted by a person registered with the Department of Ecology to perform site assessments. Results of the site assessment must be included with the Site Assessment Checklist (ECY 010-158).

4. CHECKLIST

Each item of the following checklist shall be initialed by the licensed supervisor whose signature appears below.

	Yes	No	NA*
1. Has all liquid been removed from product lines?	X		
2. Has all product piping been capped or removed?	X		
3. Have all non-product lines been capped or removed?	X		
4. Have all liquid and accumulated sludges been removed from the tank?	X		
5. Has the tank been properly purged or inerted?	X		
6. Have the drop tube, fill pipe, gauge pipe, pumps and other tank fixtures been removed?	X		
7. Have all tank openings been plugged or capped? NOTE: One plug should have 1/8 inch vent hole.	X		
8. Have all sludges removed from the tank been designated and disposed of in accordance with the state of Washington's dangerous waste regulations (Chapter 173-303 WAC)?	X		
9. If removed, was tank properly labeled and disposed of in accordance with all applicable local, state and federal regulations?	X		

*Item not applicable

I hereby certify that I have been the licensed supervisor present on site during the above listed permanent closure activities and to the best of my knowledge they have been conducted in compliance with all applicable state and federal laws, regulations and procedures pertaining to underground storage tanks.

Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

11/19/91 — Date

Joseph A. Stumpo — Signature of Licensed Supervisor

5. ADDITIONAL REQUIRED SIGNATURES

12/3/91 — Date

John Polk — Signature of Licensed Service Provider (firm) Owner or Authorized Representative

12/4/91 — Date

Ted Coon — Signature of Tank Owner or Authorized Representative

This page must be completed separately for each tank permanently closed (decommissioned) or change-in-service at the site. For additional tanks you may photocopy this form prior to completing.

3. TANK CLOSURE/CHANGE-IN-SERVICE INFORMATION

1. Tank ID Number (as registered with Ecology): 2-UNLEAD GAS 2. Year installed: 1982
3. Tank capacity in gallons: 10,000 4. Date of last use: 11/12/91
5. Last substance stored: UNLEADED GASOLINE 6. Date of closure/change-in-service: 11/13/91
7. Type of closure: Closure with Tank Removal [X] In-place Closure [ ] Change-in-Service [ ]
8. If in-place closure is used, the tank has been filled with the following substance: _____
9. If change-in-service, indicate new substance stored in tank: _____
10. Local permit(s) (if any) obtained from: _____

Always contact local authorities regarding permit requirements.

11. Has a site assessment been completed? Yes [X] No [ ]

Unless an external release detection system is operating at the time of closure or change in service, and a report is provided as specified in WAC 173-360-390, a site assessment must be conducted. This site assessment must be conducted by a person registered with the Department of Ecology to perform site assessments. Results of the site assessment must be included with the Site Assessment Checklist (ECY 010-158).

4. CHECKLIST

Each item of the following checklist shall be initialed by the licensed supervisor whose signature appears below.

	Yes	No	NA*
1. Has all liquid been removed from product lines?	X		
2. Has all product piping been capped or removed?	X		
3. Have all non-product lines been capped or removed?	X		
4. Have all liquid and accumulated sludges been removed from the tank?	X		
5. Has the tank been properly purged or inerted?	X		
6. Have the drop tube, fill pipe, gauge pipe, pumps and other tank fixtures been removed?	X		
7. Have all tank openings been plugged or capped? NOTE: One plug should have 1/8 inch vent hole.	X		
8. Have all sludges removed from the tank been designated and disposed of in accordance with the state of Washington's dangerous waste regulations (Chapter 173-303 WAC)?	X		
9. If removed, was tank properly labeled and disposed of in accordance with all applicable local, state and federal regulations?	X		

*Item not applicable

I hereby certify that I have been the licensed supervisor present on site during the above listed permanent closure activities and to the best of my knowledge they have been conducted in compliance with all applicable state and federal laws, regulations and procedures pertaining to underground storage tanks.

Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

11/19/91 — Date

Joseph A. Witten — Signature of Licensed Supervisor

5. ADDITIONAL REQUIRED SIGNATURES

12/3/91 — Date

John Rich — Signature of Licensed Service Provider (firm) Owner or Authorized Representative

12/4/91 — Date

Ted Coon — Signature of Tank Owner or Authorized Representative

UNDERGROUND STORAGE TANK
Site Check/Site Assessment Checklist

The purpose of this form is to certify the proper investigation of an UST site for the presence of a release. These activities shall be conducted in accordance with Chapter 173.360 WAC. A description of the various situations requiring a site check or site assessment is provided in the guidance document for UST site checks and site assessments.

This Site Check/Site Assessment Checklist shall be completed and signed by a person registered with the Department of Ecology to perform site assessments.

Two copies of the results of the site check or site assessment should be included with this checklist according to the reporting requirements in the guidance document for UST site checks and site assessments.

For further information about completing this form, please contact the Department of Ecology UST Program.

The completed checklist should be mailed to the following address:

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-8711

1. UST SYSTEM OWNER AND LOCATION

UST Owner/Operator: TED COONS ; J.H. KELLY, INC.

Owners Address: 821 3rd AVE (Street) P.O. Box

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

Telephone: (206) 423-5510

Site ID Number (on invoice or available from Ecology if tank is registered): 002053

Site/Business Name: J.H. KELLY, INC.

Site Address: 821 3rd AVE (Street) COWLITZ (County)

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

2. SITE CHECK/SITE ASSESSMENT CONDUCTED BY:

Registered Person: JOSEPH A. STURZA

Address: 1081 COLUMBIA BLVD (Street) P.O. Box

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

Telephone: (206) 423-2245

3. TANK INFORMATION

1. Tank ID Number (as registered with Ecology): 2-UNLEAD GAS
2. Year installed: 1982
3. Tank capacity in gallons: 10,000
4. Last substance stored: UNLEADED GASOLINE

4. REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT

Check one:

- ___ Investigate suspected release due to on-site environmental contamination
- ___ Investigate suspected release due to off-site environmental contamination
- ___ Extend temporary closure of UST system for more than 12 months
- ___ UST system undergoing change-in-service
- ___ UST system permanently closed-in-place
- X UST system permanently closed with tank removed
- ___ Required by Ecology or delegated agency for UST system closed before December 22, 1988
- ___ Other (describe): ___

5. CHECKLIST

Each item of the following checklist shall be initialed by the person registered with the Department of Ecology whose signature appears below.

	Yes	No
1. Has the site check/site assessment been conducted according to applicable procedures specified in the UST site check/site assessment guidance issued by the Department of Ecology?	X (initialed)	
2. Has a release from the UST system been confirmed? *NOTE: Owners/operators must report all confirmed releases to the Department of Ecology or delegated agency within 24 hours.*	X (initialed)	
3. Are the results of the site check/site assessment enclosed with this checklist? *NOTE: Two copies of the site check/site assessment results must be submitted to the Department of Ecology according to the reporting requirements specified in the UST site check/site assessment guidance.*	X (initialed)	

I hereby certify that I have been in responsible charge of performing the site check/site assessment described above. Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

11/19/91
Date

Joseph A. [signature]
Signature of Person Registered with Ecology

6. OWNER'S SIGNATURE

12/4/91
Date

[signature]
Signature of Tank Owner or Authorized Representative

3. TANK INFORMATION

1. Tank ID Number (as registered with Ecology): 1 - DIESEL
2. Year installed: 1982
3. Tank capacity in gallons: 4,000
4. Last substance stored: DIESEL FUEL

4. REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT

Check one:

_____ Investigate suspected release due to on-site environmental contamination

_____ Investigate suspected release due to off-site environmental contamination

_____ Extend temporary closure of UST system for more than 12 months

_____ UST system undergoing change-in-service

_____ UST system permanently closed-in-place

X UST system permanently closed with tank removed

_____ Required by Ecology or delegated agency for UST system closed before December 22, 1988

_____ Other (describe): _____

5. CHECKLIST

Each item of the following checklist shall be initialed by the person registered with the Department of Ecology whose signature appears below.

	Yes	No
1. **Has the site check/site assessment been conducted according to applicable procedures specified in the UST site check/site assessment guidance issued by the Department of Ecology?**	X	
2. **Has a release from the UST system been confirmed?** ***NOTE:** Owners/operators must report all confirmed releases to the Department of Ecology or delegated agency within 24 hours.*	X	
3. **Are the results of the site check/site assessment enclosed with this checklist?** ***NOTE:** Two copies of the site check/site assessment results must be submitted to the Department of Ecology according to the reporting requirements specified in the UST site check/site assessment guidance.*	X	

I hereby certify that I have been in responsible charge of performing the site check/site assessment described above. Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

11/19/20
Date

Joseph A. Stamp
Signature of Person Registered with Ecology

6. OWNER'S SIGNATURE

12/4/91
Date

Ted Coon
Signature of Tank Owner or Authorized Representative

TANK DISPOSAL RECEIPT

3177

CUSTOMER'S ORDER NO.	DEPT.	DATE
		11-14-1981

NAME Petroleum Services

ADDRESS

SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE. RETD.	PAID OUT

QUAN.		DESCRIPTION	PRICE	AMOUNT
1	1	10,000 gal tank		
1	2	4,000 gal tank		
	3			
	4			
	5			
	6	Picked up at J.H. Kelly		
	7	82L 32		
	8	Longview wash		
	9			
	10			
	11			
	12	Dave Robinson		
	13			
	14			
	15			
	16			
	17			
	18			

REC'D BY

REDIFORM
5L320/01320

KEEP THIS SLIP
FOR REFERENCE

CARBONLESS

ANALYTICAL RESULTS AND CHAIN-OF-CUSTODY DOCUMENTATION

Columbia Analytical Services inc.

November 19, 1991

Joe Sturza
Pacific Northern Environmental
1081 Columbia Blvd.
Longview, WA 98632

Re: **J.H. Kelly Project**

Dear Joe:

Enclosed are the results of the rush samples submitted to our lab on November 14, 1991. Preliminary results were transmitted via facsimile on November 18, 1991. For your reference, the results have been assigned our work order number K916653.

All analyses were performed in accordance with our laboratory's quality assurance program.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.

Colin Elliott

Colin B. Elliott
Senior Project Chemist

CBE/das

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Analyzed:**	11/14/91
Sample Matrix:	Soil	**Work Order #:**	K916653

Solids, Total
EPA Method Modified 160.3
Percent (%)

Sample Name	Lab Code	Result
JHK-EX1	K6653-1	90.0
JHK-EX2	K6653-2	91.7
JHK-SS1-12.5'	K6653-3	69.2
JHK-SS2-12.5'	K6653-4	73.1
JHK-SS3-12.5'	K6653-5	85.8
JHK-SS4-12.5'	K6653-6	75.5

Approved by Chris Elliott Date 11/19/91

00001

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Pacific Northern Environmental
Project: J.H. Kelley
Sample Matrix: Soil

Date Received: 11/14/91
Date Extracted: 11/14/91
Date Analyzed: 11/15/91
Work Order #: K916653

Hydrocarbon Scan
EPA Methods 3540/Modified 8015
mg/Kg (ppm)
Dry Weight Basis

Sample Name	Lab Code	MRL	Diesel	Jet Fuel	Gasoline	Kerosene	Mineral Spirits	Oil♦
JHK-EX1	K6653-1	10	190	ND	ND	ND	ND	60
JHK-EX2	K6653-2	10	120	ND	ND	ND	ND	90
JHK-SS1-12.5'	K6653-3	10	ND	ND	ND	ND	ND	70
JHK-SS2-12.5'	K6653-4	10	ND	ND	ND	ND	ND	130
JHK-SS3-12.5'	K6653-5	10	ND	ND	ND	ND	ND	480
JHK-SS4-12.5'	K6653-6	10	ND	ND	ND	ND	ND	140
Method Blank	K6653-MB	10	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantitated using hydraulic oil as a standard. The MRL for oil is four times the listed MRL.
ND None Detected at or above the method reporting limit

Approved by Colin Elliott Date 11/19/91

317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Pacific Northern Environmental
Project: J.H. Kelley
Sample Matrix: Soil

Date Received: 11/14/91
Date Extracted: 11/14/91
Work Order #: K916653

BTEX
EPA Methods 5030/8020
mg/Kg (ppm)
Dry Weight Basis

Sample Name:		JHK-SS1-12.5'	JHK-SS3-12.5'	Method Blank
Lab Code:		K6653-3	K6653-5	K6653-MB
Date Analyzed:		11/15/91	11/14/91	11/14/91
Analyte	**MRL**			
Benzene	0.05	1.1	0.14	ND
Toluene	0.05	*<0.1	ND	ND
Ethylbenzene	0.05	*<0.1	ND	ND
Total Xylenes	0.05	*<0.1	0.07	ND

MRL Method Reporting Limit
ND None Detected at or above the method reporting limit
* Elevated MRL because of the low percent solids in the sample as received.

Approved by Chris Elliott Date 11/19/91

317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

APPENDIX A

LABORATORY QC RESULTS

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Extracted:**	11/14/91
Sample Matrix:	Soil	**Date Analyzed:**	11/15/91
		Work Order #:	K916653

QA/QC Report
Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3540/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHK-EX1	K6653-1	76.0
JHK-EX2	K6653-2	76.0
JHK-SS1-12.5'	K6653-3	76.7
JHK-SS2-12.5'	K6653-4	74.6
JHK-SS3-12.5'	K6653-5	86.4
JHK-SS4-12.5'	K6653-6	75.4
Method Blank	K6653-MB	92.3
	CAS Acceptance Criteria	64-123

Approved by Chris Ellis Date 11/19/91

00007

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Extracted:**	11/14/91
Sample Matrix:	Water	**Date Analyzed:**	11/15/91
		Work Order #:	K916653

QA/QC Report
Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHK-WS1-11/13	K6653-7	89.0
Method Blank	K6653-MB	89.5
	CAS Acceptance Criteria	66-120

Approved by Chris Elliott Date 11/19/91

00008

COLUMBIA ANALYTICAL SERVICES, INC.

Client: Pacific Northern Environmental
Project: J.H. Kelley
Sample Matrix: Soil

Date Received: 11/14/91
Date Extracted: 11/14/91
Date Analyzed: 11/14,15/91
Work Order #: K916653

QA/QC Report
Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK-SS1-12.5'	K6653-3	87.5
JHK-SS3-12.5'	K6653-5	88.5
Method Blank	K6653-MB	95.0
	CAS Acceptance Criteria	50-130

Approved by *Colin Elliott* Date *11/19/91*

317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Analyzed:**	11/14,15/91
Sample Matrix:	Water	**Work Order #:**	K916653

QA/QC Report
Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK-WS1-11/13	K6653-7	83.6
Method Blank	K6653-MB	95.7
	CAS Acceptance Criteria	60-120

Approved by Chris Elliott Date 11/19/91

00010

Columbia Analytical Services inc.

1317 South 13th Ave. • Kelso, WA 98626 • (206) 577-7222, FAX (206) 636-1068

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

DATE 11/13/91 PAGE 1 OF 1

PROJECT NAME J.H. KELLY #

PROJECT MNGR. JOSEPH A. STURZA

COMPANY/ADDRESS 1091 COLUMBIA BLVD. LONGVIEW, WA / PACIFIC NORTHERN ENVIRONMENTAL PHONE 423-2245

SAMPLERS SIGNATURE Joseph A. Sturza

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	ANALYSIS REQUESTED: Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA 418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Oregon 418.1 ☐ Gas ☐ BTEX ☒	TPH/8015 Modified Diesel ☐	Hydrocarbon Scan ☒	TPH - HCID	TCLP Metals ☐	Semi Pest/ VOA ☐ Herb ☐ Metals (total or dissolved) List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3, (circle)	NH_3-N, COD, Total P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020	REMARKS
JHK-EX1	11/13/91	1515		SOIL	1							X									
JHK-EX2	11/13/91	1456		SOIL	1							X									
JHK-SS1-12.5'	11/13/91	1707		SOIL	1						X	X									
JHK-SS2-12.5'	11/13/91	1712		SOIL	1							X									
JHK-SS3-12.5'	11/13/91	1717		SOIL	1						X	X									
JHK-SS4-12.5'	11/13/91	1722		SOIL	1							X									
JHK-WS1-11/13	11/13/91	1657		WATER	4						X	X									

RELINQUISHED BY:
Signature: Joseph A. Sturza
Printed Name: JOSEPH A. STURZA
Firm: PNE
Date/Time: 11/14/91 0840

RECEIVED BY:
Signature: Ruth Allison
Printed Name: Ruth Allison
Firm: CAS
Date/Time: 11/14/91 0840

RELINQUISHED BY:
Signature
Printed Name
Firm
Date/Time

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

TURNAROUND REQUIREMENTS:
___ 24 hr X 48 hr ___ 5 day
___ Standard (~ 10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX Preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
___ I. Routine Report
___ II. Report (includes DUP,MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV.CLP Deliverable Report

INVOICE INFORMATION:
P.O. # ___
Bill to: ___

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No.: ___

SPECIAL INSTRUCTIONS/COMMENTS:
48-HOUR AS PRE-ARRANGED

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

Columbia Analytical Services, Inc.

December 2, 1991

John Polk
Pacific Northern Environmental
1081 Columbia Blvd.
Longview, WA 98632

Re: **J. H. Kelly, Inc. Project**

Dear John:

Enclosed are the results of the rush samples submitted to our lab on November 22, 1991. Preliminary results were transmitted via facsimile on November 26, 1991. For your reference, the results have been assigned our work order number K916850.

All analyses were performed in accordance with our laboratory's quality assurance program.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.

Colin B. Elliott
Senior Project Chemist

CBE/tlt

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Pacific Northern Environmental
Project: J. H. Kelly, Inc.
Sample Matrix: Soil

Date Received: 11/22/91
Date Extracted: 11/25/91
Date Analyzed: 11/26/91
Work Order #: K916850

Hydrocarbon Scan
EPA Methods 3540/Modified 8015
mg/Kg (ppm)
Dry Weight Basis

Sample Name	Lab Code	MRL	Diesel	Jet Fuel	Gasoline	Kerosene	Mineral Spirits	Oil♦
JHK-EX3	K6850-1	10	120	ND	ND	ND	ND	120
JHK-SS5-12.5'	K6850-2	10	ND	ND	ND	ND	ND	70
Method Blank	K6850-MB	10	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantitated using hydraulic oil as a standard. The MRL for oil is four times the listed MRL.
ND None Detected at or above the method reporting limit

Approved by Chris Elliott Date 12/03/91

00001

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Pacific Northern Environmental
Project: J. H. Kelly, Inc.
Sample Matrix: Soil

Date Received: 11/22/91
Date Extracted: 11/22/91
Work Order #: K916850

BTEX
EPA Methods 5030/8020
mg/Kg (ppm)
Dry Weight Basis

Sample Name:		JHK-SS6-12.5'	Method Blank
Lab Code:		K6850-3	K6850-MB
Date Analyzed:		11/23/91	11/22/91
Analyte	**MRL**		
Benzene	0.05	*<0.1	ND
Toluene	0.05	*<0.1	ND
Ethylbenzene	0.05	*<0.1	ND
Total Xylenes	0.05	*<0.1	ND

MRL Method Reporting Limit
***** Elevated MRL because of the low percent solids in the sample as received.
ND None Detected at or above the method reporting limit

Approved by Chris Ellenit Date 12/03/91

00002

SITE ASSESSMENT CHECKLIST

COLUMBIA ANALYTICAL SERVICES, INC.

Client: Pacific Northern Environmental
Project: J. H. Kelly, Inc.
Sample Matrix: Soil

Date Received: 11/22/91
Date Extracted: 11/22/91
Date Analyzed: 11/22,23/91
Work Order #: K916850

QA/QC Report
Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK-SS6-12.5'	K6850-3	98.5
Method Blank	K6850-MB	100
	CAS Acceptance Criteria	50-130

Approved by Chris Elliott Date 12/03/91

0005

Columbia Analytical Services, Inc.

1317 South 13th Ave. • Kelso, WA 98626 • (206) 577-7222, FAX (206) 636-1068

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

DATE 11/22/91 PAGE 1 OF 1

PROJECT NAME J.H. KELLY, INC.

PROJECT MNGR. JOSEPH A. STURZA

COMPANY/ADDRESS PACIFIC NORTHERN ENVIRO
1081 COLUMBIA BLVD.
LONGVIEW, WA 98632 PHONE 423-2245

SAMPLERS SIGNATURE Joseph A. Sturza

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA 418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Oregon 418.1 ☐ Gas ☐ BTEX ☒	TPH/8015 Modified Diesel ☐	Hydrocarbon Scan ☒	TPH - HCID	TCLP Metals ☐ VOA ☐	Semi Pest/ Metals (total or dissolved) VOA ☐ Herb ☐ List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3, (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020		REMARKS
JHK-EX3	11/22/91	0908		SOIL	1						X										✓	
JHK-SS5-12.5'	11/22/91	0943		SOIL	1						X										✓	
JHK-SS6-12.5'	11/22/91	1038		SOIL	1						X										✓	

RELINQUISHED BY:
Signature: Joseph A. Sturza
Printed Name: JOSEPH A. STURZA
Firm: PNE
Date/Time: 11/22/91 1106

RECEIVED BY:
Signature: Ruth Allison
Printed Name: Ruth Allison
Firm: CAS
Date/Time: 11/22/91 1100

RELINQUISHED BY:
Signature
Printed Name
Firm
Date/Time

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

TURNAROUND REQUIREMENTS:
___ 24 hr X 48 hr ___ 5 day
___ Standard (~ 10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX Preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
___ I. Routine Report
___ II. Report (includes DUP,MS, MSD, as required , may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV.CLP Deliverable Report

INVOICE INFORMATION:
P.O. # ___
Bill to: ___

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No.: ___

SPECIAL INSTRUCTIONS/COMMENTS:
48-HOUR AS PRE-ARRANGED.

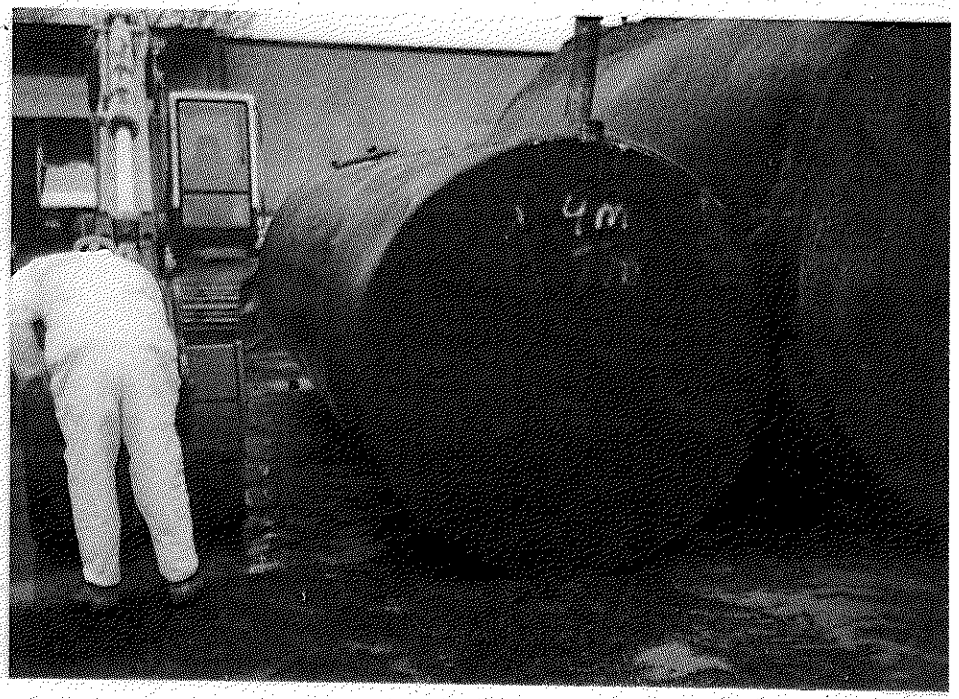
DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

PHOTOGRAPHS

C-LINE #52584
35MM PRINTS

C-LINE #52584
35MM PRINTS



Exhibit

G

J.H. KELLY, INC.

1-17-92

Patricia L. Martin
LUST Site Manager
Department of Ecology
7272 Cleanwater Lane, LU-11
Olympia, WA 98504-6811

As per our discussion on December 16, 1991, I am enclosing some information on our monitoring well in the UST removal area. Our engineer's sketch will show you how the work was done. The work was done the week of November 22, 1991.

Our last water sample was taken December 10, 1991, by Jeff Wilson of Cowlitz Clean Sweep. Enclosed are the results of that test. As you can see things are tremendously improved from prior findings.

As you suggested we will take water samples next quarter and I will send you the results. I'm sure the next sample will be within the limits.

If you have any questions, Please call me at (206)423-5510.

Sincerely,

Ted Coons

Ted Coons
J.H. Kelly, Inc.

TC/cc
Enclosure

COPY OF LETTER/
WATER (SAMPLE PRELIMINARY REPORT)
DRAWING.

SENT TO PATTY
1-17-92

FINAL REPORT WATER
1-23-92

821 3RD. AVENUE • BOX 2038 • LONGVIEW, WA 98632 (206) 423-5510 • FAX (206) 423-9170
CONTRACTOR NO. JHKELI *188PD

Columbia Analytical Services inc.

December 20, 1991

Jeff Wilson
Cowlitz Clean Sweep
340-C Oregon Way
Longview, WA 98632

Re: **J.H. Kelly/Project #Well**

Dear Jeff:

Enclosed are the results of the sample submitted to our lab on December 10, 1991. Preliminary results were transmitted via facsimile on December 12, 1991. For your reference, these analyses have been assigned our work order number K917231.

All analyses were performed in accordance with our laboratory's quality assurance program.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.

Colin B. Elliott
Senior Project Chemist

CBE/das

317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: J.H. Kelly/#Well
Sample Matrix: Water

Date Received: 12/10/91
Date Extracted: 12/10/91
Date Analyzed: 12/11/91
Work Order #: K917231

Hydrocarbon Scan
EPA Methods 3510/Modified 8015
µg/L (ppb)

Sample Name	Lab Code	MRL	Diesel	Jet Fuel	Gasoline	Kerosene	Mineral Spirits	Oil♦
JHKWS #2	K7231-1	50	ND	ND	1,010	ND	ND	3,340
Method Blank	K7231-MB	50	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantitated using hydraulic oil as a standard. The MRL for oil is four times the listed MRL.
ND None Detected at or above the method reporting limit

Approved by Colin Ellicott Date 12/20/91

00001

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COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: J.H. Kelly/#Well
Sample Matrix: Water

Date Received: 12/10/91
Work Order #: K917231

BTEX
EPA Methods 5030/8020
µg/L (ppb)

Sample Name:		JHKWS #2	Method Blank
Lab Code:		K7231-1	K7231-MB
Date Analyzed:		12/11/91	12/11/91
Analyte	**MRL**		
Benzene	0.5	30	ND
Toluene	1	30	ND
Ethylbenzene	1	16	ND
Total Xylenes	1	200	ND

MRL Method Reporting Limit
ND None Detected at or above the method reporting limit

Approved by Colin Elliott Date 12/20/91

00002

COLUMBIA ANALYTICAL SERVICES, INC.

Client: Cowlitz Clean Sweep
Project: J.H. Kelly/#Well
Sample Matrix: Water

Date Received: 12/10/91
Date Extracted: 12/10/91
Date Analyzed: 12/11/91
Work Order #: K917231

QA/QC Report
Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHKWS #2	K7231-1	*176
Method Blank	K7231-MB	88.6
	CAS Acceptance Criteria	66-120

* Outside acceptance limits because of matrix interferences. The gas chromatogram showed target components that interfered with the analysis. The sample was not reanalyzed.

Approved by Chris Elliott Date 12/20/91

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Cowlitz Clean Sweep	**Date Received:**	12/10/91
Project:	J.H. Kelly/#Well	**Date Analyzed:**	12/11/91
Sample Matrix:	Water	**Work Order #:**	K917231

QA/QC Report
Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHKWS #2	K7231-1	98.7
Method Blank	K7231-MB	99.1
	CAS Acceptance Criteria	60-120

Approved by Ann Elliott Date 12/20/91

09004

Columbia Analytical Services inc.

K 7231

Chain of Custody/ Laboratory Analysis Request

1317 South 13th Avenue • Kelso, WA 98626 • 206/577-7222, Fax 206/636-1068

DATE 12-10-91 PAGE 1 OF 1

PROJECT J. H. Kelly # well
SEND REPORT TO Jeff Wilson
ADDRESS 340 Oregon Way #C Longview, WA.
TELEPHONE# 423-6316
SAMPLERS NAME Jeff Wilson PHONE# 423-6316
SAMPLERS SIGNATURE Jeff Wilson

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	ORGANIC ANALYSIS												INORGANIC ANALYSIS					OTHER			NUMBER OF CONTAINERS
					Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated Volatiles 601/8010	Aromatic Volatiles 602/8020 BTEX	Gas/BTEX MOD 8015/8020	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons - Mod 8015	Total Petroleum Hydrocarbons - 418.1	Total Organic Halides (TOX) 9020	Total Organic Carbon (TOC) 415/9060	EPTOX Metals As, Ba, Cd, Cr, Pb, Hg, Se, Ag	Metals (total or dissolved) List Below	Cyanide	Ph, Cond, Cl, SO4, PO4, F, Br NO3, NO2, (Circle)	NH3-N, COD, Total-P, TKN (Circle)	Coliform (Circle) Total, Fecal				
1. JHKWS #2	12-10	2:00		Wat				X			X													
2.																								
3.																								
4.																								
5.																								
6.																								
7.																								
8.																								

Relinquished By: J. Wilson	Relinquished By	Invoice Information: P.O.#	Project Information Site Contact:
Signature: Jeff Wilson	Signature	Bill to:	Site Address:
Printed Name: CCS	Printed Name		
Firm: CCS	Firm		
Date/Time	Date/Time		
Received By: Lori K Hann	Received By:	Special Instruction/Comments: Bill to: J. H. Kelly Attn. Ted 821 3rd. Longview, wa. 98632 48 hr. RUSH!	Sample Receipt: Shipped Via: / Seals Intact: / Condition: / Lab No. / SR Number:
Signature: Lori K. Hann	Signature		
Printed Name: CCS	Printed Name		
Firm: 12/10/91 2:35	Firm		
Date/Time	Date/Time		

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator.

Exhibit

H

J.H. KELLY, INC.

11558, 7:40 Am
1-17-92

Patricia L. Martin
LUST Site Manager
Toxics Cleanup Program
206/586-5562

Department of Ecology
Southwest Regional Office
7272 Cleanwater Lane, LU-11
Olympia, WA 98504-6811

FAX 206/753-8531
24 Hr. Emergency
Spill Response:
206/753-2353

June 3, 1992

Patricia L. Martin
LUST Site Manager
Department of Ecology
7272 Cleanwater Lane, LU-11
Olympia, WA 98504-6811

Dear Patricia

As per your suggestion, I am enclosing more information on our monitoring well in the UST removal area.

This last water sample was taken May 14, 1992, by Jeff Wilson of Cowlitz Clean Sweep. Enclosed are the results of that test. As you can see things are improved from our last findings on December 10, 1991.

We will take water samples again next quarter and will send you the results.

If you have any questions, Please call me at (206)423-5510.

Sincerely,

J.H. Kelly, Inc.

Ted Coons
Senior Manager Equipment & Facilities

TC/cc
Enclosure

COPY OF LETTER,
COPY OF TEST RESULTS
TAKEN 5-14-92.
SENT TO PATTY →
6-3-92

Columbia Analytical Services inc.

May 29, 1992

Jeff Wilson
Cowlitz Clean Sweep
340-C Oregon Way
Longview, WA 98632

Re: **J.H. Kelly/Well Project**

Dear Jeff:

Enclosed are the results of the sample submitted to our lab on May 14, 1992. For your reference, these analyses have been assigned our work order number K923114.

All analyses were performed in accordance with our laboratory's quality assurance program.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.

Colin B. Elliott
Senior Project Chemist

CBE/tlt

317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Cowlitz Clean Sweep	**Date Received:**	05/14/92
Project:	J.H. Kelly/Well	**Date Extracted:**	05/16/92
Sample Matrix:	Water	**Date Analyzed:**	05/19/92
		Work Order No.:	K923114

Hydrocarbon Scan
EPA Methods 3510/Modified 8015
µg/L (ppb)

Sample Name	Lab Code	MRL	Gasoline	Mineral Spirits	Jet Fuel	Kerosene	Diesel	Other♦
JHK WS#3	K3114-1	50	ND	ND	ND	ND	ND	ND
Method Blank	K3114-MB	50	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantified using 30-weight motor oil as a standard. The MRL is 200 µg/L.
ND None Detected at or above the method reporting limit

Approved by Chris Elliott Date 6/1/92

00001

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Cowlitz Clean Sweep	**Date Received:**	05/14/92
Project:	J.H. Kelly/Well	**Work Order No.:**	K923114
Sample Matrix:	Water		

BTEX
EPA Methods 5030/8020
µg/L (ppb)

Sample Name:		**JHK WS#3**	**Method Blank**
Lab Code:		**K3114-1**	**K3114-MB**
Date Analyzed:		**05/19/92**	**05/19/92**
Analyte	**MRL**		
Benzene	0.5	11.1	ND
Toluene	1	ND	ND
Ethylbenzene	1	12	ND
Total Xylenes	1	37	ND

MRL Method Reporting Limit
ND None Detected at or above the method reporting limit

Approved by Colin Elliott Date 6/1/92

00002

APPENDIX A

LABORATORY QC RESULTS

317 South 13th Avenue • P.O. Box 179 • Kelso, Washington 98626 • Telephone (206) 577-7222

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Cowlitz Clean Sweep	**Date Received:**	05/14/92
Project:	J.H. Kelly/Well	**Date Extracted:**	05/16/92
Sample Matrix:	Water	**Date Analyzed:**	05/19/92
		Work Order No.:	K923114

Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHK WS#3	K3114-1	73
Method Blank	K3114-MB	79
	CAS Acceptance Criteria	36-124

Approved by Adam Ellwig Date 6/1/92

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Cowlitz Clean Sweep	**Date Received:**	05/14/92
Project:	J.H. Kelly/Well	**Date Analyzed:**	05/19/92
Sample Matrix:	Water	**Work Order No.:**	K923114

Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK WS#3	K3114-1	98
Method Blank	K3114-MB	100
	CAS Acceptance Criteria	59-139

Approved by John Elliott Date 6/1/92

317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone (206) 577-7222

Columbia Analytical Services, Inc.

1317 South 13th Avenue • Kelso, WA 98626 • 206/577-7222, Fax 206/636-1068

Chain of Custody/ Laboratory Analysis Request

DATE 5-14-92 PAGE 1 OF 1

PROJECT J. H. Kelly # well

SEND REPORT TO Jeff Wilson / 340 Oregon WAY #C

ADDRESS Longview, WA.

TELEPHONE# 423-6316

SAMPLERS NAME Jeff Wilson PHONE# 423-6316

SAMPLERS SIGNATURE Jeff Wilson

					ORGANIC ANALYSIS												INORGANIC ANALYSIS				OTHER				
SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated Volatiles 601/8010	Aromatic Volatiles 602/8020 BTEX	Gas/BTEX MOD 8015/8020	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons - Mod 8015	Total Petroleum Hydrocarbons - 418.1	Total Organic Halides (TOX) 9020	Total Organic Carbon (TOC) 415/9060	EPTOX Metals As, Ba, Cd, Cr, Pb, Hg, Se, Ag	Metals (total or dissolved) List Below	Cyanide	Ph, Cond, Cl, SO_4, PO_4, F, Br NO_3, NO_3, (Circle)	NH_3-N, COD, Total-P, TKN (Circle)	Coliform (Circle) Total, Fecal					NUMBER OF CONTAINERS
1 JHK WS #3	5-14	9:15	K3114-1	water				X			X														
2.																									
3.																									
4.																									
5.																									
6.																									
7.																									
8.																									

Relinquished By: J. Wilson	Relinquished By	Invoice Information: P.O.#	Project Information Site Contact:
Signature: Jeff Wilson	Signature	Bill to:	Site Address:
Printed Name: CCS	Printed Name		
Firm: CCS	Firm		
Date/Time	Date/Time		
Received By: Ruth Allison	Received By:	Special Instruction/Comments: Bill to; J. H. Kelly Attn. Ted 821 3rd Ave Longview, WA. 98632	Sample Receipt: Shipped Via: / Seals Intact: / Condition: / Lab No. / SR Number:
Signature: Ruth Allison	Signature		
Printed Name: CAS	Printed Name		
Firm: 5/14/92 0950	Firm		
Date/Time	Date/Time		

900006

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator.

Exhibit

I

J.H. KELLY, INC.

July 16, 1993

Patricia L. Martin
LUST Site Manager
DEPARTMENT OF ECOLOGY
7272 Cleanwater Lane, LU-11
Olympia, WA 98504-6811

Dear Patricia:

Enclosed are results from the last water sample taken 6-30-93 by Jeff Wilson of Cowlitz Clean Sweep. Again a dramatic improvement from our last tests. We feel the levels are well within acceptable limits and we are not in violation.

In view of the latest findings, I see no reason to continue monitoring the well. I would like you to give us a clean bill of health on this matter.

Sincerely,

J.H. KELLY, INC.

Ted Coons
Senior Manger
Equipment & Facilities

TC/bb

Enclosure

Columbia Analytical Services, Inc.

July 12, 1993

Service Request No.: K933755

Jeff Wilson
Cowlitz Clean Sweep
340-C Oregon Way
Longview, WA 98632

Re: **J. H. Kelly/2nd Qtr. Project**

Dear Jeff:

Enclosed are the results of the sample submitted to our laboratory on June 30, 1993. For your reference, these analyses have been assigned our service request number K933755.

All analyses were performed consistent with our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 243.

Respectfully submitted,

Columbia Analytical Services, Inc.

Eileen M Arnold

Eileen M. Arnold
Project Chemist

EMA/sam

317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: JH Kelly/#2nd Qtr.
Sample Matrix: Water

Date Collected: 6/30/93
Date Received: 6/30/93
Date Extracted: 7/2/93
Service Request: K933755

Hydrocarbon Scan
EPA Methods 3510/Modified 8015
µg/L (ppb)

Sample Name	Lab Code	Date Analyzed	Analyte	Gasoline	Mineral Spirits	Kerosene	Jet Fuel	Diesel	Other*
			MRL	50	50	50	50	50	200
MW #1	K3755-1(a)	7/7/93		ND	ND	ND	ND	270000(b)	6000
Method Blank	K3755-MB	7/6/93		ND	ND	ND	ND	ND	ND

a MRL for this sample is 20 times that reported above due to sample requiring dilution.
b Quantified as diesel. The sample contained components that eluted in the diesel range, but the chromatogram did not match the typical diesel fingerprint.

Approved By _____ Date 7/12/93

W37558.XLS/7/8/93

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Cowlitz Clean Sweep	**Date Collected:**	6/30/93
Project:	JH Kelly/#2nd Qtr.	**Date Received:**	6/30/93
Sample Matrix:	Water	**Date Extracted:**	NA
		Service Request:	K933755

BTEX
EPA Methods 5030/8020
µg/L (ppb)

Sample Name	Lab Code	Date Analyzed	Analyte	Benzene	Toluene	Ethyl-benzene	Total Xylenes
			MRL	0.5	1	1	1
MW #1	K3755-1	7/3/93		3.7	ND	1	1
Method Blank	K3755-MB	7/3/93		ND	ND	ND	ND

Approved By Eileen M Arnold Date 7/12/93

W3755B.XLS/7/7/93

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Cowlitz Clean Sweep	**Date Collected:**	6/30/93
Project:	JH Kelly/#2nd Qtr.	**Date Received:**	6/30/93
Sample Matrix:	Water	**Date Extracted:**	NA
		Date Analyzed:	7/3/93
		Service Request:	K933755

Surrogate Recovery Summary
Total Petroleum Hydrocarbons as Gasoline
EPA Methods 5030/Washington DOE Method WTPH-G

Sample Name	Lab Code	Spike Level µg/L (ppb)	Percent Recovery 4-Bromofluorobenzene
MW #1	K3755-1	50	92
Method Blank	K3755-MB	50	91

CAS Acceptance Limits: 59-139

Approved By Erika M Arnett Date 7/12/93

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Cowlitz Clean Sweep	**Date Collected:**	6/30/93
Project:	JH Kelly/#2nd Qtr.	**Date Received:**	6/30/93
Sample Matrix:	Water	**Date Extracted:**	7/2/93
		Date Analyzed:	7/6,7/93
		Service Request:	K933755

Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/Modified 8015

Sample Name	Lab Code	Spike Level µg/L (ppb)	Percent Recovery o-Terphenyl
MW #1	K3755-1	550	79
Method Blank	K3755-MB	500	89

CAS Acceptance Limits: 36-124

Approved By Eileen M Annett Date 7/12/93

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Cowlitz Clean Sweep	**Date Collected:**	6/30/93
Project:	JH Kelly/#2nd Qtr.	**Date Received:**	6/30/93
Sample Matrix:	Water	**Date Extracted:**	NA
		Date Analyzed:	7/3/93
		Service Request:	K933755

Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Spike Level µg/L (ppb)	Percent Recovery 4-Bromofluorobenzene
MW #1	K3755-1	50	91
Method Blank	K3755-MB	50	90

CAS Acceptance Limits: 59-139

Approved By Eileen M Arnold Date 7/12/93

W3755BR.XLS/7/7/93

Columbia Analytical Services, Inc.

1317 South 13th Avenue • Kelso, WA 98626 • 206/577-7222, Fax 206/636-1068

Chain of Custody/ Laboratory Analysis Request

DATE 6-30-93 PAGE 1 OF 1

PROJECT JH Kelly # 2nd Qtr.

SEND REPORT TO Jeff Wilson

ADDRESS 340 Oregon Way - Longv.

TELEPHONE# 423-6316

SAMPLERS NAME Jeff Wilson PHONE# 423-6316

SAMPLERS SIGNATURE Jeff Wilson

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated Volatiles 601/8010	Aromatic Volatiles 602/8020 BTEX	Gas/BTEX MOD 8015/8020	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons - Mod 8015	Total Petroleum Hydrocarbons - 418.1	Total Organic Halides (TOX) 9020	Total Organic Carbon (TOC) 415/9060	EPTOX Metals As, Ba, Cd, Cr, Pb, Hg, Se, Ag	Metals (total or dissolved) List Below	Cyanide	Ph, Cond, Cl, SO_4, PO_4, F, Br NO_3, NO_3, (Circle)	NH_3-N, COD, Total-P, TKN (Circle)	Coliform (Circle) Total, Fecal				NUMBER OF CONTAINERS
1. MW #1	6/30	9:40		Wate					X		X													1
2.																								
3.																								
4.																								
5.																								
6.																								
7.																								
8.																								

Relinquished By	Jeff Wilson	Relinquished By	
Signature	Jeff Wilson	Signature	
Printed Name	Jeff Wilson	Printed Name	
Firm	CCS	Firm	
Date/Time	6-30-93 10 pm	Date/Time	
Received By:	Ruth Allison	Received By:	
Signature	Ruth Allison	Signature	
Printed Name	CAS	Printed Name	
Firm	6/30/93 1000	Firm	
Date/Time		Date/Time	

Invoice Information:

P.O.#

Bill to:

Project Information

Site Contact:

Site Address:

Sample Receipt

Shipped Via:

Seals Intact:

Condition:

K93-3755

Lab No.

SR Number:

Special Instruction/Comments:

Bill to: JH Kelly
Attn. Ted Coons
821 3rd.
Longview, WA. 98632

DISTRIBUTION: WHITE - return to originator YELLOW - lab PINK -

000069

Exhibit

J

XXXXXXXXXXXXXXXXX
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2353

August 5, 1993

ATTN DICK HEGGEN
OK TO DEPT OF ECOLOGY
OK / $100.00

Mr. Ted Coons
J. H. Kelly, Inc.
821 3rd Avenue
Post Office Box 2038
Longview, Washington 98632

Dear Mr. Coons:

Thank you for your cooperation with the reporting requirements for the Leaking Underground Storage Tank (LUST) program. The record for the reports for the J. H. Kelly, Inc. site, located at 812 Third Avenue in Longview, Washington, is maintained on the LUST database at the Department of Ecology. With receipt of your latest report, the status of your site is recorded on the database as a conducted cleanup.

Ecology processes a large number of independent LUST site reports. These reports are given brief reviews. Some owners and/or operators have been requesting an extensive review by Ecology. Ecology has implemented a system effective July 1, 1993, in which owners and/or operators can apply to Ecology for a extensive review of final independent cleanup reports. The review would determine whether or not a site qualifies for a "no further action" status letter by Ecology. The review is a fee-based service. For more information, contact Dick Heggen at ~~(206) 586-8613~~. I have enclosed some information on the independent review process.

The records for this site will be kept in the Central Files of the Southwest Regional Office of Ecology. The reports in Central Files are made available for public review by appointment only. Appointments can be made by calling the SWRO resource person, Cathy Downs, at (206) 664-0388.

Please call me at (206) 586-5562 if you have any questions.

Sincerely,

Patricia L. Martin

Patricia L. Martin
Toxics Cleanup Program
Southwest Regional Office

~~FAX 1-206-705-6811~~
586-8618

PLM:ak
Enclosure

WASHINGTON STATE DEPARTMENT OF ECOLOGY

Focus

Review of Independent Cleanups

Timely Review of Independent Cleanups Available for a Fee

The Department of Ecology has received more than 3,000 reports from property owners and operators who have conducted independent cleanups of hazardous substances. In many cases, a review by Ecology concerning the adequacy of an independent cleanup would help expedite sale or other use of the property — without that review there is no way to be sure that a cleanup meets state cleanup standards under the Model Toxics Control Act.

Ecology has only reviewed a handful of the reports received to date. In response to public need, Ecology has established the Independent Remedial Action Program. A report review fee will support the additional workload necessary for Ecology to evaluate a greater number of independent cleanups and help return property to a productive use more quickly.

Participation Is Not Mandatory

The Independent Remedial Action Program is strictly voluntary. You are required by Model Toxics regulations to *report* the results of any independent remedial action to Ecology within 90 days of its completion, but Ecology *review* of an independent cleanup is not required before the property is put back into use. Buyers and lenders, however, may desire such a review as a protection against liability for contaminants left by an inadequate cleanup.

Benefits of an Independent Cleanup Review

If you need a bank loan, wish to sell your property, or petition to have your site removed from the Hazardous Sites List, or otherwise seek to limit your potential liability for past contamination of your property, the Independent Remedial Action Program can benefit you.

After reviewing your independent remedial action report, Ecology will provide you a written determination which indicates that your cleanup meets Model Toxics Control Act standards, or identifies the additional remedial actions needed at your site. If your cleanup is satisfactory, Ecology will issue a "no further action" designation to your facility on the state's hazardous waste site tracking system.

Cost

- **Filing Fee:** All Sites, $1,000 (applies to Detailed Review Fee)
- **Detailed Review Fee:** Additional fees for detailed reviews are based on the cost of the cleanup conducted at your site:

Cleanup Costs:	Detailed Review Fee:
Minimum	$1,000
$50,000 - $750,000	2% of the total remedial action costs
Maximum	$15,000

July 1993

F-TCP-93-123

printed on recycled paper

How The Program Works

1. SUBMIT YOUR CLEANUP REPORT, ECOLOGY REPORT FORMS AND FILING FEE

Your Independent Remedial Action Report should be submitted to Ecology consistent with the available guidance, "Preparing Independent Remedial Action Reports".

Submit your completed Independent Remedial Action Program "Request for Review" application form; Independent Remedial Action Report; report summary form; and a $1,000 non-refundable filing fee to the Ecology Regional Office where your site is located or to the Department of Ecology, Independent Review, P.O. Box 5128, Lacey, WA 98503-0210. If you have questions regarding reporting requirements, please call your local Regional Office prior to submitting the report and fee.

Reports are reviewed on a first-come, first-served basis. Ecology's goal is to complete all initial screening reviews within 90 days of receiving the report. The $1,000 filing fee holds your place in line and covers the cost of the report screening review.

IMPORTANT: Every time a report is resubmitted, a new filing fee is required.

2. AFTER YOUR REPORT PASSES INITIAL REVIEW

If an additional fee is required, you will be sent a letter requesting payment of the balance of the fee. This fee must be paid before Ecology will begin a more detailed review of your independent interim action or cleanup report (See Fee Schedule on Page 1). Your $1,000 filing fee will be deducted from the total fee you are required to pay.

3. IF YOUR SITE PASSES DETAILED REVIEW

Your site will receive a "No Further Action" designation if it passes Ecology's detailed review. No further action means the site will no longer appear on any published public listing of contaminated properties. If your site is ranked on the Hazardous Sites List, it will be removed from that list as well. By designating a site "No Further Action," Ecology states that it has no intention of pursuing additional cleanup at the site, but could require more work if contamination at the site threatens human health or the environment at a future date.

OR

4. IF YOUR SITE FAILS DETAILED REVIEW

If deficiencies are found with your report or the remedial actions you have conducted, you will receive a notice of Ecology's determination about your site, including a description of the deficiencies found with your report or remedial action(s). If you wish to correct deficiencies and resubmit your report, you must begin the review process again and you may be required to pay a new filing fee. Once your report passes the initial screening, you may again be required to pay the remainder of the appropriate review fee before Ecology initiates a detailed review of your remedial action report.

Independent Remedial Action Reports Already Filed With Ecology

Ecology may review your report even though it has not been completed as recommended in "Preparing Independent Remedial Action Reports." However, it is in your interest to look over the guidelines Ecology has prepared for reporting independent remedial actions. If your report does not contain information Ecology needs to complete a full review of your cleanup, your report will be returned to you as incomplete.

Information and Documents

Guidance for Remediation of Releases from Underground Storage Tanks

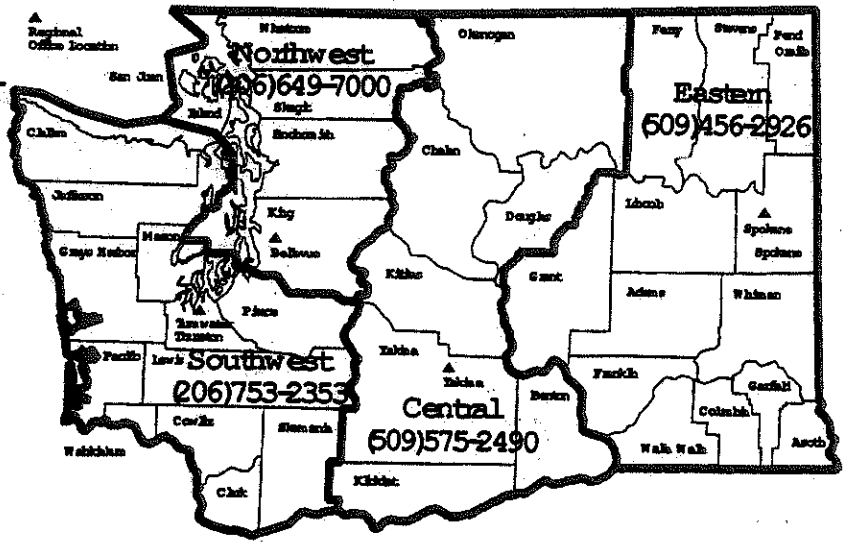
Preparing Independent Remedial Action Reports

Independent Remedial Action Program "Request for Review" application form

Call 800/458-0920 or the Ecology regional office nearest you.

If you have special accommodations needs, please contact Ron Langley at 206/438-7360, or 206/438-8721, Telecommunications Device for the Deaf (TDD).

Ecology is an Equal Opportunity and Affirmative Action employer.



Exhibit

K

J.H. KELLY, INC.
Longview (206) 423-5510
Portland (503) 228-2487
FAXs (206) 423-9170

TED COONS
Senior Manager,
Equipment & Facilities

821 3RD AVENUE • P.O. BOX 2038
LONGVIEW, WA 98632 JH-KE-LI*188 PD

J.H. KELLY, INC.
821 3rd Avenue P.O. Box 2038
LONGVIEW, WA 98632-8171
Phone (206) 423-5510
JHKELI*188PD

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
INDEPENDENT REMEDIAL ACTION SUMMARY

August 16, 1993

J.H. KELLY, INC.

INDEX

821 3RD. AVENUE • BOX 2038 • LONGVIEW, WA 98632 (206) 423-5510 • FAX (206) 423-9170
CONTRACTOR NO. JHKELI *188PD WE ARE AN EQUAL OPPORTUNITY EMPLOYER

Section 1

J.H. KELLY, INC.

August 17, 1993

Mr. Dick Heggen
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
7272 Cleanwater Lane, LU-11
Olympia, WA 98504-6811

Dear Mr. Heggen: See Sec. 4A

In November, 1991, J.H. Kelly, Inc. decided to remove our underground storage tanks. Both tanks were less than ten years old and were not leaking (see tank tightness testing results dated July 1989). Decommission of the tanks was a result of the direction the state was going on regulation of UST.

I have been uncomfortable from the beginning with J.H. Kelly, Inc. being listed as a leaking underground storage tank site. We are not. Upon removal of the tanks there was no evidence of leaks. There was, however, some contamination from overfilling of the tanks. Very minimal digging around the contaminated area produced clean dirt. Minimal pumping produced clean water. We installed a monitoring well before backfilling to enable us to continue to take water samples. Latest test results show we are not in violation.

J.H. Kelly, Inc. has spent a great deal of time and money dealing with this matter. We have complied with everything the State has asked us to do. We ask now for a "No Further Action" status letter from the Department of Ecology. I am submitting documentation to support that conclusion.

Sincerely,

J.H. KELLY, INC.

Ted Coons
Senior Manager
Equipment and Facilities

TC/bb

J.H. Kelly, Inc.
821 3rd Avenue/P.O. Box 2038
Longv ew, WA 98632
(206) 423-5510

Section 2

2. SITE HISTORY

Property Owners - 1979 to Present

- Dan Evans
- Terry Major

Previous Owner - before 1979

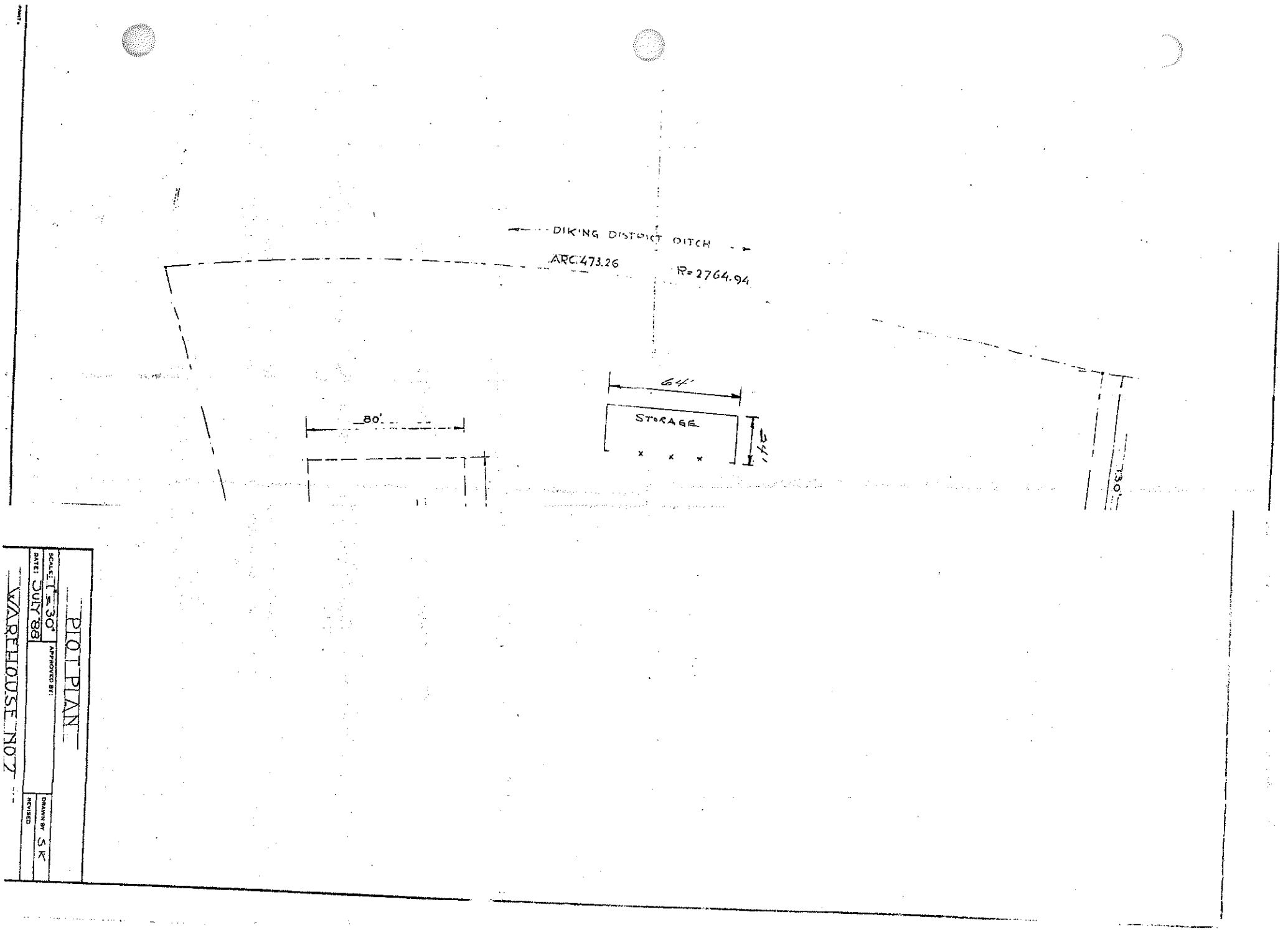
- Stan Thurman

J.H. Kelly, Inc. is a Mechanical and Piping Contractor. Our work is done in the field on location in mills, refineries, etc. We do fabrication of pipe in our fabrication shop on this site.

J.H. Kelly, Inc. was established in 1923. We located on this site in 1979. This site houses corporate offices and repair/maintenance facilities in a common building of 11,360 square feet, constructed in 1979. We also have on site a 9,000 square foot fabrication shop built in 1989. The third building is a 1,536 square foot open front storage building built in 1989. The site occupies approximately four acres. I have enclosed a plot plan for your review (see Section 3).

Prior to J.H. Kelly, Inc.'s purchase of the property, it was a vacant field sometimes used to graze livestock.

Section 3



PLOT PLAN

SCALE: 1" = 30'

DATE: JULY '88

APPROVED BY:

DRAWN BY: SK

REVISED

WAREHOUSE NO 7

Section 4

Section 4.A

ACUTEST

July 21, 1989

Mr. John Jabusch
Petroleum Services Unlimited
340-C Oregon Way
Longview, WA 98632

Test No. : 890715
Test Date : July 15, 1989
Location : J. H. Kelly
Longview, WA

Dear Mr. Jabusch:

A precision test was performed on tanks at the above location using the LEAK COMPUTER® System. We have reviewed the data produced in conjunction with this test for purposes of verifying the results and certifying the tank systems. The testing was performed in accordance with AcuTest protocol, and therefore satisfies all requirements for such testing as set forth by NFPA 329-87 and USEPA 40 CFR part 280.

The results of testing are shown on the following page, and indicate whether the full systems, including the tank and associated piping, or just the individual tank passed or failed. Included with the report are computer printouts of the data compiled during the last hour of each test. Each printout shows leak rate, and the confidence level (three times standard deviation) of that leak rate. This information is stored in a permanent file if future verification of test results is needed.

QUALITY ASSURANCE BY:

Ronald L. Uher
A/T #019

TEST CERTIFIED BY:

D. G. Van Delinder
A/T #049

ACUTEST CORPORATION 1141 BRITTMOORE ROAD HOUSTON, TEXAS 77043
(713) ACUTEST (800) 992-8884 (713) 228-8378

Test No. : 890715
Test Date : July 15, 1989
Location : J. H. Kelly
Longview, WA

TEST RESULTS

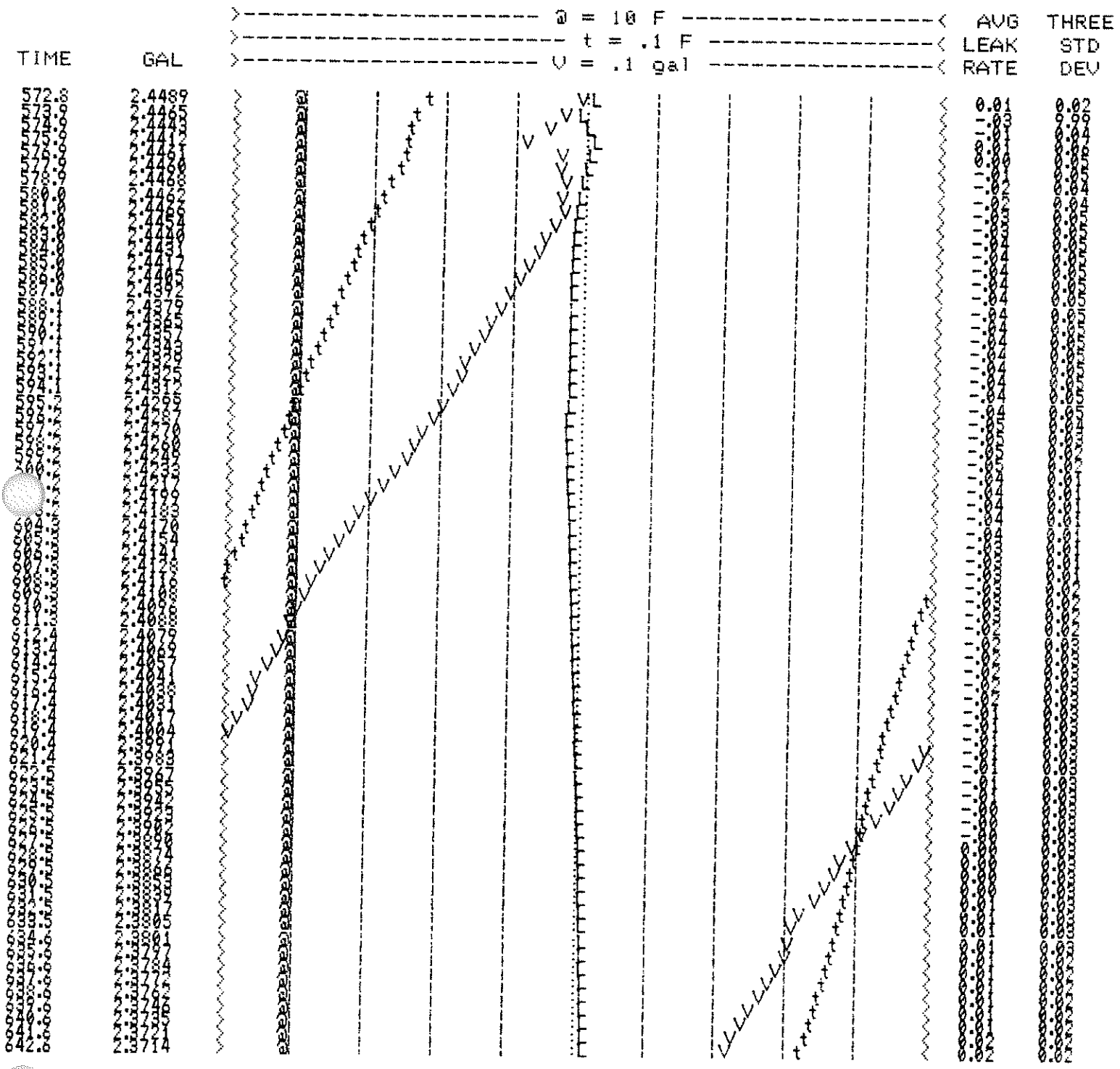
PRODUCT	VOLUME (GAL)	WATER IN TANK (INCHES)	HIGH LEVEL LEAK RATE (GPH)	LOW LEVEL LEAK RATE (GPH)	FULL SYSTEM	TANK ONLY
DIESEL	3,954	0	0.01 @ 20″	-0.02 @ 8″	PASS	PASS
NOLEAD	10,103	.25	-0.02 @ 20″	-0.02 @ 15″	PASS	PASS

SUCTION PRODUCT LINE TEST

DIESEL: Tight at a level of 20″ above tank top.
NOLEAD: Tight at a level of 20″ above tank top.

STRIP CHART FOR DATA RECORD: 89071513.A20 OF 3954 GALLON DIESEL TANK
CATION: J H KELLY LV WA TEST OPERATOR: HAGDAHL

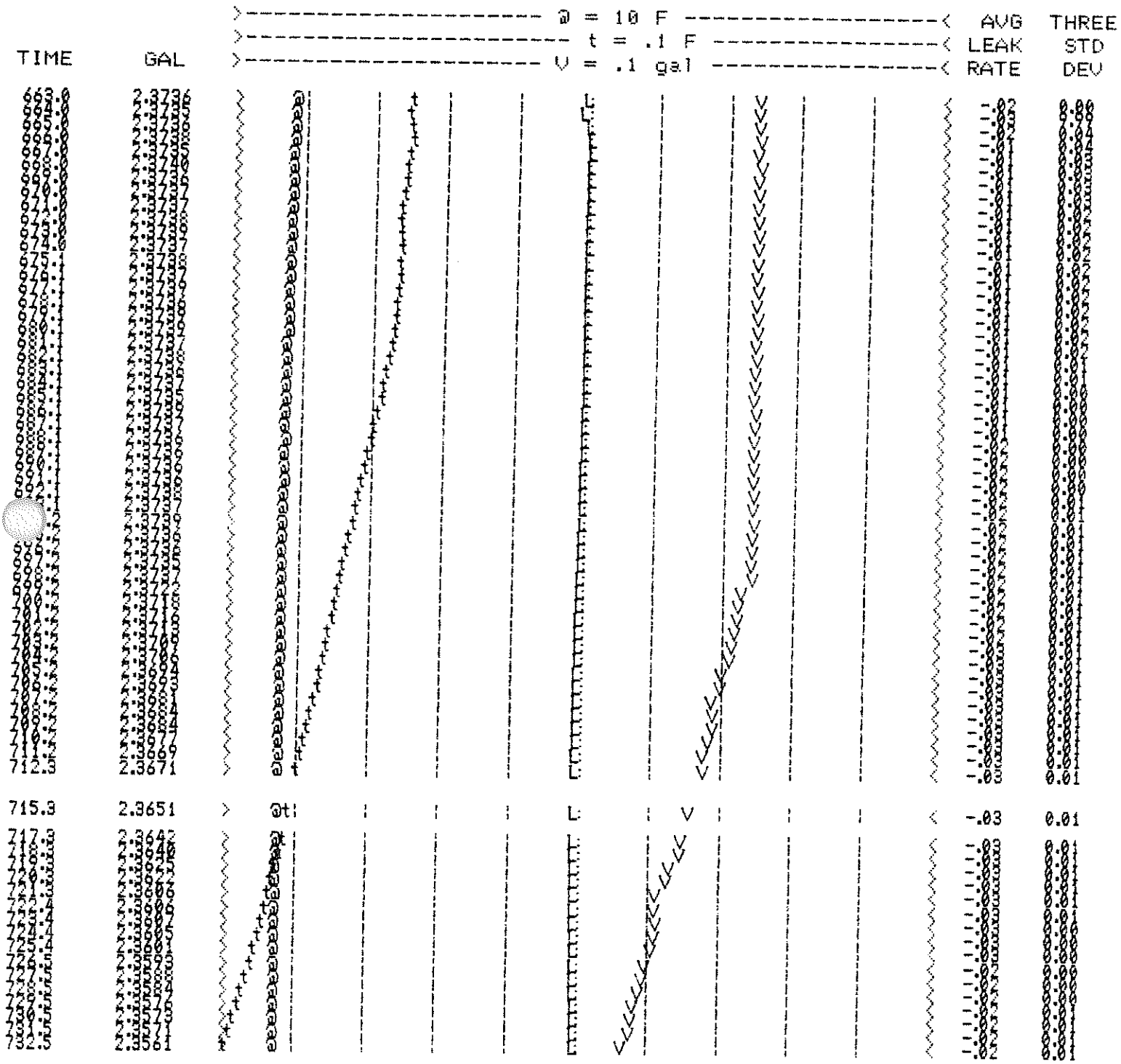
LEAK RATE AVG OF 20 CYCLES; LINE FEED: 6 IN/HR; TOTAL TEST TIME: 72.8 MIN
DENSITY: .87 TANK TEMP @ START: 70 F COE: .000448



END OF STRIP CHART 89071513.A20
DATA COLLECTED ON LEAK COMPUTER S/N 88121904

STRIP CHART FOR DATA RECORD: 89071514.A08 OF 3954 GALLON DIESEL TANK
LOCATION: J H KELLY LV WA TEST OPERATOR: HAGDAHL

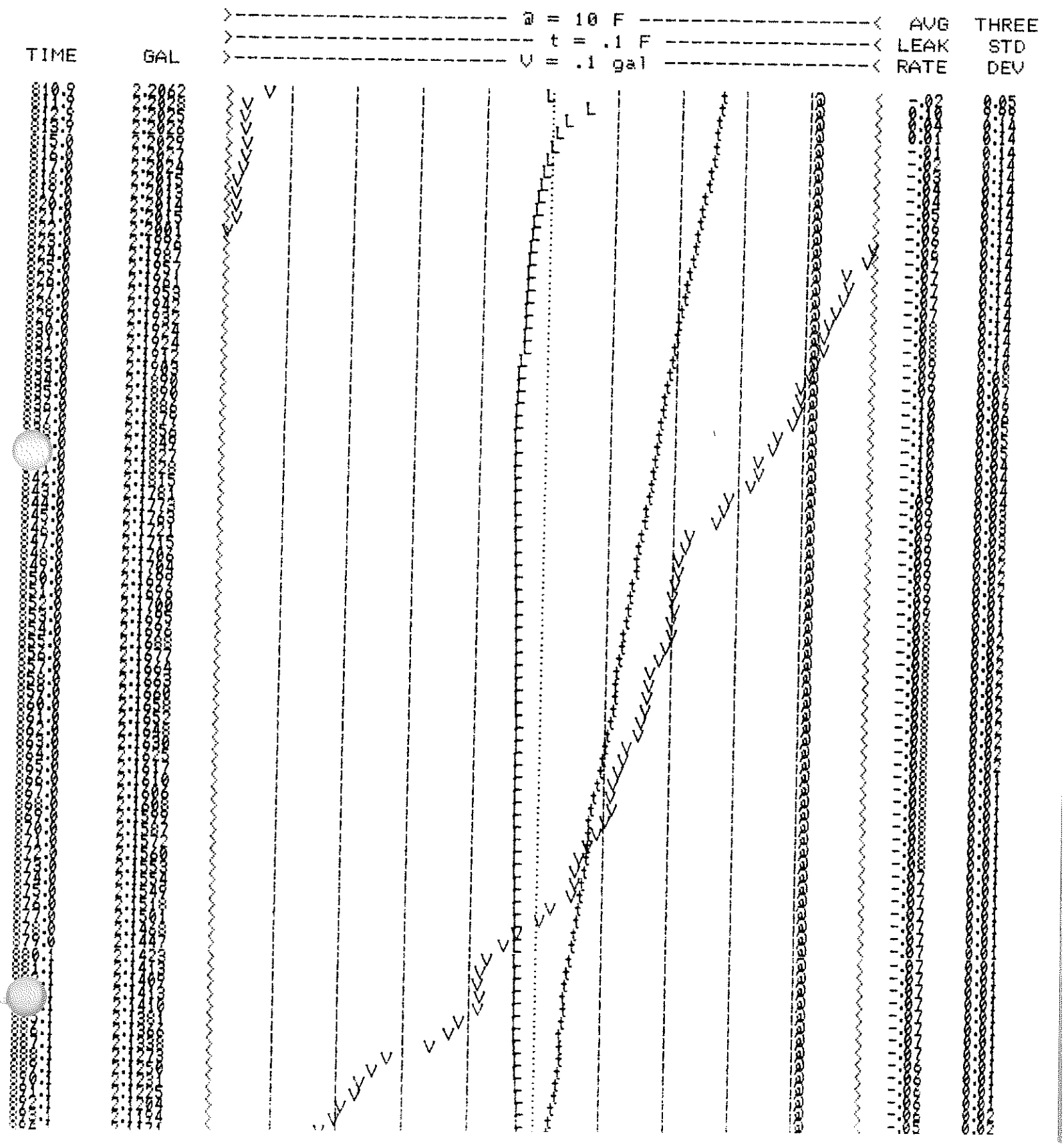
LEAK RATE AVG OF 20 CYCLES; LINE FEED: 6 IN/HR; TOTAL TEST TIME: 70.6 MIN
DENSITY: .86 TANK TEMP @ START: 70 F COE: .000448

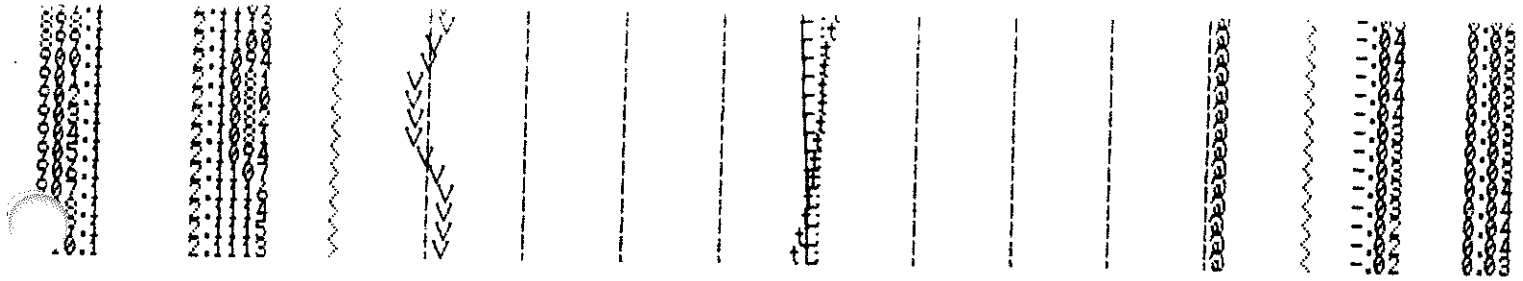


END OF STRIP CHART 89071514.A08
DATA COLLECTED ON LEAK COMPUTER S/N 88121904

STRIP CHART FOR DATA RECORD: 89071515.B19 OF 10103 GALLON NOLEAD TANK
CATION: J H KELLY LV WA TEST OPERATOR: HAGDAHL

LEAK RATE AVG OF 20 CYCLES; LINE FEED: 6 IN/HR; TOTAL TEST TIME: 181.6 MIN
DENSITY: .74 TANK TEMP @ START: 69 F COE: .000679

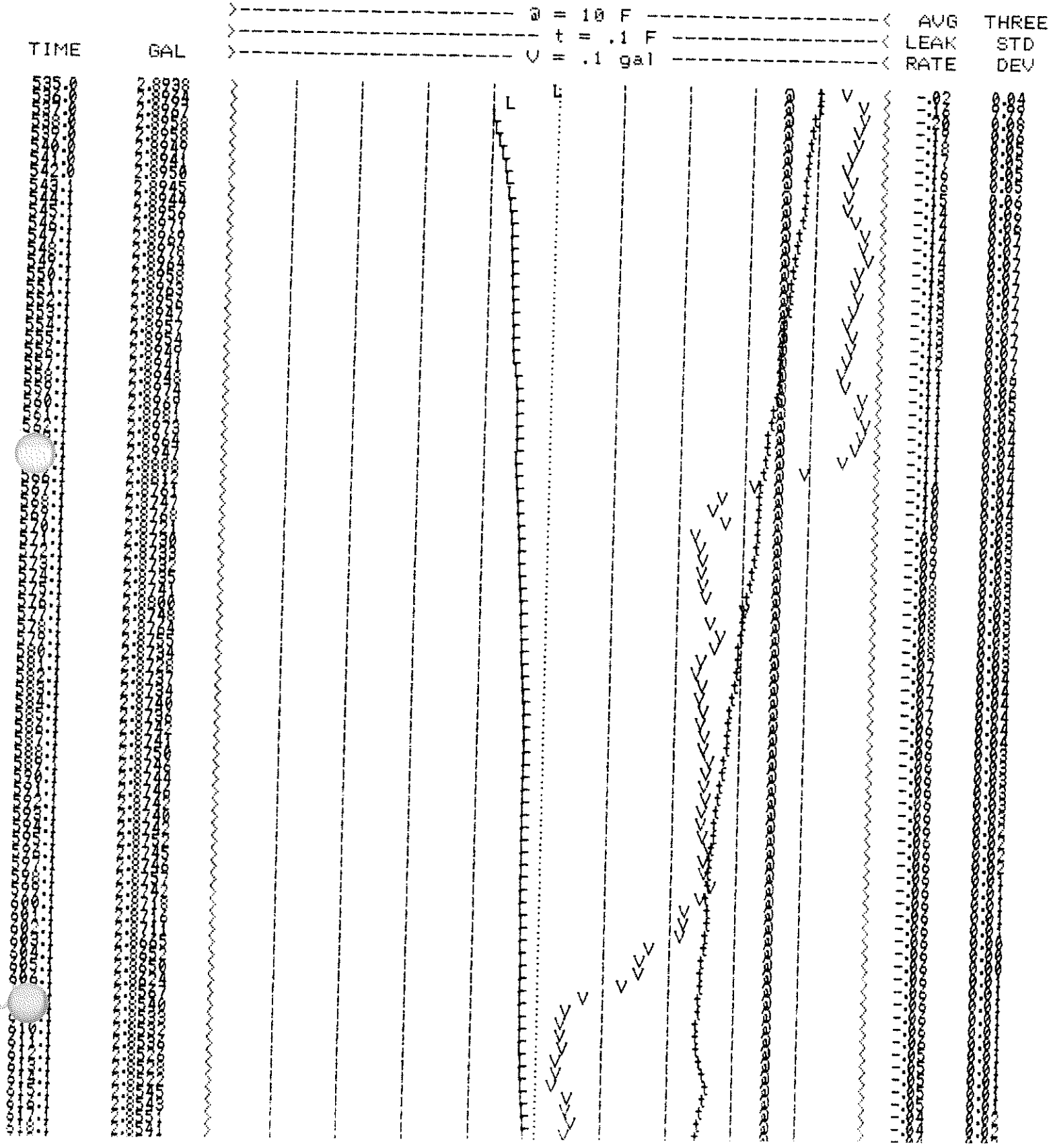


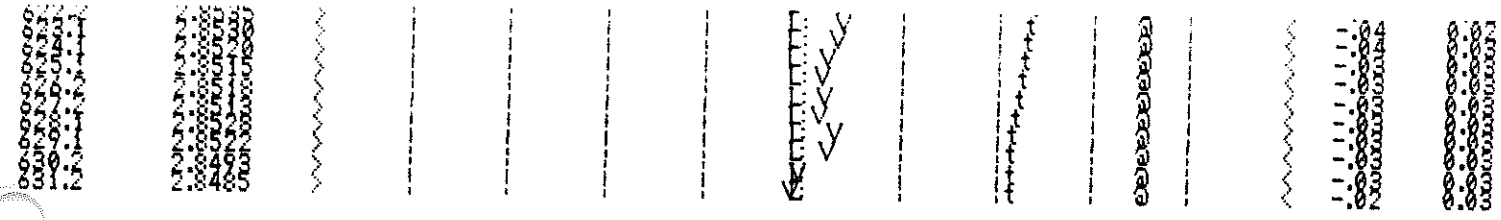


END OF STRIP CHART 89071515.B19
DATA COLLECTED ON LEAK COMPUTER S/N 88121904

STRIP CHART FOR DATA RECORD: 89071619.B15 OF 10103 GALLON NOLEAD TANK
LOCATION: J H KELLY LV WA TEST OPERATOR: HAGDAHL

LEAK RATE AVG OF 20 CYCLES; LINE FEED: 6 IN/HR; TOTAL TEST TIME: 99.2 MIN
DENSITY: .77 TANK TEMP @ START: 68 F COE: .000679





END OF STRIP CHART 89071619.B15
DATA COLLECTED ON LEAK COMPUTER S/N 88121904

INVOICE

Petroleum Services Unlimited, Inc.
340 Oregon Way, Suite C
Longview, WA 98632
(206) 423-2245

TANK Cert

SOLD TO
J H Kelly
821 - 3rd Ave
Longview, Wa. 98632

SHIPPED TO

CUSTOMER'S ORDER	SALESMAN	TERMS	SHIPPED VIA	F.O.B.	DATE
					7/30/89

2	Test & certify two tanks	400	00	800	00

J.H. KELLY
JUL 27 1989
RECEIVED

PAY THIS INVOICE
NO STATEMENT WILL BE SENT

Sub Total	800	00
Sales Tax	60.	80
Total	#860.	80

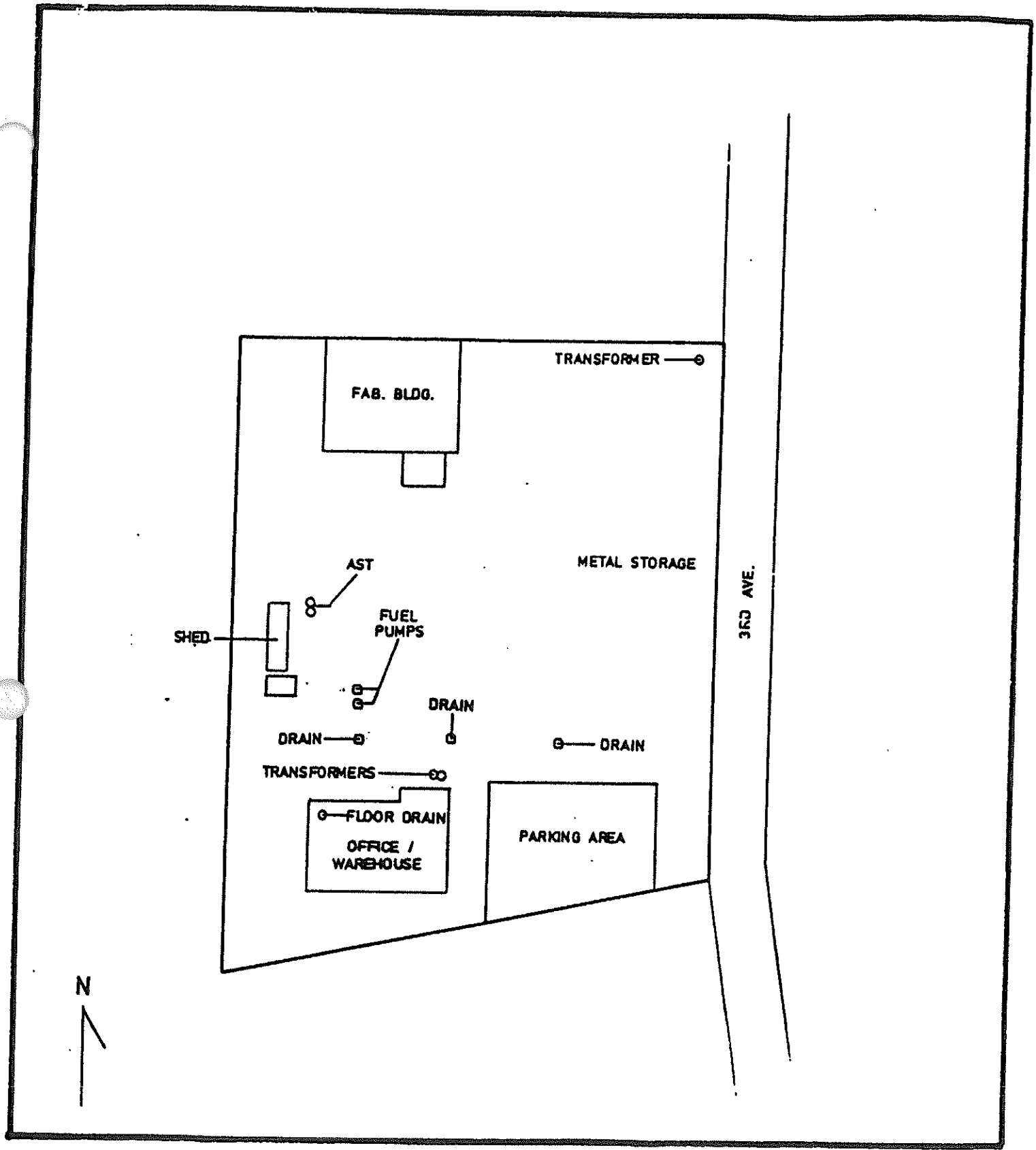
Section 4.B

REPORT ON

SOIL SAMPLING AND ANALYSES

J.H. KELLY COMPANY
LONGVIEW, WASHINGTON

SRH
GROUP



DATE	8/15/89	SRH GROUP	SRH Environmental Management 12245 N.E. Whitaker Way Portland, Or 97230	SCALE
PROJECT NO.	1535-1			N/A
DRAWN BY	SMS	JH KELLY CO.		FIGURE
APPROVED BY	RDA	SITE MAP		2

Introduction

SRH Environmental Management was retained by J.H. Kelly Company of Longview, Washington to perform a limited test pit and soil sampling program in the material handling yard of the J.H. Kelly facility located at 821 3rd Avenue, Longview, Washington. This investigation was performed as a followup to an earlier investigation described in the "Level 1 Environmental Site Assessment Report," dated August 15, 1989. A soil gas survey performed as part of the earlier investigation identified indications of elevated volatile hydrocarbon levels in a limited area to the north of a fueling island and associated underground storage tanks (UST's). The objective of the test pit investigation was to confirm or disprove the presence of substantial subsurface contamination at the test pit location and to assess the vertical extent of contamination, if present.

This phase of investigation consisted of the sampling and logging one test pit located in the area of concern identified in the August 15 report. The area sampled was immediately north of the concrete apron for the vehicle fueling island. The two soil samples were composited into a single sample for analytical purposes, in order to minimize analytical costs. The water sample was preserved in cold at the SRH offices for future possible analysis. This report summarizes the activities and findings of this investigation.

The observations and interpretations presented in this report are based on the assumption that the conditions do not vary from those found in the single test pit. If any variations are encountered during any further investigations for this project, SRH should be notified so that supplemental interpretations can be made. The observations and interpretations of this report are intended only for the individual sampling site described and must not be extended to adjacent areas.

The findings of this report are valid for the dates and under the conditions of the observations and testing. However, changes in the conditions of the subject property, neighboring properties, or changes in applicable standards can occur with the passage of time, whether they result from natural processes, legislation, or the broadening of knowledge. Accordingly, the observations and findings presented in this report may be invalidated by changes outside of our control.

Sampling Locations and Procedure

The test pit was located immediately adjacent to the northern edge of the fueling island concrete apron. This was in the area identified by the earlier soil gas survey as the location of elevated volatile hydrocarbon levels. The test pit was excavated by Anderson Construction of Longview, Washington, using a rubber-tired backhoe with extending boom. The total depth of the test pit was 18 feet, which carried the pit into the groundwater.

Soils in the top 8.5 feet of the test pit consisted of a demolition fill with chunks of wood, asphalt, concrete, reinforcing bar and bricks. The matrix was a moist, mottled gray mixture of silt, sand and gravel with a small amount of clay. The fill appeared to be free of any visual or olfactory signs of contamination from petroleum, though it had a slight odor of what appeared to be decaying organic material.

Immediately below the fill, and extending to the bottom of the test pit, were native sands and silts, typical of those found throughout the Longview area. The upper portions of the native soil had considerable amounts of grass and roots, indicating it was once the topsoil horizon. There was no visual or olfactory evidence of contamination in the native soils, and no obvious signs of significant contamination observed elsewhere in the test pit.

Two soil samples, one from each of the soil horizons described above, were obtained by transferring soil from the center of undisturbed soil chunks in the backhoe bucket. A dedicated, clean stainless steel spoon was used for each individual sample. Each individual sample was loaded directly into a laboratory cleaned, 8-ounce, clear glass, wide mouth jar fitted with a teflon-lined screw cap lid.

Two water samples were obtained by allowing laboratory cleaned, wide-mouth, clear glass jars to fill by gravity with water from the bottom of the pit. One of the samples was observed in a clear glass jar to determine if hydrocarbon product was floating on the water. An observation of a fiberglass measuring tape placed in the top of the water was also made to determine if a sheen was present which would adhere to the tape. No floating product was observed using either method. The second water sample was placed on ice and preserved for future laboratory analyses, if required.

All containers were filled to maximum capacity to minimize headspace losses and sealed with teflon-lined caps. A clean pair of disposable surgical-type gloves was worn for the collection of each discrete sample. The samples were placed into a cooler with ice immediately following sample collection, and promptly delivered to an offsite analytical laboratory. Chain-of-Custody forms were filled out immediately upon sampling, and accompanied the samples into the laboratory.

Sampling implements were decontaminated by accepted procedure prior to use by scrubbing off all visible particulates with a tap water/TSP/baking soda solution, de-ionized water rinse, hexane rinse, and three further rinses with de-ionized water.

Laboratory Analyses

At the laboratory the two soil samples were combined into a single composite sample for analyses. The composite sample was analyzed for the presence of total petroleum hydrocarbons (TPH) by modified EPA Method 418.1, and for BTXE (benzene, toluene, xylene, ethylbenzene) via EPA method 8020. BTXE are components of gasoline and their presence in soil is indicative of gasoline contamination. No concentrations of BTXE were detected in the sample above the detection limit for the analytical method.

The analyses of the composite soil sample detected 58 parts per million (ppm) TPH.

Copies of the laboratory analysis report and chain-of-custody documents are presented in the Appendix.

Conclusions and Recommendations

The test pit was excavated in the area shown by the earlier soil gas survey to be the site of highest volatile hydrocarbon concentrations. The pit was excavated to a depth of 18 feet, well below the bottom of the nearby UST's. No visual or olfactory evidence of substantial petroleum contamination was observed in the test pit and no contamination was apparent on the groundwater reached near the bottom of the pit. Laboratory analysis for BTXE did not detect the presence of these gasoline constituents which, if present, would indicate the likelihood of leakage or spillage from the nearby tanks, Based on the results of this investigation and the previous soil gas survey, there is no evidence of substantial gasoline contamination in the subsurface environment around the fueling island.

The TPH levels detected in this sample are below levels at which the Washington Department of Ecology typically requires further investigation and/or remediation. This analysis did indicate the presence of some hydrocarbon contamination of the soil in this area. However, the level detected and the limited areal extent identified by the soil gas survey do not indicate the presence of substantial contamination. No numeric cleanup standards currently exist for hydrocarbon contamination. The cleanup standard for petroleum releases onto soil is the absence of visual sheen and/or odor. As noted above, visual or olfactory evidence of contamination was not found during the sampling.

Based on the results of the limited investigation described above and the earlier soil gas survey, no recommendations for further investigation are made.

TABLE 1

SUMMARY OF LABORATORY ANALYSIS RESULTS

SOIL SAMPLING
J.H. Kelly Company
Longview, Washington

Analysis	EPA Method	Test Pit Composite
Total Petroleum Hydrocarbons	418.1	58 PPM
Benzene	8020	ND
Toluene	8020	ND
Xylene	8020	ND
Ethylbenzene	8020	ND

ND = None Detected

APPENDIX

LABORATORY ANALYSIS REPORTS

AND

CHAIN OF CUSTODY DOCUMENTATION

RECEIVED SEP - 5 1989 ✓

COFFEY LABORATORIES, INC.
12423 N.E. WHITAKER WAY
PORTLAND, OR 97230
PHONE: (503) 254-1794
FAX: (503) 254-1452

September 1, 1989
Log # A890823-AB2
PO # 01033

SRH Environmental Management
12245 NE Whitaker Way
Portland, OR 97230
Attention: Dave Brown

Sample(s) Collected: 8/23/89
Sample(s) Received: 8/23/89

Analysis Requested: Total Petroleum Hydrocarbons in soil by modified EPA Method 418.1

SAMPLE ID	SAMPLE RESULTS COMPOSITE
08231535-01, 0930 hrs 08231535-02, 1000 hrs	58

Detection Limit: 2.0

Results expressed as mg/kg unless otherwise noted.

REPORT CONTINUES

COFFEY LABORATORIES, INC.
12423 N.E. WHITAKER WAY
PORTLAND, OR 97230
PHONE: (503) 254-1794
FAX: (503) 254-1452

Log # A890823-AB2
PO # 01033

SRH Environmental Management
Page 2

Analysis Requested: BTXE in soil by EPA Method 8020, GC/PID

Sample ID: 08231535-01 & 08231535-02

ANALYTE	DETECTION LIMIT	LABORATORY BLANK	COMPOSITE RESULTS
Benzene	0.04	ND	ND
Ethylbenzene	0.04	ND	ND
Toluene	0.04	ND	ND
Total Xylenes	0.08	ND	ND

ND means none detected at or above the detection limit listed.

Results expressed as mg/kg unless otherwise noted.

Sincerely,

Victor A. Perry,
Quality Assurance

Sincerely,

Susan M. Coffey
President

SMC/mlh

'245 NE Whitaker Way
'lland, Oregon 97230
3-252-8316 Fax 503-255-7038

Environmental Management

LAB NAME
LOG # A890823-AB2

CHAIN OF CUSTODY RECORD

PROJ. NO. 585-3 | SITE/LOCATION J.H. KELLY / LONGVIEW

SAMPLERS (Signature) David C. Brown

P. NO.	DATE	TIME	COMP.	GRAB	MTX	SAMPLE IDENTIFICATION	NO. OF CONTAINERS	BTXE	TPH	SEAL NO.	SEAL INTACT? (Y/N/X)	REMARKS (with initials)
P-1	8/23	9:30		GRAB	SOIL	08231535-01	1	X	X			COMPOSITE
P-1	"	10:00		"	"	08231535-02	1					

Relinquished by: (Signature/Firm) David C. Brown — Date/Time 8/23 1408 — Received by: (Signature/Firm)

Relinquished by: (Signature/Firm) — Date/Time — Received by: (Signature/Firm)

Relinquished by: (Signature/Firm) — Date/Time — Received by: (Signature/Firm) Albert Hansen Jr

Relinquished by: (Signature/Firm) — Date/Time — Received by: (Signature/Firm)

Relinquished by: (Signature/Firm) — Date/Time — Received by: (Signature/Firm)

Relinquished by: (Signature/Firm) — Date/Time 8/23 '08 pm — Received by: (Signature/Firm)

Remarks (attachments if necessary)

COFFEY LABORATORIES, INC.
12423 N.E. WHITAKER WAY
PORTLAND, OR 97230
PHONE: (503) 254-1794
FAX: (503) 254-1452

THIS SECTION FOR LABORATORY USE

LABORATORY LOG # A890823-A6
CUSTABBR: SRH Envirm NEW
DUE DATE +10 R P
VERBAL RESULTS Yes Std
(1)PREPAID? CASH CK#
(2)PAY FOR REL $ PRT PH$
(3)NET 30 DAY (4)PROF. COU

PLEASE FILL IN THE REQUESTED INFORMATION COMPLETELY

LABORATORY REPORT INFORMATION:

COMPANY (or private party) NAME SRH

MAILING ADDRESS:

CITY, STATE, ZIP

REPORT TO ATTENTION OF: Dave Brown PHONE ( ) -

DO YOU NEED VERBAL RESULTS? Yes CALL // PHONE ( ) -

SEND EXTRA COPY OF REPORT TO: ATTN:

MAILING ADDRESS:

EXTRA COPY of REPORT is: For ALL jobs ___, or For this Job ONLY ___.

Pick up or Delivery address:

BILLING INFORMATION:

DO YOU HAVE A PRICE QUOTE FOR THIS JOB? QUOTE #

BILLING ADDRESS:

CITY, STATE, ZIP

BILLING TO ATTENTION OF: PHONE ( ) -

SEND EXTRA COPY OF BILL TO: ATTN:

MAILING ADDRESS:

EXTRA BILLING REQUEST IS: For ALL Jobs ___, or For this job ONLY ___.

DOES YOUR COMPANY USE POHS ? YES ___ NO___ IF NO POH IS REQUIRED, INITAL HERE

POH FOR THIS JOB 01033

PAYMENT AUTHORIZATION FOR:

RUSH SURCHARGE (2 X Std. PRICE) SIGN HERE

PRIORITY SURCHARGE (1.5 X Std. PRICE) SIGN HERE

Section 5

Pacific Northern Environmental
dba Petroleum Services Unlimited

P N E

J.H. KELLY, INC.

CLOSURE REPORT

December 2, 1991

1081 Columbia Boulevard • Longview, Washington 98632
(206) 423-2245 FAX (206) 423-2272

December 2, 1991

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Re: Tank decommissioning activities at J.H. Kelly, Inc. site #002053.

Dear UST Section:

Pacific Northern Environmental was retained by J.H. Kelly, Inc. to conduct tank decommissioning and site assessment activities. The J.H. Kelly, Inc. site is located at 812 Third Avenue in Longview, Washington. A site vicinity map is presented in Figure 1.

The J.H. Kelly, Inc. site operates as a maintenance, fabrication, and contract coordination facility. Prior to decommissioning activities, J.H. Kelly, Inc. operated the following two underground storage tanks at the site:

1. One 6,000 gallon Diesel Tank;

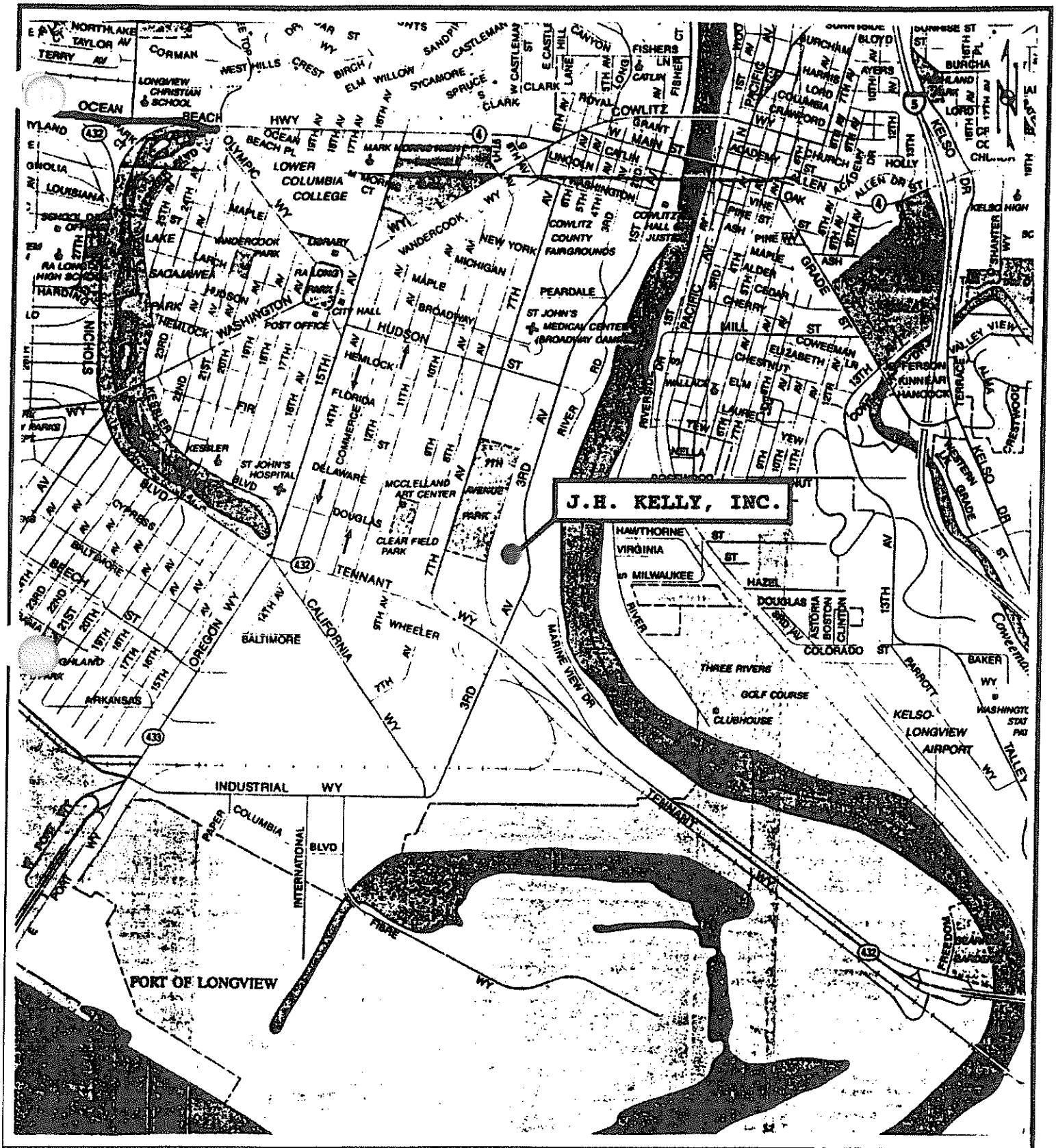
2. One 10,000 gallon Unleaded Gasoline Tank.

The last day of operation of the tanks was 11/12/91.

November 13, 1991

Pacific Northern Environmental was on site to conduct tank decommissioning activities in accordance with Chapter 173-360-385 of the Washington Administrative Codes. The site assessment was conducted in accordance with Chapter 173-360-390 of the Washington Administrative Codes. Activities on site progressed as follows:

- Fuel dispensers were removed. Tank and ancillary equipment locations are presented in Figure 2. Field screening techniques (color, odor, and photo-ionization) indicated petroleum hydrocarbons present in the soil below the former location of the dispensers;

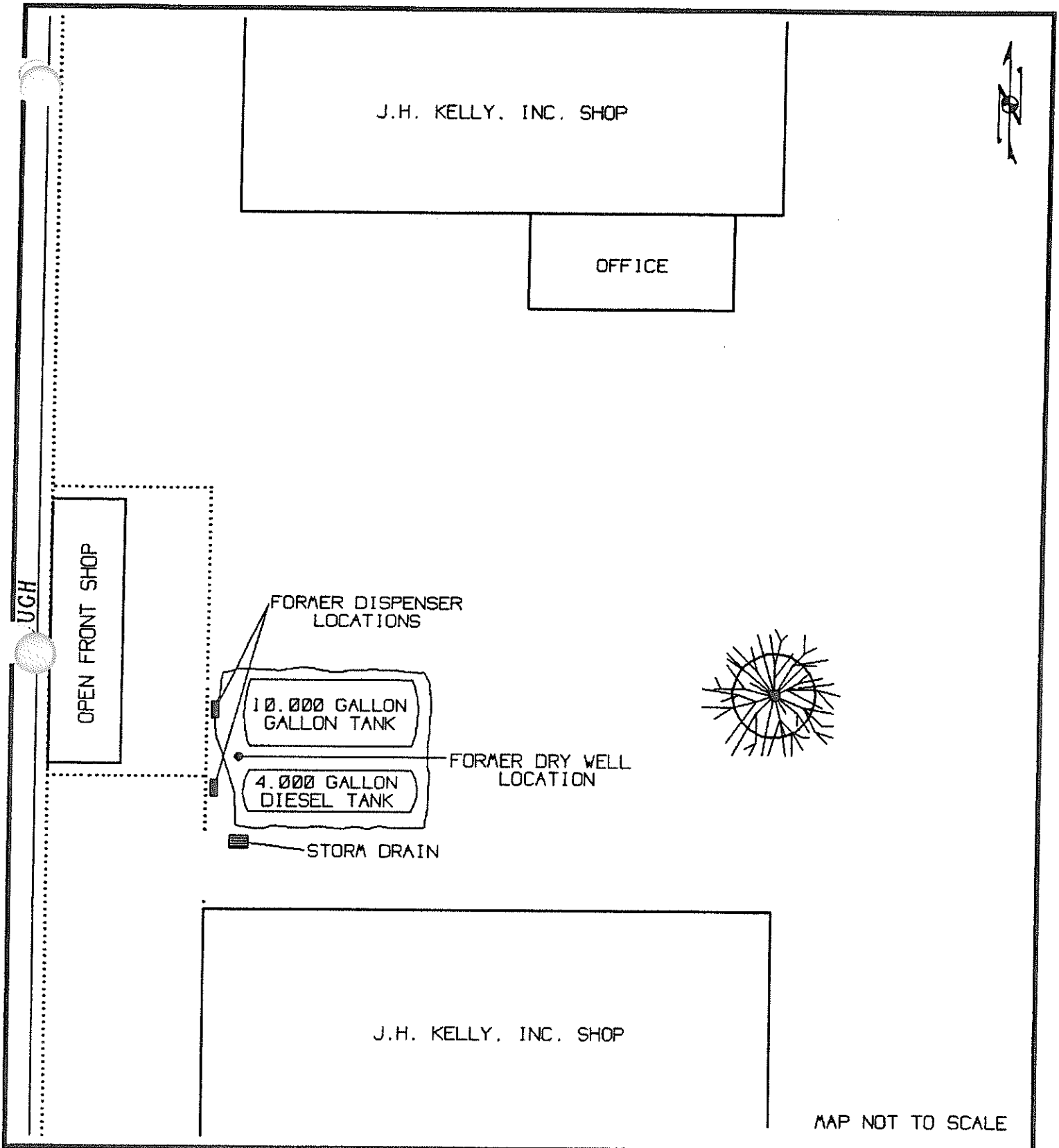


J.H. KELLY. INC.
21 THIRD AVE.
LONGVIEW. WASHINGTON 98632

FIGURE 1

SITE VICINITY MAP

PACIFIC NORTHERN ENVIRONMENTAL



J.H. KELLY. INC.
21 THIRD AVENUE
LONGVIE WASHINGTON 98632

FIGURE 2

SITE FACILTY MAP

PACIFIC NORTHERN ENVIRONMENTAL

- The fill slab was broken with a Komatsu PC 200 LC hydraulic excavator and removed. Field screening techniques indicated a presence of petroleum hydrocarbons in the soil below the fill pad;

- Soil was removed from above and around the gasoline tank. The soil from this area was field screened and stockpiled on polyethylene sheeting, as a presence of petroleum hydrocarbons was indicated. Fill material within the tank nest was moist gray sand;

- Upon removal of soil from the tank excavation, the native soil of the walls was observed. This soil contained pieces of wood, chucks of concrete, chunks of asphalt, and pieces of cable. The color of the soil was dark gray;

- Dry ice was inserted into the gasoline tank to evacuate explosive vapors;

- The gasoline tank was removed from the excavation and the following observations were made:

  - Tank Diameter: 6 feet 3.5 inches
  - Tank Length: 17 feet
  - Approximately 95% of the protective coating was intact.
  - Approximately two inches of water was observed within the excavation. A sheen was observed on this water.

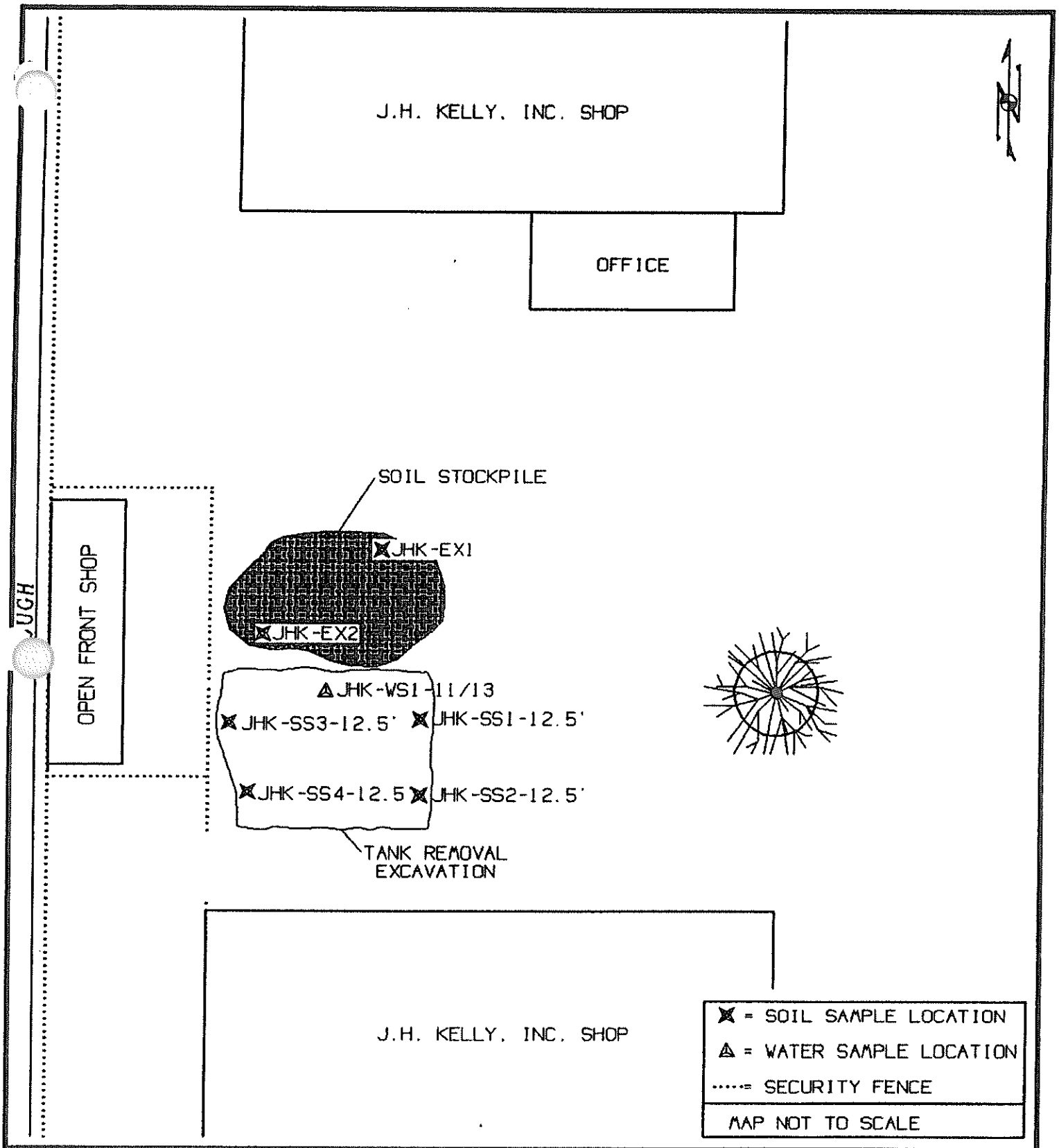
- Photographs were taken of the unleaded gasoline tank.

- Upon removal of the unleaded gasoline tank, excavation of soil above and around the diesel tank commenced. The soil from this area was field screened and stockpiled on polyethylene sheeting, as a presence of petroleum hydrocarbons was indicated.

- The diesel tank was removed from the excavations and the following observations were made:

  - Tank Diameter: 10 feet
  - Tank Length: 17 feet
  - Approximately 95% of the protective coating was intact.

- Soil samples JHK-EX1 and JHK-EX2 were collected from the stockpile of excavated soil. Locations of samples collected on November 13, 1991 are presented in Figure 3.



J.H. KELLY, INC.
221 THIRD AVENUE
LONGVIE WASHINGTON 98632

FIGURE 3

11/13/91
SAMPLE LOCATIONS

PACIFIC NORTHERN ENVIRONMENTAL

The soil stockpile samples were collected directly from the stockpile of excavated material.

Soil samples were collected with stainless steel spoons by personnel wearing clean vinyl gloves. Samples were placed in laboratory cleaned 8-ounce glass sample jars and sealed with teflon lined screw caps. Once sealed, each sample was given a different name and placed in an iced cooler to be maintained at approximately 4 degrees Celsius. Samples were placed under chain-of-custody documentation and hand delivered to Columbia Analytical Services, Inc. in Kelso, Washington.

Upon arrival at Columbia Analytical Services, samples were relinquished to a laboratory technician. The soil samples were chemically analyzed by EPA Method 3550/8015 Modified for Total Petroleum Hydrocarbons. Soil sample results for the soil stockpile are presented in Table 1.

TABLE 1

Total Petroleum Hydrocarbons
EPA Methods 3550/8015 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Diesel	Jet Fuel	Gasoline	Mineral Spirits	Kerosene	Oil*
JHK-EX1	10	190	ND	ND	ND	ND	60
JHK-EX2	10	120	ND	ND	ND	ND	90

MRL - Method Report Limit.
ND - None Detected at or above the method reporting limit.
*** - Quantitated using hydraulic oil as a standard. The MRL for oil is four times the MRL shown above.**

Analyses presented above indicate diesel and oil present in Soil samples JHK-EX1 and JHK-EX2. The levels present are below Washington Department of Ecology Method A Cleanup Levels as outlined in Chapter 173-340-740 of the Washington Administrative Codes (Table 2).

TABLE 2

**Washington Department of Ecology
Method A Cleanup Levels
for Soil**

Compound	Cleanup Level (ppm)
Total Petroleum Hydrocarbons (Gasoline)	100.0
Total Petroleum Hydrocarbons (Diesel)	200.0
Total Petroleum Hydrocarbons (other)	200.0
Benzene	0.5
Toluene	40.0
Ethylbenzene	20.0
Total Xylenes	20.0

Work progressed on site as follows:

- Approximately 800 gallons of water was pumped from the excavation by Cowlitz Clean Sweep of Longview, Washington.

- The water was allowed to recharge into the excavation. Water sample JHK-WS1-11/13 was collected from the recharge water. The water sample location is presented in Figure 3.

The water sample was collected with a decontaminated stainless steel bailer with a teflon bottom valve by personnel wearing clean vinyl gloves. The water sample was placed in a laboratory cleaned 32 ounce amber sample bottle and three 40 milliliter VOAs. The water sample was sealed with teflon lined screw caps. Sample preservation procedures, chain-of-custody, and sample delivery were conducted in the same manner as soil samples.

Upon arrival at Columbia Analytical Services, the water sample was relinquished to a laboratory technician. The water sample was chemically analyzed by EPA Method 3550/8015 Modified for Total Petroleum Hydrocarbons and EPA Method 5030/8020 Modified for benzene, toluene, ethylbenzene, and total xylenes. Results of these analyses are presented in Tables 3 and 4 respectively.

TABLE 3

**Total Petroleum Hydrocarbons
EPA Methods 3550/8015 Modified
microgram/Kilogram (ppb)
Liquid Basis**

Sample	MRL	Diesel	Jet Fuel	Gasoline	Mineral Spirits	Kerosene	Oil*
JHK-WS1-11/13	1000	24,000	ND	130,000	ND	ND	ND

TABLE 4

**BTEX Scan
EPA Method 5030/8020 Modified
microgram/Kilogram (ppb)
Liquid Basis**

Sample	MRL	Benzene	Toluene	Ethyl Benzene	Total Xylenes
JHK-WS1-11/13	0.05	4,100	18,000	5,300	32,000

MRL - Method Report Limit.
ND - None Detected at or above the method reporting limit.
*** - Quantitated using hydraulic oil as a standard. The MRL for oil is four times the MRL shown above.**

The analyses presented above indicate diesel, gasoline, benzene, toluene, ethylbenzene, and total xylenes above Washington Department of Ecology Method A Cleanup Levels for groundwater. These levels are outlined in Chapter 173-340-720 of the Washington Administrative Codes and presented in Table 5.

TABLE 5

**Washington Department of Ecology
Method A Cleanup Levels
for Groundwater**

Compound	Cleanup Level (ppb)
Total Petroleum Hydrocarbons	1000.0
Benzene	5.0
Toluene	40.0
Ethylbenzene	30.0
Total Xylenes	20.0

Work progressed on site as follows:

- Soil samples JHK-SS1-12.5', JHK-SS2-12.5', JHK-SS3-12.5' and JHK-SS3-12.5' were collected from the soil-groundwater interface of the excavation walls. Soil sample locations are presented in Figure 3.

The walls of the excavation exceeded four feet in height, making it potentially hazardous for personnel to enter. Thus, samples were collected from excavation locations by removing the soils with a backhoe and gathering the samples from the center of the bucket. Photographs were taken of each sample location.

Sample preservation procedures, chain-of-custody, and sample delivery were conducted in the same manner as soil samples collected from the stockpile of excavated materials.

Upon arrival at Columbia Analytical Services, the excavation soil samples were relinquished to a laboratory technician. The soil samples were Chemically analyzed by EPA Method 3550/8015 Modified for Total Petroleum Hydrocarbons. Soil samples JHK-SS1-12.5' and JHK-SS3-12.5' were chemically analyzed by EPA Methods 5030/8020 Modified for benzene, toluene, ethylbenzene, and total xylenes. Results of these analyses are presented in Tables 6 and 7 respectively.

TABLE 6

Total Petroleum Hydrocarbons
EPA Methods 3550/8015 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Diesel	Jet Fuel	Gasoline	Mineral Spirits	Kerosene	Oil*
JHK-SS1-12.5'	10	ND	ND	ND	ND	ND	70
JHK-SS2-12.5'	10	ND	ND	ND	ND	ND	130
JHK-SS3-12.5'	10	ND	ND	ND	ND	ND	480
JHK-SS4-12.5'	10	ND	ND	ND	ND	ND	140

TABLE 7

BTEX Scan
EPA Method 5030/8020 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Benzene	Toluene	Ethyl Benzene	Total Xylenes
JHK-SS1-12.5'	0.05	1.10	<0.10	<0.10	<0.10
JHK-SS3-12.5'	0.05	0.14	ND	ND	0.07

MRL - Method Report Limit.
ND - None Detected at or above the method reporting limit.
*** - Quantitated using hydraulic oil as a standard. The MRL for oil is four times the MRL shown above.**

The analyses presented above indicate oil present in soil sample JHK-SS3-12.5' is above Washington Department of Ecology Method A Cleanup Levels. In addition, benzene present in oils sample JHK-SS1-12.5' is above Washington Department of Ecology Method A Cleanup Levels.

November 22, 1991

Pacific Northern Environmental was on site to conduct Independent Interim Cleanup in the area of the tank excavation where previous soil sample analyses indicated Petroleum and BTEX above Method A Cleanup Levels for soil. Activities progressed on site as follows:

- Additional soil was removed from the location where soil sample JHK-SS3-12.5′ was previously collected. Soil was removed until field screening techniques indicated no petroleum hydrocarbons were present.

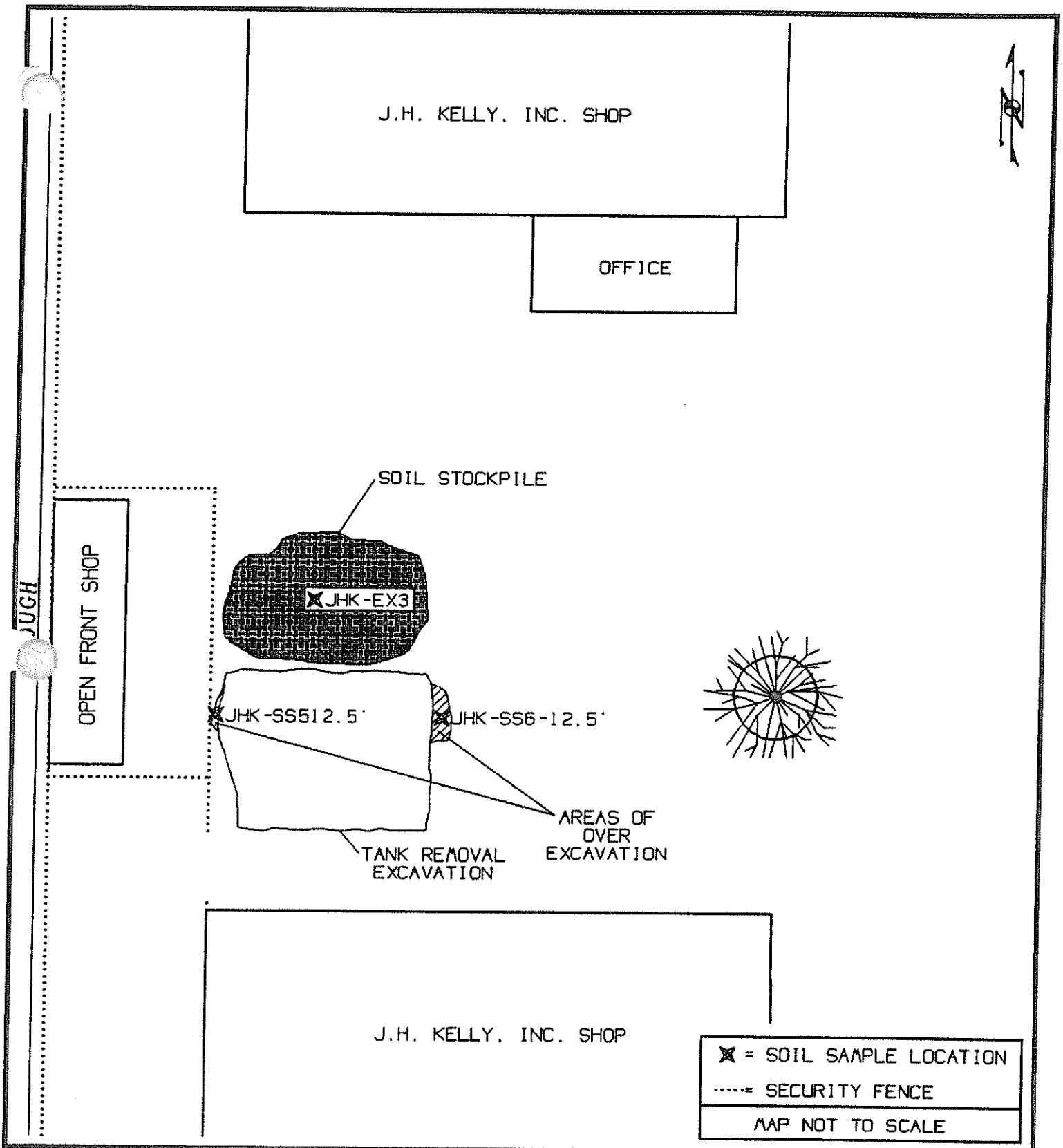
- Soil sample JHK-SS5-12.5 was collected from the above location to confirm the presence or absence of petroleum hydrocarbons. Locations of soil samples collected on November 22, 1991 are presented in Figure 4.

- Additional soil was removed from the location where soil sample JHK-SS1-12.5′ was previously collected. Soil was removed until field screening techniques indicated no petroleum hydrocarbons were present.

- Soil sample JHK-SS5-12.5 was collected from the above location to confirm the presence or absence of petroleum hydrocarbons.

- Soil sample JHK-EX3 was collected directly from stockpiled soils.

Soil sample collection and preservation procedures were conducted in the same manner as discussed earlier. Soil samples JHK-SS5-12.5′ and JHK-EX3 were chemically analyzed by EPA Method 3550/8015 for Total Petroleum Hydrocarbons. Soil sample JHK-SS6-12.5′ was chemically analyzed by 5030/8020 Modified. Sample results are presented in Tables 8 and 9 respectively.



J.H. KELLY. INC.
221 THIRD AVENUE
LONGVIE WASHINGTON 98632

FIGURE 4

11/22/91
SAMPLE LOCATIONS

PACIFIC NORTHERN ENVIRONMENTAL

TABLE 8

Total Petroleum Hydrocarbons
EPA Methods 3550/8015 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Diesel	Jet Fuel	Gasoline	Mineral Spirits	Kerosene	Oil*
JHK-SS5-12.5'	10	ND	ND	ND	ND	ND	70
JHK-EX3	10	120	ND	ND	ND	ND	120

TABLE 9

BTEX Scan
EPA Method 5030/8020 Modified
mg/Kg (ppm)
Dry Weight Basis

Sample	MRL	Benzene	Toluene	Ethyl Benzene	Total Xylenes
JHK-SS6-12.5'	0.05	ND	ND	ND	ND

MRL - Method Report Limit.
ND - None Detected at or above the method reporting limit.
*** - Quantitated using hydraulic oil as a standard. The MRL for oil is four times the MRL shown above.**

The analyses presented above indicate that Petroleum Hydrocarbons were detected in soil samples JHK-SS5-12.5' and JHK-EX3. Hydrocarbons present were not above Washington Department of Ecology Method A Cleanup Levels for soil. No benzene, toluene, ethylbenzene, or total xylenes were detected.

Conclusions

Pacific Northern Environmental concludes that soil within the former under ground storage tank excavation at the J.H. Kelly, Inc. site#002053 is below Washington Department of Ecology Method A Cleanup Levels. The soil stockpiled at the site is also below Washington Department of Ecology Method A Cleanup Levels.

Pacific Northern Environmental concludes that groundwater at the J.H. Kelly, Inc. site is above Washington Method A Cleanup Levels. The compounds present above Method A Cleanup Levels are as follows:

- Diesel (24,000 ppb);
- Gasoline (130,000 ppb);
- Benzene (4,100 ppb);
- Toluene (18,000 ppb);
- Ethylbenzene (5,300 ppb);
- Total Xylenes (32,000 ppb).

Recommendations

Pacific Northern Environmental recommends immediate remediation of ground water at the J.H. Kelly, Inc. site #002053.

Limitations

The conclusions and recommendations presented above are limited to soil and water samples collected at the J.H. Kelly, Inc. site #002053.

If you have any questions or require further information, please feel free to contact me.

Sincerely,

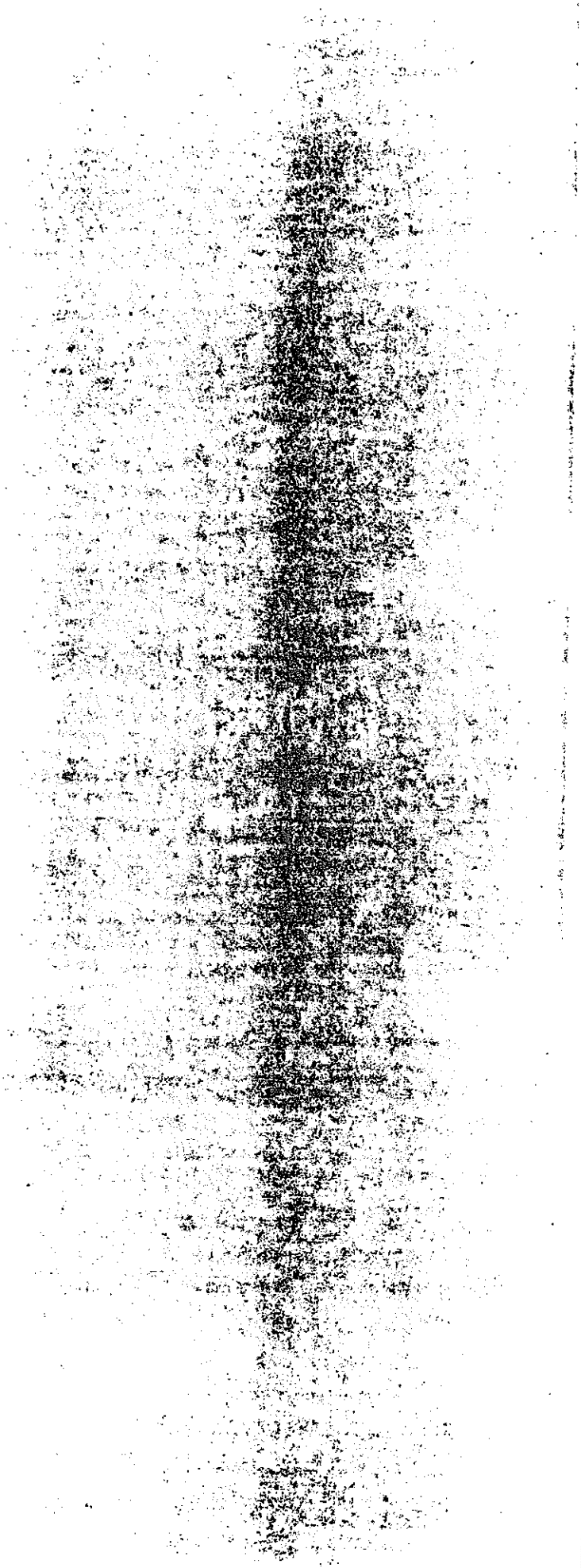
Joseph A. Sturza
Registered Washington Department of Ecology Underground Storage Tank Section Site Assessor

Attachments: Permanent Closure Checklist, Site Assessment Checklist, Tank Disposal Receipt, Photographs, Analytical Results and Chain-of-Custody Documentation.

CC: Ted Coons/J.H. Kelly, Inc.

JAS/D:\REPORT\JHK.WP

CLOSURE CHECKLIST



UNDERGROUND STORAGE TANK
Permanent Closure/Change-In-Service Checklist

The purpose of this form is to certify the proper closure/change-in-service of underground storage tank (UST) systems. These activities must be conducted in accordance with Chapter 173.360 WAC. Washington State UST rules require the tank owner or operator to notify Ecology in writing 30 days prior to closure or change-in-service of tanks. This must be done by completing the 30 Day Notice form (ECY 010-155).

This Permanent Closure Checklist shall be completed and signed by a Licensed Decommissioning Supervisor. The supervisor shall be on site when all tank permanent closure/change-in-service activities are being conducted. The firm which employs the licensed supervisor shall also be licensed by the Washington State Department of Ecology as a Service Provider. If any of the activities listed below have been supervised by a different licensed supervisor, a separate checklist must be filled out and signed by the licensed supervisor performing those activities.

For further information about completing this form, please contact the Department of Ecology UST Program.

A separate checklist must be completed for each UST system (tank and associated piping), except that UST systems at one site may be reported together by completing page 2 of this form separately for each system. The completed checklist should be mailed to the following address within 30 days of the completion of the closure or change-in-service.

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-8711

1. UST SYSTEM OWNER AND LOCATION

Site Owner/Operator: TED COONS; J.H. KELLY, INC.

Owners Address: 821 THIRD AVE (Street) (P.O. Box)

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

Telephone: (206) 423-5510

Site ID Number (on invoice or available from Ecology if tank is registered): 002053

Site/Business Name: J.H. KELLY, INC.

Site Address: 821 THIRD AVE (Street) COWLITZ (County)

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

2. TANK PERMANENT CLOSURE/CHANGE-IN-SERVICE PERFORMED BY:

Firm: PACIFIC NORTHERN ENVIRONMENTAL License Number: 5000153

Address: 1081 COLUMBIA BLVD (Street) (P.O. Box)

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

Telephone: (206) 423-2245

Licensed Supervisor: JOSEPH A. STARZA Decommissioning License Number: W001469

This page must be completed separately for each tank permanently closed (decommissioned) or change-in-service at the site. For additional tanks you may photocopy this form prior to completing.

3. TANK CLOSURE/CHANGE-IN-SERVICE INFORMATION

1. Tank ID Number (as registered with Ecology): 1-DIESEL
2. Year installed: 1982
3. Tank capacity in gallons: 4,000
4. Date of last use: 11/12/91
5. Last substance stored: DIESEL FUEL
6. Date of closure/change-in-service: 11/13/91
7. Type of closure: Closure with Tank Removal [X] In-place Closure [ ] Change-in-Service [ ]
8. If in-place closure is used, the tank has been filled with the following substance: _____
9. If change-in-service, indicate new substance stored in tank: _____
10. Local permit(s) (if any) obtained from: _____

Always contact local authorities regarding permit requirements.

11. Has a site assessment been completed? Yes [X] No [ ]

Unless an external release detection system is operating at the time of closure or change in service, and a report is provided as specified in WAC 173-360-390, a site assessment must be conducted. This site assessment must be conducted by a person registered with the Department of Ecology to perform site assessments. Results of the site assessment must be included with the Site Assessment Checklist (ECY 010-156).

4. CHECKLIST

Each item of the following checklist shall be initialed by the licensed supervisor whose signature appears below.

	Yes	No	NA*
1. Has all liquid been removed from product lines?	X		
2. Has all product piping been capped or removed?	X		
3. Have all non-product lines been capped or removed?	X		
4. Have all liquid and accumulated sludges been removed from the tank?	X		
5. Has the tank been properly purged or inerted?	X		
6. Have the drop tube, fill pipe, gauge pipe, pumps and other tank fixtures been removed?	X		
7. Have all tank openings been plugged or capped? NOTE: One plug should have 1/8 inch vent hole.	X		
8. Have all sludges removed from the tank been designated and disposed of in accordance with the state of Washington's dangerous waste regulations (Chapter 173-303 WAC)?	X		
9. If removed, was tank properly labeled and disposed of in accordance with all applicable local, state and federal regulations?	X		

*Item not applicable

I hereby certify that I have been the licensed supervisor present on site during the above listed permanent closure activities and to the best of my knowledge they have been conducted in compliance with all applicable state and federal laws, regulations and procedures pertaining to underground storage tanks.

Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

11/19/91 — Date

George A. Thorpe — Signature of Licensed Supervisor

5. ADDITIONAL REQUIRED SIGNATURES

12/3/91 — Date

John Pelp — Signature of Licensed Service Provider (firm) Owner or Authorized Representative

12/4/91 — Date

Signature of Tank Owner or Authorized Representative

This page must be completed separately for each tank permanently closed (decommissioned) or change-in-service at the site. For additional tanks you may photocopy this form prior to completing.

3. TANK CLOSURE/CHANGE-IN-SERVICE INFORMATION

1. Tank ID Number (as registered with Ecology): 2-UNLEAD GAS 2. Year installed: 1982
3. Tank capacity in gallons: 10,000 4. Date of last use: 11/12/91
5. Last substance stored: UNLEADED GASOLINE 6. Date of closure/change-in-service: 11/13/91
7. Type of closure: Closure with Tank Removal [X] In-place Closure [ ] Change-in-Service [ ]
8. If in-place closure is used, the tank has been filled with the following substance: _____
9. If change-in-service, indicate new substance stored in tank: _____
10. Local permit(s) (if any) obtained from: _____

Always contact local authorities regarding permit requirements.

11. Has a site assessment been completed? Yes [X] No [ ]

Unless an external release detection system is operating at the time of closure or change in service, and a report is provided as specified in WAC 173-360-390, a site assessment must be conducted. This site assessment must be conducted by a person registered with the Department of Ecology to perform site assessments. Results of the site assessment must be included with the Site Assessment Checklist (ECY 010-158).

4. CHECKLIST

Each item of the following checklist shall be initialed by the licensed supervisor whose signature appears below.

	Yes	No	NA*
1. Has all liquid been removed from product lines?	X		
2. Has all product piping been capped or removed?	X		
3. Have all non-product lines been capped or removed?	X		
4. Have all liquid and accumulated sludges been removed from the tank?	X		
5. Has the tank been properly purged or inerted?	X		
6. Have the drop tube, fill pipe, gauge pipe, pumps and other tank fixtures been removed?	X		
7. Have all tank openings been plugged or capped? NOTE: One plug should have 1/8 inch vent hole.	X		
8. Have all sludges removed from the tank been designated and disposed of in accordance with the state of Washington's dangerous waste regulations (Chapter 173-303 WAC)?	X		
9. If removed, was tank properly labeled and disposed of in accordance with all applicable local, state and federal regulations?	X		

*Item not applicable

I hereby certify that I have been the licensed supervisor present on site during the above listed permanent closure activities and to the best of my knowledge they have been conducted in compliance with all applicable state and federal laws, regulations and procedures pertaining to underground storage tanks.

Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

11/19/91 — Date
Joseph A. Potter — Signature of Licensed Supervisor

5. ADDITIONAL REQUIRED SIGNATURES

12/3/91 — Date
John Polk — Signature of Licensed Service Provider (firm) Owner or Authorized Representative

12/4/91 — Date
Ted Com — Signature of Tank Owner or Authorized Representative

UNDERGROUND STORAGE TANK
Site Check/Site Assessment Checklist

The purpose of this form is to certify the proper investigation of an UST site for the presence of a release. These activities shall be conducted in accordance with Chapter 173.360 WAC. A description of the various situations requiring a site check or site assessment is provided in the guidance document for UST site checks and site assessments.

This Site Check/Site Assessment Checklist shall be completed and signed by a person registered with the Department of Ecology to perform site assessments.

Two copies of the results of the site check or site assessment should be included with this checklist according to the reporting requirements in the guidance document for UST site checks and site assessments.

For further information about completing this form, please contact the Department of Ecology UST Program.

The completed checklist should be mailed to the following address:

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-8711

1. UST SYSTEM OWNER AND LOCATION

UST Owner/Operator: TED COONS ; J.H. KELLY, INC.

Owners Address: 821 3rd AVE (Street) (P.O. Box)

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

Telephone: (206) 423-5510

Site ID Number (on invoice or available from Ecology if tank is registered): 002053

Site/Business Name: J.H. KELLY, INC.

Site Address: 821 3rd AVE (Street) COWLITZ (County)

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

2. SITE CHECK/SITE ASSESSMENT CONDUCTED BY:

Registered Person: JOSEPH A. STURZA

Address: 1081 COLUMBIA BLVD (Street) (P.O. Box)

LONGVIEW (City) WA (State) 98632 (ZIP-Code)

Telephone: (206) 423-2245

3. TANK INFORMATION

1. Tank ID Number (as registered with Ecology): 2-UNLEAD GAS
2. Year installed: 1982
3. Tank capacity in gallons: 10,000
4. Last substance stored: UNLEADED GASOLINE

4. REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT

Check one:

_____ Investigate suspected release due to on-site environmental contamination

_____ Investigate suspected release due to off-site environmental contamination

_____ Extend temporary closure of UST system for more than 12 months

_____ UST system undergoing change-in-service

_____ UST system permanently closed-in-place

X UST system permanently closed with tank removed

_____ Required by Ecology or delegated agency for UST system closed before December 22, 1988

_____ Other (describe): _____

5. CHECKLIST

Each item of the following checklist shall be initialed by the person registered with the Department of Ecology whose signature appears below.

	Yes	No
1. Has the site check/site assessment been conducted according to applicable procedures specified in the UST site check/site assessment guidance issued by the Department of Ecology?	X	
2. Has a release from the UST system been confirmed? ***NOTE: Owners/operators must report all confirmed releases to the Department of Ecology or delegated agency within 24 hours.***	X	
3. Are the results of the site check/site assessment enclosed with this checklist? ***NOTE: Two copies of the site check/site assessment results must be submitted to the Department of Ecology according to the reporting requirements specified in the UST site check/site assessment guidance.***	X	

I hereby certify that I have been in responsible charge of performing the site check/site assessment described above. Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

11/19/91
Date

Joseph A. Strupp
Signature of Person Registered with Ecology

6. OWNER'S SIGNATURE

12/4/91
Date

Jerry Cam
Signature of Tank Owner or Authorized Representative

3. TANK INFORMATION

1. Tank ID Number (as registered with Ecology): 1 - DIESEL
2. Year installed: 1982
3. Tank capacity in gallons: 4,000
4. Last substance stored: DIESEL FUEL

4. REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT

Check one:

_____ Investigate suspected release due to on-site environmental contamination

_____ Investigate suspected release due to off-site environmental contamination

_____ Extend temporary closure of UST system for more than 12 months

_____ UST system undergoing change-in-service

_____ UST system permanently closed-in-place

__X__ UST system permanently closed with tank removed

_____ Required by Ecology or delegated agency for UST system closed before December 22, 1988

_____ Other (describe): _____

5. CHECKLIST

Each item of the following checklist shall be initialed by the person registered with the Department of Ecology whose signature appears below.

	Yes	No
1. Has the site check/site assessment been conducted according to applicable procedures specified in the UST site check/site assessment guidance issued by the Department of Ecology?	X	
2. Has a release from the UST system been confirmed? *NOTE: Owners/operators must report all confirmed releases to the Department of Ecology or delegated agency within 24 hours.*	X	
3. Are the results of the site check/site assessment enclosed with this checklist? *NOTE: Two copies of the site check/site assessment results must be submitted to the Department of Ecology according to the reporting requirements specified in the UST site check/site assessment guidance.*	X	

I hereby certify that I have been in responsible charge of performing the site check/site assessment described above. Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

11/19/20
Date

Signature of Person Registered with Ecology

6. OWNER'S SIGNATURE

12/4/91
Date

Signature of Tank Owner or Authorized Representative

TANK DISPOSAL RECEIPT

3177

CUSTOMER'S ORDER NO.	DEPT.	DATE
		11-14-1991

NAME Petroleum Services

ADDRESS

SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE. RETD.	PAID OUT

QUAN.		DESCRIPTION	PRICE	AMOUNT
1	1	10,000 gal tank		
1	2	4,000 gal tank		
	3			
	4			
	5			
	6	Picked up at J.H. Kelly		
	7	821 30		
	8	Longview wash		
	9			
	10			
	11			
	12	Dave Robinson		
	13			
	14			
	15			
	16			
	17			
	18			

REC'D BY

REDIFORM
5L320/01320

KEEP THIS SLIP
FOR REFERENCE

CARBONLESS

ANALYTICAL RESULTS AND CHAIN-OF-CUSTODY DOCUMENTATION

Columbia Analytical Services Inc.

November 19, 1991

Joe Sturza
Pacific Northern Environmental
1081 Columbia Blvd.
Longview, WA 98632

Re: J.H. Kelly Project

Dear Joe:

Enclosed are the results of the rush samples submitted to our lab on November 14, 1991. Preliminary results were transmitted via facsimile on November 18, 1991. For your reference, the results have been assigned our work order number K916653.

All analyses were performed in accordance with our laboratory's quality assurance program.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.

Colin Elliott

Colin B. Elliott
Senior Project Chemist

CBE/das

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Analyzed:**	11/14/91
Sample Matrix:	Soil	**Work Order #:**	K916653

Solids, Total
EPA Method Modified 160.3
Percent (%)

Sample Name	Lab Code	Result
JHK-EX1	K6653-1	90.0
JHK-EX2	K6653-2	91.7
JHK-SS1-12.5'	K6653-3	69.2
JHK-SS2-12.5'	K6653-4	73.1
JHK-SS3-12.5'	K6653-5	85.8
JHK-SS4-12.5'	K6653-6	75.5

Approved by Chris Ellis Date 11/19/91

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Pacific Northern Environmental
Project: J.H. Kelley
Sample Matrix: Soil

Date Received: 11/14/91
Date Extracted: 11/14/91
Date Analyzed: 11/15/91
Work Order #: K916653

Hydrocarbon Scan
EPA Methods 3540/Modified 8015
mg/Kg (ppm)
Dry Weight Basis

Sample Name	Lab Code	MRL	Diesel	Jet Fuel	Gasoline	Kerosene	Mineral Spirits	Oil♦
JHK-EX1	K6653-1	10	190	ND	ND	ND	ND	60
JHK-EX2	K6653-2	10	120	ND	ND	ND	ND	90
JHK-SS1-12.5'	K6653-3	10	ND	ND	ND	ND	ND	70
JHK-SS2-12.5'	K6653-4	10	ND	ND	ND	ND	ND	130
JHK-SS3-12.5'	K6653-5	10	ND	ND	ND	ND	ND	480
JHK-SS4-12.5'	K6653-6	10	ND	ND	ND	ND	ND	140
Method Blank	K6653-MB	10	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantitated using hydraulic oil as a standard. The MRL for oil is four times the listed MRL.
ND None Detected at or above the method reporting limit

Approved by Chris Elliott Date 11/19/91

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Pacific Northern Environmental
Project: J.H. Kelley
Sample Matrix: Water

Date Received: 11/14/91
Date Extracted: 11/14/91
Date Analyzed: 11/15/91
Work Order #: K916653

Hydrocarbon Scan
EPA Methods 3510/Modified 8015
µg/L (ppb)

Sample Name	Lab Code	MRL	Diesel	Jet Fuel	Gasoline	Kerosene	Mineral Spirits	Oil♦
JHK-WS1-11/13	K6653-7	*1,000	24,000	ND	130,000	ND	ND	ND
Method Blank	K6653-MB	ND	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantitated using hydraulic oil as a standard. The MRL for oil is four times the listed MRL.
* Elevated MRL because the sample required dilution.
ND None Detected at or above the method reporting limit

Approved by Alan Elliott Date 11/19/91

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Extracted:**	11/14/91
Sample Matrix:	Soil	**Work Order #:**	K916653

BTEX
EPA Methods 5030/8020
mg/Kg (ppm)
Dry Weight Basis

Sample Name:		JHK-SS1-12.5'	JHK-SS3-12.5'	Method Blank
Lab Code:		K6653-3	K6653-5	K6653-MB
Date Analyzed:		11/15/91	11/14/91	11/14/91
Analyte	**MRL**			
Benzene	0.05	1.1	0.14	ND
Toluene	0.05	*<0.1	ND	ND
Ethylbenzene	0.05	*<0.1	ND	ND
Total Xylenes	0.05	*<0.1	0.07	ND

MRL Method Reporting Limit
ND None Detected at or above the method reporting limit
* Elevated MRL because of the low percent solids in the sample as received.

Approved by Chris Elliott Date 11/19/91

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Pacific Northern Environmental
Project: J.H. Kelley
Sample Matrix: Water

Date Received: 11/14/91
Work Order #: K916653

BTEX
EPA Methods 5030/8020
µg/L (ppb)

Sample Name:		JHK-WS1-11/13	Method Blank
Lab Code:		K6653-7	K6653-MB
Date Analyzed:		11/15/91	11/14/91
Analyte	**MRL**		
Benzene	0.5	4,100	ND
Toluene	1	18,000	ND
Ethylbenzene	1	5,300	ND
Total Xylenes	1	32,000	ND

MRL Method Reporting Limit
ND None Detected at or above the method reporting limit

Approved by John Elliott Date 11/19/91

APPENDIX A

LABORATORY QC RESULTS

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Extracted:**	11/14/91
Sample Matrix:	Soil	**Date Analyzed:**	11/15/91
		Work Order #:	K916653

QA/QC Report
Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3540/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHK-EX1	K6653-1	76.0
JHK-EX2	K6653-2	76.0
JHK-SS1-12.5'	K6653-3	76.7
JHK-SS2-12.5'	K6653-4	74.6
JHK-SS3-12.5'	K6653-5	86.4
JHK-SS4-12.5'	K6653-6	75.4
Method Blank	K6653-MB	92.3
	CAS Acceptance Criteria	64-123

Approved by Colin Elliott Date 11/19/91

00007

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Extracted:**	11/14/91
Sample Matrix:	Water	**Date Analyzed:**	11/15/91
		Work Order #:	K916653

QA/QC Report
Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHK-WS1-11/13	K6653-7	89.0
Method Blank	K6653-MB	89.5
	CAS Acceptance Criteria	66-120

Approved by Glenn Elliott Date 11/19/91

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Extracted:**	11/14/91
Sample Matrix:	Soil	**Date Analyzed:**	11/14,15/91
		Work Order #:	K916653

QA/QC Report
Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK-SS1-12.5'	K6653-3	87.5
JHK-SS3-12.5'	K6653-5	88.5
Method Blank	K6653-MB	95.0
	CAS Acceptance Criteria	50-130

Approved by Alan Ellwitt Date 11/19/91

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Pacific Northern Environmental	**Date Received:**	11/14/91
Project:	J.H. Kelley	**Date Analyzed:**	11/14,15/91
Sample Matrix:	Water	**Work Order #:**	K916653

QA/QC Report
Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK-WS1-11/13	K6653-7	83.6
Method Blank	K6653-MB	95.7
	CAS Acceptance Criteria	60-120

Approved by Chris Elliott Date 11/19/91

Analytical Services, Inc.
1317 South 13th Ave. • Kelso, WA 98626 • (206) 577-7222, FAX (206) 636-1068

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

DATE 11/13/91 PAGE 1 OF 1

PROJECT NAME J.H. KELLY #
PROJECT MNGR JOSEPH A. STURZA
COMPANY/ADDRESS 1081 COLUMBIA BLVD.
LONGVIEW, WA / PACIFIC NORTHERN
ENVIRONMENTAL PHONE 423-2245
SAMPLERS SIGNATURE Joseph A. Sturza

	SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	TPH-HCID	TCLP Metals ☐ VOA ☐ Semi ☐ Pest/ Metals (total or dissolved) List Below ☐ VOA ☐ Herb ☐	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3 (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020	REMARKS
✓	JHK-EX1	11/13/91	1515		SOIL	1	X						
✓	JHK-EX2	11/13/91	1456		SOIL	1	X						
✓	JHK-SS1-12.5'	11/13/91	1707		SOIL	1	X						
✓	JHK-SS2-12.5'	11/13/91	1712		SOIL	1	X						
✓	JHK-SS3-12.5'	11/13/91	1717		SOIL	1	X						
✓	JHK-SS4-12.5'	11/13/91	1722		SOIL	1	X						
✓	JHK-WS1-11/13	11/13/91	1657		WATER	4	X						

ANALYSIS REQUESTED: Base/Neu/Acid Organics GC/MS 625/8270; Volatile Organics GC/MS 624/8240; Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐; Pesticides/PCBs 608/8080; Total Petroleum Hydrocarbons EPA 418.1 ☐ Oregon 418.1 ☐; TPH/Gas-BTEX 5030/8015/8020 Gas ☐ BTEX ☒; TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☒

RELINQUISHED BY:
Signature: Joseph A. Sturza
Printed Name: JOSEPH A. STURZA
Firm: PNE
Date/Time: 11/14/91 0840

RECEIVED BY:
Signature: Ruth Allison
Printed Name: Ruth Allison
Firm: CAS
Date/Time: 11/14/91 0840

RELINQUISHED BY:
Signature
Printed Name
Firm
Date/Time

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

TURNAROUND REQUIREMENTS:
___ 24 hr X 48 hr ___ 5 day
___ Standard (~ 10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX Preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
___ I. Routine Report
___ II. Report (includes DUP, MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O. # ___
Bill to: ___

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No.: ___

SPECIAL INSTRUCTIONS/COMMENTS:
48-HOUR AS PAE-ARRANGED

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

Columbia Analytical Services INC.

December 2, 1991

John Polk
Pacific Northern Environmental
1081 Columbia Blvd.
Longview, WA 98632

Re: J. H. Kelly, Inc. Project

Dear John:

Enclosed are the results of the rush samples submitted to our lab on November 22, 1991. Preliminary results were transmitted via facsimile on November 26, 1991. For your reference, the results have been assigned our work order number K916850.

All analyses were performed in accordance with our laboratory's quality assurance program.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.

Colin B. Elliott
Senior Project Chemist

CBE/tlt

17 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Pacific Northern Environmental
Project: J. H. Kelly, Inc.
Sample Matrix: Soil

Date Received: 11/22/91
Date Extracted: 11/25/91
Date Analyzed: 11/26/91
Work Order #: K916850

Hydrocarbon Scan
EPA Methods 3540/Modified 8015
mg/Kg (ppm)
Dry Weight Basis

Sample Name	Lab Code	MRL	Diesel	Jet Fuel	Gasoline	Kerosene	Mineral Spirits	Oil♦
JHK-EX3	K6850-1	10	120	ND	ND	ND	ND	120
JHK-SS5-12.5'	K6850-2	10	ND	ND	ND	ND	ND	70
Method Blank	K6850-MB	10	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantitated using hydraulic oil as a standard. The MRL for oil is four times the listed MRL.
ND None Detected at or above the method reporting limit

Approved by Chris Ellenberg Date 12/03/91

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Pacific Northern Environmental	**Date Received:**	11/22/91
Project:	J. H. Kelly, Inc.	**Date Extracted:**	11/22/91
Sample Matrix:	Soil	**Work Order #:**	K916850

BTEX
EPA Methods 5030/8020
mg/Kg (ppm)
Dry Weight Basis

Sample Name:		JHK-SS6-12.5'	Method Blank
Lab Code:		K6850-3	K6850-MB
Date Analyzed:		11/23/91	11/22/91
Analyte	**MRL**		
Benzene	0.05	*<0.1	ND
Toluene	0.05	*<0.1	ND
Ethylbenzene	0.05	*<0.1	ND
Total Xylenes	0.05	*<0.1	ND

MRL Method Reporting Limit
***** Elevated MRL because of the low percent solids in the sample as received.
ND None Detected at or above the method reporting limit

Approved by Chris Ellicott Date 12/03/91

APPENDIX A

LABORATORY QC RESULTS

COLUMBIA ANALYTICAL SERVICES, INC.

Client: Pacific Northern Environmental
Project: J. H. Kelly, Inc.
Sample Matrix: Soil

Date Received: 11/22/91
Date Extracted: 11/25/91
Date Analyzed: 11/26/91
Work Order #: K916850

QA/QC Report
Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3540/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHK-EX3	K6850-1	70.0
JHK-SS5-12.5'	K6850-2	75.1
Method Blank	K6850-MB	80.7
	CAS Acceptance Criteria	64-123

Approved by Colin Elliott Date 12/03/91

SITE ASSESSMENT CHECKLIST

COLUMBIA ANALYTICAL SERVICES, INC.

Client: Pacific Northern Environmental
Project: J. H. Kelly, Inc.
Sample Matrix: Soil

Date Received: 11/22/91
Date Extracted: 11/22/91
Date Analyzed: 11/22,23/91
Work Order #: K916850

QA/QC Report
Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK-SS6-12.5'	K6850-3	98.5
Method Blank	K6850-MB	100
	CAS Acceptance Criteria	50-130

Approved by Chris Elliott Date 12/03/91

Analytical Services inc.
1317 South 13th Ave. • Kelso, WA 98626 • (206) 577-7222, FAX (206) 636-1068

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

DATE 11/22/91 PAGE 1 OF 1

PROJECT NAME J.H. KELLY, INC.
PROJECT MNGR JOSEPH A. STURZA
COMPANY/ADDRESS PACIFIC NORTHERN ENVIRO
1081 COLUMBIA BLVD.
LONGVIEW, WA 98632 PHONE 423-2245
SAMPLERS SIGNATURE Joseph A. Sturza

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	TPH/Gas/BTEX(5030/8015/8020 Gas ☐ BTEX ☒	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☒	REMARKS
JHK-EX3	11/22/91	0908		SOIL	1	X	X	✓
JHK-SSS-12.5'	11/22/91	0935		SOIL	1	X	X	✓
JHK-SSC-12.5'	11/22/91	1038		SOIL	1	X	X	✓

ANALYSIS REQUESTED

Base/Neu/Acid Organics GC/MS 625/8270 ☐
Volatile Organics GC/MS 624/8240 ☐
Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐
Pesticides/PCBs 608/8080 ☐
Total Petroleum Hydrocarbons EPA 418.1 ☐ Oregon 418.1 ☐
TPH-HCID ☐
TCLP Metals ☐ VOA ☐ Semi ☐ Pest/ ☐ Herb ☐
Metals (total or dissolved) List Below ☐
Organics ☐
pH, Cond, Cl, SO_4, PO_4, F, Br, NO_2, NO_3 (circle) ☐
NH_3-N, COD, Total-P, TKN, TOC (circle) ☐
Total Organic Halides (TOX) 9020 ☐

RELINQUISHED BY:
Signature Joseph A. Sturza
Printed Name JOSEPH A. STURZA
Firm PNE
Date/Time 11/22/91 1106

RECEIVED BY:
Signature Ruth Allison
Printed Name Ruth Allison
Firm CAS
Date/Time 11/22/91 1100

RELINQUISHED BY:
Signature
Printed Name
Firm
Date/Time

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

TURNAROUND REQUIREMENTS:
___ 24 hr X 48 hr ___ 5 day
___ Standard (~ 10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX Preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
___ I. Routine Report
___ II. Report (Includes DUP, MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O. # ___
Bill to: ___

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No.: ___

SPECIAL INSTRUCTIONS/COMMENTS:
48-HOUR AS PRE-ARRANGED.

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

Section 6

Section 6.A

CHRISTINE O. GREGOIRE
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2353

November 20, 1991

Mr. Ted Coons
J. H. Kelly, Inc.
821 3rd Avenue
Longview, WA 98632

Re: Requirements for Reporting Environmental Conditions at LUST Contaminated Sites

Dear Mr. Coons:

Thank you for reporting contamination resulting from a Leaking Underground Storage Tank (LUST) at J. H. Kelly, Inc., 821 3rd Avenue, Longview, WA 98632, to the Department of Ecology (Ecology). Your report was required under Chapter 173-340 Washington Administrative Code (WAC) adopted under the authority of the Model Toxics Control Act [Chapter 70.105D Revised Code of Washington (RCW)] or Initiative 97. The purpose of this letter is to outline the remaining requirements, with which you must comply, in order to satisfy the regulation. For your reference, a copy of the appropriate part (section -450) of the regulation is enclosed. It can be found in Appendix B (page 78) of the enclosed document, "Guidance for Remediation of Releases from Underground Storage Tanks." I apologize for the technical nature of this letter, but it is necessary in order to provide you a complete picture of what must be done in the near future at your site in order to meet the requirements of the regulation.

Cooperation with Ecology

The Model Toxics Control Act (MTCA) encourages all investigations and cleanups which are protective of human health and the environment. It is the policy of Ecology to work cooperatively with potentially liable persons (PLPs) to accomplish prompt and effective cleanups. Cooperating with Ecology in planning or conducting a remedial action is not an admission of guilt or liability. Ecology's ability to work closely with the many contaminated sites of which we are aware, is very limited.

The MTCA specifies two methods by which cleanups can occur. These are:

1) an independent cleanup with little or no oversight from Ecology, or

2) an investigation and cleanup with regulatory and technical oversight and review.

Section 6.B

J.H. KELLY, INC.

1-17-92

Patricia L. Martin
LUST Site Manager
Department of Ecology
7272 Cleanwater Lane, LU-11
Olympia, WA 98504-6811

As per our discussion on December 16, 1991, I am enclosing some information on our monitoring well in the UST removal area. Our engineer's sketch will show you how the work was done. The work was done the week of November 22, 1991.

Our last water sample was taken December 10, 1991, by Jeff Wilson of Cowlitz Clean Sweep. Enclosed are the results of that test. As you can see things are tremendously improved from prior findings.

As you suggested we will take water samples next quarter and I will send you the results. I'm sure the next sample will be within the limits.

If you have any questions, Please call me at (206)423-5510.

Sincerely,

Ted Coons

Ted Coons
J.H. Kelly, Inc.

TC/cc
Enclosure

Columbia Analytical Services inc.

December 20, 1991

Jeff Wilson
Cowlitz Clean Sweep
340-C Oregon Way
Longview, WA 98632

Re: J.H. Kelly/Project #Well

Dear Jeff:

Enclosed are the results of the sample submitted to our lab on December 10, 1991. Preliminary results were transmitted via facsimile on December 12, 1991. For your reference, these analyses have been assigned our work order number K917231.

All analyses were performed in accordance with our laboratory's quality assurance program.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.

Colin B. Elliott
Senior Project Chemist

CBE/das

17 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Cowlitz Clean Sweep	**Date Received:**	12/10/91
Project:	J.H. Kelly/#Well	**Date Extracted:**	12/10/91
Sample Matrix:	Water	**Date Analyzed:**	12/11/91
		Work Order #:	K917231

Hydrocarbon Scan
EPA Methods 3510/Modified 8015
µg/L (ppb)

Sample Name	Lab Code	MRL	Diesel	Jet Fuel	Gasoline	Kerosene	Mineral Spirits	Oil♦
JHKWS #2	K7231-1	50	ND	ND	1,010	ND	ND	3,340
Method Blank	K7231-MB	50	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantitated using hydraulic oil as a standard. The MRL for oil is four times the listed MRL.
ND None Detected at or above the method reporting limit

Approved by Colin Ellwitt Date 12/20/91

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: J.H. Kelly/#Well
Sample Matrix: Water

Date Received: 12/10/91
Work Order #: K917231

BTEX
EPA Methods 5030/8020
µg/L (ppb)

Sample Name:		JHKWS #2	Method Blank
Lab Code:		K7231-1	K7231-MB
Date Analyzed:		12/11/91	12/11/91
Analyte	**MRL**		
Benzene	0.5	30	ND
Toluene	1	30	ND
Ethylbenzene	1	16	ND
Total Xylenes	1	200	ND

MRL Method Reporting Limit
ND None Detected at or above the method reporting limit

Approved by Colin Elliott Date 12/30/91

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Cowlitz Clean Sweep	**Date Received:**	12/10/91
Project:	J.H. Kelly/#Well	**Date Extracted:**	12/10/91
Sample Matrix:	Water	**Date Analyzed:**	12/11/91
		Work Order #:	K917231

QA/QC Report
Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHKWS #2	K7231-1	*176
Method Blank	K7231-MB	88.6
	CAS Acceptance Criteria	66-120

* Outside acceptance limits because of matrix interferences. The gas chromatogram showed target components that interfered with the analysis. The sample was not reanalyzed.

Approved by Glenn E Clatt Date 12/20/91

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Cowlitz Clean Sweep	**Date Received:**	12/10/91
Project:	J.H. Kelly/#Well	**Date Analyzed:**	12/11/91
Sample Matrix:	Water	**Work Order #:**	K917231

QA/QC Report
Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHKWS #2	K7231-1	98.7
Method Blank	K7231-MB	99.1
	CAS Acceptance Criteria	60-120

Approved by Alan Elliott Date 12/20/91

17 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

Columbia Analytical Services, Inc.

K 7231

Chain of Custody/ Laboratory Analysis Request

1317 South 13th Avenue • Kelso, WA 98626 • 206/577-7222, Fax 206/636-1068

DATE 12-10-91 PAGE 1 OF 1

PROJECT J. H. Kelly # well

SEND REPORT TO Jeff Wilson 340 Oregon Way #C

ADDRESS Longview, WA.

TELEPHONE# 423-6316

SAMPLERS NAME Jeff Wilson PHONE# 423-6316

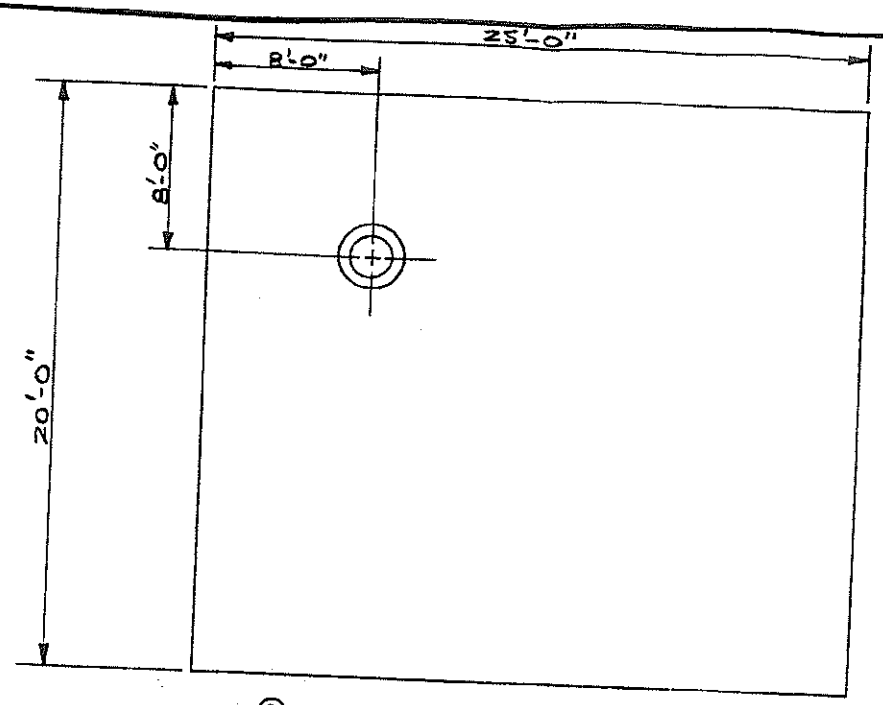
SAMPLERS SIGNATURE Jeff Wilson

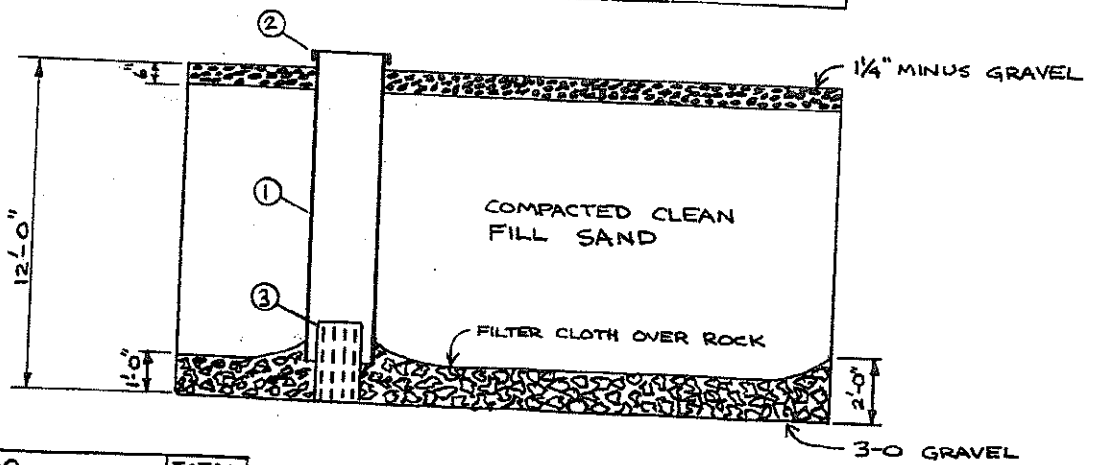
SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated Volatiles 601/8010	Aromatic Volatiles 602/8020 BTEX	Gas/BTEX MOD 8015/8020	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons - Mod 8015	Total Petroleum Hydrocarbons - 418.1	Total Organic Halides (TOX) 9020	Total Organic Carbon (TOC) 415/9060	EPTOX Metals As, Ba, Cd, Cr, Pb, Hg, Se, Ag	Metals (total or dissolved) List Below	Cyanide	Ph, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3, (Circle)	NH_3-N, COD, Total-P, TKN (Circle)	Coliform (Circle) Total, Fecal				NUMBER OF CONTAINERS
1. JHKWS #2	12-10	2:00		Water				X			X													
2.																								
3.																								
4.																								
5.																								
6.																								
7.																								
8.																								

ORGANIC ANALYSIS | INORGANIC ANALYSIS | OTHER

Relinquished By: J. Wilson	Relinquished By	Invoice Information: P.O.#	Project Information Site Contact:
Signature: Jeff Wilson	Signature	Bill to:	Site Address:
Printed Name: CCS	Printed Name		
Firm: CCS	Firm		
Date/Time	Date/Time		
Received By: Lori K. Hann	Received By:	Special Instruction/Comments: Bill to: J. H. Kelly Attn. Ted 821 3rd. Longview, Wa. 98632 48 hr. RUSH!	Sample Receipt Shipped Via: Seals Intact: Condition: Lab No. SR Number:
Signature: Lori K. Hann	Signature		
Printed Name: CAS	Printed Name		
Firm: 12/10/91 2:35	Firm		
Date/Time	Date/Time		

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator.





ITEM	QTY	SIZE	DESCRIPTION
1	1	30"	C/S SOLID CASING
2	1	30"	C/S REMOVABLE ⌀ CAP
3	1	24"	PVC SLOTTED CASING

SPECIFICATION:
PIPE:
FTTGS:
FLGS:
GSKTS:

REF. DWGS.:

J. H. KELLY, INC.
821 3rd AVE, LONGVIEW, WA.
COST CODE:
LINE NO: GROUND WATER MONITOR STATION

* INCL. 3" F.A.	SPOOL NO.	TOTAL

REV	DESCRIPTION	DATE	DRN	DATE	ISO NUMBER	REV
0	ISSUED FOR CONSTRUCTION		DJP	1-10-92	92 - 001	0

Section 6.C

J.H. KELLY, INC.

June 3, 1992

Patricia L. Martin
LUST Site Manager
Department of Ecology
7272 Cleanwater Lane, LU-11
Olympia, WA 98504-6811

Dear Patricia

As per your suggestion, I am enclosing more information on our monitoring well in the UST removal area.

This last water sample was taken May 14, 1992, by Jeff Wilson of Cowlitz Clean Sweep. Enclosed are the results of that test. As you can see things are improved from our last findings on December 10, 1991.

We will take water samples again next quarter and will send you the results.

If you have any questions, Please call me at (206)423-5510.

Sincerely,

J.H. Kelly, Inc.

Ted Coons

Ted Coons
Senior Manager Equipment & Facilities

TC/cc
Enclosure

821 3RD. AVENUE • BOX 2038 • LONGVIEW, WA 98632 (206) 423-5510 • FAX (206) 423-9170
CONTRACTOR NO. JHKELI *188PD

Columbia Analytical Services inc.

May 29, 1992

Jeff Wilson
Cowlitz Clean Sweep
340-C Oregon Way
Longview, WA 98632

Re: J.H. Kelly/Well Project

Dear Jeff:

Enclosed are the results of the sample submitted to our lab on May 14, 1992. For your reference, these analyses have been assigned our work order number K923114.

All analyses were performed in accordance with our laboratory's quality assurance program.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.

Colin Elliott

Colin B. Elliott
Senior Project Chemist

CBE/tlt

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Cowlitz Clean Sweep	**Date Received:**	05/14/92
Project:	J.H. Kelly/Well	**Date Extracted:**	05/16/92
Sample Matrix:	Water	**Date Analyzed:**	05/19/92
		Work Order No.:	K923114

Hydrocarbon Scan
EPA Methods 3510/Modified 8015
µg/L (ppb)

Sample Name	Lab Code	MRL	Gasoline	Mineral Spirits	Jet Fuel	Kerosene	Diesel	Other♦
JHK WS#3	K3114-1	50	ND	ND	ND	ND	ND	ND
Method Blank	K3114-MB	50	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit
♦ Quantified using 30-weight motor oil as a standard. The MRL is 200 µg/L.
ND None Detected at or above the method reporting limit

Approved by Alan Elliott Date 6/1/92

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: J.H. Kelly/Well
Sample Matrix: Water

Date Received: 05/14/92
Work Order No.: K923114

BTEX
EPA Methods 5030/8020
µg/L (ppb)

Sample Name:		JHK WS#3	Method Blank
Lab Code:		K3114-1	K3114-MB
Date Analyzed:		05/19/92	05/19/92
Analyte	**MRL**		
Benzene	0.5	11.1	ND
Toluene	1	ND	ND
Ethylbenzene	1	12	ND
Total Xylenes	1	37	ND

MRL Method Reporting Limit
ND None Detected at or above the method reporting limit

Approved by Colin Elliott Date 6/1/92

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

APPENDIX A

LABORATORY QC RESULTS

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Cowlitz Clean Sweep	**Date Received:**	05/14/92
Project:	J.H. Kelly/Well	**Date Extracted:**	05/16/92
Sample Matrix:	Water	**Date Analyzed:**	05/19/92
		Work Order No.:	K923114

Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/Modified 8015

Sample Name	Lab Code	Percent Recovery *p*-Terphenyl
JHK WS#3	K3114-1	73
Method Blank	K3114-MB	79
	CAS Acceptance Criteria	36-124

Approved by Adm. Ellwitt Date 6/1/92

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Cowlitz Clean Sweep	**Date Received:**	05/14/92
Project:	J.H. Kelly/Well	**Date Analyzed:**	05/19/92
Sample Matrix:	Water	**Work Order No.:**	K923114

Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK WS#3	K3114-1	98
Method Blank	K3114-MB	100
	CAS Acceptance Criteria	59-139

Approved by John Elliott Date 6/1/92

Columbia Analytical Services Inc.

Chain of Custody/ Laboratory Analysis Request

1317 South 13th Avenue • Kelso, WA 98626 • 206/577-7222, Fax 206/636-1068

DATE 5-14-92 PAGE 1 OF 1

PROJECT J. H. Kelly # well
SEND REPORT TO Jeff Wilson / 340 Oregon WAY #C
ADDRESS Longview, WA.
TELEPHONE# 423-6316
SAMPLERS NAME Jeff Wilson PHONE# 423-6316
SAMPLERS SIGNATURE [signature]

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	ORGANIC ANALYSIS: Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated Volatiles 601/8010	Aromatic Volatiles 602/8020 BTEX	Gas/BTEX MOD 8015/8020	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons - Mod 8015	Total Petroleum Hydrocarbons - 418.1	Total Organic Halides (TOX) 9020	Total Organic Carbon (TOC) 415/9060	INORGANIC ANALYSIS: EPTOX Metals As, Ba, Cd, Cr, Pb, Hg, Se, Ag	Metals (total or dissolved) List Below	Cyanide	OTHER: Ph, Cond, Cl, SO4, PO4, F, Br NO2, NO3 (Circle)	NH3-N, COD, Total-P, TKN (Circle)	Coliform (Circle) Total, Fecal				NUMBER OF CONTAINERS
1. JHK WS #3	5-14	9:15	K3114-1	water				X			X													
2.																								
3.																								
4.																								
5.																								
6.																								
7.																								
8.																								

Relinquished By	Relinquished By
J. Wilson	
Signature [signature]	Signature
Printed Name CCS	Printed Name
Firm CCS	Firm
Date/Time	Date/Time
Received By: Ruth Allison	Received By:
Signature Ruth Allison	Signature
Printed Name CAS	Printed Name
Firm 5/14/92 0950	Firm
Date/Time	Date/Time

Invoice Information:
P.O.#
Bill to:

Project Information
Site Contact:
Site Address:

Sample Receipt
Shipped Via:
Seals Intact:
Condition:
Lab No.
SR Number:

Special Instruction/Comments: Bill to;
J. H. Kelly Attn. Ted
821 3rd. Ave
Longview, WA. 98632

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator.

Section 6.D

J.H. KELLY, INC.

July 16, 1993

Patricia L. Martin
LUST Site Manager
DEPARTMENT OF ECOLOGY
7272 Cleanwater Lane, LU-11
Olympia, WA 98504-6811

Dear Patricia:

Enclosed are results from the last water sample taken 6-30-93 by Jeff Wilson of Cowlitz Clean Sweep. Again a dramatic improvement from our last tests. We feel the levels are well within acceptable limits and we are not in violation.

In view of the latest findings, I see no reason to continue monitoring the well. I would like you to give us a clean bill of health on this matter.

Sincerely,

J.H. KELLY, INC.

Ted Coons
Senior Manger
Equipment & Facilities

TC/bb

Enclosure

821 3RD. AVENUE • BOX 2038 • LONGVIEW, WA 98632 (206) 423-5510 • FAX (206) 423-9170
CONTRACTOR NO. JHKELI *188PD WE ARE AN EQUAL OPPORTUNITY EMPLOYER

Columbia Analytical Services, Inc.

July 12, 1993

Service Request No.: K933755

Jeff Wilson
Cowlitz Clean Sweep
340-C Oregon Way
Longview, WA 98632

Re: J. H. Kelly/2nd Qtr. Project

Dear Jeff:

Enclosed are the results of the sample submitted to our laboratory on June 30, 1993. For your reference, these analyses have been assigned our service request number K933755.

All analyses were performed consistent with our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 243.

Respectfully submitted,

Columbia Analytical Services, Inc.

Eileen M Arnold

Eileen M. Arnold
Project Chemist

EMA/sam

317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1066

COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: JH Kelly/#2nd Qtr.
Sample Matrix: Water

Date Collected: 6/30/93
Date Received: 6/30/93
Date Extracted: 7/2/93
Service Request: K933755

Hydrocarbon Scan
EPA Methods 3510/Modified 8015
µg/L (ppb)

Sample Name	Lab Code	Date Analyzed	Analyte	Gasoline	Mineral Spirits	Kerosene	Jet Fuel	Diesel	Other*
			MRL	50	50	50	50	50	200
MW #1	K3755-1(a)	7/7/93		ND	ND	ND	ND	270000(b)	6000
Method Blank	K3755-MB	7/6/93		ND	ND	ND	ND	ND	ND

a MRL for this sample is 20 times that reported above due to sample requiring dilution.
b Quantified as diesel. The sample contained components that eluted in the diesel range, but the chromatogram did not match the typical diesel fingerprint.

Approved By _____ Date 7/12/93

W37558.XLS/7/8/93

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: JH Kelly/#2nd Qtr.
Sample Matrix: Water

Date Collected: 6/30/93
Date Received: 6/30/93
Date Extracted: NA
Service Request: K933755

BTEX
EPA Methods 5030/8020
µg/L (ppb)

Sample Name	Lab Code	Date Analyzed	Analyte	Benzene	Toluene	Ethyl-benzene	Total Xylenes
			MRL	0.5	1	1	1
MW #1	K3755-1	7/3/93		3.7	ND	1	1
Method Blank	K3755-MB	7/3/93		ND	ND	ND	ND

Approved By Eileen M Arnold Date 7/12/93

W3755B.XLS/7/7/93

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Cowlitz Clean Sweep	**Date Collected:**	6/30/93
Project:	JH Kelly/#2nd Qtr.	**Date Received:**	6/30/93
Sample Matrix:	Water	**Date Extracted:**	NA
		Date Analyzed:	7/3/93
		Service Request:	K933755

Surrogate Recovery Summary
Total Petroleum Hydrocarbons as Gasoline
EPA Methods 5030/Washington DOE Method WTPH-G

Sample Name	Lab Code	Spike Level µg/L (ppb)	Percent Recovery 4-Bromofluorobenzene
MW #1	K3755-1	50	92
Method Blank	K3755-MB	50	91

CAS Acceptance Limits: 59-139

Approved By Erika M Arner Date 7/12/93

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Cowlitz Clean Sweep
Project: JH Kelly/#2nd Qtr.
Sample Matrix: Water

Date Collected: 6/30/93
Date Received: 6/30/93
Date Extracted: 7/2/93
Date Analyzed: 7/6,7/93
Service Request: K933755

Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/Modified 8015

Sample Name	Lab Code	Spike Level µg/L (ppb)	Percent Recovery o-Terphenyl
MW #1	K3755-1	550	79
Method Blank	K3755-MB	500	89

CAS Acceptance Limits: 36-124

Approved By Eileen M Aurer Date 7/12/93

W37558R.XLS/7/8/93

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Cowlitz Clean Sweep
Project: JH Kelly/#2nd Qtr.
Sample Matrix: Water

Date Collected: 6/30/93
Date Received: 6/30/93
Date Extracted: NA
Date Analyzed: 7/3/93
Service Request: K933755

Surrogate Recovery Summary
BTEX
EPA Methods 5030/8020

Sample Name	Lab Code	Spike Level µg/L (ppb)	Percent Recovery 4-Bromofluorobenzene
MW #1	K3755-1	50	91
Method Blank	K3755-MB	50	90

CAS Acceptance Limits: 59-139

Approved By Eileen M Arnold Date 7/12/93

W3755BR.XLS/7/7/93

60009

Columbia Analytical Services Inc.

1317 South 13th Avenue • Kelso, WA 98626 • 206/577-7222, Fax 206/636-1068

Chain of Custody/ Laboratory Analysis Request

DATE 6-30-93 PAGE 1 OF 1

PROJECT JH Kelly # 2nd Qtr.

SEND REPORT TO Jeff Wilson

ADDRESS 340 Oregon Way - Longv.

TELEPHONE# 423-6316

SAMPLERS NAME Jeff Wilson PHONE# 423-6316

SAMPLERS SIGNATURE Jeff Wilson

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated Volatiles 601/8010	Aromatic Volatiles 602/8020 BTEX	Gas/BTEX MOD 8015/8020	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons - Mod 8015	Total Petroleum Hydrocarbons - 418.1	Total Organic Halides (TOX) 9020	Total Organic Carbon (TOC) 415/9060	EPTOX Metals As, Ba, Cd, Cr, Pb, Hg, Se, Ag	Metals (total or dissolved) List Below	Cyanide	Ph, Cond, Cl, SO4, PO4, F, Br NO3, NO3, (Circle)	NH3-N, COD, Total-P, TKN (Circle)	Coliform (Circle) Total, Fecal				NUMBER OF CONTAINERS
1. MW #1	6/30	9:40		Water					X		X													1
2.																								
3.																								
4.																								
5.																								
6.																								
7.																								
8.																								

Relinquished By	Jeff Wilson	Relinquished By
Signature	Jeff Wilson	Signature
Printed Name	J Wilson CCS	Printed Name
Firm	CCS	Firm
Date/Time	6-30-93 10:00	Date/Time
Received By:	Keith Allison	Received By:
Signature	Keith Allison	Signature
Printed Name	KA	Printed Name
Firm	6/30 3 1000	Firm
Date/Time		Date/Time

Invoice Information:

P.O.#

Bill to:

Project Information

Site Contact:

Site Address:

Sample Receipt

Shipped Via:

Seals Intact:

Condition:

K93-3755

Lab No.

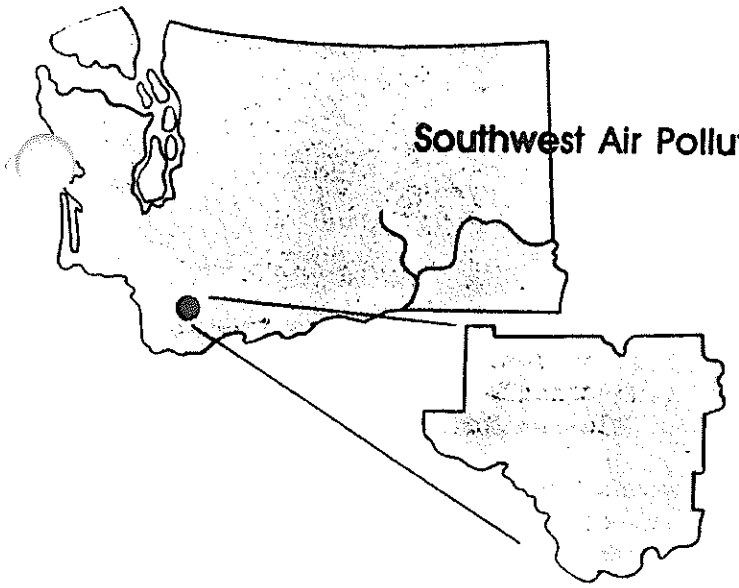
SR Number:

Special Instruction/Comments:

Bill to:

JH Kelly
Attn. Ted Coons
821 3rd.
Longview, WA. 98632

Section 7



Southwest Air Pollution Control Authority

1308 N.E. 134TH. ST., SUITE D
VANCOUVER, WA 98685-2747
Vancouver (206) 574-3058
Fax (206) 576-0925
1-(800) 633-0709

November 25, 1991

JERRY STRAWN NOTIFIED BY PHONE 12-4-91 @ 4:45 P.m. STOCKPILE IS CLEAN SOIL IS CLEAN HE WILL TAKE CARE OF PAPERWORK

Ted Coons
J. H. Kelly, Inc.
821 3rd Avenue
Longview, WA 98632

Dear Mr. Coons:

The Southwest Air Pollution Control Authority has received notice from the Washington Department of Ecology concerning soil contamination due to leaking underground storage tanks under your control at J. H. Kelly, Inc., 821 3rd Ave., Longview, Washington.

The purpose of this letter is to inform and advise you of this Agency's requirements concerning the remediation of petroleum contaminated soils. Under RCW 70.94, the Washington Clean Air Act, this Agency is charged with regulating air pollution sources within the counties of Clark, Cowlitz, Lewis, Skamania and Wahkiakum.

Prior to the commencement of the remediation of contaminated soils you, or your agent, must submit an Application for Approval/Notice of Construction which details your proposal for reducing the contaminant level in the soil to levels set by the Department of Ecology as outlined in their correspondence to you regarding this matter.

There are a number of options open to you for treating the soil to reduce the level of contaminants. Some of these options were listed in the above referenced letter which you received from the Department of Ecology. You are not limited to these options exclusively. You are not however allowed to reduce the contaminant level through open aeration. Open aeration involves spreading the contaminated soil in a thin layer allowing the contaminants to volatilize or evaporate into the air. Doing so is a violation of this Agency's Regulations for which civil penalties are assessed. It is the Agency's requirement that the contaminated soil remain covered with an impermeable layer, such as plastic sheeting, before and during the remediation/clean-up process to

Section 8

AUGUST 13, 1993

REVIEW FOR LUST SI...
Table FOR LUST ON...

Independent Remedial Action Report Summary

This report summary is an important part of the Independent Remedial Action Report. Please complete the summary and submit it with your Independent Remedial Action Report. If this document does not accompany your cleanup report, or if it is not fully completed, your report cannot enter the review process necessary for Ecology to provide you with a "no further action" determination, or to remove your site from the hazardous sites lists.

FOR ECOLOGY USE ONLY			
ERTS No.	TCP LD. No.	Date Received	☐ HFA ☐ SHA Referral ☐ Interim Action ☐ Emergency Action
Reviewed by		Initial Investigation (Date)	

PLEASE PRINT CLEARLY OR TYPE

Complete all of the following:

GENERAL INFORMATION

Name of Site Owner Dan Evans/Terry Major	Phone (206)425-9098/(206)425-6975
Address 2415 Park Hill Dr.; Longview, WA 98632/1322 River Rd.; Longview, WA 98632	
Authorized Contact Terry Major	Phone (206) 423-5510
Name of Facility Operator Dan Evans/Terry Major	Phone (206) 423-5510
Address 821 3rd Avenue; Longview, WA 98632 (P.O. Box 2038)	
Authorized Contact Ted Coons	Phone (206) 423-5510
Name of Consultant John Jabusch	Phone (206) 423-2245
Name of Firm Pacific Northern Environmental	
Address 1081 Columbia Blvd.; Longview, WA 98632	

Please indicate which of the above persons completed this report. If the report was completed by someone other than listed above, please provide their name, address, and a daytime phone.

Ted Coons
Senior Manager Equipment/Facilities
J.H. Kelly, Inc.

REPORT INFORMATION

Type of Report (*check one*)	Is this a Leaking Underground Storage Tank (LUST) report? Yes ☒ No ☐
☐ Combined release and independent remedial action report ☒ Independent remedial action report ☐ Interim Action Report ☒ Final Cleanup Action Report	Date release was reported to Ecology November 20, 1991 Date cleanup was completed December 2, 1991

FACILITY INFORMATION

Site Name
J.H. Kelly, Inc.

Other Names (*the site may be known as*)
N/A

Site Contact Person If Other Than Owner/Operator (*This must be a person who is on-site during normal working hours and is authorized and qualified to answer questions about the site, or a person who is available during normal business hours and has knowledge about the site and the remediation.*)

Name Ted Coons Phone (206) 423-5510

Site Mailing Address (*or site contact mailing address*)
P.O. Box 2038; Longview, WA 98632

Site Location Address (*including zip code*)
821 3rd Avenue; Longview, WA 98632

Closest City
Longview

County (*where site is located*)
Cowlitz

NW QTR.

Township 7 NORTH Range 2 WEST Section 3 Quarter-Quarter NW QTR, Meridian WILLAMETTE

ELEVATION 17 1/2 FT.

Longitude: Degree 123° Minute 53' Second 29"

Latitude: Degree 46° Minute 05' Second 26"

Ownership and Operator Type C ... to identify the type of owner and operator for the facility. (*For exam* ... *a private individual, then check the boxes under owner identification c* ... *tor identification column in the private party, code #1 row.*)

NW QRTR, NW QRTR OF SEC. 3
7 NORTH TNSHP
RANGE 2 WEST
DOUG ZARING
PUBLIC WORKS
8-17-93 ELEVATION 17 1/2'
WILLAMETTE MERIDIAN
123° 53' 29"
46° 05' 26"

Ownership/Operat	ation	Operator Identification
Private Part		
Municipal (Pub		
County		
Federal		
State		
Tribal		
Mixed		
Other		
Unknown		
Public Entity Acquisition thr		
Financial Institution Acquisition		

Standard Industrial Classificatio ... activities conducted at the site, e.g., automotive repair and maintenance, construction equipment storage, etc.

Mechanical and Piping Contractor

Hazardous Substance Management Practice(s). The hazardous substance(s) cleaned up from the site was the result of which of the following sources, activities, or actions? Please circle all that apply to the facility.

1 = Drug Lab
2 = Drum
3 = A Leaking Impoundment
4 = Improper Handling
5 = Landfill
6 = Land application
7 = Pesticide application
8 = Pesticide Disposal
9 = A Spill
10 = Storm Drain
11 = Leaking Tank: a - below ground; b - above ground
12 = Unknown

RELEASE INFORMATION

Date of Release *(If known)*	Date of Discovery	Are there any drinking water systems affected?
Unknown	11-13-93	Yes ☐ No ☒ Unknown ☐

If drinking water systems are affected, are the systems public, private, or both? *(circle one)* N/A	If drinking water systems are affected, has alternate drinking water been provided? Yes ☐ No ☐ Unknown ☐

General Hazardous Substance Categories Using the contaminants listed below, complete the table. *(A more detailed description of the contaminants can be found in Appendix A of the guidance.)*

Contaminants. For each of the applicable contaminants, enter the appropriate letter designating the status of the contaminants: C = Confirmed or S = Suspected *(Contaminant status definitions are defined in Appendix A of the guidance.)*

Affected Media	Halogenated Organic Compounds	Metals - Priority Pollutants	Metals - Other	Polychlorinated Bi-Phenyls (PCBs)	Pesticides/Herbicides	Petroleum Products	Phenolic Compounds	Non-Halogenated Solvents	Dioxins	Polynuclear Aromatic Hydrocarbons (PAH)	Reactive Wastes	Corrosive Wastes	Radioactive Wastes	Conventional Contaminants - Organics	Conventional Contaminants - Inorganic	Base/Neutral Organic Compounds	Asbestos
Ground Water						C											
Surface Water																	
Drinking Water																	
Soil						C											
Air																	

CLEANUP INFORMATION

Indicate cleanup level methods used by completing Table 5-A below. *(Check all that apply)*

TABLE 5-A

	Soil	Ground Water	Air	Surface Water
Method A				
B				
C				
Have these levels been met throughout the site? *(circle only one)*	(YES) NO	(YES) NO	(YES) NO	(YES) NO

CLEANUP INFORMATION (continued)

Indicate the treatment methods used by completing Tables 5-B through 5-D below. *(Check all that apply)*

TABLE 5-B

	Destruction or Detoxification				Media Transfer		
	Carbon Adsorption[1]	Biological Treatment	Chemical Destruction	Incineration	Air Stripping/ Air Sparging	Aeration/Vapor Extraction	Thermal Desorption
Soil	-NA-				-NA-		
Ground Water				-NA-		-NA-	-NA-
Surface Water				-NA-		-NA-	-NA-
Air		-NA-				-NA-	
Wastes	-NA-				-NA-	-NA-	-NA-

[1]Carbon followed by regeneration; use of granular activated carbon followed by landfilling would be classified in these tables as volume reduction and off-site landfill.

TABLE 5-C

	Immobilization		Reuse/Recycling[2]	Separation/Volume Reduction		
	Vitrification	Solidification/ Stabilization		Solvent Extraction	Soil Washing	Physical Separation[3]
Soil						
Ground Water	-NA-	-NA-		-NA-	-NA-	
Surface Water	-NA-	-NA-		-NA-	-NA-	
Wastes						

[2]For example, reuse of free petroleum product recovered in a pump and treat system.
[3]For example, oil/water separators.

TABLE 5-D

	Land Disposal/Containment		Institutional Controls	Others
	Containment or On-site Landfill	Off-site Landfill		Specify treatment method
Soil				
Ground Water		-NA-		Pump and transport
Surface Water	-NA-	-NA-		for recycle off site
Wastes				

LUST SITE INFORMATION

Type of product released *(check one)*
Leaded Gas ☐ Diesel ☐ Waste Oil ☐
Unleaded Gas ☒ Heating Oil ☐ Other ☐ (Identify _____)

Approx. Tank Size: 10,000 gals

Was free product encountered?
Yes ☐ No ☒

ENVIRONMENTAL INDICATORS

Answer the following questions as they are applicable to your site:

How many cubic yards of soil have been treated? _____

Where soil treatment was conducted, was it done on-site, off-site, or both? *(circle one)*

How many cubic yards of soil have been disposed of off-site? _____ *(Calculate these quantities of soil while the soil is in place, prior to any excavation and/or treatment.)*

Identify the off-site location(s) where soil was disposed. _____

_____

If ground water pump and treatment was conducted, how many gallons of ground water have been recycle to date? 1,040 recycle gals.

How many years is the ground water extraction system expected to continue in operation? _____ yrs.

Exhibit

L

TELECOPY TRANSMITTAL

WASHINGTON STATE DEPARTMENT OF ECOLOGY

Date 8/17/93
Time 10:00 AM
No. of Pages 3 total.

FAX* (206) - 423 - 9170

TO (NAME/AGENCY)
Ted Coons /
JH Kelly Inc.

FROM (NAME/DIVISION)
Dick Heggen /
SWRO - Toxics Cleanup
(206) - 586 8618

REMARKS

I briefly reviewed the file on the J. H. Kelley site in Longview. Based on the 6/93 Monitoring well results of 270 ppm diesel, 6.0 ppm oil, a No-Further Action letter would not be attainable at this time. Additional site characterization would be needed such as additional monitoring wells and soil sampling.

WASHINGTON STATE DEPARTMENT OF ECOLOGY
SOUTHWEST REGIONAL OFFICE
7272 CLEANWATER LANE (MS: 47775)
PO BOX 47775
OLYMPIA WA 98504-7775

FAX (206) 753-8531
PHONE (206) 753-2353
(SCAN 234)

Q

Exhibit

M

Columbia Analytical Services Inc.

April 11, 1996

Service Request No.: K9601893

Jeff Wilson
Cowlitz Clean Sweep
340-C Oregon Way
Longview, WA 98632

Re: **J. H. Kelly Project**

Dear Jeff:

Enclosed are the results of the rush sample(s) submitted to our laboratory on April 4, 1996. For your reference, these analyses have been assigned our service request number K9601893.

All analyses were performed consistent with our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 240.

Respectfully submitted,

Columbia Analytical Services, Inc.

LaVerne Landauer

LaVerne Landauer
Project Chemist

→ DOE 4-18-96

LL/sm

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: J.H. Kelly
Sample Matrix: Water

Service Request: K9601893
Date Collected: 4/4/96
Date Received: 4/4/96
Date Extracted: 4/8/96

Hydrocarbon Scan
EPA Methods 3510/8015 Modified
Units: µg/L (ppb)

		Sample Name:	**JHK-WS4**	**Method Blank**
		Lab Code:	K9601893-001	K960408-WB
		Date Analyzed:		
Analyte	**MRL**			
Gasoline	50		ND	ND
Mineral Spirits	50		ND	ND
Jet Fuel	50		ND	ND
Kerosene	50		ND	ND
Diesel	50		ND	ND
Other	200		279 (N)	ND

N Quantitated as diesel. The sample contained components that eluted in the diesel range, but the chromatogram did not match the typical diesel fingerprint.

Approved By: Vandana Date: 4/11/96

3S22/102094
K9601893.XLS - 8015w 4/11/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Cowlitz Clean Sweep
Project: J.H. Kelly
Sample Matrix: Water

Service Request: K9601893
Date Collected: 4/4/96
Date Received: 4/4/96
Date Extracted: NA
Date Analyzed: 4/5,6/96

BTEX
EPA Methods 5030A/8020
Units: µg/L (ppb)

Analyte:		**Benzene**	**Toluene**	**Ethylbenzene**	**Total Xylenes**
Method Reporting Limit:		0.5	1	1	1
Sample Name	**Lab Code**				
JHK-WS4	K9601893-001	ND	ND	ND	ND
Method Blank	K960405-WB	ND	ND	ND	ND

Approved By: _____ Date: 4/10/96

4A/102194
01893PHC.SP1 - BTEXw 4/10/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Cowlitz Clean Sweep
Project: J.H. Kelly
Sample Matrix: Water

Service Request: K9601893
Date Collected: 4/4/96
Date Received: 4/4/96
Date Extracted: 4/8/96
Date Analyzed: 4/9/96

Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3510/8015 Modified

Sample Name	Lab Code	Percent Recovery o-Terphenyl
JHK-WS4	K9601893-001	83
Method Blank	K960408-WB	83

CAS Acceptance Limits: 59-110

Approved By: _____ Date: 4/10/96

SUR1/111594
01893PHC.AP1 - 8015wSUR 4/9/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Cowlitz Clean Sweep
Project: J.H. Kelly
Sample Matrix: Water

Service Request: K9601893
Date Collected: 4/4/96
Date Received: 4/4/96
Date Extracted: NA
Date Analyzed: 4/5,6/96

Surrogate Recovery Summary
BTEX
EPA Methods 5030A/8020

Sample Name	Lab Code	Percent Recovery 4-Bromofluorobenzene
JHK-WS4	K9601893-001	92
Method Blank	K960405-WB	91

CAS Acceptance Limits: 69-114

Approved By: _____ Date: 4/10/96

SUR1/111594
01893PHC.SPI - BTEXwSUR 4/10/96

Columbia Analytical Services, Inc.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave. • Kelso, WA 98626 • (206) 577-7222 • (800) 695-7222 • FAX (206) 636-1068

DATE 4-4-96 PAGE 1 OF 1

PROJECT NAME J.H. Kelly #well

PROJECT MANAGER Jeff Wilson

COMPANY/ADDRESS 340 Oregon Way #C
Longview, WA 98632

PHONE 423-6316

SAMPLERS SIGNATURE Jeff Wil

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA/418.1 ☐ OR/418.1 ☐ WA/418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐ VOA ☐ Semi VOA ☐ Pest/Herb ☐	Metals (total or dissolved) List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3 (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650A ☐			REMARKS
JHK-WS 4	4-4-96	10:45	1893-1	water							X	X										

RELINQUISHED BY:
Signature: Jeff Wil
Printed Name: Jeff Wilson
Firm: CCS
Date/Time: 4-4-96 11:40 AM

RECEIVED BY:
Signature: Ruth Higley
Printed Name: Ruth Higley
Firm: CAS
Date/Time: 4/4/96 1140

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. X 5 day
___ Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
X I. Routine Report
___ II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# ___
Bill To J.H. Kelly
Ted Coons
821 3rd
Longview, WA 98632

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: K1893

RELINQUISHED BY:
Signature ___
Printed Name ___
Firm ___
Date/Time ___

RECEIVED BY:
Signature ___
Printed Name ___
Firm ___
Date/Time ___

SPECIAL INSTRUCTIONS/COMMENTS:

Bill to:
J.H. Kelly
Attn. Ted Coons
821 3rd
Longview, WA 98632

No VOA vials received for BTEX - OK to analyze as per Jeff Wilson

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

00007

Exhibit

N

1317 South 13th Avenue P.O. Box 479 Kelso, Washington 98626 (360) 577-7222 ph (360) 636-1068 fax

Columbia Analytical Services INC.
An Employee - Owned Company

May 11, 2006

Service Request No: K0603320

JH Kelly
821 Third Ave
P.O. Box 2038
Longview, WA 98632

RE: GX, BTEX

Enclosed are the results of the sample(s) submitted to our laboratory on April 27, 2006. For your reference, these analyses have been assigned our service request number K0603320.

All analyses were performed according to our laboratory's quality assurance program. The test results meet requirements of the NELAC standards except as noted in the case narrative report. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please call if you have any questions. My extension is 3291.

Respectfully submitted,

Columbia Analytical Services, Inc.

Ed Wallace

Ed Wallace
Project Chemist

EW/jm

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.

Metals Data Qualifiers

#	The control limit criteria is not applicable. See case narrative.
B	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
E	The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits. See case narrative.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.
*	The duplicate analysis not within control limits. See case narrative.
+	The correlation coefficient for the MSA is less than 0.995.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a chromatographic interference.
X	See case narrative.

Additional Petroleum Hydrocarbon Specific Qualifiers

F	The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
L	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
H	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
O	The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
Y	The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
Z	The chromatographic fingerprint does not resemble a petroleum product.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client: JH Kelly
Project: GX, BTEX
Sample Matrix: Water

Service Request: K0603320
Date Collected: 04/27/2006
Date Received: 04/27/2006

Gasoline Range Organics

Sample Name: Well
Lab Code: K0603320-001

Extraction Method: EPA 5030B
Analysis Method: NWTPH-Gx

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Gasoline Range Organics-NWTPH	ND	U	250	1	05/03/06	05/03/06	KWG0607279	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
1,4-Difluorobenzene	89	50-150	05/03/06	Acceptable

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client: JH Kelly
Project: GX, BTEX
Sample Matrix: Water

Service Request: K0603320
Date Collected: 04/27/2006
Date Received: 04/27/2006

Gasoline Range Organics

Sample Name: Ditch
Lab Code: K0603320-002

Extraction Method: EPA 5030B
Analysis Method: NWTPH-Gx

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Gasoline Range Organics-NWTPH	ND	U	250	1	05/03/06	05/03/06	KWG0607279	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
1,4-Difluorobenzene	89	50-150	05/03/06	Acceptable

omments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client: JH Kelly
Project: GX, BTEX
Sample Matrix: Water

Service Request: K0603320
Date Collected: NA
Date Received: NA

Gasoline Range Organics

Sample Name: Method Blank
Lab Code: KWG0607279-4

Extraction Method: EPA 5030B
Analysis Method: NWTPH-Gx

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Gasoline Range Organics-NWTPH	ND	U	250	1	05/03/06	05/03/06	KWG0607279	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
1,4-Difluorobenzene	88	50-150	05/07/06	Acceptable

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client: JH Kelly
Project: GX, BTEX
Sample Matrix: Water

Service Request: K0603320
Date Collected: 04/27/2006
Date Received: 04/27/2006

BTEX

Sample Name: Well
Lab Code: K0603320-001

Extraction Method: EPA 5030A
Analysis Method: 8021B

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzene	ND	U	0.50	1	05/03/06	05/03/06	KWG0607281	
Toluene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
Ethylbenzene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
m,p-Xylenes	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
o-Xylene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
1,4-Difluorobenzene	108	77-118	05/03/06	Acceptable

omments:

000[illegible]

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client: JH Kelly
Project: GX, BTEX
Sample Matrix: Water

Service Request: K0603320
Date Collected: 04/27/2006
Date Received: 04/27/2006

BTEX

Sample Name: Ditch
Lab Code: K0603320-002

Extraction Method: EPA 5030A
Analysis Method: 8021B

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzene	ND	U	0.50	1	05/03/06	05/03/06	KWG0607281	
Toluene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
Ethylbenzene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
m,p-Xylenes	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
o-Xylene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
1,4-Difluorobenzene	108	77-118	05/03/06	Acceptable

omments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Results

Client: JH Kelly
Project: GX, BTEX
Sample Matrix: Water

Service Request: K0603320
Date Collected: NA
Date Received: NA

BTEX

Sample Name: Method Blank
Lab Code: KWG0607281-3

Extraction Method: EPA 5030A
Analysis Method: 8021B

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzene	ND	U	0.50	1	05/03/06	05/03/06	KWG0607281	
Toluene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
Ethylbenzene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
m,p-Xylenes	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	
o-Xylene	ND	U	1.0	1	05/03/06	05/03/06	KWG0607281	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
1,4-Difluorobenzene	108	77-118	05/03/06	Acceptable

omments:

CHAIN OF CUSTODY

Columbia Analytical Services INC.
An Employee - Owned Company
1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222x07 • FAX (360) 636-1068

SR#: K0602??0 PAGE ____ OF ____ COC # ____

00010

PROJECT NAME
PROJECT NUMBER Ted Coons
PROJECT MANAGER JH Kelley
COMPANY/ADDRESS
CITY/STATE/ZIP Longview, ph: 575-3111
E-MAIL ADDRESS
PHONE # 423-5510 JHKelly FAX#
SAMPLER'S SIGNATURE

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐ 8270LL☐	Volatile Organics 624☐ 8260☐	Hydrocarbons (*see below) Gas☒ Diesel☐ Oil☐ 8021☐ BTEX☒	☐ Fuel Fingerprint (FIQ) ☐ NW-HCID Screen	Oil & Grease/TRPH 1664 HEM☐ 1664 SGT☐	PCB's Aroclors☐	Pesticides/Herbicides 608☐ 8081A☐ Congeners☐	Chlorophenolics - 8151M Tri☐ Tetra☐ 8141A☐ 8151A☐	PAHS 8310☐ SIM☐ PCP☐	Metals, Total or Dissolved (See list below)	Cyanide☐ Hex-Chrom☐	pH, Cond., Cl, SO4, PO4, F, NO2, NO3, BOD, TSS, TDS (circle)	NH3-N, COD, Total-P, TKN, TOC, DOC (circle) NO2+NO3	TOX 9020☐ AOX 1650☐ 506☐					REMARKS
Well	4/27/06	0915		H2O	4		X	X																
Ditch	″	0845		H2O	4		X	X																

REPORT REQUIREMENTS

___ I. Routine Report: Method Blank, Surrogate, as required
___ II. Report Dup., MS, MSD as required
___ III. Data Validation Report (includes all raw data)
___ IV. CLP Deliverable Report
___ V. EDD

INVOICE INFORMATION

P.O. # ____
Bill To: ____

TURNAROUND REQUIREMENTS

___ 24 hr. ___ 48 hr.
___ 5 Day
X Standard (10-15 working days)
___ Provide FAX Results
____ Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

*INDICATE STATE HYDROCARBON PROCEDURE: AK CA WI NORTHWEST OTHER: ____ (CIRCLE ONE)

SPECIAL INSTRUCTIONS/COMMENTS:

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: Ted Coons Date/Time:	Signature: Mary Black Date/Time: 4/27/06 1050	Signature Date/Time	Signature Date/Time
Printed Name Firm	Printed Name: Black Firm: CAS	Printed Name Firm	Printed Name Firm

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services • 1-800-695-7222

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any location of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the action or inaction of any carrier shipping or delivering any sample to or from LAB's premises.

LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations under the Agreement. The provision of electronic data does not in any way modify the intention of the parties that the Client rely on the written or hard copy form of the deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do not extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included: but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client for any failure or delay in performance by LAB which results in whole or in part from any cause or circumstance beyond the reasonable control of LAB. Such causes and circumstances shall include, but not be limited to, acts of God, acts of Client, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

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Columbia Analytical Services Inc.
Cooler Receipt and Preservation Form

PC ED

Project/Client JH Kelly Service Request K06 3320

Cooler received on 4/27/06 and opened on 4/27/06 by [signature]

1.	Were custody seals on outside of coolers?				NO Y (N)	
	If yes, how many and where? —					
2.	Were custody seals intact?				~~Y~~ N	
3.	Were signature and date present on the custody seals?				~~Y~~ N	
4.	Is the shipper's airbill available and filed? If no, record airbill number:				Y ~~N~~	
5.	COC#	—				
	Temperature of cooler(s) upon receipt: (°C)	N/A				
	Temperature Blank: (°C)	—				
	Were samples hand delivered on the same day as collection?				(Y) N	
6.	Were custody papers properly filled out (ink, signed, etc.)?				(Y) N	
7.	Type of packing material present —					
8.	**Did all bottles arrive in good condition (unbroken)?**				(Y) N	
9.	Were all bottle labels complete (i.e analysis, preservation, etc.)?				(Y) N	
10.	Did all bottle labels and tags agree with custody papers?				(Y) N	
11.	**Were the correct types of bottles used for the tests indicated?**				(Y) N	
12.	Were all of the preserved bottles received at the lab with the appropriate pH?				~~Y~~ N	
13.	Were VOA vials checked for absence of air bubbles, and if present, noted below?				(Y) N	
14.	Were the 1631 Mercury bottles checked for absence of air bubbles, and if present, noted below?				~~Y~~ N	
15.	Did the bottles originate from CAS/K or a branch laboratory?				(Y) N	
16.	**Are CWA Microbiology samples received with >1/2 the 24hr. hold time remaining from collection?**				Y N	
17.	Was C12/Res negative?				~~Y~~ N	

Explain any discrepancies: —

RESOLUTION: —

Samples that required preservation or received out of temperature:

Sample ID	Reagent	Volume	Lot Number	Bottle Type	Rec'd out of Temperature	Initials

00011

Exhibit

O

Mark Fleischauer

From: Mark Fleischauer
Sent: Monday, October 16, 2006 5:54 PM
To: 'rwar461@ecy.wa.gov'
Subject: FW: 821 Third Avenue; Longview - Former UST

Importance: High

-----Original Message-----
From: Mark Fleischauer
Sent: Thursday, September 28, 2006 4:35 PM
To: 'rwar461@ecy.wa.gov'
Subject: 821 Third Avenue; Longview - Former UST

Hi Bob-

Hoping I've located the correct contact at DOE, but if not, could you please point me in the right direction?

I'm the attorney for a property owner in Longview, and I apologize in advance for a rambling message. I'm the recent recipient of an archived box of records pertaining to the site and am trying to piece the puzzle together-- with the hope of getting NFA status on this site.

The property owner leases the site to JH Kelly LLC at 821 Third Avenue in Longview. In November of 1991, in attempt to eliminate any potential for leakage (and presumably because they also wished to eliminate any need to comply with recently enacted UST requirements) JH Kelly opted to remove two UST's on the property. The removal was done under informal direction from Patricia Martin when she was heading up the TCP program. Both tanks were removed by a certified contractor (Pacific Northern Environmental). Upon removal, the tanks were pressure tested and found to have no leaks. As part of the removal, PNE sampled dirt and ground water adjacent to the tanks. Minor amounts of BTEX were detected in the soil, and it was determined that such detections were likely the result of a tank overfill at some point in time. Roughly 325 yards of soil were removed, and per the request of DOE, JHK installed a monitoring well and provided DOE with quarterly monitoring reports. Per the attached letter, after receiving monitoring reports for about 18 months, DOE recorded the site as a "conducted clean-up."

After reviewing the attached letter, JH Kelly, on August 16, 1993, assembled an "Independent Remedial Action Summary and Request for No Further Action Status." The summary, however, was apparently never filed with the DOE because a gentleman from DOE named Dick Heggen advised that his brief review of the JH Kelly file still reflected "270 ppm diesel and 6.0 ppm oil" (fax attached). That's were my correspondence trail dries up, but I have found follow-up sampling results that reflect further attenuation.

In May of this year, we had the well sampled again (in conjunction with sampling we do on a nearby slew as part of our Storm water Plan). As reflected in the attached reports from Columbia Analytical, we have Non-Detects across the BTEX and organic spectrums. Obviously we're very pleased with these findings, and our real desire is to pursue NFA status under whatever program is currently applicable to sites such as this one. I have found a couple historical references to "Independent Remedial Action reports" on the DOE website, but I can't seem to find a current roadmap.

Can you help me start the process?

Thanks much in advance for your help. I look forward to hearing from you.

Mark Fleischauer

Longivew
Materials 9282

Mark Fleischauer
Vice President
JH Kelly LLC
2311 East First Street
Vancouver, WA 98661
360-737-6790
360-735-0766 Fax

Mark Fleischauer

From: Mark Fleischauer
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Subject: 821 Third Avenue; Longview - Former UST

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Can you help me start the process?

Thanks much in advance for your help. I look forward to hearing from you.

Mark Fleischauer

ongivew
rials 9282

Exhibit

P

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

March 11, 2013

DANNY L & MARY J EVANS ETAL
PO BOX 2038
LONGVIEW. WA 98632

Re: EARLY NOTICE LETTER

- Site Name: Kelly, JH
- Site Address: 821 3RD AVE, LONGVIEW, WA 98632
- Facility/Site No.: 74552527
- LUST ID No.: 1349

Dear DANNY L & MARY J EVANS ETAL:

Under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW, which governs the cleanup of hazardous waste sites in Washington State, the Department of Ecology (Ecology) maintains a list of sites where further testing and possible cleanup may be needed. We call this the Confirmed and Suspected Contaminated Sites List (List).

The Kelly, JH facility (Site) is part of a group of historical sites previously designated as "Reported Cleaned Up" (RCU). These are sites where cleanup reports and/or other documentation was submitted to Ecology by owners or consultants indicating to us they had "reportedly cleaned up the site" but did not enter Ecology's former Independent Remedial Action Program (IRAP) or current Voluntary Cleanup Program (VCP) to achieve closure. Ecology has recently reviewed the file for this Site. Our review confirms that soil and/or groundwater were contaminated due to a release from a leaking underground storage tank (LUST), and the documentation provided to Ecology thus far does not demonstrate MTCA cleanup standards were achieved. Specifically, our review noted the following:

- Groundwater contaminated with gasoline-range and diesel-range total petroleum hydrocarbons was documented above MTCA cleanup levels in the area of the former USTs. Potential impacts to groundwater have not been adequately characterized. No documentation demonstrating cleanup standards were achieved for groundwater is known to have been provided to Ecology.

Based on the available information in Ecology's files, this Site has been added to the List as a state cleanup site. Please note that inclusion on the List does not mean Ecology has determined

you are a potentially liable person under MTCA. Further investigation or cleanup action will need to be done to comply with Washington State laws and regulations. Alternately, if historical documentation exists demonstrating MTCA cleanup standards were achieved that had not been provided to Ecology, please provide that documentation for review.

In the future, Ecology may conduct a more detailed inspection of this Site, including testing for possible contamination. This inspection is called a "Site Hazard Assessment." At that time, Ecology will establish a priority for the work.

Ecology has a strong commitment to working cooperatively with owners/operators to accomplish prompt and effective cleanups. Your cooperation in planning or conducting remedial action is not an admission of guilt or liability. Please be aware of state laws that must be adhered to if you decide to proceed with cleanup work on your own. The primary law is MTCA, Chapter 70.105D RCW, and the implementing regulation, the MTCA Cleanup Regulation, Chapter 173-340 WAC. These laws may be found at Ecology's Toxics Cleanup Program website: http://www.ecy.wa.gov/toxicscleanup/policy.

Ecology's VCP is designed to provide technical assistance, for a fee, to cleanup sites that qualify. If you would like additional information regarding this program, you can find information on our website at http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm.

Ecology's copies of documents on this Site are kept in the Records Center for the Southwest Regional Office (SWRO) of Ecology. These documents are available for public review by appointment only. Appointments can be made to review site files by calling the SWRO Records Center at (360) 407-6365.

Thank you for your work toward remediation of this Site. If you have any questions, please contact me by e-mail at scott.rose@ecy.wa.gov or by phone at (360) 407-6347.

Sincerely,

Scott Rose, L.G.
VCP/LUST Unit Supervisor
Southwest Regional Office
Toxics Cleanup Program

SR: ksc: SWRO ENL Cowlitz County

By certified mail: (7010 0780 0002 3403 3862)

cc: DANNY L & MARY J EVANS ETAL, 821 3RD AVE, LONGVIEW, WA 98632

Exhibit

Q

Mark Fleischauer

From: Mark Fleischauer
Sent: Monday, April 22, 2013 3:50 PM
To: scott.rose@ecy.wa.gov
Cc: Mark Fleischauer
Subject: March 11, 2013 EARLY NOTICE LETTER Site: 74552527
Attachments: Longivew UST materials 9282006.pdf; Independent Remedial Action Summary & Request for No Further Action Stat....pdf; SKMBT_60113042215370.pdf

Importance: High

Dear Mr. Rose-

Our landlords (Danny L. Evans, Mary J Evans and Terry Major) received your Early Notice Letter dated March 11, 2013 regarding 821 Third Avenue in Longview and forwarded it on to me. After many attempts to work through the issues in your letter over the last 20 years with the DOE, I am writing with the hope that we can finally take the necessary steps to put this matter to bed without significant effort or expense for either party.

The last communication we had from the State on this matter was in October 2006. At that time, in response to the attached email to Robert Warren, the DOE continued to improperly characterize the situation as a LUST and suggested that the only remedy was the Voluntary Clean Up Program. I am hoping that your letter and Ecology's "strong commitment to working cooperatively with owners/operators to accomplish prompt and effective clean-ups" opens a new door to resolving this 1991 matter in an more expeditious manner.

By way of background, the property owners lease the site to JH Kelly LLC. In November of 1991, in attempt to eliminate any potential for leakage (and presumably because they also wished to eliminate any need to comply with the then-recently enacted UST requirements) JH Kelly opted to remove the two UST's located on the property: one used for unleaded gas storage and one used for diesel storage. The removal was done under informal direction from Patricia Martin when she was heading up the TCP program for DOE. Both tanks were removed by a certified contractor (Pacific Northern Environmental). Upon removal, the tanks were pressure tested and found to have no leaks. As part of the removal, PNE sampled dirt and ground water adjacent to the tanks. Minor amounts of BTEX were detected in the soil, and it was determined that such detections were likely the result of a tank overfill at some point in time. Roughly 325 yards of soil were removed, and per the request of DOE, JHK installed a monitoring well and provided DOE with quarterly monitoring reports. After receiving monitoring reports for about 18 months, DOE recorded the site as a "conducted clean-up" in the attached letter to JHK on August 5, 1993.

After reviewing the attached August 5,1993 letter, JH Kelly, on August 16, 1993, assembled an "Independent Remedial Action Summary and Request for No Further Action Status." The summary, however, was apparently never filed with the DOE because DOE's Dick Heggen advised that his brief review of the JH Kelly file still reflected "270 ppm diesel and 6.0 ppm oil" (fax attached). That's where my correspondence trail dries up, but I have found follow-up sampling results that reflect further attenuation. In May of 2006, JHK had the well sampled again. As reflected in the attached reports from Columbia Analytical, the sampling reflected Non-Detects across the BTEX and organic spectrums.

I still have the binder containing the original "Independent Remedial Action Summary and Request for No Further Action Status" dated August 16, 1993 and am providing PDF copy of it your review. The binder contains documentation and testing results consistent with the above narrative. In light of the fact that:

(A) There is absolutely no evidence that our UST was ever a LUST;

(B) We had a certified contractor properly decommission the tanks and file a closure notice with the state well over twenty years ago;
(C) We tested and properly removed and disposed of all soils that may have been contaminated by the above-ground spill of the unleaded gas UST (which presumably led to the DOE's involvement) well over 20 years ago;
(D) We installed a monitoring well on site and provided regular test results to DOE from such well for over 18 months; and
(E) We provided DOE, in 2006, with independent lab analysis reflecting petroleum hydrocarbons well below MTCA clean up levels.

we respectfully request that DOE update its records to reflect that there was not a LUST on this site and that it work with us to secure NFA status under whatever program is applicable to sites and situations such as this one.

Thanks much. I look forward to hearing from you and resolving this matter.

Best regards,

Mark Fleischauer

JH KELLY

Mark Fleischauer
Sr. Vice President
JH Kelly LLC
2311 East First St.
Vancouver, WA 98661
360.759.3307

Exhibit

R

Mark Fleischauer

From: Turner, Paul B. (ECY) <PTUR461@ECY.WA.GOV>
Sent: Tuesday, April 23, 2013 10:17 AM
To: Mark Fleischauer
Subject: RE: March 11, 2013 EARLY NOTICE LETTER Site: 74552527

Thanks Mark. I'll let you know if something pops up on this end as well.

Paul

From: Mark Fleischauer [mailto:MFleisch@jhkelly.com]
Sent: Tuesday, April 23, 2013 10:15 AM
To: Turner, Paul B. (ECY)
Cc: Rose, Scott (ECY)
Subject: RE: March 11, 2013 EARLY NOTICE LETTER Site: 74552527

Thanks – I'm tied up all day but will try to dig into the records for more info on the check tomorrow

---

From: Turner, Paul B. (ECY) [mailto:PTUR461@ECY.WA.GOV]
Sent: Tuesday, April 23, 2013 10:08 AM
To: Mark Fleischauer
Cc: Rose, Scott (ECY)
Subject: RE: March 11, 2013 EARLY NOTICE LETTER Site: 74552527

Good morning Mr. Fleischauer,

I just printed out the attachments you forwarded to Scott yesterday and have been reviewing both our old and new databases in an attempt to tie this all together. Thank you for the "Cliff Notes" history version! That was a big help for me getting started. One question I have at the moment pertains to a handwritten note on the August 5, 1993 letter from Patricia L. Martin (Ecology) to Mr. Ted Coons (J.H. Kelly, Inc.). The handwritten note states " ATTN Dick Hegen CK to Dept of Ecology $1000.00" . The letter pertains to the determination of a "conducted cleanup" and goes on to talk about the fee-based service Ecology implemented beginning July 1, 1993. The fee-based program was designed to have Ecology provide an extensive review of the files to determine if a site qualifies for a No Further Action (NFA) determination. This was most likely referring to the Independent Remedial Action Program (IRAP) which has since morphed into the Voluntary Cleanup Program (VCP).

I have no idea who wrote the note but was concerned that a payment may have been made to Ecology and no official review ever performed. I will most likely be taking a trip down to the state archives to review anything else that may be in the file and see if there is any other mention of the $1000.00 check. My hope is to have something written up for Scott by Thursday of this week (April 25).

If you have any questions, please either give me a call at (360) 407-6179 or e-mail at ptur461@ecy.wa.gov.

Sincerely,

Paul Turner, L.HG
WA Dept. of Ecology
Toxics Cleanup program/SWRO

(360) 407-6179
Ptur461@ecy.wa.gov

From: Mark Fleischauer [mailto:MFleisch@jhkelly.com]
Sent: Monday, April 22, 2013 4:36 PM
To: Rose, Scott (ECY)
Cc: Turner, Paul B. (ECY)
Subject: RE: March 11, 2013 EARLY NOTICE LETTER Site: 74552527

Thanks for the quick reply Scott. Appreciate it. When you get a letter like that from a regulator, you're never sure when they're going to show up on your doorstep with a code enforcement officer :)

Given the history on this matter and numerous personnel who've touched it, I do think it's time to put it to bed one way or another.

I will await a response from you and your site manager.

Best

Mark

From: Rose, Scott (ECY) [mailto:sros461@ECY.WA.GOV]
Sent: Monday, April 22, 2013 4:00 PM
To: Mark Fleischauer
Cc: Turner, Paul B. (ECY)
Subject: RE: March 11, 2013 EARLY NOTICE LETTER Site: 74552527

Mark,

Thank you for your email, and I too hope we can put this one to bed with minimal effort. I plan to forward this to the site manager on my staff who handles sites in Cowlitz Co, and will get back to you as soon as we can to let you know the best path toward resolution. Please note that this is one of about 700 sites that recently received a Early Notice Letter/Status Update from us, so please bear with us in getting back to you. Don't hesitate to check back in with me.

Thanks.

Scott Rose, L.G.
Unit Supervisor
Department of Ecology
TCP/SWRO
(360) 407-6347
sros461@ecy.wa.gov

From: Mark Fleischauer [mailto:MFleisch@jhkelly.com]
Sent: Monday, April 22, 2013 3:50 PM
To: Rose, Scott (ECY)
Cc: Mark Fleischauer

Exhibit S

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

December 11, 2013

Evans Major LLC
821 3rd Ave
Longview, WA 98632

Subject: Site Hazard Assessment – J. H. Kelly Inc.
Ecology Facility Site ID: 74552527

To Whom It May Concern:

The Department of Ecology (Ecology) will conduct a site hazard assessment (SHA) of the J. H. Kelly Inc. site, at 821 3rd Ave, Longivew, under the authority of the Model Toxics Control Act (MTCA), Chapter 173-340 WAC. This site is currently on Ecology's Confirmed and Suspected Contaminated Sites List (CSCSL) with a status of "Awaiting SHA". This assessment will be performed by Kirsten Alvarez, Ecology. If necessary, she may contact you in the near future to arrange a site visit.

The purpose of an SHA is to gather information on past/present waste management activities, along with other basic site-specific environmental data, in order to score the site following the Washington Ranking Method (WARM) Scoring Manual guidelines. Potential/actual threats to human health and the environment are evaluated for each applicable migration route, with a resultant "hazard ranking" for the site determined.

Sites are ranked on a scale of one (1) to five (5), with 1 representing the highest level of concern, and 5 the lowest, relative to all other assessed/ranked sites in the state. The level of relative concern may be such that a recommendation of "No Further Action" (NFA) can be made, and the site will be removed from Ecology's CSCSL.

In addition to any required fieldwork, the following information will be considered in scoring this site:

- Ecology Southwest Regional Office Site Files
- State Archived Files

You are requested to submit any additional environmental information regarding this site to:

Kirsten Alvarez
Washington State Department of Ecology
P O Box 47775
Olympia, WA 98504-7775

Additional data could include any environmental assessment work or laboratory analyses conducted regarding this site not previously submitted to Ecology. Every attempt will be made to obtain the most recent and accurate data for scoring your site. If you have better information, or comments on the adequacy of the data already collected, please advise us as soon as possible. The final site rank and eventual site priority will be based primarily on the information used in the scoring. Your active participation in the assessment and scoring process is important to insure that only the best data available is used.

Fact sheets describing Site Hazard Assessments, the Washington Ranking Method and the Hazardous Sites List are enclosed for your information. If you have questions please call me at (360) 407-6388 (e-mail: cris.matthews@ecy.wa.gov) or Kirsten Alvarez at (360) 407-6246 (e-mail: kirsten.alvarez@ecy.wa.gov).

Sincerely,

Cris Matthews
Site Hazard Assessments
Toxics Cleanup Program
Southwest Regional Office
Washington Department of Ecology

KA/CM/ksc:JH Kelly inc SHA notice

Enclosures (3)

By certified mail: (7011 2970 0000 0555 4781)

cc: Kirsten Alvarez, Department of Ecology

Site Hazardous Assessment is a First Step

Under the Model Toxics Control Act, one of the first steps in the process for cleaning up a hazardous waste site is a Site Hazard Assessment (SHA). During a site hazard assessment, the Department of Ecology collects environmental data about a site to determine the type and extent of contamination. If further action is needed, Ecology ranks the site using the Washington Ranking Method (WARM) and places it on the *Hazardous Sites List*.

Assessing the Potential Hazard

A site hazard assessment provides preliminary data regarding the potential hazard of a site. The main purpose of a site hazard assessment is to provide sufficient sampling data and other information to:

- Confirm or rule out contamination
- Identify the hazardous substance(s)
- Identify environmental characteristics associated with the site
- Evaluate the potential threats to human health and the environment

In addition, the site hazard assessment provides enough information to allow Ecology to rank the site's potential hazard relative to other sites on the *Hazardous Sites List*. This helps Ecology determine which sites should be worked on first. It is important to note that a hazard assessment is not intended to be a detailed site study or assessment of the health risk posed by a site.

Is a Site Hazard Assessment Always Necessary?

No, for a variety of reasons, a site hazard assessment may not always be necessary at a site. For example, sites doing independent cleanups and requesting Ecology consultation under the voluntary cleanup program would not normally need a site hazard assessment. In general, Ecology will conduct a site hazard assessment on sites that are anticipated to require significant future staff resources, since the assessment helps in setting workload priorities.

What Information Is Needed To Accurately Assess a Site?

Although a site hazard assessment is not intended to be a detailed site characterization, it includes sampling results from various locations on and around the site, site observations, maps and historical information. Specifically, a site hazard assessment should include:

1. Evidence confirming a release or threatened release of a hazardous substance.
2. Identification of the hazardous substances and their location, including what was or may be released and, if applicable, what products of decomposition, recombination or chemical reaction are currently present at the site.
3. A description of the facilities containing the substances and their condition.
4. Consideration of surface water run-on or run-off and the possibility of contaminants seeping through the surface and contaminating ground water.

5. Characterization of sub-surface and ground water, including the depth to ground water and distance to nearby wells, bodies of surface water and drinking water supplies.
6. An evaluation of human population, food crops, recreation areas, sensitive environments, irrigated areas and aquatic resources.
7. Any other factors which may be significant in estimating exposure of sensitive environments to hazardous waste.

What Happens After the Hazard Assessment?

The environmental information collected through the site hazard assessment process is used to "score" the primary exposure routes through which contaminants could pose a risk to human health and the environment. These include surface water, air and ground water. Each exposure route is then evaluated to determine the relative risk at each site and the final ranking for each site. Sites are ranked on a scale of 1 to 5 using the Washington Ranking Method, with a ranking of 1 representing the highest level of potential risk and 5 the lowest. The rankings represent an estimation of the potential threat posed by a site compared to all other assessed/ranked sites in the state.

Ecology will provide results from the site hazard assessment to site owners, operators and other potentially liable persons. If the department determines, after the assessment, that no further action is required at the site, it will notify the public through Ecology's *Site Register*.

How Can I Get More Information?

If you are interested in finding out more about a specific site or to find out which sites in your area will be assessed in the near future, call the regional office in which the site is located:

Central Region (*Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima*)	15 West Yakima Ave, Suite 200 Yakima WA 98902-3452	509/575-2490
Eastern Region (*Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman*)	N. 4601 Monroe, Suite 100 Spokane WA 99205-1295	509/329-3400
Northwest Region (*Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom*)	3190 160th Ave SE Bellevue WA 98008-5452	425/649-7000
Southwest Region (*Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Pierce, Skamania, Thurston, Wahkiakum*)	P O Box 47775 Olympia WA 98504-7775	360/407-6300

For additional information on the Site Hazard Assessment/WARM Ranking process, or to receive the Site Register, contact: Department of Ecology, Toxics Cleanup Program, P. O. Box 47600, Olympia WA 98504-7600. Or call 360/407-7170 or visit the Ecology website at: www.ecy.wa.gov and click on *Programs* then *Toxics Cleanup*. For information on the cleanup process and cleanup definitions, visit this site: http://www.ecy.wa.gov/programs/tcp/cu_support/cu_process_steps_defns.htm

This focus sheet is intended to help the user understand the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC. It does not establish or modify regulatory requirements.

What is the Hazardous Sites List?

The Hazardous Sites List is a list of sites that have been assessed and ranked using the Washington Ranking Method (WARM). The list, which is a requirement of the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC, helps the Department of Ecology (Ecology) target where to spend cleanup funds. The list is updated twice a year.

How Are Sites Ranked?

Once Ecology receives a complaint about a piece of property or the practices of an owner or operator of a piece of property, an Ecology inspector or other delegated agency representative will go to the site and conduct an initial investigation. This involves looking at the present conditions of the site for signs of possible spills or discharges and the use and storage of hazardous waste. If Ecology determines further work is required after the initial investigation, a site hazard assessment (SHA) will be conducted. An SHA provides Ecology with basic information about a site.

Once an SHA has been conducted, Ecology then uses the WARM to estimate the potential threat the site poses if not cleaned up. Sites are ranked on a scale of one to five, with one representing the highest level of concern and five the lowest. When ranking a site, the primary exposure routes that could pose a risk to the public and the environment are taken into consideration. These are air, surface water, any release to sediments, and groundwater.

Hazard ranking is not an evaluation of the absolute risk a site poses to human health and the environment. Rather, a site's rank is relative to all other similarly assessed and ranked sites in the state. Information gathered during the SHA is used to determine the pathway scores of all applicable routes of exposure at the site

How Does a Site Get on the List?

Once a site goes through the ranking method and is ranked, it will appear on the Hazardous Sites List. Updates to the list occur at the end of February and August, twice yearly.

How Does the Site Ranking Affect Cleanup?

Ranking a site helps Ecology determine where to spend funds. However, public concern, a need for immediate response, and the availability of funding and cleanup staff also affect which sites get first priority for cleanup.

Can Site Rankings Change?

Ecology generally does not rerank sites, although a site's rank can change. Ecology may re-think a site if new or additional information is discovered that changes the site's relative health and environmental risk. The ranking system works similar to grading on a curve. The highest scoring sites are ranked as "ones" and the lowest as "fives." Thus, adding or removing sites from the list over time may also affect a site's rank.

How Does a Site Get Removed from the List?

A site may be removed from the list only if the site is cleaned up. In some cases, long-term monitoring and periodic reviews may be required to ensure the cleanup is adequate to protect the public and the environment. Ecology will provide public notice for any site it proposes to remove from the Hazardous Sites List.

Definitions

Each site on the Hazardous Sites List is categorized according to the status of the cleanup at the site. The site status categories used by Ecology are intended to give a general indication of the progress at the site. Typical categories include:

Awaiting further remedial action. This means cleanup work has not yet started at the site. Only a site hazardous assessment (SHA) has been done on the property.

Remedial action in progress. These are sites at which Ecology or the responsible party (with Ecology's oversight) has started investigations, active construction, or actual cleanup work.

Construction complete. At these sites all major cleanup work has been completed, but conformational monitoring or operation and maintenance may continue to be performed at the site.

Independent remedial action. This indicates that the site owner/operator or the responsible party has independently conducted cleanup at the site.

How Can I Get More Information?

You can receive a copy of the Hazardous Sites List by calling (360) 407-7170 or by going to Ecology's website at http://www.ecy.wa.gov/programs/tcp/sites/SiteLists.htm. For more information on a specific site, please contact the appropriate regional office listed below.

Central Region (*Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima*)	15 West Yakima Ave, Suite 200 Yakima WA 98902-3452	509/575-2490
Eastern Region (*Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman*)	N. 4601 Monroe, Suite 100 Spokane WA 99205-1295	509/329-3400
Northwest Region (*Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom*)	3190 160th Ave SE Bellevue WA 98008-5452	425/649-7000
Southwest Region (*Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Pierce, Skamania, Thurston, Wahkiakum*)	P O Box 47775 Olympia WA 98504-7775	360/407-6300

This focus sheet is intended to help the user understand the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC. It does not establish or modify regulatory requirements.

Special accommodations: To ask about the availability of this document in a version for the visually impaired call the Toxics Cleanup Program at 360-407-7170. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.

MTCA Requires Hazardous Waste Sites be Ranked

Every hazardous waste site in Washington is unique and poses a potentially different type and level of risk to human health and the environment. The Model Toxics Control Act (MTCA) requires these sites to be ranked relative to each other to guide Ecology's use of cleanup resources. Working with the Science Advisory Board, Ecology developed a ranking system for hazardous sites known as the Washington Ranking Method (WARM).

Ecology ranks a site after the agency gathers enough information to complete a site hazard assessment (SHA). Owners and operators and any other potentially liable persons (PLPs) known to the agency are notified when their site is ranked and placed on Ecology's Hazardous Sites List. Additions to the list are announced twice each year.

What Does the Washington Ranking Method Do?

A site's potential threat to human health and the environment is estimated using the data gathered during the SHA. The WARM categorizes sites on the basis of this information. Sites are ranked on a scale of one to five, with a score of one representing the highest relative level on concern, and five the lowest.

The WARM is designed to:

- Provide a consistent, objective means of assessing sites.
- Establish a scientifically defensible method of evaluating sites.
- Maximize accuracy with minimum data.
- Provide adequate distinction between sites.

How Will the Rankings be Used?

It is important to keep in mind that hazardous site ranking is not the same as risk assessment. Rather, it is an estimation of the potential threat posed by a site relative to all other ranked sites in the state. An actual assessment of a site's health risk is determined after detailed data has been gathered through a remedial investigation.

The WARM provides a framework in which to organize and compare sites. However, it is not the only factor used to determine which sites receive priority for Ecology's resources. Other considerations include the availability of funds, the potential cost of cleanup, the level of cooperation shown by a responsible party, and public concern about a site.

How Does the Washington Ranking Method Work?

When ranking a site, Ecology considers the primary routes through which humans or the environment could be exposed to hazardous substances found on that site. These routes include air, surface water and ground water. For each "exposure route," the following information is evaluated to determine the relative risk posed by each site.

Substance Characteristics	Site Characteristics	Exposure Potential
Toxicity of substance	Migration potential	Population
Quantity of substance	Soil permeability	Sensitive environment
Mobility of substance	Average rainfall	Surface water uses (drinking water, irrigation, fisheries)
Containment	Flood plain	
	Terrain slope	
	Distance to ground water	Ground water uses

What Is the Relationship Between the WARM and the Federal Hazard Ranking System?

The Federal Hazard Ranking System's purpose is to nominate hazardous waste sites with high federal scores to the National Priorities List (NPL). The federal system is used to set cleanup priorities for the Environmental Protection Agency. The WARM is not intended to duplicate the Federal Hazard Ranking System model. The purpose of WARM is to help Ecology set priorities for sites not on the federal list.

How Can I Get More Information?

For additional information on the Washington Ranking Method, contact the Department of Ecology, (360) 407-7170), Toxics Cleanup Program, P.O. box 47600, Olympia, WA 98504-7600. You may also visit the Ecology website at www.ecy.wa.gov and click on *Programs* then *Toxics Cleanup*. For information on the cleanup process and cleanup definitions visit: http://www.ecy.wa.gov/programs/tcp/cu_support/cu_process_steps_defns.htm, or for information on a specific site, please contact the appropriate regional office listed below.

Central Region (*Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima*)	15 West Yakima Ave, Suite 200 Yakima WA 98902-3452	509/575-2490
Eastern Region (*Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman*)	N. 4601 Monroe, Suite 100 Spokane WA 99205-1295	509/329-3400
Northwest Region (*Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom*)	3190 160th Ave SE Bellevue WA 98008-5452	425/649-7000
Southwest Region (*Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Pierce, Skamania, Thurston, Wahkiakum*)	P O Box 47775 Olympia WA 98504-7775	360/407-6300

This focus sheet is intended to help the user understand the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC. It does not establish or modify regulatory requirements.

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Exhibit

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Mark Fleischauer

From: Matthews, Cris (ECY) <crim461@ECY.WA.GOV>
Sent: Tuesday, February 4, 2014 9:39 PM
To: Mark Fleischauer
Subject: RE: Evans - Major-- JH Kelly

Mark;

I hope we can help you work this out. My interest is getting these old sites to some form of acceptable resolution. While not always possible, No Further Action is still my favorite.

>> govt worker <<

Now maybe. But in my previous life I was an exploration geologist/geochemist working for years under contract wherever the job took me. That work and lifestyle didn't include ANY schedule – mostly just 10 months on / 2months off ;-)

From: Mark Fleischauer [mailto:MFleisch@jhkelly.com]
Sent: Tuesday, February 04, 2014 9:13 PM
To: Matthews, Cris (ECY)
Cc: Nicole McOmie; Jamie MorrisPease
Subject: RE: Evans - Major-- JH Kelly

Thanks Cris. You are shattering the image of the 9-5 govt worker :)
Go home!

Sent from my Verizon Wireless 4G LTE smartphone

-------- Original message --------
From: "Matthews, Cris (ECY)"
Date:02/04/2014 9:00 PM (GMT-08:00)
To: Mark Fleischauer ,"Alvarez, Kirsten (ECY)"
Cc: Nicole McOmie ,Jamie MorrisPease ,"Turner, Paul B. (ECY)" ,"Rose, Scott (ECY)" ,"Hancock, Kevin (ECY)"
Subject: RE: Evans - Major-- JH Kelly

Mark;

You ask:

>> Can you confirm that the SHA is a result of the site being on the CSCSL? <<

Yes. The SHA is simply the next step in a regulatory process for sites that appear on the CSCSL. I can assure you the SHA is not the result of some pressing concern Ecology has for the site – rather, it is one of many such older sites that have been awaiting SHA in Cowlitz County. Kirsten Alvarez is working through that backlog and this site has received attention accordingly. And, depending on the availability of existing site information she can access and use, there may be no need to schedule on-site visits.

I can't speak to the earlier interactions with Ecology about tank removal. I haven't seen any of that record. For information about Ecology's leaking underground storage tank history for this site, I recommend you contact Paul Turner at 360-407-6179. I do know the site has received attention more recently – including its appearance on the CSCSL – because of apparent impacts to groundwater from petroleum and related compounds that were documented in past reporting.

Thanks, I appreciate your interest of resolving this.

Cris

Cris Matthews, LHG
Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office
Washington Department of Ecology
360.407.6388
cris.matthews@ecy.wa.gov
www.ecy.wa.gov/programs/tcp/cleanup.html

From: Mark Fleischauer [mailto:MFleisch@jhkelly.com]
Sent: Tuesday, February 04, 2014 5:13 PM
To: Matthews, Cris (ECY); Alvarez, Kirsten (ECY)
Cc: Nicole McOmie; Jamie MorrisPease; Turner, Paul B. (ECY); Rose, Scott (ECY); Hancock, Kevin (ECY)
Subject: RE: Evans - Major-- JH Kelly

Thanks for the quick reply Cris. Yes, your comments are helpful, and Nicole will await your call on SHA scheduling.

Can you confirm that the SHA is a result of the site being on the CSCSL?

We are indeed aware of the VCP, but it's been a source of frustration over the years. We believe we properly addressed the DOE issues, paid our fees and provided all of the requisite documentation back in 90's. We believe it's an unfair and inaccurate stigma, and given that it's been nearly 11 months year since the matter re-surfaced after a six year remission, we presumed it was ether resolved or deemed to be of lesser importance to the DOE.

Thanks again for your reply. We look forward to working with your deem to get this across the finish line.

Mark

From: Matthews, Cris (ECY) [mailto:crim461@ECY.WA.GOV]
Sent: Tuesday, February 04, 2014 4:50 PM
To: Mark Fleischauer; Alvarez, Kirsten (ECY)
Cc: Nicole McOmie; Jamie MorrisPease; Turner, Paul B. (ECY); Rose, Scott (ECY); Hancock, Kevin (ECY)
Subject: RE: Evans - Major-- JH Kelly

Mark:

This site appears to have a rather long and possibly complicated past history of interaction with the Department of Ecology (Ecology). I certainly understand your possible confusion, and interest in resolving – or at least clarifying – some these questions.

The letter with my signature (Ecology; December 11, 2013) is simply notification of intent to perform a ***site hazard assessment*** (SHA). The SHA – as described in the enclosures included with the letter – is a step in a regulatory process the Toxics Cleanup Program (TCP) uses to assess sites for potential threat to human health and/or the environment (if any). As the letter indicates, sites receive a relative ranking that assigns internal priority for possible future attention. The site has never received this assessment.

This site is on the CSCSL because of unresolved past concerns for leaking underground petroleum storage tanks with apparent record of impact to groundwater. The TCP SHA process is solely for these concerns. It is independent of other site interaction with Ecology such as your NPDES Industrial Stormwater permitting through the Water Quality Program.

You should know the SHA process does not conclude with TCP taking direct action or require action from the property owner. Currently, the most common method to resolve these types of old environmental issues and cleanup (if required) is through Ecology's Voluntary Cleanup Program (VCP). For information about the program and how it may benefit this site contact Scott Rose at 360-407-6347. Scott coordinates VCP for TCP in this regional office, and you corresponded with him last year about the site early notice letter for the CSCSL.

I hope this helps. Please let me know if you have questions about this message, or other issues with TCP's involvement with this site.

Regards,

Cris Matthews, LHG
Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office
Washington Department of Ecology
360.407.6388
cris.matthews@ecy.wa.gov
www.ecy.wa.gov/programs/tcp/cleanup.html

From: Mark Fleischauer [mailto:MFleisch@jhkelly.com]
Sent: Tuesday, February 04, 2014 2:29 PM
To: Matthews, Cris (ECY); Alvarez, Kirsten (ECY)
Cc: Nicole McOmie; Jamie MorrisPease
Subject: Evans - Major-- JH Kelly

Dear Cris and Kirsten-

We were forwarded the attached letter from DOE earlier this year, and I wanted to touch base with you on several fronts.

First off, we are happy to host Kirsten or any other DOE representative. To arrange a visit, please contact our safety officer and industrial hygienist Nicole McOmie. She is copied on this email and can be reached at 360.423.5510.

Secondly, I was curious as to what's driving our status as a CSCSL and the purported need for another SHA. Nicole has been working closely with DOE (Kevin Hancock) over the last few years as we transitioned to the imposition of an NPDES permit. Nicole has done a great job of sampling, reporting and overseeing numerous best practices to reduce and mitigate storm water issues. As you'll note from our most recent DOE correspondence, we have made significant improvements in controlling zinc and are actively engaged in BMPs. Does the DOE have other storm water concerns other than those being addressed by Nicole and Kevin?

We have also been pro-active with the DOE regarding USTs that were removed and remediated by a certified contractor well over twenty years ago. I have attached recent correspondence relative to the UST issue, and I believe we have been very responsive to these matters. We have received no further communication from Paul Turner at DOE since the April 23, 2013 email.

Could you please outline just what factors are underlying the CSCSL and SHA, and what other actions we need to take in order to be removed from these lists?

Thanks much for your assistance.

Mark Fleischauer

JH KELLY

Mark Fleischauer
Sr. Vice President & General Counsel
JH Kelly LLC
2311 East First St.
Vancouver, WA 98661
360.759.3307

Exhibit

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 · Olympia, Washington 98504-7775 · (360) 407-6300
711 for Washington Relay Service · Persons with a speech disability can call 877-833-6341

February 2, 2016

Evans Major LLC
821 3rd Ave
Longview, WA 98632

RE: Site Hazard Assessment Completion
Ecology Facility Site ID: 74552527

To Whom It May Concern:

The Washington State Department of Ecology (Ecology) has completed the Site Hazard Assessment (SHA) of the **J. H. Kelly Inc. site,** located at 821 3rd Ave in Longview. The action was under the authority of Ecology as required by the Model Toxics Control Act (Chapter 70.1 05D RCW).

Based on this work, a **hazard ranking of 2** has been assigned to this site. The hazard ranking is an estimation of the potential threat to human health and/or the environment, relative to all other Washington State sites assessed at this time. The ranking scale is 1 to 5, with 1 representing the highest relative risk and 5 the lowest relative risk. The site will be placed on Ecology's Hazardous Sites List, a compilation of these rankings updated twice a year.

Ecology will publish the ranking of this and other recently assessed sites in the February 2016 Site Register Special Issue (Hazardous Sites List). The site hazard ranking will be used in addition to other site-specific considerations in determining Ecology's priority for future actions. Please contact me at (360) 407-6246 if you have any questions regarding the SHA of this site, the ranking process, or further activities at the site related to this listing.

Sincerely,

Kirsten Alvarez
Toxics Cleanup Program
Washington State Department of Ecology

KA/ksc:J H Kelly Inc SHA Result

By certified mail: (91 7108 2133 3939 7043 6461

Site Hazardous Assessment is a First Step

Under the Model Toxics Control Act, one of the first steps in the process for cleaning up a hazardous waste site is a Site Hazard Assessment (SHA). During a site hazard assessment, the Department of Ecology collects environmental data about a site to determine the type and extent of contamination. If further action is needed, Ecology ranks the site using the Washington Ranking Method (WARM) and places it on the *Hazardous Sites List*.

Assessing the Potential Hazard

A site hazard assessment provides preliminary data regarding the potential hazard of a site. The main purpose of a site hazard assessment is to provide sufficient sampling data and other information to:

- Confirm or rule out contamination
- Identify the hazardous substance(s)
- Identify environmental characteristics associated with the site
- Evaluate the potential threats to human health and the environment

In addition, the site hazard assessment provides enough information to allow Ecology to rank the site's potential hazard relative to other sites on the *Hazardous Sites List*. This helps Ecology determine which sites should be worked on first. It is important to note that a hazard assessment is not intended to be a detailed site study or assessment of the health risk posed by a site.

Is a Site Hazard Assessment Always Necessary?

No, for a variety of reasons, a site hazard assessment may not always be necessary at a site. For example, sites doing independent cleanups and requesting Ecology consultation under the voluntary cleanup program would not normally need a site hazard assessment. In general, Ecology will conduct a site hazard assessment on sites that are anticipated to require significant future staff resources, since the assessment helps in setting workload priorities.

What Information Is Needed To Accurately Assess a Site?

Although a site hazard assessment is not intended to be a detailed site characterization, it includes sampling results from various locations on and around the site, site observations, maps and historical information. Specifically, a site hazard assessment should include:

1. Evidence confirming a release or threatened release of a hazardous substance.
2. Identification of the hazardous substances and their location, including what was or may be released and, if applicable, what products of decomposition, recombination or chemical reaction are currently present at the site.
3. A description of the facilities containing the substances and their condition.
4. Consideration of surface water run-on or run-off and the possibility of contaminants seeping through the surface and contaminating ground water.

5. Characterization of sub-surface and ground water, including the depth to ground water and distance to nearby wells, bodies of surface water and drinking water supplies.
6. An evaluation of human population, food crops, recreation areas, sensitive environments, irrigated areas and aquatic resources.
7. Any other factors which may be significant in estimating exposure of sensitive environments to hazardous waste.

What Happens After the Hazard Assessment?

The environmental information collected through the site hazard assessment process is used to "score" the primary exposure routes through which contaminants could pose a risk to human health and the environment. These include surface water, air and ground water. Each exposure route is then evaluated to determine the relative risk at each site and the final ranking for each site. Sites are ranked on a scale of 1 to 5 using the Washington Ranking Method, with a ranking of 1 representing the highest level of potential risk and 5 the lowest. The rankings represent an estimation of the potential threat posed by a site compared to all other assessed/ranked sites in the state.

Ecology will provide results from the site hazard assessment to site owners, operators and other potentially liable persons. If the department determines, after the assessment, that no further action is required at the site, it will notify the public through Ecology's *Site Register*.

How Can I Get More Information?

If you are interested in finding out more about a specific site or to find out which sites in your area will be assessed in the near future, call the regional office in which the site is located:

Central Region (*Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima*)	15 West Yakima Ave, Suite 200 Yakima WA 98902-3452	509/575-2490
Eastern Region (*Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman*)	N. 4601 Monroe, Suite 100 Spokane WA 99205-1295	509/329-3400
Northwest Region (*Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom*)	3190 160th Ave SE Bellevue WA 98008-5452	425/649-7000
Southwest Region (*Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Pierce, Skamania, Thurston, Wahkiakum*)	P O Box 47775 Olympia WA 98504-7775	360/407-6300

For additional information on the Site Hazard Assessment/WARM Ranking process, or to receive the Site Register, contact: Department of Ecology, Toxics Cleanup Program, P. O. Box 47600, Olympia WA 98504-7600. Or call 360/407-7170 or visit the Ecology website at: www.ecy.wa.gov and click on *Programs* then *Toxics Cleanup*. For information on the cleanup process and cleanup definitions, visit this site: http://www.ecy.wa.gov/programs/tcp/cu_support/cu_process_steps_defns.htm

This focus sheet is intended to help the user understand the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC. It does not establish or modify regulatory requirements.

Hazardous Sites List

SITE REGISTER SPECIAL ISSUE — August 28, 2015

Clark

FS ID	SITE NAME	CITY	RANK		STATUS	RU
95697798	RONALD BROWN PROPERTY	CAMAS	5		Cleanup Started	SW
1105153	SCHAFFER PROPERTY	RIDGEFIELD	3		Awaiting Cleanup	SW
9157494	SPRAGUE & FJERMESTAD	RIDGEFIELD	3		Awaiting Cleanup	SW
61862781	ST SERVICES NUSTAR ENERGY LP	VANCOUVER	2		Cleanup Started	SW
11197	SUN DRY CLEANERS VANCOUVER	VANCOUVER	2		Awaiting Cleanup	SW
1063	TIME OIL HANDY ANDY 8	VANCOUVER	1		Construction Complete-Performance Monitoring	SW
10775	TODAYS FAMILY DENTISTRY	VANCOUVER	2		Awaiting Cleanup	SW
11251483	TOSCO CORPORATION SITE 257323-31299	VANCOUVER	3		Cleanup Started	SW
69965472	US ARMY CAMP BONNEVILLE	VANCOUVER	1		Cleanup Started	HQ
5093080	US ARMY CAMP BONNEVILLE RAU-1	PROEBSTEL	2		Cleanup Started	HQ
9420069	US ARMY CAMP BONNEVILLE RAU-2	PROEBSTEL	1		Cleanup Started	HQ
47197	US ARMY CAMP BONNEVILLE RAU-2A	PROEBSTEL	1		Cleanup Started	HQ
3184561	US ARMY CAMP BONNEVILLE RAU-2B	PROEBSTEL	1		Cleanup Started	HQ
475000	US ARMY CAMP BONNEVILLE RAU-2C	PROEBSTEL	1		Cleanup Started	HQ
5125990	US ARMY CAMP BONNEVILLE RAU-3	PROEBSTEL	1		Cleanup Started	HQ
202	VANCOUVER CITY BLANDFORD STATION 4	VANCOUVER	0	▲	Cleanup Started	EP
5922991	VANCOUVER PORT OF 058720-000	VANCOUVER	5		Awaiting Cleanup	SW
1026	VANCOUVER PORT OF NUSTAR CADET SWAN	VANCOUVER	1		Cleanup Started	SW
1024	WA DOC DNR LARCH MOUNTAIN CORR	YACOLT	2		Cleanup Started	SW
46933333	WA DOT SHELL DENNIS MEADOWS	VANCOUVER	3		Cleanup Started	SW
1050	WA DOT VANCOUVER	VANCOUVER	5		Cleanup Started	SW
77432389	WA PARKS BATTLEGROUND STATE PARK	BATTLE GROUND	2		Awaiting Cleanup	SW
3612707	WERTZ PROPERTY	RIDGEFIELD	2		Awaiting Cleanup	SW

Columbia

FS ID	SITE NAME	CITY	RANK	STATUS	RU
41637325	SKYLINE FLUID POWER INC	DAYTON	2	Awaiting Cleanup	EA

Cowlitz

FS ID	SITE NAME	CITY	RANK	STATUS	RU
1095	ARATEX	LONGVIEW	2	Awaiting Cleanup	SW
16676141	ASTRO 745 - MINIT MART	WOODLAND	3	Cleanup Started	SW
430456	BNSF RR 2003 TRAIN COLLISION	KELSO	1	Awaiting Cleanup	SW
62794162	CHEVRON 60098829	WOODLAND	2	Cleanup Started	SW
1101	CHEVRON USA LONGVIEW	LONGVIEW	1	Cleanup Started	SW
1102	CLIFF KOPPE METALS	KELSO	2	Awaiting Cleanup	SW
2070515	DION CLARK PROPERTY	WOODLAND	1	Awaiting Cleanup	SW
95369134	DOT KELSO MAINTENANCE SITE	KELSO	3	Cleanup Started	SW
8358215	DREWS GROCERY & SERVICE	TOUTLE	2	Cleanup Started	SW
11589213	E R KELLY ESTATE	LONGVIEW	2	Awaiting Cleanup	SW
1082	EMERALD KALAMA CHEMICAL LLC	KALAMA	1	Cleanup Started	IN
810	FUEL PROCESSORS INC	WOODLAND	3	Cleanup Started	SW
1091	GARDNER FOREST PRODUCTS	LONGVIEW	4	Awaiting Cleanup	SW
36354352	GROAT BROS INC	WOODLAND	1	Cleanup Started	SW
29977842	HALTON COMPANY	LONGVIEW	2	Cleanup Started	SW
87376683	HOLTS QUIK CHEK MARKET	KELSO	2	Cleanup Started	SW

HSL Legend

◆ New site added to the ranked list

▼ Superfund site, State has lead

Superfund site, Federal (EPA) has lead

◀ Superfund site, Joint lead

▶◀ Superfund site, Federal Facilities Agrmnt

Tacoma Smelter Plume (State Lead)

Responsible Unit (RU) Site Contacts

(CE) Central Regional Office: Frosti Smith (509) 454-7841 /Ted Benson (360) 407-6683
(EA) Eastern Regional Office: Patti Carter (509) 329-3522/Ted Benson (360) 407-6683
(NW) Northwest Regional Office: Donna Musa (425) 649-7136/Ted Benson (360) 407-6683
(SW) Southwest Regional Office: Rebecca Lawson (360) 407-6241 /Ted Benson (360) 407-6683
(HQ) Headquarters Cleanup Section: Barry Rogowski (360) 407-7243/Ted Benson (360) 407-6683
(IN) Industrial Section: Guy Barrett (360) 407-6999/Ted Benson (360) 407-6683
(HA) Nuclear Waste Program: John Price (509) 372-7921/Robin Varljen (509) 372-7912

Hazardous Sites List

SITE REGISTER SPECIAL ISSUE — August 28, 2015

Cowlitz

FS ID	SITE NAME	CITY	RANK	STATUS	RU
1080	INTERNATIONAL PAPER LONGVIEW	LONGVIEW	1	Cleanup Started	SW
1597458	KALAMA PORT OF FORMER COLUMBIA FIBRE	KALAMA	3	Awaiting Cleanup	SW
14672927	KID VALLEY STORE	TOUTLE	5	Cleanup Started	SW
5808650	LONGVIEW AUTO WRECKING	LONGVIEW	1	Awaiting Cleanup	SW
31	LONGVIEW FIBRE PAPER & PACKAGING	LONGVIEW	5	Construction Complete-Performance Monitoring	IN
1105	MCCORD BROS NISSAN DODGE	LONGVIEW	3	Awaiting Cleanup	SW
91861675	MILLER'S MARKET	LONGVIEW	1	Cleanup Started	SW
63671677	MONTICELLO GARAGE	LONGVIEW	2	Awaiting Cleanup	SW
53662275	NG PROPERTY	LONGVIEW	1	Awaiting Cleanup	SW
6799307	OLD KALAMA LANDFILL	KALAMA	3	Awaiting Cleanup	SW
1092	OLYMPIC PIPELINE COMPANY	CASTLE ROCK	1	Awaiting Cleanup	SW
1084	OSTRANDER PROPERTY	LONGVIEW	4	Awaiting Cleanup	SW
7491444	PACIFIC PRIDE 3	KELSO	5	Cleanup Started	SW
99775267	PARKS MAINTENANCE DEPARTMENT	LONGVIEW	3	Cleanup Started	SW
42978181	PORT LONGVIEW	LONGVIEW	2	Awaiting Cleanup	SW
28773839	QUALITY CARRIERS INC	KELSO	3	Cleanup Started	SW
5878482	◆ REPROGRAPHICS	LONGVIEW	3	Cleanup Started	SW
29	REYNOLDS METALS ALUMINUM SMELTER	LONGVIEW	5	Cleanup Started	IN
99173413	ROSE STIRLING HONDA	LONGVIEW	2	Cleanup Started	SW
1085	SCHILL BROTHERS ASPHALT & PAVING	LONGVIEW	1	Awaiting Cleanup	SW
4962876	SHELL STATION OREGON WAY	LONGVIEW	2	Cleanup Started	SW
74214235	SUBURBAN PROPANE	LONGVIEW	2	Cleanup Started	SW
9643998	THE ARCHDIOCESE HOUSING AUTHORITY	KELSO	1	Cleanup Started	SW
[illegible]925141	◆ THE CLEAN MACHINE	LONGVIEW	2	Cleanup Started	SW
[illegible]664878	TIME SAVER MART	LONGVIEW	3	Awaiting Cleanup	SW
53212796	TROY PROPERTY	KELSO	2	Awaiting Cleanup	SW
1094	UNOCAL BULK PLANT 0321	KELSO	1	Cleanup Started	SW
1111	UNOCAL BULK PLANT 0885	WOODLAND	3	Cleanup Started	SW
53424674	UNOCAL KELSO	KELSO	2	Cleanup Started	SW
3964890	WALLACE ROCK PRODUCTS INC	KELSO	1	Awaiting Cleanup	SW
1083	WEST COAST MOBIL OIL CO	LONGVIEW	1	Construction Complete-Performance Monitoring	SW
54248966	WEST COAST OIL (OREGON WAY)	LONGVIEW	2	Cleanup Started	SW
28	WEYERHAEUSER CO HG CHLOR ALK	LONGVIEW	1	Cleanup Started	IN
27	WEYERHAEUSER CO LONGVIEW	LONGVIEW	1	Cleanup Started	IN
1106	WEYERHAEUSER HQ CAMP	CASTLE ROCK	3	Awaiting Cleanup	SW
62431315	WEYERHAEUSER TIMBERLANDS	COUGAR	3	Awaiting Cleanup	SW
83572551	WILCOX & FLEGEL OIL CO	KELSO	2	Cleanup Started	SW
57785258	WILDWOOD CORP RYDERWOOD PROPERTY	RYDERWOOD	3	Cleanup Started	SW

Douglas

FS ID	SITE NAME	CITY	RANK	STATUS	RU
813	AMERICAN SILICON TECHNOLOGIES	ROCK ISLAND	4	Cleanup Started	CE
23834782	AUVIL FRUIT COMPANY INC RANCH 1	ORONDO	5	Cleanup Started	CE
74382127	G & K COUNTRY STORE / ROCKY BUTTE	BREWSTER	5	Cleanup Started	CE
25378742	NORTH CENTRAL PETROLEUM SPILL	BRIDGEPORT	5	Cleanup Started	CE

HSL Legend

◆ New site added to the ranked list

▼

▲ Superfund site: State has lead

Superfund site: Federal (EPA) has lead

Superfund site: Joint lead

Superfund site: Federal Facilities Agrmnt

▶◀ Tacoma Smelter Plume (State Lead)

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(HQ) Headquarters Cleanup Section: Barry Rogowski (360) 407-7213/Ted Benson (360) 407-6683
(IN) Industrial Section: Guy Barrett (360) 407-6999/Ted Benson (360) 407-6683
(HA) Nuclear Waste Program: John Price (509) 372-7921/Robin Varljen (509) 372-7912

Exhibit

V

ALS Environmental
ALS Group USA, Corp
1317 South 13th Avenue
Kelso, WA 98626
T : +1 360 577 7222
F : +1 360 636 1068
www.alsglobal.com

April 22, 2016

Analytical Report for Service Request No: K1603664

Nicole McOmie
JH Kelly
2311 E. First St.
Vancouver, WA 98661

RE:

Dear Nicole,

Enclosed are the results of the sample(s) submitted to our laboratory April 12, 2016
For your reference, these analyses have been assigned our service request number **K1603664.**

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3275. You may also contact me via email at Chris.Leaf@ALSGlobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Chris Leaf
Project Manager

ALS Environmental
ALS Group USA, Corp
1317 South 13th Avenue
Kelso, WA 98626
T : +1 360 577 7222
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www.alsglobal.com

Table of Contents

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LOD	Limit of Detection
LOQ	Limit of Quantitation
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated value.
U	The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. *DOD-QSM 4.2 definition* : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
i	The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
X	See case narrative.
Q	See case narrative. One or more quality control criteria was outside the limits.
H	The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

#	The control limit criteria is not applicable. See case narrative.
J	The result is an estimated value.
E	The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits. See case narrative.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. *DOD-QSM 4.2 definition* : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
X	See case narrative.
+	The correlation coefficient for the MSA is less than 0.995.
Q	See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimated value.
J	The result is an estimated value.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
U	The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. *DOD-QSM 4.2 definition* : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
i	The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
X	See case narrative.
Q	See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

F	The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
L	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
H	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
O	The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
Y	The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
Z	The chromatographic fingerprint does not resemble a petroleum product.

ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso
State Certifications, Accreditations, and Licenses

Agency	Web Site	Number
Alaska DEC UST	http://dec.alaska.gov/applications/eh/ehllabreports/USTLabs.aspx	UST-040
Arizona DHS	http://www.azdhs.gov/lab/license/env.htm	AZ0339
Arkansas - DEQ	http://www.adeq.state.ar.us/techsvs/labcert.htm	88-0637
California DHS (ELAP)	http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx	2795
DOD ELAP	http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm	L14-51
Florida DOH	http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm	E87412
Hawaii DOH	Not available	-
Idaho DHW	http://www.healthandwelfare.idaho.gov/Health/Labs/CertificationDrinkingWaterLabs/tabid/1833/Default.aspx	-
ISO 17025	http://www.pjlabs.com/	L14-50
Louisiana DEQ	http://www.deq.louisiana.gov/portal/DIVISIONS/PublicParticipationandPermitSupport/LouisianaLaboratoryAccreditationProgram.aspx	03016
Maine DHS	Not available	WA01276
Michigan DEQ	http://www.michigan.gov/deq/0,1607,7-135-3307_4131_4156---,00.html	9949
Minnesota DOH	http://www.health.state.mn.us/accreditation	053-999-457
Montana DPHHS	http://www.dphhs.mt.gov/publichealth/	CERT0047
Nevada DEP	http://ndep.nv.gov/bsdw/labservice.htm	WA01276
New Jersey DEP	http://www.nj.gov/dep/oqa/	WA005
North Carolina DWQ	http://www.dwqlab.org/	605
Oklahoma DEQ	http://www.deq.state.ok.us/CSDnew/labcert.htm	9801
Oregon – DEQ (NELAP)	http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaboratoryAccreditation/Pages/index.aspx	WA100010
South Carolina DHEC	http://www.scdhec.gov/environment/envserv/	61002
Texas CEQ	http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html	T104704427
Washington DOE	http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html	C544
Wisconsin DNR	http://dnr.wi.gov/	998386840
Wyoming (EPA Region 8)	http://www.epa.gov/region8/water/dwhome/wyomingdi.html	-
Kelso Laboratory Website	www.alsglobal.com	NA

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.
Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/anlayte is offered by that state.

ALS Environmental

Chain of Custody

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577- 7222 Fax (360)636- 1068
www.alsglobal.com

ALS Environmental

CHAIN OF CUSTODY

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COC#____

Page 1 of 1

1317 South 13th Ave, Kelso, WA 98626 Phone (360) 577-7222 / 800-695-7222 / FAX (360) 636-1068
www.alsglobal.com

Project Name: | Project Number:

Project Manager: Tracy sillik

Company: JH Kelly

Address: 821 Third Ave., Longview, WA 98632

Phone # 360-575-3160 | email: Tsillik@jhkelly.com

Sampler Signature: [signature] | Sampler Printed Name: Laurence spangler

CLIENT SAMPLE ID	LABID	SAMPLING Date	SAMPLING Time	Matrix	NUMBER OF CONTAINERS	14D 8260B / VOC_FP	1	2	3	4	5	Remarks
1. well		04-12-16	1245	W	3	X						
2. [illegible] other		04-12-16	1300	W	3	X						
3.												
4.												
5.												
6.												
7.												
8.												
9.												
10.												

Report Requirements

___ I. Routine Report: Method Blank, Surrogate, as required

___ II. Report Dup., MS, MSD as required

___ III. CLP Like Summary (no raw data)

___ IV. Data Validation Report

___ V. EDD

Invoice Information

P.O.#____

Bill To:____

Turnaround Requirements

___ 24 hr. ___ 48 hr.

___ 5 Day

_X_ Standard

Requested Report Date

Circle which metals are to be analyzed

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Special Instructions/Comments:

*Indicate State Hydrocarbon Procedure: AK CA WI Northwest Other____ (Circle One)

	Relinquished By:	Received By:	Relinquished By:	Received By:	Relinquished By:	Received By:
Signature	[signature]	K Smith				
Printed Name	Laurence spangler	ALS				
Firm	ESS					
Date/Time	04-12-16 1325	4/12/16 1325				

PC W

Cooler Receipt and Preservation Form

Client JH Kelly Service Request K16 1631664

Received: 4/12/16 Opened: 4/12/16 By: UL Unloaded: 4/12/16 By: UL

1. Samples were received via? *Mail* *Fed Ex* *UPS* *DHL* *PDX* *Courier* *Hand Delivered*
2. Samples were received in: (circle) *Cooler* *Box* *Envelope* *Other*_____ *NA*
3. Were custody seals on coolers? NA Y N If yes, how many and where?_____
   If present, were custody seals intact? Y N If present, were they signed and dated? Y N

Temp °C	Corrected Temp °C	Raw Temp Blank	Corrected Temp Blank	Corr. Factor	Thermometer ID	Cooler/COC ID NA	Tracking Number NA	Fed
13.3	13.0	19.1	18.8	-0.3	328	69561		

4. Packing material: *Inserts* *Baggies* *Bubble Wrap* *Gel Packs* *Wet Ice* *Dry Ice* *Sleeves* _____
5. Were custody papers properly filled out (ink, signed, etc.)? Thawed. NA Y N
6. Did all bottles arrive in good condition (unbroken)? *Indicate in the table below.* NA Y N
7. Were all sample labels complete (i.e analysis, preservation, etc.)? NA Y N
8. Did all sample labels and tags agree with custody papers? *Indicate major discrepancies in the table on page 2.* NA Y N
9. Were appropriate bottles/containers and volumes received for the tests indicated? NA Y N
10. Were the pH-preserved bottles (*see SMO GEN SOP*) received at the appropriate pH? *Indicate in the table below* NA Y N
11. Were VOA vials received without headspace? *Indicate in the table below.* NA Y N
12. Was C12/Res negative? NA Y N

Sample ID on Bottle	Sample ID on COC	Identified By:

Sample ID	Bottle Count Bottle Type	Out of Temp	Head space	Broke	pH	Reagent	Volume added	Reagent Lot Number	Initials	Time

*Notes, Discrepancies, & Resolutions:*_____

*Page*____ *of*____

ALS Environmental

Volatile Organic Compounds

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577- 7222 Fax (360)636- 1068
www.alsglobal.com

Analytical Results

Client: JH Kelly
Project:
Sample Matrix: Water

Service Request: K1603664
Date Collected: 04/12/2016
Date Received: 04/12/2016

Volatile Organic Compounds

Sample Name: Well
Lab Code: K1603664-001

Extraction Method: EPA 5030B
Analysis Method: 8260C

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
Toluene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
Ethylbenzene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
m,p-Xylenes	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
o-Xylene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	116	73-122	04/20/16	Acceptable
Toluene-d8	113	65-144	04/20/16	Acceptable
4-Bromofluorobenzene	101	68-117	04/20/16	Acceptable

Comments:

ALS Group USA, Corp. dba ALS Environmental

Analytical Results

Client: JH Kelly
Project:
Sample Matrix: Water

Service Request: K1603664
Date Collected: 04/12/2016
Date Received: 04/12/2016

Volatile Organic Compounds

Sample Name: Drainage Ditch
Lab Code: K1603664-002

Extraction Method: EPA 5030B
Analysis Method: 8260C

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
Toluene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
Ethylbenzene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
m,p-Xylenes	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
o-Xylene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	117	73-122	04/20/16	Acceptable
Toluene-d8	114	65-144	04/20/16	Acceptable
4-Bromofluorobenzene	103	68-117	04/20/16	Acceptable

Comments:

Analytical Results

Client: JH Kelly
Project:
Sample Matrix: Water

Service Request: K1603664
Date Collected: NA
Date Received: NA

Volatile Organic Compounds

Sample Name: Method Blank
Lab Code: KWG1603036-4

Extraction Method: EPA 5030B
Analysis Method: 8260C

Units: ug/L
Basis: NA
Level: Low

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Note
Benzene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
Toluene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
Ethylbenzene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
m,p-Xylenes	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	
o-Xylene	ND	U	0.50	1	04/20/16	04/20/16	KWG1603036	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Note
Dibromofluoromethane	117	73-122	04/20/16	Acceptable
Toluene-d8	114	65-144	04/20/16	Acceptable
4-Bromofluorobenzene	102	68-117	04/20/16	Acceptable

Comments: