



DAVIDO CONSULTING GROUP, INC.

CIVIL • STRUCTURAL • LAND USE

MEMORANDUM

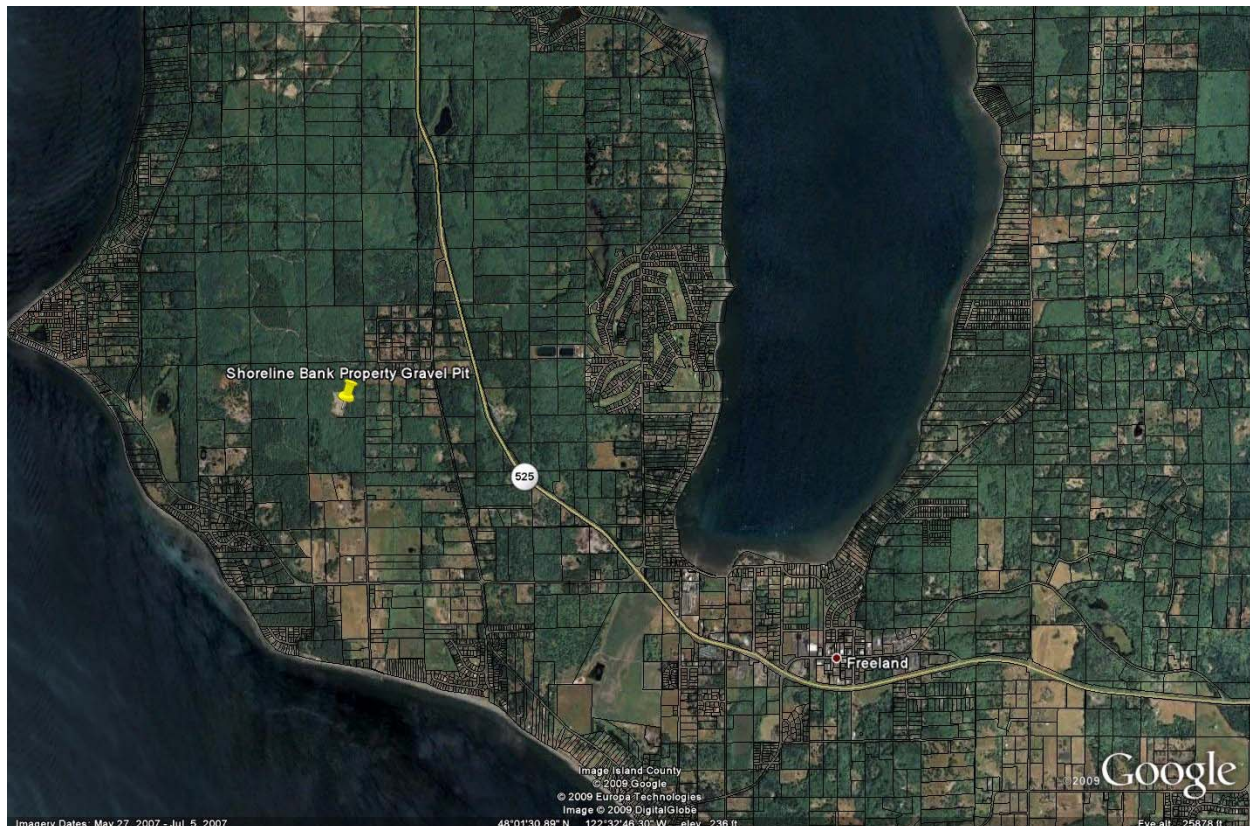
TO: Donna Musa
Regional II/SHA Coordinator
WA Dept of Ecology
NWRO Toxics Cleanup

FROM: Gary Hess, PE, LEED AP

DATE: January 4, 2010

RE: Shoreline Bank Property Gravel Pit Contaminated Soil Cleanup Report

The Freeland Water and Sewer District ("District") is in the process of purchasing 80 acres of tree farm property from Shoreline Bank. The Bank acquired the 744 acre "Trillium Tree Farm" property in foreclosure on October 9, 2009. The District's interest in the property is for the eventual use as a groundwater recharge area for the proposed Freeland Sewer System. As Engineer for the District, I have been involved in these negotiations. The property is located on Whidbey Island approximately 2.5 miles northwest of Freeland. The gravel pit coordinates are Latitude 48°01'33.32" Longitude 122°34'27.39". The tax parcel number is R22905-166-4310 in Township 29N, Range 2E, Section 5, and Quarter-Quarter: NE-SE.



To: Donna Musa, WA Dept of Ecology, NWRO Toxics Cleanup
Date: January 5, 2010

Prior to the purchase, I inspected the property, part of which contains a 5 acre unregulated/permitted gravel pit. The pit was established to supply gravel for road maintenance on the Tree Farm site. Island County has no record of a permit for a gravel mining operation. In the recent past, the pit operators stored a Caterpillar bulldozer. When visiting the pit on October 21, 2009, I discovered that the bulldozer had been removed. Evidence of oil change/engine servicing was left (buckets of oil, oily rags, filters and empty oil jugs). The Bank and the District agreed that the contamination should be cleaned up to the best of our ability and the District directed me to coordinate the work. There were two patches of what appeared to be oil contaminated soil where the bulldozer was previously stored. On a later visit to the site, I found another location where used oil was left which was considerably more contaminated with oil puddled on the ground (see photos, Attachment A). Five buckets of used oil were taken to the Island County Transfer station for recycling.



I contacted Ecology's Voluntary Cleanup Program NW Region office and received advice on applying for the VCP program. At the same time I contacted Cemex in Everett about receiving the contaminated soils. Following these contacts I visited the site and grabbed samples of the contaminated soil from the bulldozer storage location for analysis by ALS Laboratory Group in Everett. The analysis (Attachment B) confirmed the presence of total petroleum hydrocarbons in the soil.

Subsequent discussion with Ecology directed me to the Small Spill Cleanup Guide for petroleum spills and guidance for removal of the contaminated soil and preparation of this cleanup report. A contractor was hired and 14.86 tons of petroleum contaminated soil were removed and delivered to Cemex for destruction. Attachment C is a copy of the invoice from Cemex receiving the contaminated soil for processing at their Everett Plant.

I monitored the excavation of the contaminated soils and to the best of my knowledge determined the contamination removed. Samples from the excavation sites were taken to verify the cleanup. Attachment D is the analysis by ALS Laboratory Group of the clean site samples.

To: Donna Musa, WA Dept of Ecology, NWRO Toxics Cleanup
Date: January 5, 2010

ATTACHMENT A: PHOTOS

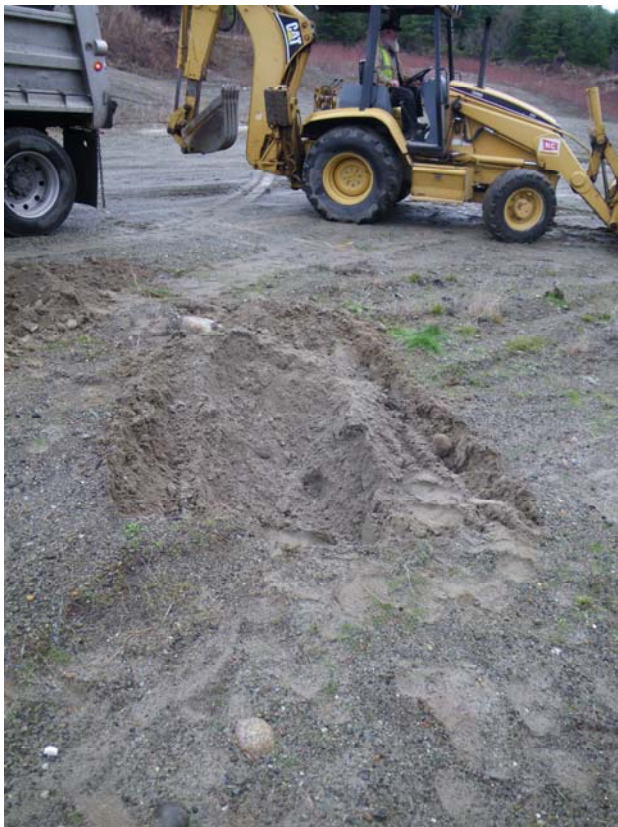


Bulldozer
parked here,
contaminated
soil sites 1 &
2



Contaminated soil site #3; oil buckets removed from this location

To: Donna Musa, WA Dept of Ecology, NWRO Toxics Cleanup
Date: January 5, 2010



Excavating contaminated
soils from Gravel Pit
site.
December 15, 2009

To: Donna Musa, WA Dept of Ecology, NWRO Toxics Cleanup
Date: January 5, 2010

ATTACHMENT B:

Laboratory Analysis Report on Contaminated Soil



ALS Laboratory Group
ANALYTICAL CHEMISTRY & TESTING SERVICES

CERTIFICATE OF ANALYSIS

CLIENT: Davido Consulting Group, Inc.
PO Box 1132
Freeland, WA 98249

DATE: 11/17/2009
ALS JOB#: 0911069
DATE RECEIVED: 11/16/2009
WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given
CLIENT SAMPLE ID: 11/16/2009 Dogwood 1
ALS SAMPLE #: -01

DATA RESULTS

ANALYTE	METHOD	RESULTS*	REPORTING LIMITS	DILUTION FACTOR	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	6,000	250	10	MG/KG	11/17/2009	EBS
TPH-Oil Range	NWTPH-DX	18,000	500	10	MG/KG	11/17/2009	EBS

Chromatogram indicates that it is likely that sample contains light oil.

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT.

** UNITS FOR ALL NON-LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS.

APPROVED BY:



ALS Laboratory Group
ANALYTICAL CHEMISTRY & TESTING SERVICES

CERTIFICATE OF ANALYSIS

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WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given

QUALITY CONTROL RESULTS

SURROGATE RECOVERY

ALS SAMPLE ID	METHOD	SUR ID	% RECV
0911069-01 10X Dilution	NWTPH-DX	C25	S2

S2- Surrogate outside of control limits due to dilution.

APPROVED BY:



ALS Laboratory Group
ANALYTICAL CHEMISTRY & TESTING SERVICES

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DATE RECEIVED: 11/16/2009
WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given

QUALITY CONTROL RESULTS

BLANK RESULTS

QC SAMPLE ID	MATRIX	METHOD	ANALYTE	RESULT	UNITS
MB-111209S	Soil	NWTPH-DX	TPH-Diesel Range	ND(<25)	MG/KG
MB-111209S	Soil	NWTPH-DX	TPH-Oil Range	ND(<50)	MG/KG

APPROVED BY:



ALS Laboratory Group

ANALYTICAL CHEMISTRY & TESTING SERVICES

CERTIFICATE OF ANALYSIS

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PO Box 1132
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DATE: 11/17/2009
ALS JOB#: 0911069
DATE RECEIVED: 11/16/2009
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CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given

QUALITY CONTROL RESULTS

BLANK SPIKE/BLANK SPIKE DUPLICATE RESULTS

QC BATCH ID	MATRIX	METHOD	ANALYTE	SPIKE AMOUNT	BLANK SPIKE RECOVERY	BLANK SPIKE DUPLICATE RECOVERY	RPD
386	Soil	NWTPH-DX	TPH-Diesel Range	250	93%	95%	2

APPROVED BY:



CCI Analytical Laboratories, Inc.
8620 Holly Drive
Everett, WA 98208
Phone (425) 356-2600
(206) 292-9059 Seattle
(425) 356-2626 Fax
http://www.cciabs.com

Chain Of Custody/ Laboratory Analysis Request

CCI Job# (Laboratory Use Only)

911069

Date 11/16/09 Page 1 of 1

PROJECT ID:				ANALYSIS REQUESTED												OTHER (Specify)											
REPORT TO COMPANY:				DAVID CONSULTING GROUP, INC.																							
PROJECT MANAGER:				GARY HESS PE																							
ADDRESS:				17 E. MAIN ST PO BOX 1132 FREELAND, WA 98249																							
PHONE: (360) 331-4131				FAX: (360) 331-5131																							
PO. NUMBER:				E-MAIL: gary@dcengr.com																							
INVOICE TO COMPANY:				DAVID CONSULTING GROUP																							
ATTENTION:				GARY HESS																							
ADDRESS:				SAME AS ABOVE																							
SAMPLE I.D.	DATE	TIME	TYPE	LAB#	NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA-8021	MTBE by EPA-8021 <input type="checkbox"/> EPA-8260 <input type="checkbox"/>	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	Ethylene dibromide (EDB) by EPA-8260 <input type="checkbox"/> EPA-504.1 <input type="checkbox"/>	1,2 Dichloroethene (EDC) by EPA-8260	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA-8270 SIM <input type="checkbox"/>	PCB <input type="checkbox"/> Pesticides <input type="checkbox"/> by EPA 8081/8082	Metals-MTCA-5 <input type="checkbox"/> RCRA-8 <input type="checkbox"/> Pri Pol <input type="checkbox"/> TAL <input type="checkbox"/>	Metals Other (Specify)	TCLP-Metals <input type="checkbox"/> VOA <input type="checkbox"/> Semi-Vol <input type="checkbox"/> Pest <input type="checkbox"/> Herbs <input type="checkbox"/>	NUMBER OF CONTAINERS	RECEIVED IN GOOD CONDITION?						
1. Dogwood 1	11/16/09	11AM	Gravel Soil	1		X															1						
2.																											
3.																											
4.																											
5.																											
6.																											
7.																											
8.																											
9.																											
10.																											

SPECIAL INSTRUCTIONS Please email results to gary@dcengr.com
CCI Analytical Laboratories, Inc accepts and processes this request on the terms and conditions set forth on the reverse side. By its signature hereon, Customer accepts these terms and conditions.

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By: Gary Hess 11/17/09

Received By: [Signature] 11/17/09

2. Relinquished By: [Signature]

Received By: [Signature]

Organic, Metals & Inorganic Analysis
TURNAROUND REQUESTED IN BUSINESS DAYS*
OTHER:

Standard 10 5 3 2 1 Same Day

Fuels & Hydrocarbon Analysis

Standard 5 3 1 Same Day

* Turnaround request less than standard may incur Rush Charges

To: Donna Musa, WA Dept of Ecology, NWRO Toxics Cleanup
Date: January 5, 2010

ATTACHMENT C:

Cemex Invoice for Processing Contaminated Soil



Terms: Net 30th prox
Discount Amount:
Payment Due On 01/31/10
Job No. 13112664
Legal Address: PARCEL #R22905-166-4310
Customer Job No. SHORELINE CLENUP
Account: 3147556

For All Inquiries Call: 800-355-2772

001217 FREELAND WATER & SEWER DISTRICT
PO BOX 222
FREELAND, WA 98249-0222

Date	12/15/09
Invoice No.	9418462338
Reference No.	

PO Number		Delivery Address		City		Zip Code	
DATE SHIPPED	DELIVERY NUMBER	RET#	PRODUCT CODE	PRODUCT DESCRIPTION	DELIVERED		NET UNIT PRICE
					QTY	UOM	BY
					UOM		UNITS
					MATERIAL AMOUNT		FREIGHT
VERBAL- G. HESS 12/15/09 8044459456 1876047045 1192508 CLASS 3 SOIL DUMPED BY TON PO Subtotal: 0.00 Yards 14.86 Tons 557.25 Material 0.00 Freight 14.860 TON 37.50 1 TON 14.860 557.25 0.00							
76: PARCEL #R22905-166-4310 FREELAND 98249							

*"Other" amount represents Refuse Tax

Yards	0.00	Tons	14.86	Freight Total	0.00	Other	20.06	Sales Tax Total	0.00	Invoice Total	577.31
PAGE # 1 This Invoice incorporates herein by reference Buyer's previously executed Credit Application, if any, Sellers Standard Terms and Conditions, Seller's Quotation and Seller's Order Confirmation (including limitations of warranties), as fully set forth on this Invoice ("Agreement"). Buyer agrees that unless otherwise noted herein, all quantities and items were delivered as indicated and further expressly agrees to pay in accordance with this Agreement											

This Invoice incorporates herein by reference Buyer's previously executed Credit Application, if any, Seller's Standard Terms and Conditions, Seller's Quotation and Seller's Order Confirmation (including limitations of warranties), as fully set forth on this Invoice ("Agreement"). Buyer agrees that, unless otherwise noted herein, all quantities and items were delivered as indicated and further expressly agrees to pay in accordance with this Agreement.

To: Donna Musa, WA Dept of Ecology, NWRO Toxics Cleanup
Date: January 5, 2010

ATTACHMENT D:

Laboratory Analysis Report on Cleanup Site Soils



CERTIFICATE OF ANALYSIS

CLIENT: Davido Consulting Group, Inc.
PO Box 1132
Freeland, WA 98249

DATE: 12/18/2009
ALS JOB#: 0912090
DATE RECEIVED: 12/16/2009
WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given
CLIENT SAMPLE ID: 12/15/2009 Dogwood Clean Hole #1
ALS SAMPLE #: -01

DATA RESULTS

ANALYTE	METHOD	RESULTS*	REPORTING LIMITS	DILUTION FACTOR	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	270	25	1	MG/KG	12/16/2009	EBS
TPH-Oil Range	NWTPH-DX	920	50	1	MG/KG	12/16/2009	EBS

Chromatogram indicates that it is likely that sample contains light oil/lube oil.

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT.

** UNITS FOR ALL NON-LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS.

APPROVED BY:



CERTIFICATE OF ANALYSIS

CLIENT: Davido Consulting Group, Inc.
PO Box 1132
Freeland, WA 98249

DATE: 12/18/2009
ALS JOB#: 0912090
DATE RECEIVED: 12/16/2009
WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given
CLIENT SAMPLE ID: 12/15/2009 Dogwood Clean Hole #2
ALS SAMPLE #: -02

DATA RESULTS

ANALYTE	METHOD	RESULTS*	REPORTING LIMITS	DILUTION FACTOR	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	ND	25	1	MG/KG	12/16/2009	EBS
TPH-Oil Range	NWTPH-DX	430	50	1	MG/KG	12/16/2009	EBS

Chromatogram indicates that it is likely that sample contains lube oil.

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT.

** UNITS FOR ALL NON-LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS.

APPROVED BY:



CERTIFICATE OF ANALYSIS

CLIENT: Davido Consulting Group, Inc.
PO Box 1132
Freeland, WA 98249

DATE: 12/18/2009
ALS JOB#: 0912090
DATE RECEIVED: 12/16/2009
WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given
CLIENT SAMPLE ID: 12/15/2009 Dogwood Clean Hole #3
ALS SAMPLE #: -03

DATA RESULTS

ANALYTE	METHOD	RESULTS*	REPORTING LIMITS	DILUTION FACTOR	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	1,100	120	5	MG/KG	12/17/2009	EBS
TPH-Oil Range	NWTPH-DX	4,300	250	5	MG/KG	12/17/2009	EBS

Chromatogram indicates that it is likely that sample contains light oil.

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** UNITS FOR ALL NON-LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS.

APPROVED BY:



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DATE: 12/18/2009
ALS JOB#: 0912090
DATE RECEIVED: 12/16/2009
WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given

QUALITY CONTROL RESULTS

SURROGATE RECOVERY

ALS SAMPLE ID	METHOD	SUR ID	% RECV
0912090-01	NWTPH-DX	C25	107%
0912090-02	NWTPH-DX	C25	87%
0912090-03 5X Dilution	NWTPH-DX	C25	96%

APPROVED BY:



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ALS JOB#: 0912090
DATE RECEIVED: 12/16/2009
WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given

QUALITY CONTROL RESULTS

BLANK RESULTS

QC SAMPLE ID	MATRIX	METHOD	ANALYTE	RESULT	UNITS
MB-121609S	Soil	NWTPH-DX	TPH-Diesel Range	ND(<25)	MG/KG
MB-121609S	Soil	NWTPH-DX	TPH-Oil Range	ND(<50)	MG/KG

APPROVED BY:



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DATE: 12/18/2009
ALS JOB#: 0912090
DATE RECEIVED: 12/16/2009
WDOE ACCREDITATION #: C1336

CLIENT CONTACT: Gary Hess
CLIENT PROJECT ID: None Given

QUALITY CONTROL RESULTS

BLANK SPIKE/BLANK SPIKE DUPLICATE RESULTS

QC BATCH ID	MATRIX	METHOD	ANALYTE	SPIKE AMOUNT	BLANK SPIKE RECOVERY	BLANK SPIKE DUPLICATE RECOVERY	RPD
436	Soil	NWTPH-DX	TPH-Diesel Range	250	93%	94%	2

APPROVED BY:




CCI Job# (Laboratory Use Only)

912090

Date_____ Page_____ Of_____[illegible]

CCI Analytical Laboratories Inc accepts and processes this request on the terms and conditions set forth on the reverse side. By its signature hereon, Customer accepts these terms and conditions.

SIGNATURES (Name, Company, Date, Time)
<div> <div>  <div> <div>WILLIAM J. KEENAN</div> <div>12/16/09 8:25 a.m.</div> </div> </div> <div> <div>Beltinghatched But</div> </div> </div>

1. Relinquished By: WILLIAM C. KENST, 12-16-09 8:25 a.m.
William C. Kenst, ACS, 12-16-09 8:25 am
 Received By: _____

2. Relinquished By: _____

Received By: _____

TURNAROUND
Organic, Metals & Inorganic Analysis

Standard

10	5	3	2	1	Sample
10	5	3	2	1	Sample

Specify: _____

* Turnaround request less than standard may incur Bush Charges

red. on