

Environmental Inspection Services

Page 1 of 3

November 6, 1991

Steve Wilcox, President
Wilcox & Flegel Oil Company
110 Panel Way
Longview, WA 98632

Reference: Analytical test results from samples taken from an excavation at the site of "Johns Shell Service Station located at 1410 Ocean Beach Highway in Longview, Washington

Dear Steve,

A field representative from Environmental Inspection Services, Charles Spear, supervised limited excavation activities performed by Jay Brookhart Excavating. The representative also collected four representative soil samples and one water sample (sample No.s 1 thru 5) from the excavation at the aforementioned property on Friday, October 18, 1991. The four soil samples were collected from representative cavity areas as depicted on the Generalized Site Plan Plate P-1. The soil samples were collected in a manner consistent with proper sampling procedures, presentation, and chain of custody documentation as stated in a prepared sampling plan.

The sampling plan was developed to ensure that sample collection, sample location, sample handling, and data analysis were sufficient to evaluate the effectiveness of limited excavations performed on-site. The four soil samples and one water sample were subsequently analyzed by Columbia Analytical Services, Inc. a Longview based certified laboratory, in a manner consistent with the analytical procedures outlined in the EPA test methods document SW-846. Each of the soil samples and the water sample were analyzed for the presence of Total Petroleum Hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX) in manner consistent with Test Methods 5030/8020 and Modified 8015.

Based on the analytical test results from samples taken at representative locations in the subject excavation, the excavation episode was successful with regards to removing contaminated petroleum-contaminated soils within the subject excavation.

The excavation project was briefly described as follows:

Soil was excavated from the 9 foot wide by 28 foot long by 15 foot deep excavation by an excavation contractor and it was loaded and transported to an off-site Wilcox & Flegel location for either thermal treatment or temporary storage. Representative and confirmation soil samples were subsequently collected from locations at the bottom and sides of the excavation. Four soil samples and one water sample were collected by Charles A. Spear by taking representative soil samples from the backhoe bucket. The soil samples were immediately transferred to a clean 8-ounce glass sample jar by using a clean sampling trowel, packed into the sample container until no headspace was present, and a teflon-lined lid was applied to the sample container. The container was labeled and placed into a plastic vapor-tight bag and preserved on ice until the soil and water samples were analyzed by the laboratory.

The soil sample test results for volatile gasoline constituents (BTEX) and total petroleum hydrocarbons, sample No.s 1 thru 4, were reported in parts per million (ppm). The results are outlined below:

<u>SAMPLE #</u>	<u>SAMPLE LOCATION</u>	<u>BTEX</u>	<u>GAS TPH</u>
1.0	Riser-1 Bottom	ND	10 ppm
2.0	Riser-2 Bottom	Benzene - ND Toluene - ND Ethylbenzene - 0.3 Total xylenes- 0.1	14 ppm
3.0	Riser -2 northwall	BTEX - ND	22 ppm
4.0	Riser - 2 southwall	BTEX - ND	43 ppm
5.0	Water	Benzene - .022 <i>22 ppb</i> Toluene - ND Ethylbenzene - .211 <i>211 ppb</i> Total xylenes - .108 <i>108 ppb</i>	12.8 ppm <i>12.8 ppm</i>

A single soil sample, sample No. 3, was also analyzed for the presence of total lead and the analytical test result was negative for lead. This soil sample was taken from an area of soil where leaded gasoline may have been present. Since the total lead contaminant level was determined to be less than 100 parts per million it was not necessary to analyze the soil sample for extractable lead by Total Characteristic Leaching procedure (TCLP).

Based on the analytical test results the analytical findings indicate that the most-contaminated soil has been removed from the subject excavation. Soil samples collected from the bottom and sides of the subject excavation indicate that both the vertical and horizontal extents of the contamination have been delineated according to established acceptable clean-up levels for TPH.

The elevated TPH test results from water collected in the bottom of the excavation indicated a collection of contaminants that have leached from adjoining soils into the water that was present in small quantities at the bottom of the excavation. This water sample, sample No. 5, was not a representative sample of groundwater in the excavation.

In our opinion, based on the analytical test results, the limited excavation episode was effective and soils contaminated with TPH or BTEX in levels exceeding clean-up levels were removed from the excavation. If there are any questions feel free to call me at 1-503-644-8526.

Respectfully,



Charles Arthur Spear
Director of Professional Services

Environmental Inspection Services



CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

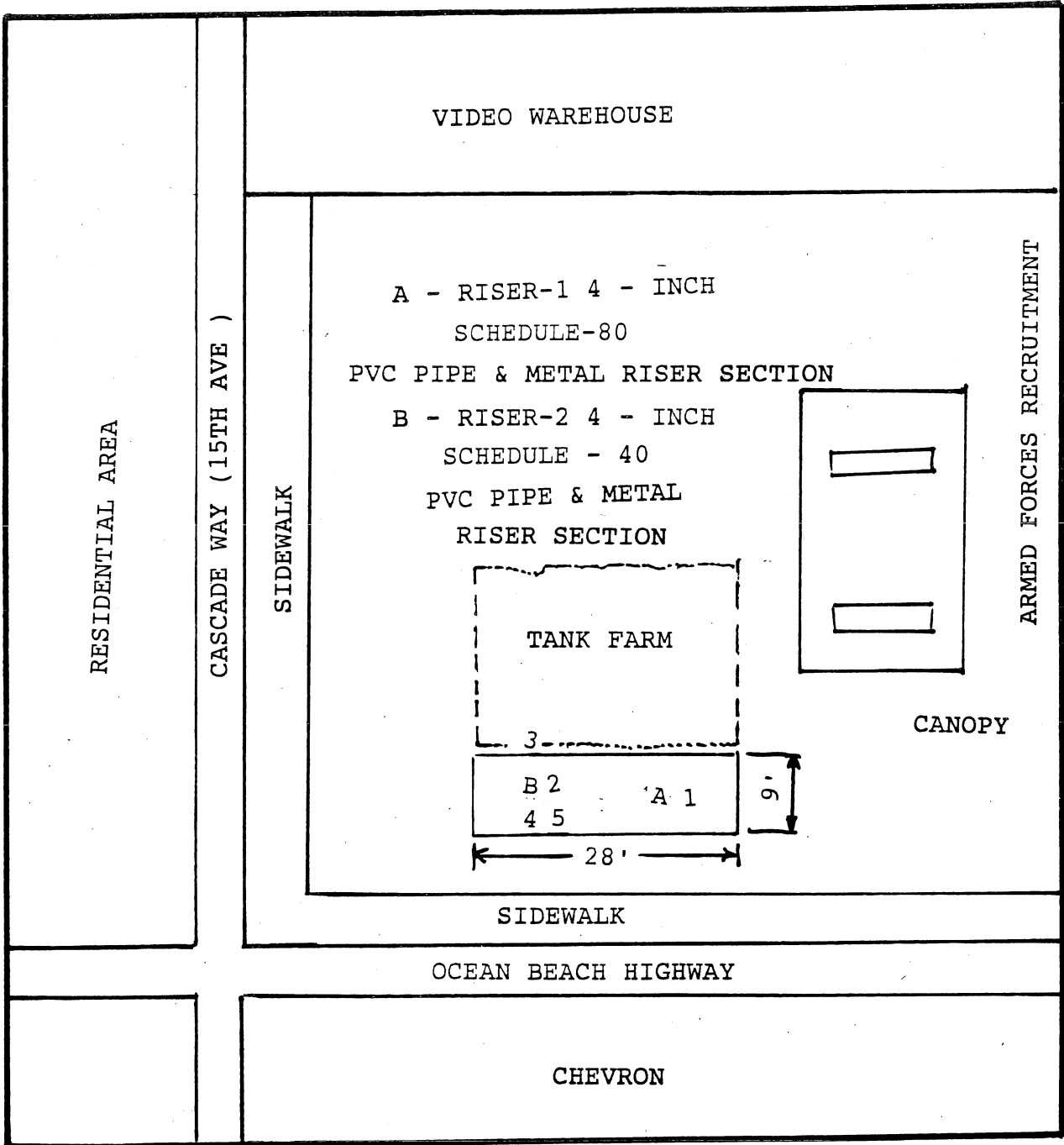
1317 South 13th Ave. • Kelso, WA 98626 • (206) 577-7222, FAX (206) 636-1068

DATE 10/2/91 PAGE _____ OF _____

PROJECT INFORMATION					NUMBER OF CONTAINERS	ANALYSIS REQUESTED														REMARKS
PROJECT NAME	PROJECT MNGR	COMPANY/ADDRESS	SAMPLERS SIGNATURE	PHONE		Base/Non/Acid Organics GC/MS 823/8270	Volatile Organics GC/MS 824/8240	Halogenated or Aromatic Volatiles 607/8010	Pesticides/PCBs 608/8090	Total Petroleum Hydrocarbons EPA 418.1	TPH/Gas BTEX 500/8015/8020	BTEX 8015 Modified	TPH - HCD	TCUP	Metals List Below	Cyanide	pH, Cond, Cl, SO ₄ , PO ₄ , F, Br, NO ₂ , NO ₃ (circle)	NH ₄ -N, COO, Total P, TKN, TOC (circle)	Total Organic Halides 9020	
#1 - River 1 Bottom	10/18	100 ft	Soil	1						<input checked="" type="checkbox"/>										
#2 - River 2 Bottom	10/18	2130m	Soil	1						<input checked="" type="checkbox"/>										
#3 - North side River 2	10/18	3:00	Soil	1						<input checked="" type="checkbox"/>									<input checked="" type="checkbox"/>	
#4 - South side River 2	10/18	5:00	Soil	1						<input checked="" type="checkbox"/>										
#5 - Grandditch	10/18	5:00	Water	1						<input checked="" type="checkbox"/>										

RELINQUISHED BY:	RECEIVED BY:	TURNAROUND REQUIREMENTS:	REPORT REQUIREMENTS	INVOICE INFORMATION:	SAMPLE RECEIPT:
Signature: <u>Charles A. Spear</u>	Signature: _____	<input type="checkbox"/> 24 hr <input type="checkbox"/> 48 hr <input type="checkbox"/> 5 day	<input type="checkbox"/> I. Routine Report	P.O. #: _____	Shipping VIA: _____
Printed Name: <u>Charles A. Spear</u>	Printed Name: _____	<input checked="" type="checkbox"/> Standard (~ 10-15 working days)	<input type="checkbox"/> II. Report (includes DUP, MS, MSD, as required, may be charged as samples)	Billing to: _____	Shipping #: _____
Firm: <u>Environmental Inspection Services</u>	Firm: _____	<input type="checkbox"/> Provide Verbal Preliminary Results	<input type="checkbox"/> III. Data Validation Report (includes All Raw Data)		Condition: _____
Date/Time: <u>10/2/91 - 11:30 AM</u>	Date/Time: _____	<input type="checkbox"/> Provide FAX Preliminary Results	<input type="checkbox"/> IV. CLP Deliverable Report		Lab No.: _____
		Requested Report Date: _____			

RELINQUISHED BY:	RECEIVED BY:	SPECIAL INSTRUCTIONS/COMMENTS:
Signature: <u>Chris Elliott</u>	Signature: _____	
Printed Name: <u>Chris Elliott</u>	Printed Name: _____	
Firm: <u>CAS</u>	Firm: _____	
Date/Time: <u>10/21/91 11:45 am</u>	Date/Time: _____	



SITE
NOT TO SCALE

EXCAVATION - 15 FEET DEEP

ENVIRONMENTAL INSPECTION SERVICES
PROJECT NO. 91016

GENERALIZED SITE PLAN
1410 OCEAN BEACH HIGHWAY
LONGVIEW, WASHINGTON

PLATE
P-1

COLUMBIA ANALYTICAL SERVICE NC.

Analytical Report

Client: _____

Date Received: 10/25/91

Project: _____

Date Analyzed: 10/25/91

Sample Matrix: SOIL

Work Order #: 916104

TOTAL LEAD

(Method Title)

EPA METHOD 7420

(Method No.)

mg/kg

(Units)

DRY wt

Basis

Sample Name	Lab Code	MRL	Result
#3 RISER 2 MESH WHI	6104-3	3	ND
METHOD BLANK	ND	6	ND
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

MRL Method Reporting Limit

ND None Detected at or above the method reporting limit

Approved by [Signature] Date 10/25/91 Filename: GEN1.B/05-10-91

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Alaska:
Use VPH
Others:
Use TPH

Client: _____

Date Received: _____

Project: _____

Date Extracted: 10/22/91

Sample Matrix: Soil

Work Order #: K91-6104

PRELIMINARY

These results have not gone

BTEX and TPH/VPH as Gasoline
EPA Methods 5030/8020/Modified 8015 through final QA review.

mg/Kg (ppm)

Dry wt. Basis

Sample Name:	#1 - <u>Riser 1 Bottom</u>	#2 - <u>Riser 2 Bottom</u>	#3 - <u>Riser 2 Northwell</u>
Lab Code:	<u>K6104-1</u>	<u>→ 2</u>	<u>→ 3</u>
Date Analyzed:	<u>10-23-91</u>	<u>10-23-91</u>	<u>10-23-91</u>

Analyte	MRL			
Benzene	0.05	ND	ND	ND
Toluene	0.05	ND	ND	ND
Ethylbenzene	0.05	ND	ND 0.3L	ND
Total Xylenes	0.05	ND	ND 0.1L	ND
TPH/VPH as Gasoline	1	ND 10	ND 14	ND 2L

TPH Total Petroleum Hydrocarbons
VPH Volatile Petroleum Hydrocarbons
MRL Method Reporting Limit
ND None Detected at or above the method reporting limit

ms

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Alaska
Use VPH
Others:
Use TPH

Client: _____
Project: _____
Sample Matrix: Soil

Date Received: _____
Date Extracted: 10/22/91
Work Order #: K91-6104

PRELIMINARY

These results have not gone through final QA review.

BTEX and TPH/VPH as Gasoline
EPA Methods 5030/8020/Modified 8015
mg/Kg (ppm)

Dry wt Basis

Sample Name: #4 Riser 2 Southwell Method Blank
Lab Code: K6104-4 → MB
Date Analyzed: 10-23-91 10-22-91

Analyte	MRL			
Benzene	0.05	ND	ND	ND
Toluene	0.05	ND	ND	ND
Ethylbenzene	0.05	ND	ND	ND
Total Xylenes	0.05	ND	ND	ND
TPH/VPH as Gasoline	1	<u>ND 43</u>	ND	ND

TPH Total Petroleum Hydrocarbons
VPH Volatile Petroleum Hydrocarbons
MRL Method Reporting Limit
ND None Detected at or above the method reporting limit

WILSON OIL, INC.

110 Panel Way - P.O. Box 69
Longview, Washington 98632
Phone 423-3300

August 20, 1991

Pattie Martin
Department of Ecology
7272 Clearwater Lane, LU-11
Olympia, Washington 98504-6811

Dear Pattie:

In July, 1991, we reported to you by telephone that a "release to the environment" was discovered at John's Shell, 1410 Ocean Beach Highway, Longview, Washington. John Szkodyn, who is the owner and operator of this site, has decided to retire and sell the property to Wilson Oil. In preparation for the sale we conducted a level three environmental assessment, using Sweet Edward/Emcon, Inc. Gasoline was discovered at one end of the tanks in the soil and ground water. The source of the gasoline was a mystery at first because all lines passed a tightness test (performed by Petroleum Services), the tanks are lined, and the tanks were recently inspected by Tank Liners. We discovered the source was that the Red Jacket line leak detector on the unleaded turbin pump had two bolts that had loosened, allowing a very small release when under pressure. This has now been replaced.

After drilling some additional holes, we believe the plume of contamination to involve an area 20'x20'x10', or about 150 cubic yards. On October 1, 1991, this station is scheduled for a rebuild and will be closed for three months. At that time we will be replacing the steel gas lines with fiberglass lines and will conduct our site clean up.

We anticipate excavating 150 yards of soil and having Spencer Environmental Service "pump and treat" any contaminated ground water we encounter. The soil will be piled on site and treated using soil bioremediation, then replaced in the hole. Three monitoring wells will be installed that will be large enough to serve as a collection point for "pump and treat" ground water collection and additional bioremediation.

Wilson Oil will be assisting John's Shell with this clean up project.

Very truly yours,



Steve C. Wilcox
President

SCW/dlm