

## **PNG ENVIRONMENTAL, INC.**

---

June 19, 2008

1052-01

Mr. Rob Grenley  
Grenley Stewart Resources  
1019 Pacific Avenue, 13<sup>th</sup> Floor  
Tacoma, Washington 98402-4443

**RECEIVED**

**JUN 29 2008**

Subject: **Fife Metroplex Card Lock Fuel Sales Facility - Site Closure Report**  
**Claim # 61911**

Washington State  
Department of Ecology

3200 20<sup>th</sup> Street East  
Fife, Washington 98424  
VCP Identification Number SW0610

Dear Mr. Grenley:

This letter summarizes site closure work recently performed at the above referenced site following receipt of a No Further Action (NFA) determination from the Washington State Department of Ecology (Ecology).

### **SCOPE OF WORK**

PNG coordinated site closure work that included the abandonment of the seven site monitoring wells, restoration of the ground surface at each well location, disposal of investigation derived waste, and preparation of this report. A copy of well abandonment documentation, waste disposal documentation, and a copy of Ecology's NFA determination letter are attached. Details of these tasks are described below.

### **Well Abandonment**

On May 27, 2008, PNG directed Boart Longyear to abandon the seven monitoring wells used during this investigation. Prior to initiating the work, Boart filed a Notice of Intent (Intent number AE03323) with Ecology to decommission the wells.

Abandonment procedures included the following steps:

- Each protective monument and monitoring well was physically removed from the ground.
- Bentonite chips were placed from 0.5 to 15 feet below ground surface.
- The bentonite chips were hydrated with potable water.
- The upper 0.5-foot of the borehole was filled with concrete, asphalt, or soil to match existing surface conditions.

A copy of the well abandonment documentation is included in Attachment A.

### Site Restoration

At the completion of well abandonment procedures, PNG and Boart placed a surface seal on top of each monitoring well to match existing surface conditions, which included:

- Quick set concrete mixed with black dye to match the color of the asphalt driveway was placed on top of former monitoring wells MW-1 through MW-6.
- Fresh soil was placed on top of MW-7 and groomed with a rake to match the surrounding topography.
- The driveway surface near each former monitoring well was swept with a broom and pressure washed.
- All investigation derived waste was removed from the site.

### Disposal of Investigation Derived Waste

All well materials were decontaminated using a high-pressure hot water washer, removed from the site, and transported to Boart Longyear's shop in Fife, Washington for disposal. On June 10, 2008, American Petroleum Environmental Services transported one drum containing water generated during well abandonment and site investigation procedures to Pacific Power Vac for disposal. A copy of the disposal documentation is included in Attachment B.

### NO FURTHER ACTION DETERMINATION LETTER

On March 11, 2008, Ecology prepared an NFA Determination letter for the site. A copy of the letter is included in Attachment C.

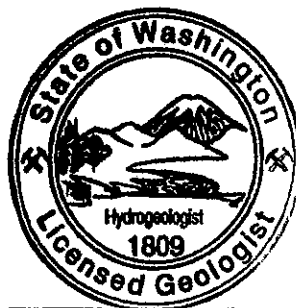
PNG appreciates this opportunity to assist you on the successful remediation and regulatory closure of your site. If you have any questions, please call at (360) 414-0669.

Sincerely,

**PNG ENVIRONMENTAL, INC.**



Craig Hultgren, R.G.  
Project Manager



CRAIG HULTGREN



John G. Kuhlman, R.G.  
Vice President

Attachments: Attachment A - Well Abandonment Documentation  
Attachment B - Disposal Documentation  
Attachment C - Ecology's No Further Action Determination Letter

cc: Mr. Terry Dahl, Markel  
Mr. Scott Rose, Ecology

**ATTACHMENT A**

**WELL ABANDONMENT DOCUMENTATION**

Please print, sign and return by mail to Department of Ecology

# RESOURCE PROTECTION WELL REPORT

CURRENT Notice of Intent No. AE 03323

(SUBMIT ONE WELL REPORT PER WELL INSTALLED)

Construction/Decommission (select one)

☐ Construction

☒ Decommission ORIGINAL INSTALLATION Notice

of Intent Number Y2062400

Consulting Firm PNG Environmental

Unique Ecology Well ID

Tag No. AHF-845

WELL CONSTRUCTION CERTIFICATION: I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

☒ Driller ☐ Engineer ☐ Trainee Name (Print) Marcus Johnson

Driller/Engineer/Trainee Signature [Signature]

Driller or Trainee License No. 21167

If trainee, licensed driller's

Signature and License No. \_\_\_\_\_

Type of Well (select one)

☒ Resource Protection

☐ Geotech Soil Boring

MW-1

Property Owner APP

Site Address 3200 20th St E

City Fife County Pierce

Location SW 1/4-1/4 NE 1/4 Sec 11 Twn 20 R 3

Select One ☒ BWM  
☐ WWM

Lat/Long (s, t, r  
still REQUIRED)

Lat Deg \_\_\_\_\_ Lat Min/Sec \_\_\_\_\_

Long Deg \_\_\_\_\_ Long Min/Sec \_\_\_\_\_

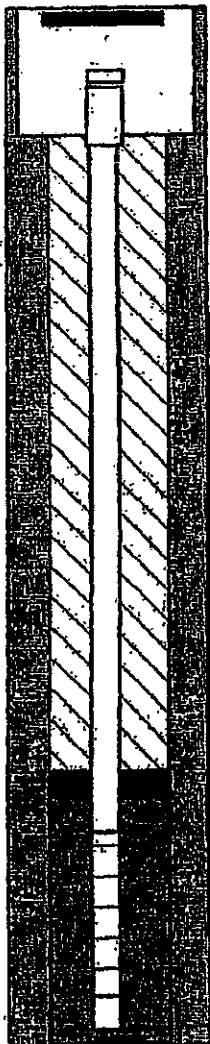
Tax Parcel No. \_\_\_\_\_

Cased or Uncased Diameter 2" Static Level \_\_\_\_\_

Work/Decommission Start Date 5-27-08

Work/Decommission Completed Date 5-27-08

## Construction/Design



## Well Data

Well Decommissioned in.  
Place from 0'-15'  
using 1 sack of Bentonite  
Chips.

2" Casing diameter

## Formation Description

Sand 0'-15'

Please print, sign and return by mail to Department of Ecology

# RESOURCE PROTECTION WELL REPORT

CURRENT Notice of Intent No. AE 03323

(SUBMIT ONE WELL REPORT PER WELL INSTALLED)

Construction/Decommission (select one)

☐ Construction

☒ Decommission ORIGINAL INSTALLATION Notice

of Intent Number 12062400

Consulting Firm PNG Environmental

Unique Ecology Well ID

Tag No. AHF-846

WELL CONSTRUCTION CERTIFICATION: I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

☒ Driller ☐ Engineer ☐ Trainee Name (Print)

Marcus Johnson

Driller/Engineer/Trainee Signature

Driller or Trainee License No. 21061

If trainee, licensed driller's

Signature and License No. \_\_\_\_\_

MW-2

Type of Well (select one)

☒ Resource Protection

☐ Geotech Soil Boring

Property Owner APP

Site Address 3200 20th St E

City Fife

County Pierce

Location SW 1/4-1/4 NE 1/4 Sec 11 Twn 2 R 3

Select One ☒ EWM  
☐ WWM

Lat/Long (s, t, r  
still REQUIRED)

Lat Deg \_\_\_\_\_

Lat Min/Sec \_\_\_\_\_

Long Deg \_\_\_\_\_

Long Min/Sec \_\_\_\_\_

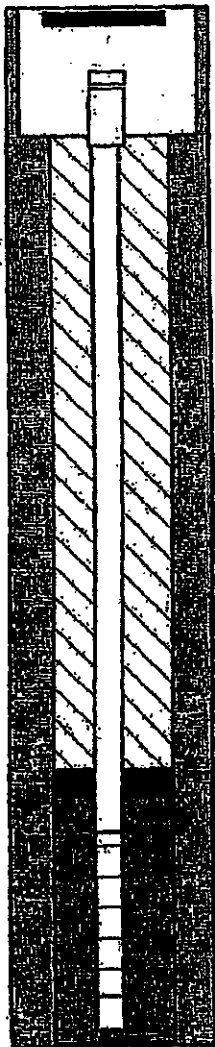
Tax Parcel No. \_\_\_\_\_

Cased or Uncased Diameter 2" Static Level \_\_\_\_\_

Work/Decommission Start Date 5-27-08

Work/Decommission Completed Date 5-27-08

## Construction/Design



## Well Data

Well Decommissioned in  
Place from 0'-15'  
using 1 sack of Bentonite  
Chips.

2" Casing diameter

## Formation Description

Sand 0'-15'

Please print, sign and return by mail to Department of Ecology

# RESOURCE PROTECTION WELL REPORT

CURRENT Notice of Intent No. AE03323

(SUBMIT ONE WELL REPORT PER WELL INSTALLED)

Construction/Decommission (select one)

☐ Construction

☒ Decommission ORIGINAL INSTALLATION Notice

of Intent Number 12062400

Consulting Firm PNG Environmental

Unique Ecology Well ID

Tag No. AHF-847

WELL CONSTRUCTION CERTIFICATION: I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

☒ Driller ☐ Engineer ☐ Trainee Name (Print)

Marcus Johnson

Driller/Engineer/Trainee Signature

Driller or Trainee License No. 21667

If trainee, licensed driller's

Signature and License No. \_\_\_\_\_

Type of Well (select one)

☒ Resource Protection

☐ Geotech Soil Boring

Property Owner APP

Site Address 3200 20th St E

City Fife

County Pierce

Location SW 1/4-1/4 NE 1/4 Sec 11 Twn 2 R 3

Select One ☒ EWM  
☐ WWM

Lat/Long (s, t, r  
still REQUIRED)

Lat Deg \_\_\_\_\_ Lat Min/Sec \_\_\_\_\_

Long Deg \_\_\_\_\_ Long Min/Sec \_\_\_\_\_

Tax Parcel No. \_\_\_\_\_

Cased or Uncased Diameter 2" Static Level \_\_\_\_\_

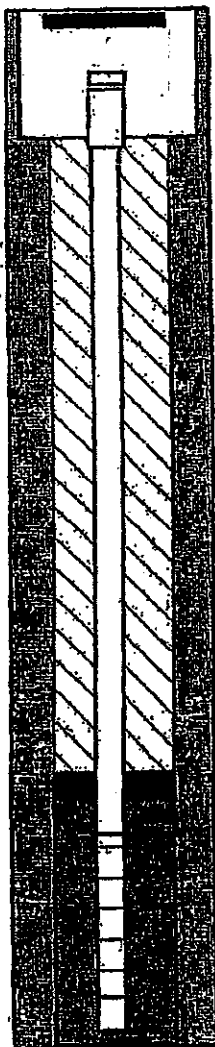
Work/Decommission Start Date 5-27-08

Work/Decommission Completed Date 5-27-08

Construction/Design

Well Data

Formation Description



Well Decommissioned in  
Place from 0'-15'  
using 1 sack of Bentonite  
Chips.

2" Casing diameter

Sand 0'-15'

Please print, sign and return by mail to Department of Ecology

# RESOURCE PROTECTION WELL REPORT

CURRENT Notice of Intent No. AE 03323

(SUBMIT ONE WELL REPORT PER WELL INSTALLED)

Construction/Decommission (select one)

☐ Construction

☒ Decommission ORIGINAL INSTALLATION Notice

of Intent Number 12062400

Consulting Firm PNG Environmental

Unique Ecology Well ID

Tag No. AHF-848

WELL CONSTRUCTION CERTIFICATION: I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

☒ Driller ☐ Engineer ☐ Trainee Name (Print)

Driller/Engineer/Trainee Signature

Driller or Trainee License No. 21067

If trainee, licensed driller's

Signature and License No. \_\_\_\_\_

Type of Well (select one)

☒ Resource Protection

☐ Geotech Soil Boring

MW-4

Property Owner APP

Site Address 3200 20th St E

City Fife

County Pierce

Location 3N 1/4-1/4 NE 1/4 Sec 11 Twn 2 R 3

Select One ☒ EWM  
☐ WWM

Lat/Long (s, t, r

still REQUIRED)

Lat Deg \_\_\_\_\_

Lat Min/Sec \_\_\_\_\_

Long Deg \_\_\_\_\_

Long Min/Sec \_\_\_\_\_

Tax Parcel No. \_\_\_\_\_

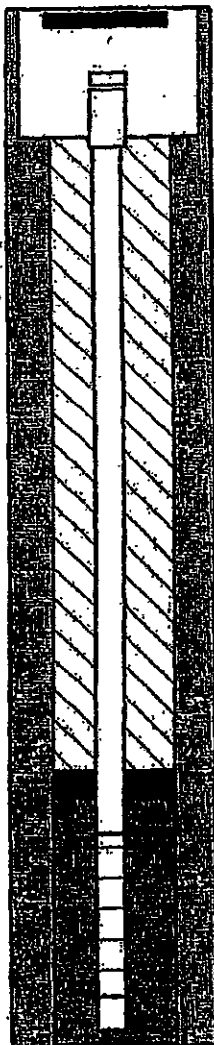
Cased or Uncased Diameter 2"

Static Level \_\_\_\_\_

Work/Decommission Start Date 5-27-08

Work/Decommission Completed Date 5-27-08

## Construction/Design



## Well Data

Well Decommissioned in  
Place from 0'-15'  
using 1 sack of Bentonite  
Chips.

2" Casing diameter

## Formation Description

Sand 0'-15'

Please print, sign and return by mail to Department of Ecology

# RESOURCE PROTECTION WELL REPORT

CURRENT Notice of Intent No. AE 03323

(SUBMIT ONE WELL REPORT PER WELL INSTALLED)

Construction/Decommission (select one)

☐ Construction

☒ Decommission ORIGINAL INSTALLATION Notice

of Intent Number 12062400

Consulting Firm PNG Environmental

Unique Ecology Well ID

Tag No. AHF-849

WELL CONSTRUCTION CERTIFICATION: I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

☒ Driller ☐ Engineer ☐ Trainee Name (Print)

Marcus Johnson

Driller/Engineer/Trainee Signature

Driller or Trainee License No. 21667

If trainee, licensed driller's

Signature and License No. \_\_\_\_\_

Type of Well (select one)

☒ Resource Protection

☐ Geotech Soil Boring

Property Owner APP

Site Address 3200 20<sup>th</sup> St E

City Fife

County Pierce

Location 3W 1/4-1/4 NE 1/4 Sec 11 Twn 20 R 3

Select One ☒ EWM  
☐ WWM

Lat/Long (s, t, r  
still REQUIRED)

Lat Deg \_\_\_\_\_

Lat Min/Sec \_\_\_\_\_

Long Deg \_\_\_\_\_

Long Min/Sec \_\_\_\_\_

Tax Parcel No. \_\_\_\_\_

Cased or Uncased Diameter 2"

Static Level \_\_\_\_\_

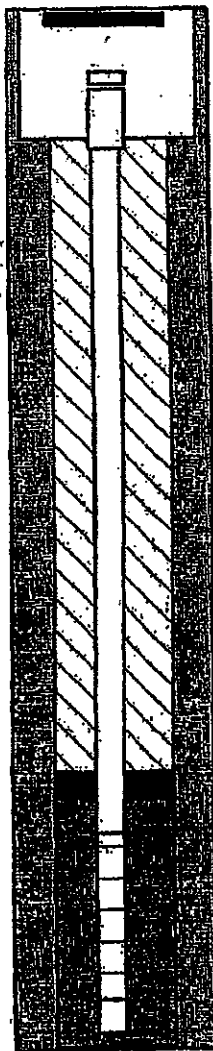
Work/Decommission Start Date 5-27-08

Work/Decommission Completed Date 5-27-08

## Construction/Design

## Well Data

## Formation Description



Well Decommissioned in  
Place from 0'-15'  
using 1 sack of Bentonite  
Chips.

2" Casing diameter

Sand 0'-15'



Please print, sign and return by mail to Department of Ecology

# RESOURCE PROTECTION WELL REPORT

CURRENT Notice of Intent No. AE 03323

(SUBMIT ONE WELL REPORT PER WELL INSTALLED)

Construction/Decommission (select one)

☐ Construction

☒ Decommission ORIGINAL INSTALLATION Notice

of Intent Number W062400

Consulting Firm PNG Environmental

Unique Ecology Well ID

Tag No. AHF-850

WELL CONSTRUCTION CERTIFICATION: I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

☒ Driller ☐ Engineer ☐ Trainee Name (Print)

Driller/Engineer/Trainee Signature

Driller or Trainee License No. 21667

If trainee, licensed driller's

Signature and License No. \_\_\_\_\_

Type of Well (select one)

☒ Resource Protection

☐ Geotech Soil Boring

Property Owner APP

Site Address 3200 20th St E

City Fife

County Pierce

Location SW 1/4-1/4 NE 1/4 Sec 11 Twn 20 R 3

Select One ☒ EWM  
☐ WWM

Lat/Long (s, t, r  
still REQUIRED)

Lat Deg \_\_\_\_\_

Lat Min/Sec \_\_\_\_\_

Long Deg \_\_\_\_\_

Long Min/Sec \_\_\_\_\_

Tax Parcel No. \_\_\_\_\_

Cased or Uncased Diameter 2"

Static Level \_\_\_\_\_

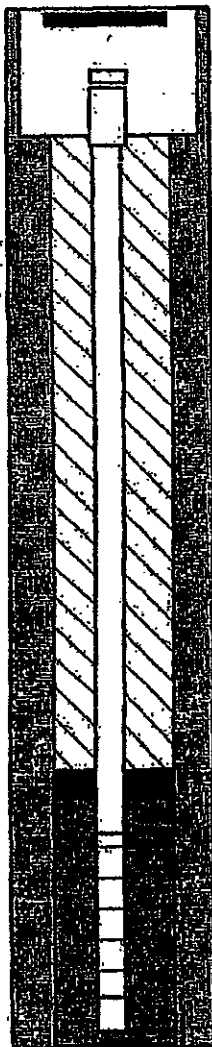
Work/Decommission Start Date 5-27-08

Work/Decommission Completed Date 5-27-08

## Construction/Design

## Well Data

## Formation Description



Well Decommissioned in  
Place from 0'-15'  
using 1 sack of Bentonite  
Chips.

2" Casing diameter

Sand 0'-15'

Please print, sign and return by mail to Department of Ecology

# RESOURCE PROTECTION WELL REPORT

CURRENT Notice of Intent No. AE 03324

(SUBMIT ONE WELL REPORT PER WELL INSTALLED)

Construction/Decommission (select one)

☐ Construction

☒ Decommission ORIGINAL INSTALLATION Notice

of Intent Number RO64562

Consulting Firm PNG Environmental

Unique Ecology Well ID

Tag No. AKF-487

WELL CONSTRUCTION CERTIFICATION: I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

☒ Driller ☐ Engineer ☐ Trainee Name (Print)

Marcus Johnson

Driller/Engineer/Trainee Signature

Driller or Trainee License No. 21667

If trainee, licensed driller's

Signature and License No. \_\_\_\_\_

Type of Well (select one)

☒ Resource Protection

☐ Geotech Soil Boring

MW-7

Property Owner APP

Site Address 3200 20<sup>th</sup> St E

City Fife

County Pierce

Location NE 1/4-1/4 NE 1/4 Sec 11 Twn 20 R 3

Select One ☒ EWM  
☐ WWM

Lat/Long (s, t, r  
still REQUIRED)

Lat Deg \_\_\_\_\_

Lat Min/Sec \_\_\_\_\_

Long Deg \_\_\_\_\_

Long Min/Sec \_\_\_\_\_

Tax Parcel No. \_\_\_\_\_

Cased or Uncased Diameter 8"

Static Level \_\_\_\_\_

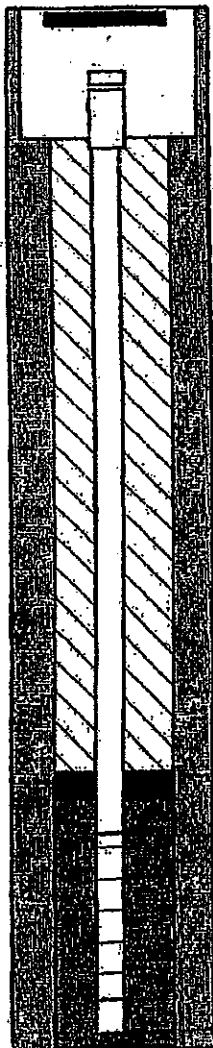
Work/Decommission Start Date 5-27-08

Work/Decommission Completed Date 5-27-08

Construction/Design

Well Data

Formation Description



2' Well decommissioned in  
Place using 1 sack of  
bentonite chips from 0'-15'

Sand 0'-15'

**ATTACHMENT B**

**IDW DISPOSAL DOCUMENTATION**



5225 7th Street East  
Fife WA 98424  
Phone: (509) 261-9800  
Fax: (253) 922-8443

F 0218

# Plant Receiving Manifest Certificate of Disposal

Hours Operation: 7:00 AM - 6:00 PM

Generator	Generator Name: <u>APEX</u>		Bill to Customer				
	Location Address:		Name: <u>SPR</u>				
	Mailing Address:		Address:				
	City/State/Zip:		City/State/Zip:				
	Phone:		Phone:				
Waste Profile	Profile #	Waste Description	Quantity	Unit	<small>This form to be completed by the Hauler of No hazardous wastes. The completed form must be presented at the disposal site prior to disposal. HAZARDOUS AND TSCA WASTE MAY NOT BE DISPOSED OF AT ANY DISPOSAL SITE. Violation of this restriction could subject you to revocation of your disposal permit. Answer all questions (please print).</small>		
	<u>Industrial</u>	<u>61878</u>	<u>55</u>	<u>gal</u>			
NOTE: NON-CONFORMING WASTE MATERIALS NOT CONSISTENT WITH ESTABLISHED PROFILE MAY INCUR ADDITIONAL PROCESSING FEES.							
Transporter	Company Name/Address <u>APEX</u>		I certify that the information supplied on this manifest is true, that it accurately describes the vehicle, waste and source(s) of the waste presented at the time of submission, and that the waste consists SOLELY of the non-hazardous wastes listed above to the best of my knowledge.	Disposal Site	Pacific Power Vac 5225 7th Street East Fife, WA 98424		
	Driver Signature: <u>[Signature]</u> Date: <u>6-11-08</u> Time: <u>PM</u>				Analyst's Signature: <u>[Signature]</u> Date: <u>6-11-08</u> Time: <u></u>		
	Print or Type Name				Print or Type Name		
Screening	Microtox Toxicity Screening Results		PPV Wastewater Centrifuge Sampling				
	Sample No.:	Waste Subcategory:	Waste Stream	Time collected	Oil Phase	Liquid Phase	Sludge/Solids
	PCB: <u>NO</u>	<u>A B C Non-Reg</u>	<u>Industrial Waste</u>		<u>2</u>	<u>90</u>	
	PH: <u>7</u>	Reason for Rejection:					
	Pass? <u>YES</u>		Comments:				
Truck Information							
Capacity (gallons):							
Truck License No:							

From:

To: 12532383454

06/06/2008

#010 P.001/001



## Material Characterization Profile

Profile Number: 10932  
Effective Date: 6/6/2008  
Expiration Date: 6/5/2010

For assistance, contact Customer  
Service at 1-503-261-8800

## Section 1: Generator Information

Generator Name: PNG Environmental, Inc  
Generator EPA ID:  
Pickup Address: 3200 20th ST  
Fife, WA  
County:  
Technical Contact:  
Phone: Fax:

Billing Name: American Petroleum Environmental Services  
Billing Address: 2117 E. River St.  
Tacoma, WA 98421  
Billing Contact: Valorie  
Billing Phone: 2535385252 Fax: 2532383454

## Section 2: Material Description &amp; Characteristics

Name of Waste: Non regulated well monitoring water Description of Waste:

Process Generating Waste: periodic Maintenance

Shipping Information: Quantity: 1 x 55gal. Units: Drums Per

Is the waste off-specification or discarded commercial product? ☐ Yes ☒ No If yes, is an MSDS available? ☐ Yes ☒ No ☐ MSDS Provided

Is the waste a hazardous waste as defined in RCRA (40 CFR §261)? ☐ Yes ☒ No If yes, list waste codes:

Is the waste a USDOT Hazardous Material? ☐ Yes ☒ No

Is the waste/wastewater subject to a CWA Categorical Pretreatment Standard (40 CFR §400-471)? ☐ Yes ☒ No List:

Method chemical/physical properties determined: ☐ Process Knowledge ☒ Lab Analysis ☐ Lab Analysis Provided ☐ MSDS ☐ MSDS Provided

Composition (key compounds, soil, water, PPE, debris, etc.):

Used Oil Management Parameters:

Halogens:

☐ ≤ 1000 ppm

☐ ≤ 4000 ppm

☐

BTU Value:

☐ < 2 (BTU/1000g)

☐ 2-5 (BTU/1000g)

☐ 6-9 (BTU/1000g)

☐ 9-12 (BTU/1000g)

☐ > 12 (BTU/1000g)

☐

Sulfur:

☐ ≤ 2%

☐

Ash (%):

☐ ≤ 1%

☐

Moisture (%):

Viscosity (SUS):

Description: Color: Odor:

Physical State @ 70°F

(check all that apply):

☐ Free Liquid %

☐ Sludge %

☐ Solid %

☐ Pumpable %

☐ Pourable %

pH:

☐ ≤ 2 ☐ < 12.5

☐ < 5 ☐ ≥ 12.5

☐ < 0 ☐ 4.1-10

Specific Gravity:

☐ < 0.8

☐ 0.8-1.2

☐ > 1.2

☐

Flash Point:

☐ < 120 °F

☐ < 140 °F

☐ 140 - 200 °F

☐ ≥ 200 °F

☐

TSS:

☐ < 200 ppm

☐ < 1000 ppm

☐ ≤ 6000 ppm

☐ > 5000 ppm

☐

TDS:

☐ < 0.5 ppm

☐ ≤ 1.0 ppm

☐ > 1.0 ppm

☐

Oil & Grease:

☐ > 100 ppm

☐ > 5%

☐

☐ BOD<sub>5</sub> ☐ COD:

☐ < 200 ppm

☐ < 2000 ppm

☐ ≤ 7500 ppm

☐ > 7500 ppm

☐

Ammonia

Sulfides

Phenols

Cyanides:

☐ < 0.02 ppm

☐ < 0.1 ppm

☐ < 5 ppm

☐ ≥ 5 ppm

☐

Contains Chelating

Agents:

☐ Yes ☒ No

If Yes, list:

PCBs:

☐ Yes ☒ No

Conc.:

Radioactive:

☐ Yes ☒ No

## Section 3: Chemical Constituents

Metals: Metal results below are: ☐ Total ☐ TCLP (Check all that are known present and indicate concentration)

☐ Antimony ppm

☐ Arsenic ppm

☐ Barium ppm

☐ Cadmium ppm

☐ Chromium ppm

☐ Cobalt ppm

☐ Copper ppm

☐ Lead ppm

☐ Mercury ppm

☐ Molybdenum ppm

☐ Nickel ppm

☐ Selenium ppm

☐ Silver ppm

☐ Tin ppm

☐ Titanium ppm

☐ Vanadium ppm

☐ Zinc ppm

Organics: Organic results below are: ☐ Total ☐ TCLP (Check all that are known present and indicate concentration)

☐ Bis(2-ethylhexyl)phthalate ppm

☐ Carbazole ppm

☐ n-Decane ppm

☐ o-Cresol ppm

☐ p-Cresol ppm

☐ 2,3-Dichloroaniline ppm

☐ Fluoranthene ppm

☐ 2,4,6-Trichlorophenol ppm

☐ n-Octadecane ppm

## Section 4: Certification

I certify under penalty of law that this document, all attachments and supporting materials were prepared and presented by me or under my direct supervision and that the information provided is a true accurate and complete representation of the waste materials to be presented for evaluation and management by Pacific Power Vac (PPV). Furthermore, I agree that any waste materials managed under any approval issued by PPV pursuant to this request will be transported, delivered, or transferred to be in conformance with the waste characterization profile. Where PPV determines a waste to be non-conforming, the generator shall be responsible for all costs associated with timely return of the waste to generator or for other alternate and lawful management of the non-conforming waste conducted on behalf of the generator.

Generator Signature:

Printed Name:

Date:

Title:

Operations MGR

Matt Deane

6/6/08

EPA# WAH 000 003 772

## STRAIGHT BILL OF LADING

**ORIGINAL - NOT NEGOTIABLE**

**American Petroleum Environmental Services, Inc.**

2117 E. River Street • Tacoma, WA 98421 • (253) 538-5252

Shipper No. \_\_\_\_\_

Invoice 10775

Date 6/10/08

Shipper: PNG Environmental, Inc

Street 3200 30TH St E

City Fife State WA Zip \_\_\_\_\_

**24 HOUR EMERGENCY CONTACT TELEPHONE NUMBER: 253-405-8281**

ROUTE/PO#

☐ **NEW CUSTOMER**

Project # 1052

Vehicle  
Number

5

No. of Units  
& Container Type

Proper Shipping Name, Hazard Class, Identification Number (UN or NA) per 172.101, 172.202, 172.203

DATE	DESCRIPTION	AMOUNT	CHECK NO.	BANK	INITIALS	REMARKS
10/1/78	10/1/78	100.00	100	100	100	100
10/2/78	10/2/78	100.00	100	100	100	100
10/3/78	10/3/78	100.00	100	100	100	100
10/4/78	10/4/78	100.00	100	100	100	100
10/5/78	10/5/78	100.00	100	100	100	100
10/6/78	10/6/78	100.00	100	100	100	100
10/7/78	10/7/78	100.00	100	100	100	100
10/8/78	10/8/78	100.00	100	100	100	100
10/9/78	10/9/78	100.00	100	100	100	100
10/10/78	10/10/78	100.00	100	100	100	100
10/11/78	10/11/78	100.00	100	100	100	100
10/12/78	10/12/78	100.00	100	100	100	100
10/13/78	10/13/78	100.00	100	100	100	100
10/14/78	10/14/78	100.00	100	100	100	100
10/15/78	10/15/78	100.00	100	100	100	100
10/16/78	10/16/78	100.00	100	100	100	100
10/17/78	10/17/78	100.00	100	100	100	100
10/18/78	10/18/78	100.00	100	100	100	100
10/19/78	10/19/78	100.00	100	100	100	100
10/20/78	10/20/78	100.00	100	100	100	100
10/21/78	10/21/78	100.00	100	100	100	100
10/22/78	10/22/78	100.00	100	100	100	100
10/23/78	10/23/78	100.00	100	100	100	100
10/24/78	10/24/78	100.00	100	100	100	100
10/25/78	10/25/78	100.00	100	100	100	100
10/26/78	10/26/78	100.00	100	100	100	100
10/27/78	10/27/78	100.00	100	100	100	100
10/28/78	10/28/78	100.00	100	100	100	100
10/29/78	10/29/78	100.00	100	100	100	100
10/30/78	10/30/78	100.00	100	100	100	100
10/31/78	10/31/78	100.00	100	100	100	100
11/1/78	11/1/78	100.00	100	100	100	100
11/2/78	11/2/78	100.00	100	100	100	100
11/3/78	11/3/78	100.00	100	100	100	100
11/4/78	11/4/78	100.00	100	100	100	100
11/5/78	11/5/78	100.00	100	100	100	100
11/6/78	11/6/78	100.00	100	100	100	100
11/7/78	11/7/78	100.00	100	100	100	100
11/8/78	11/8/78	100.00	100	100	100	100
11/9/78	11/9/78	100.00	100	100	100	100
11/10/78	11/10/78	100.00	100	100	100	100
11/11/78	11/11/78	100.00	100	100	100	100
11/12/78	11/12/78	100.00	100	100	100	100
11/13/78	11/13/78	100.00	100	100	100	100
11/14/78	11/14/78	100.00	100	100	100	100
11/15/78	11/15/78	100.00	100	100	100	100
11/16/78	11/16/78	100.00	100	100	100	100
11/17/78	11/17/78	100.00	100	100	100	100
11/18/78	11/18/78	100.00	100	100	100	

PRICE PER UNIT	QTY	UNIT	DESCRIPTION
1.00	100	EA	100 EA
2.00	200	EA	200 EA
3.00	300	EA	300 EA
4.00	400	EA	400 EA
5.00	500	EA	500 EA
6.00	600	EA	600 EA
7.00	700	EA	700 EA
8.00	800	EA	800 EA
9.00	900	EA	900 EA
10.00	1000	EA	1000 EA
11.00	1100	EA	1100 EA
12.00	1200	EA	1200 EA
13.00	1300	EA	1300 EA
14.00	1400	EA	1400 EA
15.00	1500	EA	1500 EA
16.00	1600	EA	1600 EA
17.00	1700	EA	1700 EA
18.00	1800	EA	1800 EA
19.00	1900	EA	1900 EA
20.00	2000	EA	2000 EA
21.00	2100	EA	2100 EA
22.00	2200	EA	2200 EA
23.00	2300	EA	2300 EA
24.00	2400	EA	2400 EA
25.00	2500	EA	2500 EA
26.00	2600	EA	2600 EA
27.00	2700	EA	2700 EA
28.00	2800	EA	2800 EA
29.00	2900	EA	2900 EA
30.00	3000	EA	3000 EA
31.00	3100	EA	3100 EA
32.00	3200	EA	3200 EA
33.00	3300	EA	3300 EA
34.00	3400	EA	3400 EA
35.00	3500	EA	3500 EA
36.00	3600	EA	3600 EA
37.00	3700	EA	3700 EA
38.00	3800	EA	3800 EA
39.00	3900	EA	3900 EA
40.00	4000	EA	4000 EA
41.00	4100	EA	4100 EA
42.00	4200	EA	4200 EA
43.00	4300	EA	4300 EA
44.00	4400	EA	4400 EA
45.00	4500	EA	4500 EA
46.00	4600	EA	4600 EA
47.00	4700	EA	4700 EA
48.00	4800	EA	4800 EA
49.00	4900	EA	4900 EA
50.00	5000	EA	5000 EA
51.00	5100	EA	5100 EA
52.00	5200	EA	5200 EA
53.00	5300	EA	5300 EA
54.00	5400	EA	5400 EA
55.00	5500	EA	5500 EA
56.00	5600	EA	5600 EA
57.00	5700	EA	5700 EA
58.00	5800	EA	5800 EA
59.00	5900	EA	5900 EA
60.00	6000	EA	6000 EA
61.00	6100	EA	6100 EA
62.00	6200	EA	6200 EA
63.00	6300	EA	6300 EA
64.00	6400	EA	6400 EA
65.00	6500	EA	6500 EA
66.00	6600	EA	6600 EA
67.00	6700	EA	6700 EA
68.00	6800	EA	6800 EA
69.00	6900	EA	6900 EA
70.00	7000	EA	7000 EA
71.00	7100	EA	7100 EA
72.00	7200	EA	7200 EA
73.00	7300	EA	7300 EA
74.00	7400	EA	7400 EA
75.00	7500	EA	7500 EA
76.00	7600	EA	7600 EA
77.00	7700	EA	7700 EA
78.00	7800	EA	7800 EA
79.00	7900	EA	7900 EA
80.00	8000	EA	8000 EA
81.00	8100	EA	8100 EA
82.00	8200	EA	8200 EA
83.00	8300	EA	8300 EA
84.00	8400	EA	8400 EA
85.00	8500	EA	8500 EA
86.00	8600	EA	8600 EA
87.00	8700	EA	8700 EA
88.00	8800	EA	8800 EA
89.00	890		

TOTAL	\$
-------	----

1

--	--

Non-Pec. Cell Monitoring Worker  
(ADP Profile # 10932)

556

95 ac

Subtotal

CE 00

Tax (%)

**Total**

58

	Less than 1000 ppm chlorides
--	------------------------------

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

**Signature**

RECEIVED, subject to the classifications and lawfully fixed tariffs in effect on the date of the issue of the BH of Lading, the property described above in apparent good order, except as noted (contents and conditions of contents packages unknown), marked, consigned, and destined as indicated above which said carrier free vessel carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract agrees in conformity to its usual place of delivery at said destination, if on its route, otherwise deliver to another carrier on the route to said destination. It is mutually

agreed as to each carrier of all or any of, said property over all or any portion of said route to destination, and as each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification of the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER

CARRIER *American Petroleum Environmental Services, Inc.*

PEA

PER

DATE \_\_\_\_\_

RECEIVED BY

**DAT**

white - FACILITY    yellow - OFFICE    pink - CUSTOMER

**ATTACHMENT C**

**ECOLOGY'S NO FURTHER ACTION DETERMINATION LETTER**



WASHINGTON STATE  
DEPARTMENT OF  
ECOLOGY

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Southwest Regional Office  
Toxics Cleanup Program  
PO Box 47775  
Olympia, WA 98504-7775  
360-407-6240

## TRANSMITTAL MEMO

Date: March 11, 2008

TO: Mr. Craig Hultgren

RE: *Fife Metroplex Cardlock VCP SW0610*

Subject: Explanation of Timeline

**NOTE: The determination date is the date Ecology approved the No Further Action status for the site. Final payment and EIM Data submission was then pending, and once received, the NFA letter was released.**

Ecology Determination date: March 11, 2008

Final Payment received date: April 21, 2008

EIM Data successfully uploaded: April 8, 2008

Ecology Determination letter mailed/sent: April 22, 2008





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Department of Ecology, 4000 University Avenue, SW, Olympia, WA 98512-4000, (360) 487-6000

**CERTIFIED MAIL**

March 11, 2008

Mr. Craig Hultgren  
PNG Environmental, Inc.  
1339 Commerce Avenue, Suite 313  
Longview, WA 98632

**Re: No Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site:**

- Name: Fife Metroplex Cardlock
- Address: 3200 20<sup>th</sup> Street East, Fife
- Facility/Site No.: 35377551
- VCP No.: SW0610

Dear Mr. Hultgren:

Thank you for submitting your independent remedial action report for the Fife Metroplex Cardlock facility (Site) for review by the State of Washington Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. Groundwater Monitoring Report – December 2007, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated January 9, 2008 by PNG Environmental, Inc.
2. Groundwater Monitoring Report – August 30, 2007, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated September 12, 2007 by PNG Environmental, Inc.
3. Groundwater Monitoring Report – June 4, 2007, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated June 21, 2007 by PNG Environmental, Inc.
4. Groundwater Monitoring Report – March 5, 2007, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated March 26, 2007 by PNG Environmental, Inc.
5. Groundwater Monitoring Report – December 4, 2006, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated February 13, 2007 by PNG Environmental, Inc.
6. Fourth ORC Injection and Groundwater Monitoring Report, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated September 14, 2006 by PNG Environmental, Inc.
7. Quarterly Groundwater Monitoring Report – May 2006, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated June 6, 2006 by PNG Environmental, Inc.
8. Quarterly Groundwater Monitoring Report – February 16, 2006, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated March 6, 2006 by PNG Environmental, Inc.
9. Quarterly Groundwater Monitoring Report – November 14, 2005, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated November 20, 2005 by PNG Environmental, Inc.
10. Third ORC Injection and Groundwater Monitoring Report, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20<sup>th</sup> Street East, Fife, Washington, dated October 18, 2005 by PNG Environmental, Inc.

Mr. Craig Hultgren  
March 11, 2008  
Page 4

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void and further remedial action may be required at the Site.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in successfully completing cleanup under the Voluntary Cleanup Program (VCP). If you have any questions regarding this opinion, please contact me at (360) 407-6347.

Sincerely,



Scott Rose, L.G.  
Site Manager  
SWRO Toxics Cleanup Program

SR/ksc:Fife Metroplex Cardlock NFA

Enclosures: Site Summary  
Figure 1 – Site Location Map  
Figure 2 – Groundwater Elevation Contour Plot – December 12, 2007

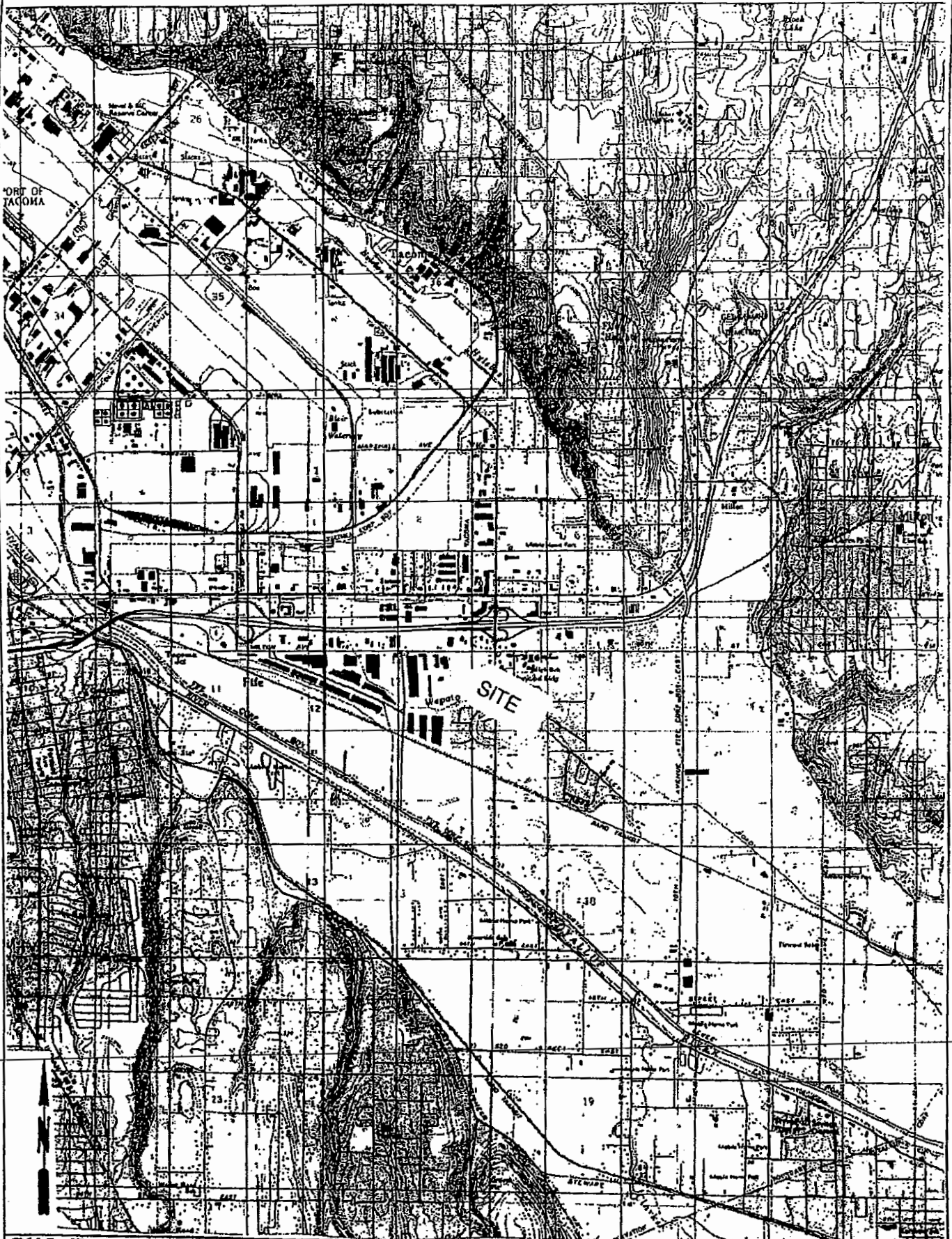
Cc: Rob Grenley – Grenley Stewart Resources  
Rob Olsen – Tacoma-Pierce County Health Dept  
Carol Johnston – Ecology  
Dolores Mitchell – Ecology

monitoring well MW-7. Soil samples from the first three borings were collected from the same depths where benzene was previously detected. Benzene was not detected in any of these samples above laboratory detection limits. No contaminants were detected in the soil sample collected from MW-7.

Two sediment samples (Seds East and Seds West) and one surface water sample were collected from the ditch and analyzed for TPH-G by Ecology Method NWTPH-Gx, TPH-D and oil-range petroleum hydrocarbons (TPH-O) by Ecology Method NWTPH-Dx, volatile organic compounds (VOCs) by EPA Method 8260B, and total lead by EPA Method 6010. No contaminants were detected in the sediment samples above laboratory method detection limits, except for lead, which was detected at 13 mg/kg and 15 mg/kg, respectively, in the two samples. These concentrations are below their respective sediment management standards. Only toluene was detected in the surface water sample. Toluene was detected at 5 micrograms per liter ( $\mu\text{g/L}$ ), which is well below Ecology surface water criteria.

MW-7 and the ditch surface water were added to the quarterly monitoring events beginning in August 2005. Also at this time, all monitoring wells and the ditch were analyzed for TPH-G by Ecology Method NWTPH-Gx, TPH-D and TPH-O by Ecology Method NWTPH-Dx, VOCs by EPA Method 8260B, and total lead by EPA Method 200.8. By this time, only MTBE was still being detected in the wells. During the August 2005 sampling event, MTBE was detected at or above the MTCA Method A cleanup level of 20  $\mu\text{g/L}$  in MW-3 (33  $\mu\text{g/L}$ ), MW-4 (50  $\mu\text{g/L}$ ), and MW-7 (20  $\mu\text{g/L}$ ).

MTBE was not detected in MW-7 during subsequent quarterly monitoring events, and by December 2007, MTBE was below MTCA cleanup levels for four consecutive quarters in MW-3 and MW-4.



**PNG ENVIRONMENTAL INC.**

1234 Commerce Avenue, Suite 200  
 Longview, Washington 98622

TEL (360) 414-0000  
 FAX (360) 414-0002

DATE: 9/02  
 FILE NO.: P01  
 DRAWING: AA  
 APPROVED BY: EN

File Cardlock Facility  
 File, Washington  
 Gravelly Stewart

Site Location Map

Project No. 1062-01  
 Page No.

20TH STREET EAST

SIDEWALK

6.16  
MW-1

6.04  
MW-2

6.54  
MW-4

UST  
UST

8.25  
MW-3

MW-7  
6.13

7.25  
MW-5  
7.2

7.0

6.8

6.6

MW-6  
6.47

6.4

6.2

6.0

5.8

DITCH  
5.65

APPROX. LOCATION  
OF DITCH

# LEGEND

MW-1

MONITORING WELL

6.2

GROUNDWATER ELEVATION CONTOUR

6.54

GROUNDWATER ELEVATION

PUMP ISLAND

PUMP ISLAND

DITCH (MONITORING POINT)

DITCH (MONITORING POINT)

GROUNDWATER FLOW DIRECTION

GROUNDWATER FLOW DIRECTION

NOTE:  
BASE MAP FROM BLUHM & ASSOCIATES  
LAND SURVEYORS, INC. JUNE 13, 2003.

APPROXIMATE SCALE IN FEET

0 40 80

**PNG ENVIRONMENTAL INC.**

1339 Commerce Avenue, Suite 313  
Longview, Washington 98632

TEL (360) 414-0669  
FAX (360) 414-0663

DATE: 1-4-08  
FILE NAME: 1052-01  
DRAWN BY: JJT  
APPROVED BY: CH

FIFE CARDLOCK FUEL FACILITY  
3200 20TH ST. EAST  
FIFE, WASHINGTON

GROUNDWATER ELEVATION  
CONTOUR PLOT  
DECEMBER 12, 2007

Project No.  
1052-01

Figure No.  
**2**