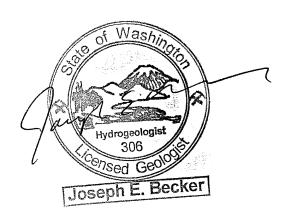


MIZUKAMI PROJECT SITE (VCP SW1137)
4524 20TH STREET EAST
FIFE, WASHINGTON
JUNE 2011 GROUNDWATER
MONITORING REPORT

JULY 2011

by

John F. Hildenbrand
Associate Environmental Scientist
Environmental Services Manager



MIZUKAMI PROJECT SITE (VCP SW1137) 4524 20th Street East, Fife, Washington June 2011 Groundwater Monitoring Report July 2011

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MIZUKAMI PROJECT SITE (VCP SW1137) 4524 20th Street East, Fife, Washington June 2011 Groundwater Monitoring Report July 2011

1.0 Introduction

1.1 Purpose and Site Identification

This report presents the results of the June 2011 groundwater monitoring event at the Mizu-kami project site located in Fife, Washington. The site is located at 4524 20th Street East, Fife, Pierce County, Washington. The parcel is bordered by 20th Street to the north and Frank Albert Road to the east. Across Frank Albert Road is a commercial business park. The subject site is bordered on the south and west by property under the same ownership, CMKM, LLC, as the subject site. Pierce County Assessor-Treasurer records indicate the subject property is identified as tax parcel number 0320126023.

1.2 Regional Geology/Hydrogeology

The subject property is mapped by the *Geological Map of the Puyallup 7.5 Minute Quadrangle, Washington* (Troost, in review) as being Quaternary alluvium (Qal). This alluvium is composed of over-bank deposits associated with the Puyallup River, consisting of generally fine to very fine sand, silts, and clay. The soils in the area of the subject have been classified by the United States Department of Agriculture, as published in the *Soil Survey for the Pierce County Washington Area*, 1977, as Puyallup fine sandy loam. Previous site activities found groundwater occurring within the alluvial sediments at a depth of approximately six to seven feet below ground surface.

2.0 Background

The site is currently developed as a commercial warehouse. The current owner, CMKM, LLC, purchased the (then) residential property in July 2003. At that time, a heating-oil underground storage tank (UST) was excavated for removal. An aboveground, heating-oil storage tank was also in close proximity to this excavation. Fuel-oil service lines associated with this aboveground tank failed during the winter of 2003 and resulted in a leakage of over 150 gallons of diesel fuel into the subsurface.

Previous efforts have established that groundwater concentrations of diesel and diesel-range organics do not exceed MTCA Method A groundwater levels. However, some soil contamination has been shown to remain underneath sidewalk and utility right-of-ways.

Based on previous opinions provided by the Department of Ecology (Ecology), we have identified five final closure tasks we anticipate are necessary for a no-further-action (NFA) determination. They are:

1. Replace the damaged monitoring well MW4 and obtain three additional quarters of groundwater monitoring data to supplement the previously collected data.

- 2. Complete a remedial action feasibility study with a disproportionate cost analysis assessing the costs of removal of the previously documented residual contamination versus leaving it in place.
- 3. Prepare a draft environmental covenant for Ecology's approval. Once it is approved, it will be recorded against the property.
- 4. A long-term groundwater monitoring plan will need to be submitted to, and approved by, Ecology.
- 5. Complete Environmental Information Management (EIM) data entry of all project data. This will need to be completed prior to the time the environmental covenant is filed.

3.0 Quarterly Monitoring

Robinson Noble personnel collected water samples from six monitoring wells on June 14. Prior to sampling, the wells were opened and allowed to stabilize before water levels were sounded. Originally, the site had seven monitoring wells; however, after the current development of the site, one of the monitoring wells was removed. The observed flow direction from the remaining six wells was determined to be toward the northeast. A groundwater mound was observed in the area around MW4-B. This is likely due to the location of the well in a landscaped area receiving substantial precipitation run off immediately prior to the monitoring event and the proximity of a storm drain catch basin within the road right-of-way. Table 1 displays the depth to water measured in each well.

Table 1. June 14, 2011 Water Levels (in feet)

Well No.	Top of Casing Elevation*	Depth to Groundwater	Groundwater Elevation*
MVV1	95.36	4.28	91.08
MW-2	100.26	8.17	92.09
MW-3	93.01	1.11	91.90
MW-4B	94.81	3.49	91.32
MW-6	98.07	6.45	91.62
MW-7	99.19	7.40	91.79

^{*} Elevations are relative to an arbitrary site benchmark of 100 feet.

A peristaltic pump and dedicated tubing were used to sample each well. Samples were collected after at least three volumes of water were purged from the wells and field measurements of temperature, conductivity, total dissolved solids, and dissolved oxygen had stabilized (within measurement error limits). The groundwater monitoring field sampling notes are attached in Appendix C.

Water samples were collected from the six wells and placed into laboratory-supplied, precleaned containers with the proper preservatives for delivery to an accredited laboratory. The samples were placed in a laboratory-supplied, thick-walled cooler containing blue ice. The samples were delivered to Libby Environmental, Inc. of Olympia, Washington. The samples were submitted for analysis using Ecology NWTPH-GX, Ecology NWTPH-Dx/Dx Extended, EPA Method 8021B, and EPA Method 8270C.

3.1 Analytical Results

As indicated by the analytical results and summarized in Table 2 below (complete results attached in Appendix B), no detection of target analytes were reported above laboratory detection limits for any of the groundwater samples submitted for analysis except for MW-7. The sample collected from MW-7 was found to have gasoline-range petroleum hydrocarbons, xylenes, and ethylbenzene above laboratory detection limits 1 . The reported concentrations are, however, below the applicable MTCA Method A cleanup limits (CULs). MW-7 is located at a site where a groundwater sample from a direct-push boring was collected during the initial characterization activities that contained diesel-range petroleum hydrocarbons at a concentration of 50,000 µg/L. These concentrations are substantially lower than those noted in the March 2011 monitoring event.

Table 2. June 14, 2011 Sampling Event Analytical Results (µg/L)

·					1 5 7		
Analyte/ Sample ID	MW-1	MW-2	MW-3	MW-4B	MW-6	MW-7	MTCA Method A
Gasoline	nd	nd	nd	nd	nd	170	800
Diesel	nd	nd	nd	nd	nd	nd	500
Oil	nd	nd	nd	nd	nd	nd	500
сРАН	nd	nd	nd	nd	nd	nd	0.1
Benzene	nd	nd	nd	nd	nd	nd	5
Toluene	nd	nd	nd	nd	nd	nd	1,000
Ethylbenzene	nd	nd	nd	nd	nd	nd	700
Xylenes	nd	nd	nd	nd	nd	4.5	1,000
1,2-Dichloroethane (EDC)*	nd	nd	nd	nd	nd	nd	nd
1,2-Dibromoethane (EDB)*	nd	nd	nd	nd	nd	nd	nd
Naphthalene	nd	nd	nd	nd	nd	nd	160

nd = analyte concentration is below the laboratory detection limit

4.0 Quality Assurance/Quality Control (QA/QC)

4.1 Daily Field QA/QC

The project manager reviewed all documentation including sample logs, custody forms, and field logs prior to samples being delivered to the laboratory. Review was done for completeness, accuracy, and consistency. As noted on the chain-of-custody sheet, MTCA 830-1 VOCs were added to the target compound list on June 21, 2011 at the request of Ecology.

4.2 Sample Packaging and Shipping

The groundwater samples collected for chemical analysis were kept out of direct sunlight and were checked for label completeness and cap tightness. All samples submitted to the laboratory were thermally preserved in the field (four degrees Celsius) immediately after sample collection by placing them upright in a pre-cooled, insulated ice chest containing uncontaminated blue

^{*=} Analyte added at the request of the Washington State Department of Ecology

¹ The reported concentrations for MW-7 are from the laboratory duplicate. The duplicate was used to present a "worst-case" picture of the levels detected.

ice. The cooler is constructed of plastic or fiberglass standard to those provided by environmental analytic laboratories. The cooler does not have a drain.

4.3 Chain-of-Custody

A chain-of-custody form accompanied samples submitted to the laboratory. Chain-of-custody forms were in order as noted in the analytical narrative from the contractor laboratory.

4.4 Laboratory QA/QC

A narrative regarding quality assurance and quality control is provided with the laboratory analysis reports. This narrative indicated quality control was within acceptable limits.

5.0 Feasibility Study and Disproportionate Cost Analysis

Subsequent to excavation of impacted soils, Robinson Noble completed remedial investigation efforts in 2005 and 2006. That work is documented in reports dated April 2005 and January 2006. The data presented in these reports, along with subsequent monitoring events, indicates that a small area of soil contamination remains in a utility right-of- way in the northeastern corner of the property.

MTCA defines that the evaluation of whether or not a cleanup action uses permanent solutions to the "maximum extent practicable" should be based on a disproportionate cost analysis consistent with the requirements of WAC 173-340-360(e). In that analysis, cleanup alternatives are arranged from most to least permanent based on the criteria contained in WAC 173-340-360(f).

The disproportionate cost analysis then compares the relative environmental benefits of each alternative against those provided by the most permanent alternative evaluated. The assessment of benefits can be qualitative as well as quantitative. Costs are disproportionate to benefits if the incremental costs of the more permanent alternative exceed the incremental degree of benefits achieved by the other lower-cost alternative (WAC 173-340-360(e) (i)). Alternatives which exhibit such disproportionate costs are considered "impracticable." Where the quantitative and qualitative benefits of two alternatives are equivalent, MTCA specifies that Department of Ecology shall select the less costly alternative (WAC 173-340-360(e)(ii)(c)).

5.1 Existing Status

As previously documented and noted above, an area of impacted soil remains within utility corridors on the Northeastern corner of the property. Based on the data generated to date, we estimate the amount of impacted soil remaining is less than 50 cubic yards.

5.2 Remedial Action Options

The existing data indicate that the residual soil concentrations are close to MCTA Method A cleanup levels. These relatively low levels, along with the absence of groundwater contaminants above MTCA limits, preclude the practical consideration of in-situ remedial options. However, in order to assess the relative costs, two options were compared. These options include excavation and off-site disposal of impacted soil and the implementation of institutional controls and long-term groundwater monitoring

The selected options were evaluated according to the criteria specified in WAC 173-340-360 3(e) which are 1) protectiveness, 2) permanence, 3) cost, 4) long-term effectiveness, 5) short-term risk management, 6) implementability (technical and administrative), and 7) consideration of public concerns. The results of our evaluation are as follows:

- 1. **Protectiveness** The excavation and off-site removal of the residual soil contamination is the more protective of the two options. However, the soil is located in a utility corridor, and groundwater contamination is not present. This, combined with the commercial nature of the subject and surrounding area, indicates that the use of institutional controls does not present any likely exposure issues.
- 2. **Permanence** Neither option permanently destroys the contaminants. While the off-site disposal option can be considered to be permanent with respect to the presence of contaminants on site, in reality, it only relocates the contaminants to another location. Thus, both options are essentially equal in permanence.
- 3. <u>Costs</u> As outlined in the following table, the implementation of institutional controls and long-term monitoring is considerably less than excavation and off-site disposal. The estimated cost of the latter is roughly 876% greater.

Table 3. Cost Comparison

rable 3. Gost Golliparison		
Took	Excavation and	Institutional control and long-
Task	off-site disposal	term groundwater monitoring
Contaminated soil excavation*	\$5,000	N/A
Contaminated soil transport and* disposal	\$4,000	N/A
Engineering and permitting for utility relocation and restoration	\$25,000	N/A
Utility relocation and restoration	\$50,000	N/A
Engineering and permitting for roadway/side walk removal and repair	\$10,000	N/A
Sidewalk and roadway repair	\$100,000	N/A
Preparation and filing of environ- mental covenant	N/A	\$1,000
**Long-term monitoring (5 years)	N/A	\$20,000
Total Cost	\$194,000	\$21,000

^{*} The excavation estimates are based on 100 tons of contaminated soil requiring removal and disposal

- 4. **Effectiveness over the long term** Given the stable nature of the contaminants and the nature of the selected options, both options are equally effective, although the onsite option will require restrictive environmental covenants. The nature of the proposed on-site disposal will not require significant ongoing or long-term maintenance/operation costs, and any use restrictions or other controls will be clearly detailed in an environmental restrictive covenant.
- 5. <u>Management of short-term risks</u> The short-term risks posed by excavation and offsite disposal consist primarily of potential worker exposure to contaminants during excavation activities and from safety risks posed by working in and near active roadways.

Given the current stable nature of the site, there are no significant short-term risks associated with the implementation of institutional controls and groundwater monitoring.

^{**} Assumes five years of monitoring at 18-month intervals

- 6. <u>Implementability</u> Excavation and off-site disposal requires substantial design and planning efforts. These efforts involve acquiring permission to temporarily re-route fiber optic communications line and to occupy and disturb public sidewalk and street right-of-ways. Receiving this permission will include engineering efforts, and receipt of permission is not guaranteed. Thus, while technically possible, it is not certain that excavation and removal will be allowed. Implementation of institutional controls and monitoring, including filing of the environmental covenant, is possible and can be achieved rapidly.
- 7. **Consideration of public concerns** Given the scope of the project and the commercial nature of the area, public concern is not expected for either option.

5.3 Summary

Considering the technical challenges and uncertainty of obtaining permission associated with the removal and off-site disposal of contaminants located in the right-of-way, the practical protectiveness of this option is limited. This limitation leads us to opine that the proposed implementation of institutional controls and long-term groundwater monitoring option is at least equally protective. As shown above, the institutional control option possesses substantially lower implementation costs. Therefore, the cost of excavation and off-site disposal is considered to be disproportionate to the reduction in risk when compared to the preferred option of implementing institutional controls.

6.0 Terrestrial Ecological Evaluation

The subject property and surrounding area is zoned industrial or regional commercial center by the City of Fife, Washington. The residual soil contamination is covered by existing sidewalks and asphalt roadway. As noted on the Terrestrial Ecological Evaluation process Primary Exclusion Documentation Form located in Appendix E, the site qualifies for primary exclusion number two.

7.0 Conclusions

The results of this monitoring event indicate the previously established trend of the absence of target compounds above MTCA Method A limits is continuing. This indicates the residual soil contamination located within the right-of-way does not appear to be impacting groundwater. Additionally, the decreasing concentrations of target compound concentrations below MTCA Method A limits in MW-7 indicate groundwater in that area is not significantly impacted. A summary of the groundwater data collected for this site is located in Appendix D

The evaluation of remedial options detailed in Section 5, show that, given the absence of groundwater contamination above MTCA method A limits and the previous removal of the majority of the impacted contaminated soil, the application of further remedial actions designed to remove or further reduce the remaining residual soil contaminants is substantially disproportionate to the additional reduction in risk when compared to the implementation of institutional controls. Further, the analysis indicates there is little risk to the terrestrial ecosystem proximal to the subject. Thus, closure of this site by implementing institutional controls and long-term groundwater monitoring is appropriate and protective of human and ecological health.

8.0 Recommendations

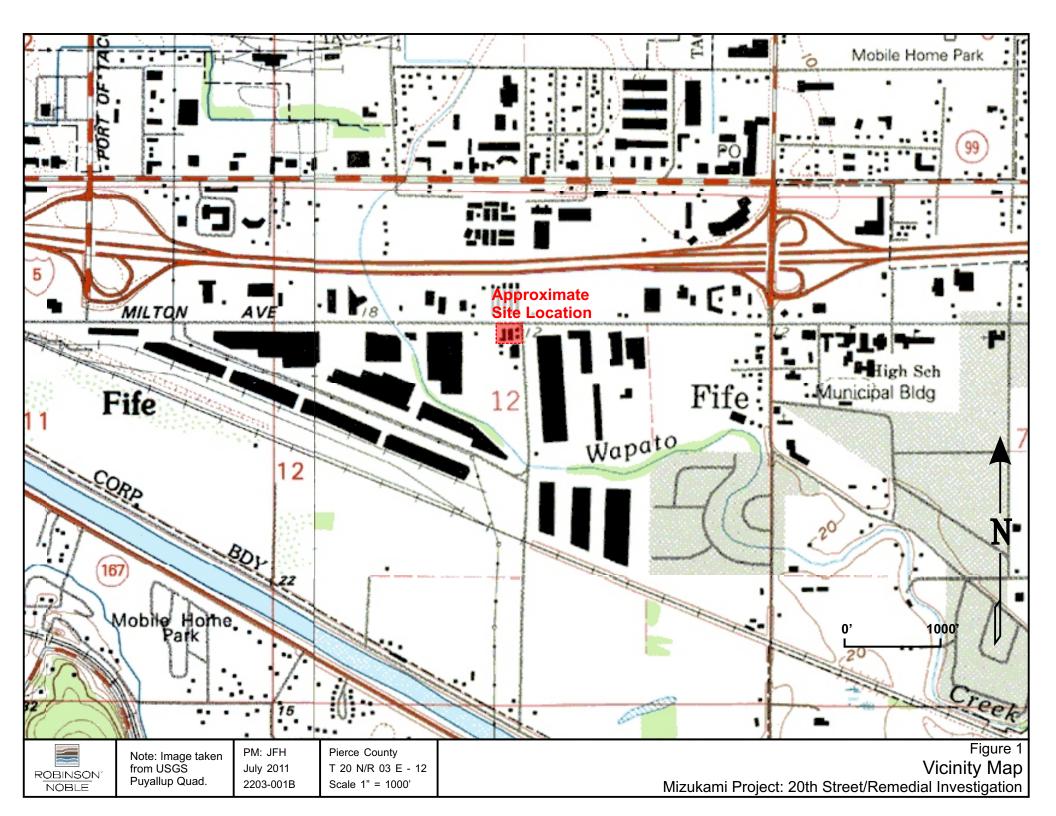
A long-term groundwater monitoring plan should be prepared and submitted to Ecology for review and approval. Subsequent to determination by the Washington State Department of Ecology that a no-further-action determination is likely, an environmental covenant specifying the institutional controls and requisite long-term groundwater monitoring program should be prepared and recorded with the Pierce County Auditor.

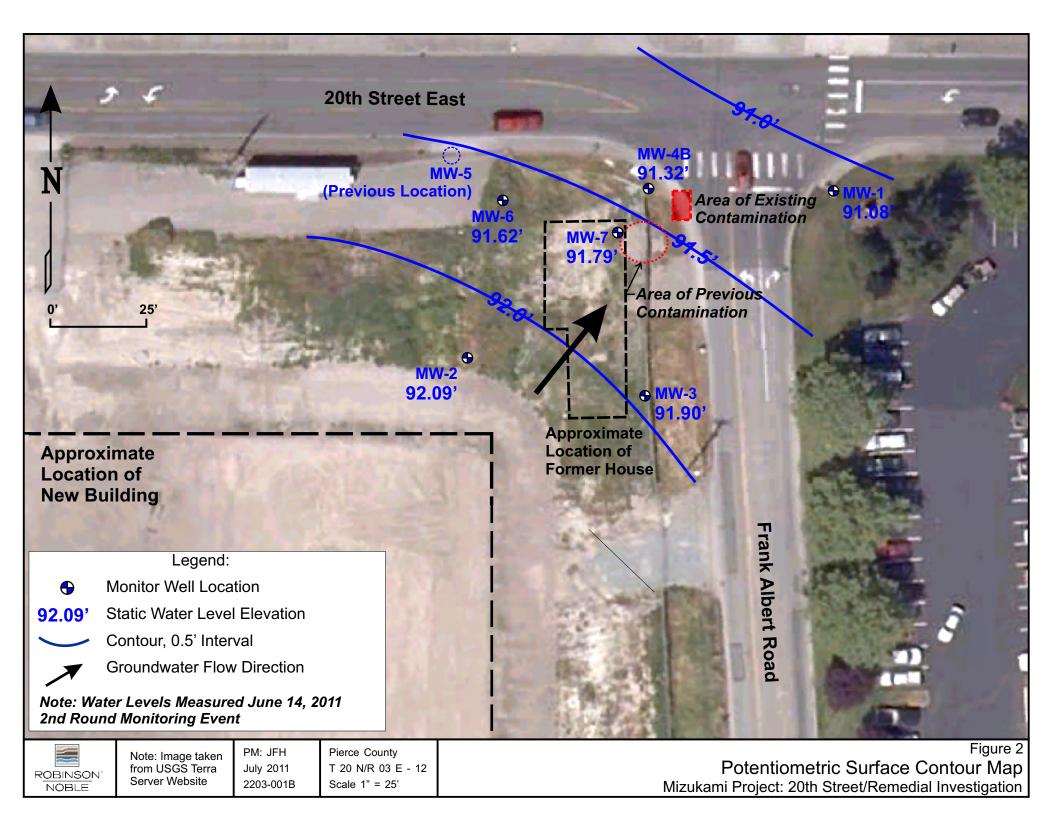
9.0 Limitations

The services described in this report were performed consistently with generally accepted environmental consulting principles and practices. No other warranty, expressed or implied, is made. These services were consistent with the Robinson Noble, Inc. agreement with the client. This report is solely for the use and information of the client unless otherwise noted. Any reliance on this report by a third party is at the party's sole risk.

Opinions and recommendations contained in this report apply to existing conditions when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. Since site conditions and regulations beyond our control could change at any time after the completion of our site visit, we are not responsible for the impacts of any changes in environmental conditions, standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, nor do we warrant the use of segregated portions of this report.

APPENDIX A









Libby Environmental, Inc.

4139 Libby Road NE • Olympia, WA 98506-2518

June 22, 2011

John Hildenbrand Robinson Noble 3011 Huson Street South Suite A Tacoma, WA 98409

Dear Mr. Hildenbrand:

Please find enclosed the analytical data report for the Gensco-Langseth Project located in Fife, Washington. Water samples were analyzed for Diesel & Oil by NWTPH-Dx/Dx Extended, Gasoline by NWTPH-Gx and BTEX by EPA Method 8021B, Specific Halogenated and Aromatic Hydrocarbons by EPA Method 8260C and PAH (Polyaromatic Hydrocarbons) by EPA Method 8270 on June 15, 17 & 22, 2011.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. An invoice for this analytical work is enclosed.

Libby Environmental, Inc. appreciates the opportunity to have provided analytical services for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

Sherry L. Chilcutt

President

Libby Environmental, Inc.

GENSCO-LANGSETH PROJECT Fife, Washington Robinson Noble, Inc. Client Project # 2203-001B Libby Project No. L110615-3

Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8021B) in Water

Sample	Date	Benzene	Toluene	Ethylbenzene	Xylenes	Gasoline	Surrogate
Number	Analyzed	(ug/l)	(ug/l)	(ug/l)	(ug/l)	(ug/l)	Recovery (%)
Method Blank	6/17/11	nd	nd	nd	nd	nd	95
LCS	6/17/11	95%	104%				92
MW-1	6/17/11	nd	nd	nd	nd	nd	92
MW-3	6/17/11	nd	nd	nd	nd	nd	95
MW-2	6/17/11	nd	nd	nd	nd	nd	95
MW-4B	6/17/11	nd	nd	nd	nd	nd	97
MW-6	6/17/11	nd	nd	nd	nd	nd	90
MW-7	6/17/11	nd	nd	nd	4.5	170	94
MW-7 Dup	6/17/11	nd	nd	nd	4.4	230	97
L110611-2 MS	6/17/11	90%	117%				98
L110611-2 MSI	6/17/11	99%	112%				95
Practical Quantita	ntion Limit	1	2	1	3	100	

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chilcutt

[&]quot;int" Indicates that interference prevents determination.

GENSCO-LANGSETH PROJECT Fife, Washington Robinson Noble, Inc. Client Project # 2203-001B Libby Project No. L110615-3

Specific Halogenated and Aromatic Hydrocarbons (EPA 8260C) in Water

Sample Description		Method Blank	MW-1	MW-3	MW-2	MW-4B	MW-6
Date Sampled		n/a	6/15/11	6/15/11	6/15/11	6/15/11	6/15/11
Date Analyzed		6/17/11	6/17/11	6/17/11	6/17/11	6/17/11	6/17/11
= 000 1 Maily 200	PQL	0/1//11	0/1//11	0/1//11	0/1//11	0/1//11	0/1//11
	(ug/l)	(ug/l)	(ug/l)	(ug/l)	(ug/l)	(ug/l)	(ug/l)
Benzene	1.0	nd	nd	nd	nd	nd	nd
Toluene	1.0	nd	nd	nd	nd	nd	nd
Ethylbenzene	1.0	nd	nd	nd	nd	nd	nd
Total Xylenes	1.0	nd	nd	nd	nd	nd	nd
1,2-Dichloroethane (EDC)	1.0	nd	nd	nd	nd	nd	nd
1,2-Dibromoethane (EDB)	0.01	nd	nd	nd	nd	nd	nd
Total Naphthalenes	5.0	nd	nd	nd	nd	nd	nd
MTBE	5.0	nd	nd	nd	nd	nd	nd
Surrogate Recovery							
Dibromofluoromethane		89.0	97.1	98.1	101	106	101
1,2-Dichloroethane-d4		97.0	78.3	74.9	76.5	82.3	75.4
Toluene-d8		94.9	92.5	95.2	94.9	96.6	90.4
4-Bromofluorobenzene		92.9	103	102	101	101	102

[&]quot;nd" Indicates not detected at listed detection limit.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE: 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chilcutt

[&]quot;int" Indicates that interference prevents determination.

GENSCO-LANGSETH PROJECT Fife, Washington Robinson Noble, Inc. Client Project # 2203-001B Libby Project No. L110615-3

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Water

Sample	Date	Surrogate	Diesel	Mineral Oil	Oil
Number	Analyzed	Recovery (%)	(ug/l)	(ug/l)	(ug/l)
Method Blank	6/15/11	95	nd	nd	nd
MW-1	6/15/11	91	nd	nd	nd
MW-3	6/15/11	86	nd	nd	nd
MW-2	6/15/11	90	nd	nd	nd
MW-4B	6/15/11	87	nd	nd	nd
MW-6	6/15/11	85	nd	nd	nd
MW-7	6/15/11	83	nd	nd	nd
MW-7 Dup	6/15/11	88	nd	nd	nd
Practical Quantitat	ion Limit	200	400	400	

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Paul Burke

[&]quot;int" Indicates that interference prevents determination.

GENSCO-LANGSETH PROJECT Fife, Washington Robinson Noble, Inc. Client Project # 2203-001B Libby Project No. L110615-3

Specific Halogenated and Aromatic Hydrocarbons (EPA 8260C) in Water

Sample Description		MW-7	MW-7	
			Dup	
Date Sampled		6/15/11	6/15/11	
Date Analyzed		6/17/11	6/17/11	
	PQL			
	(ug/l)	(ug/l)	(ug/l)	
Benzene	1.0	nd	nd	
Toluene	1.0	nd	nd	
Ethylbenzene	1.0	nd	nd	
Total Xylenes	1.0	4.5	4.4	
1,2-Dichloroethane (EDC)	1.0	nd	nd	
1,2-Dibromoethane (EDB)	0.01	nd	nd	
Total Naphthalenes	5.0	nd	nd	
MTBE	5.0	nd	nd	
Surrogate Recovery				
Dibromofluoromethane		85.0	106	
1,2-Dichloroethane-d4		92.0	86.3	
Toluene-d8		94.4	96.9	
4-Bromofluorobenzene		93.1	100	
"nd" Indicates not detec	ted at liste	d detection	limit.	

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE: 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chilcutt

[&]quot;int" Indicates that interference prevents determination.

GENSCO-LANGSETH PROJECT Fife, Washington Robinson Noble, Inc. Client Project # 2203-001B Libby Project No. L110615-3

QA/QC Data - EPA 8260C Analyses

		Sample Ide	ntification:	L110616-2			
		Matrix Spik	e	M	atrix Spike I	Dup	
	Spiked Conc.	Measured Conc.	Spike Recovery	Spiked Conc.	Measured Conc.	Spike Recovery	RPD
	(ug/l)	(ug/l)	(%)	(ug/l)	(ug/l)	(%)	(%)
Benzene	10	9.0	90	10	9.9	99	9.5
Toluene	10	11.7	117	10	11.2	112	4.4
Surrogate Recovery							
Dibromofluoromethane			107			106	
1,2-Dichloroethane-d4		85.6		77.3			
Toluene-d8			98.2			95.4	
4-Bromofluorobenzene			100			97.8	

	Laboratory Control Sample					
	Spiked Conc. (ug/l)	Measured Conc. (ug/l)	Spike Recovery (%)			
Benzene Toluene	10 10	9.5 10.4	95.0 104			
Surrogate Recovery						
Dibromofluoromethane		,	101			
1,2-Dichloroethane-d4			69.4			
Toluene-d8			91.8			
4-Bromofluorobenzene			95.3			

ACCEPTABLE RECOVERY LIMITS FOR MATRIX SPIKES: 65%-135% ACCEPTABLE RPD IS 35%

ANALYSES PERFORMED BY: Sherry Chilcutt

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06/22/2011

Project: Client ID: Gensco-Langseth

Libby Environmental, Inc. 4139 Libby Rd NE

Sample Matrix:

MW-1 Water

Olympia, WA 98506 Attn: Sherry Chilcutt Date Sampled:

06/14/2011

Date Received:

06/16/2011

Spectra Project: 2011060347

Spectra Number: 1

Analyte	Result	_Units	Method
Benzo(a)AnthraceneSIM	< 0.100	μg/L	8270D SIM
Benzo(a)PyreneSIM	< 0.100	μg/L	8270D SIM
Benzo(b)FluorantheneSIM	< 0.100	μg/L	8270D SIM
Benzo(k)FluorantheneSIM	< 0.100	μg/L	8270D SIM
ChryseneSIM	< 0.100	μg/L	8270D SIM
Dibenz(a,h)AnthraceneSIM	< 0.100	μg/L	8270D SIM
Indeno(1,2,3-cd)PyreneSIM	< 0.100	μg/L	8270D SIM

Surrogate	% Recovery	Method	
2-Fluorobiphenyl-SIM	62	8270D SIM	
Nitrobenzene-d5SIM	70	8270D SIM	
p-Terphenyl-d14SIM	90	8270D SIM	

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager a5/mlh

Page 1 of 6

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www.spectra-lab.com

06/22/2011

Project:

Gensco-Langseth

Client ID: Libby Environmental, Inc.

MW-3

4139 Libby Rd NE

Sample Matrix:

Water

Olympia, WA 98506

Date Sampled: Date Received: 06/14/2011

Attn: Sherry Chilcutt

06/16/2011

Spectra Project:

2011060347

Spectra Number: 2

Analyte Benzo(a)Anthracene--SIM

Result < 0.100 Units μg/L

Method 8270D SIM

Benzo(a)Pyrene--SIM

< 0.100

μg/L

8270D SIM

Benzo(b)Fluoranthene--SIM Benzo(k)Fluoranthene--SIM

Indeno(1,2,3-cd)Pyrene--SIM

< 0.100 < 0.100

μg/L μg/L 8270D SIM 8270D SIM

Chrysene--SIM

< 0.100

 $\mu g/L$

8270D SIM

Dibenz(a,h)Anthracene--SIM

< 0.100 < 0.100

μg/L μg/L 8270D SIM 8270D SIM

Surrogate	% Recovery	Method	_
2-FluorobiphenylSIM	49	8270D SIM	
Nitrobenzene-d5SIM	61	8270D SIM	
p-Terphenyl-d14SIM	85	8270D SIM	

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Project:

Gensco-Langseth

MW-2

Water

06/22/2011

Client ID:
Libby Environmental, Inc.
Sample Matrix:
4139 Libby Rd NE
Date Sampled:

4139 Libby Rd NE Date Sampled: 06/14/2011
Olympia, WA 98506 Date Received: 06/16/2011
Attn: Sherry Chilcutt Spectra Project: 2011060347

Spectra Number: 3

Analyte Result _Units Method Benzo(a)Anthracene--SIM < 0.100 μg/L 8270D SIM Benzo(a)Pyrene--SIM < 0.100 $\mu g/L$ 8270D SIM Benzo(b)Fluoranthene--SIM < 0.100 $\mu g/L$ 8270D SIM Benzo(k)Fluoranthene--SIM < 0.100 μg/L 8270D SIM Chrysene--SIM < 0.100 μg/L 8270D SIM Dibenz(a,h)Anthracene--SIM < 0.100 μg/L 8270D SIM Indeno(1,2,3-cd)Pyrene--SIM < 0.100 μg/L 8270D SIM

Surrogate	% Recovery	Method	_
2-FluorobiphenylSIM	58	8270D SIM	
Nitrobenzene-d5SIM	70	8270D SIM	
p-Terphenyl-d14SIM	80	8270D SIM	

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06/22/2011

Libby Environmental, Inc.

4139 Libby Rd NE Olympia, WA 98506 Attn: Sherry Chilcutt Project:

Gensco-Langseth

Client ID: Sample Matrix: MW-4B

Date Sampled:

Water 06/14/2011

Date Received:

06/16/2011

Spectra Project: 2011060347

Spectra Number: 4

Analyte	Result	Units	Method
Benzo(a)AnthraceneSIM	< 0.100	<u>μg/L</u>	8270D SIM
Benzo(a)PyreneSIM	< 0.100	μg/L	8270D SIM
Benzo(b)FluorantheneSIM	< 0.100	μg/L	8270D SIM
Benzo(k)FluorantheneSIM	< 0.100	μg/L	8270D SIM
ChryseneSIM	< 0.100	μg/L	8270D SIM
Dibenz(a,h)AnthraceneSIM	< 0.100	μg/L	8270D SIM
Indeno(1,2,3-cd)PyreneSIM	< 0.100	μg/L	8270D SIM

Surrogate	% Recovery	Method	
2-FluorobiphenylSIM	56	8270D SIM	
Nitrobenzene-d5SIM	81	8270D SIM	
p-Terphenyl-d14SIM	76	8270D SIM	

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Page 4 of 6

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06/22/2011

Libby Environmental, Inc. 4139 Libby Rd NE Olympia, WA 98506

Attn: Sherry Chilcutt

Project: Gensco-Langseth

Client ID: MW-6 Sample Matrix: Water

Date Sampled: 06/14/2011 Date Received: 06/16/2011 Spectra Project: 2011060347

Spectra Number: 5

Analyte	Result	Units	Method
Benzo(a)AnthraceneSIM	< 0.100	<u>μg/L</u>	8270D SIM
Benzo(a)PyreneSIM	< 0.100	μg/L	8270D SIM
Benzo(b)FluorantheneSIM	< 0.100	μg/L	8270D SIM
Benzo(k)FluorantheneSIM	< 0.100	μg/L	8270D SIM
ChryseneSIM	< 0.100	μg/L	8270D SIM
Dibenz(a,h)AnthraceneSIM	< 0.100	μg/L	8270D SIM
Indeno(1,2,3-cd)PyreneSIM	< 0.100	μg/L	8270D SIM

Surrogate	% Recovery	Method
2-FluorobiphenylSIM	50	8270D SIM
Nitrobenzene-d5SIM	54	8270D SIM
p-Terphenyl-d14SIM	88	8270D SIM

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06/22/2011

Project:

Gensco-Langseth

Libby Environmental, Inc.

Client ID: Sample Matrix:

MW-7 Water

4139 Libby Rd NE

Date Sampled:

06/14/2011

Olympia, WA 98506

Date Received:

06/16/2011

Attn: Sherry Chilcutt

Spectra Project: 2011060347

Spectra Number: 6

Analyte	Result	Units	Method
Benzo(a)AnthraceneSIM	< 0.100	— <u>μg/L</u>	8270D SIM
Benzo(a)PyreneSIM	< 0.100	μg/L	8270D SIM
Benzo(b)FluorantheneSIM	< 0.100	μg/L	8270D SIM
Benzo(k)FluorantheneSIM	< 0.100	μg/L	8270D SIM
ChryseneSIM	< 0.100	μg/L	8270D SIM
Dibenz(a,h)AnthraceneSIM	< 0.100	μg/L	8270D SIM
Indeno(1,2,3-cd)PyreneSIM	< 0.100	μg/L	8270D SIM

Surrogate	% Recovery	Method
2-FluorobiphenylSIM	54	8270D SIM
Nitrobenzene-d5SIM	53	8270D SIM
p-Terphenyl-d14SIM	78	8270D SIM

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager a5/mlh

Page 6 of 6

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2 MW-3		11:20	HZO	Amber							ľ	X						***************************************		2Me-2012-001	
3 MW-Z		12:38	H20	Amber							h	X				1			**************************************	THE REAL PROPERTY.	
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5 MW-C		14:45	H20	Amber								X				T		*****		PDD America	i, Militarro, en aggrega i seine mannione constru
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Distribution: White - Lab, Yellow - File, Pink -	- Orlginator				~~	••••					Тс	otal N	umber	of Cont	ainers		<u> </u>				

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4 MW-43	***************************************	13:30			X		+	X	TX.	X			1	_				·····
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Cooled by Blue	- ice in cools	

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1059	q	0.08	0.5	12.76	0.479	0.367	0.311 0.29	6.18	138.4
1102	12	0.08	0.75	12.84	0475	0.364	0.309 0.30	6.22	128.9
1t 05	15	0.08	1.0	12.90	0.475	0.365	0.308 0.29	6,25	115.8
1108	18	0.06	1,20	12.92	0.473	0.364	0.307 0.29	6.27	101.2
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1321	18	011		1321	0.773	0.599	0.502	0.50	6.45	
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scale: 1 square=



Gensco/Mizukami Historical Groundwater Quality Data Summary

Well ID and Date	Gasoline	Diesel	Mineral Oil	Oil	Benzene	Toluene	Ethyl benzene	Xylenes	EDB*	EDC*	Napthalene	MTBE	Benz(a) anthra- cene	Chrysene	Benzo(b) fluoran- thene	Benzo(K) fluoran- thene	Benzo(a) pyrene	Ideno(1,2,3-cd) pyrene	Dibenz(a,h) anthracene	Benzo(ghi) perylene
MW1																				
11/16/05	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
11/14/07	nd	nd	nd	nd	nd	nd	nd	nd	1		nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/6/08	nd	nd	nd	nd	nd	nd	nd	nd	-		nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/12/08	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/30/11	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/14/11	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
MW2																				
11/16/05	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
11/14/07	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/6/08	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/12/08	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/30/11	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/14/11	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
MW3 11/16/05	nd	nd		nd	nd	nd	nd	nd			nd	nd		l nd l		nd	nd	nd	nd I	
11/16/03	nd nd	nd nd	nd nd	nd nd	nd nd	nd nd	nd nd	nd nd			nd 2ua/l	nd nd	nd nd	nd nd	nd nd	nd nd	nd nd	nd nd	nd nd	nd nd
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6/12/08	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/30/11	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/14/11	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
MW4/MW4E			aged and rep					110	110	110	110				110		11.0	110		110
11/16/05	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
11/14/07	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/6/08	\\\\		Manala 0000			0000 :-				-1 414 41-			:4			l		I.		
6/12/08	vveii ivivv-4	was ary i	in March, 2008	8. Durii	ng the June	2008 monit	oring event	it was di	scovere	d that th	e well was bro	ken and	it was not sa	mpiea.						
3/30/11	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/14/11	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
MW5/6 (MV	W-5 was rel	ocated a	nd replaced l	by MW	/-6 in April 2	2007)				I.							ı	I		
11/16/05	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
11/14/07	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/6/08	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/12/08	nd	nd	nd	nd	nd	nd	nd	nd	-		nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/30/11	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/14/11	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
MW7																				
11/14/07	nd	nd	nd	nd	nd	nd	nd	nd			3μg/L	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/6/08	nd	nd	nd	nd	nd	nd	nd	nd			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/12/08	nd	nd	nd	nd	nd	nd	nd	nd	-		nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
3/30/11	550µg/L	nd	nd	nd	nd	nd	nd	9.1µg/L	1	-	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
6/14/11	170µg/L	nd	nd	nd	nd	nd	nd	4.5µg/L	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
MTCA Method A	1000 [†]	500	500	500	5	1000	700	1600	0.01	5	160	20		-		•	•	all cPAH concentra		
CUL		and EDC	were added t	the t	arget compo	ound liet in	lung 2011	at the requi	ast of Fr											

Additional Notes: * EDB and EDC were added to the target compound list in June 2011 at the request of Ecology.

† Denotes value for TPH-G with an absence of Benzene



APPENDIX E

Terrestrial Ecological Evaluation Process - Primary Exclusions

Documentation Form

Exclusion #	Exclusion Detail	Yes or No?	Are Institutional Controls Required If The Exclusion Applies?
	Will soil contamination be located at least 6 feet beneath the ground surface and less than 15 feet?	Yes / No	Yes
1	Will soil contamination located at least 15 feet beneath the ground surface?	Yes / No	No
	Will soil contamination located below the conditional point of compliance?	Yes / No	Yes
2	Will soil contamination be covered by buildings, paved roads, pavement, or other physical barriers that will prevent plants or wildlife from being exposed?	Yes/No	Yes
	Is there less than 1.5 acres of contiguous undeveloped land on the site, or within 500 feet of any area of the site affected by hazardous substances other than those listed in the table of <u>Hazardous Substances of Concern</u> ?	Yes / No	
3	And Is there less than 0.25 acres of contiguous undeveloped land on or within 500 feet of any area of the site affected by hazardous substances listed in the table of Hazardous Substances of Concern?	Yes / No	Other factors determine
4	Are concentrations of hazardous substances in the soil less than or equal to natural background concentrations of those substances at the point of compliance	Yes / No	No

[Exclusions Main] [TEE Definitions] [Simplified or Site-Specific?] [Simplified Ecological Evaluation] [Site-Specific Ecological Evaluation] [WAC 173-340-7493]