

March 4, 2008

Mr. Jerry Mahan
Westbrook Investments, LLC
437 29th Street NE, Suite G
Puyallup, WA 98372

Subject: Sundberg Estates Subsurface Investigation (Phase II Environmental Assessment)

Dear Mr. Mahan:

Robinson, Noble & Saltbush is pleased to present this letter report of investigation activities conducted on your behalf at the proposed Sundberg Estates site.

On January 7, 10, and 11, 32 test pits were excavated to depths between eight and fifteen feet below ground surface (bgs) at locations across the subject property. The locations for the test pits were selected after reviewing the previous investigation from Pacific Rim Soil & Water, Inc. (PRSWI). This previous work, which also involved test pitting, suggested the presence of diesel-range hydrocarbons in two of the PRSWI test pits. The property was formerly used as a gravel pit. Further evidence of on-site contamination was gained from eyewitness testimony from an anonymous source that had been employed at the gravel pit when it was active. Test pits completed during this phase of the investigation were intended to characterize the area of suspected contamination as well as the extent and general composition of the fill materials present.

The details of these site investigations and analytical data compiled are described below. This report includes the following attachments:

- Figure 1: Site Location Map
- Figure 2: Parcel and Property Boundary Map
- Figure 3: Test Pit Location Map
- Figure 4: Surficial Geology Map
- Figure 5: Regional Groundwater Flow Map

Appendix A: Laboratory Analytical Results

Site Location and History

The subject is located on the east side of Cooper Point Road between cross streets 20th Avenue Northwest and 28th Avenue Northwest, Olympia, Washington. The subject property is composed of 13 contiguous tax parcels, totaling approximately 40 acres. The Thurston County's Assessor-Treasurer's office identifies these as parcel numbers 50400100100, 50400200100, 50400300100, 50400202700, 50400400100, 50400402000, 50400402100, 50400402300, 50400402500, 74202500100, 74202500200, 74202900000, and 81700000000. The area of investigation includes most of the parcels.

The site was historically operated as a gravel mine, though other commercial activities have also taken place on the property. Over time, fill materials have been brought onto the site in attempt to level the land with the surrounding grade and reclaim the mined area for future use.

Regional Geology/Hydrology

According to the Geologic Map of Tumwater 7.5-minute Quadrangle, Thurston County, Washington (Walsh et al. 2003), the site is mapped as Modified Land on top of Vashon till (Figure 1). The subject property lies on Cooper Point Peninsula, situated between Budd Inlet and Eld Inlet. Approximately 10,000 years ago, a continental glacier covered the area depositing the glacial till. As the glacier receded and melted, recessional outwash material was deposited on top of the till. These coarse grained materials are mapped near the subject site to the northwest. This is also the material that was being mined when the gravel pit was active. The Soil Survey of Thurston County Washington (1990) maps the surficial soils of the subject site as gravel pits and Alderwood gravelly sandy loam. This soil is moderately well drained and is formed on glacial till plains. The upper two feet is very dark brown, gravelly sandy loam. At around 30 inches bgs, there typically lies a weakly cemented hardpan that can be crushed to very gravelly loamy sand.

The region's hydrogeology is described in the City of Olympia's Allison Springs and East Olympia Allison Springs Wellhead Protection Plan (Pacific Groundwater Group, December 1997). The area is underlain by an alternating sequence of glacial and non-glacial sediments, forming several confined aquifer systems. The extended capture zone of the Allison Springs wellfield extends beneath the subject property. The wells in this wellfield are completed in several aquifer systems and produce water for the City of Olympia's municipal supply.

Previous Reports

The Pacific Rim Soil & Water, Inc. report, dated November 2, 2007, suspected the presence of diesel-range hydrocarbons in northwest and southeast corners and in the southeast corner of subject area. Diesel odor was observed by PRSWI between approximately zero to six feet below ground surface in their test pits 10 and 17. Test pit 10 is on the northern property boundary near the northwest corner of parcel 81700000000. Test pit 17 is located near the southern property boundary near the southeast corner of the same parcel. A copy of the report is attached to this document in Appendix C.

Exploratory Excavation (32 test pits)

On January 7, 2008, Robinson, Noble & Saltbush personnel supervised the completion of eight test pits to evaluate the suspected contamination previously documented at the site. The locations for the test pits were selected after reviewing the previous investigation from PRSWI.

During the completion of the test pits, soil samples were collected at our geologist's discretion. Sampling intervals typically included the fill-native material interface and the capillary fringe above the groundwater surface. Soil samples were collected into lab-supplied 4-ounce glass jars using pre-cleaned stainless-steel spoons or sterile rubber gloves. All samples were labeled with location, depth and time of collection, and delivered to an on-site mobile laboratory provided by Libby Environmental, LLC of Olympia.

During the initial exploratory excavation, the test pits were generally placed in the southwest area of the subject property. All of the samples collected were analyzed on site for diesel-range hydrocarbons using the NWTPH-Dx/Dx-Extended method. Samples collected from only one of the test pits tested positive for the presence of diesel-range hydrocarbons, though the measured concentration was well below the MTCA Method A Soil Cleanup limit.

The initial sequence of test pits provided further evidence that the site has been filled with a variety of materials, placed in a haphazard fashion. Fill material was highly variable in composition, thickness, and compaction across the site. While a true geotechnical investigation is beyond the scope of what can be accomplished through the excavation of test pits, extra efforts were made to accurately characterize the thickness and composition of the fill material present at each test pit location in addition to the collection soil samples to define the presence/absence of petroleum-range hydrocarbons.

On January 10 and 11, the remainder of the test pits were dug. Twenty-five soil samples were collected from these pits in the same manner as the first eight. The samples were delivered to Libby Environmental's main laboratory to be analyzed for diesel-range hydrocarbons using the NWTPH-Dx/Dx-Extended method. A geologic log of every test pit was prepared in order to provide information applicable to any additional work done with the planning of site development.

Of the 32 test pits (see Figure 3 for locations), only one was found to have soil contamination. The soil sample from Test Pit 6 was determined to have levels of petroleum hydrocarbons, though the measured concentration of 370 mg/kg was significantly below the MTCA cleanup regulations for diesel-range hydrocarbons of 2000 mg/kg. The complete analytical results for this investigation are attached in Appendix A.

Analytical evaluation of the confirmed contaminated soil sample by Libby Environmental indicated the diesel-range hydrocarbon is heavy oil, most likely motor oil for diesel engines. The only indication of contamination during the excavation of this test pit was a slight odor of petroleum products. Due to the cool, wet weather during our investigation, it was difficult to positively identify the soil as the source of the odor, since a diesel-powered backhoe was used to dig the test pit. Diesel exhaust tends to mask the odor of soil contaminated with diesel- and oil-range petroleum products.

Based on the analytical results and the observed geologic materials, an estimate of the extent of soil contamination of diesel-range hydrocarbons was prepared. We estimate the volume of hydrocarbon-contaminated soil and fill present in this area to be approximately nine cubic yards. The estimate of nine cubic yards was calculated based on the depth of the observed contamination and the nature of the overlying material.

Discussion

It is our opinion that the contaminants identified are the result of a historic release of diesel- or oil-range hydrocarbons associated with the use or maintenance of heavy machinery used in the mining process or other historic site activities. There is no evidence to indicate that the contaminants are related to any current site activities or a current release.

Based on our observations of the presence/absence of fill, as well as the underlying material beneath the fill, the subject area can be categorized into four different zones. These zones are depicted on Figure 4 and are described in the following table.

Color	Surface	Subsurface
Gray	native materials (glacial outwash or till)	native materials (glacial outwash or till)
Blue	fill material	outwash sand
Yellow	fill material	glacial till
Red	fill material	fill material

The average depth of each aforementioned material encountered in the test pits is also given on Figure 4. During the excavation of each test pit, each distinguishable layer was logged. Information such as depths of the top and bottom of the layer, composition, general observations, and the origin of the material in the layer for each pit was recorded. The general location and the time excavation began were also recorded.

The outwash sand can be characterized as being a clean, fine to medium grained, angular to sub-angular, tan sand with occasional small gravel. The till is a very dense, compact, hard, silt-bound sand and gravel that ranges in color from gray to tan. During excavation, the backhoe encountered great difficulty in attempting to penetrate the glacial till, suggesting that the material has not been disturbed by site activities.

Fill material was found in all test pits except for Test Pits 13 and 33. These two test pits contained recessional outwash sand only. The majority of the fill on the subject site consists of reworked material from the surrounding region and counts for approximately 70% of the fill found in the test pits. The fill materials range from compact fine silt, fine sand with clay, silty sand and gravel, sand and gravel, and gravel. The remaining portion of the fill consists of wood debris in various forms, construction debris (i.e. asphalt, concrete, brick), and solid waste. While wood debris was found in 20 of the test pits, a considerable amount was found in Test Pits 3, 11, 17, 19, 21, 27, 28, and 31. Test pit 11 has a thick layer of wood chips from five to eight feet bgs, and Test Pit 31 has a layer consisting of approximately 20% wood chips from five to twelve feet bgs. The other types of fill were distributed randomly throughout the site. However, Test Pits 11, 17, and 32 had a higher occurrence of construction debris and/or solid waste than the other pits. Field screening of these pits did not indicate the presence of contaminants.

A groundwater contour map from a regional level USGS study, *Hydrological and Quality of Ground Water in Northern Thurston County* (1998, revised), is attached in Figure 5. The map shows the groundwater flow directions in the local region are to the east, towards Budd Inlet. According to the City of Olympia's Allison Springs and East Olympia Allison Springs Wellhead Protection Plan, the site is located within the extended capture zone of the Allison Springs Wellhead Protection Area. The delineation of the extended capture zone is described in detail in the Wellhead Protection Plan. The City of Olympia's Well 1 is completed in the Vashon Advance outwash. According to the Water Well Record for the well, this well was drilled to a depth of 111

March 4, 2008

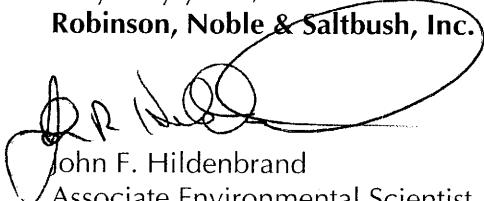
Page 5

feet and tested at a rate of 383 gallons per minute. Neither the Wellhead Protection Plan nor the Water Well Report indicates the screened interval for this well, but the static water level was reportedly 47 feet below the top of the well at the time of drilling.


Recommendations

Based on the data collected for this study, only one of the test pits shows a presence of diesel-range or oil-range hydrocarbons. The measured concentration is well below the Model Toxics Control Act (MTCA) Method A cleanup level for unrestricted land uses (CUL). Considering this localized occurrence of impacted soil and the fact that the detected concentrations are below the CUL, we do not recommend additional contaminant investigation. However, Robinson, Noble & Saltbush strongly recommends the completion of a thorough geotechnical survey to assess the suitability of the fill materials for the type of redevelopment proposed. We would be happy to discuss our observations/findings from this phase of work with your geotechnical consultant.

Very truly yours,
Robinson, Noble & Saltbush, Inc.

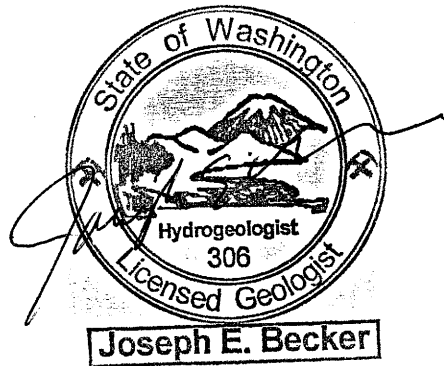


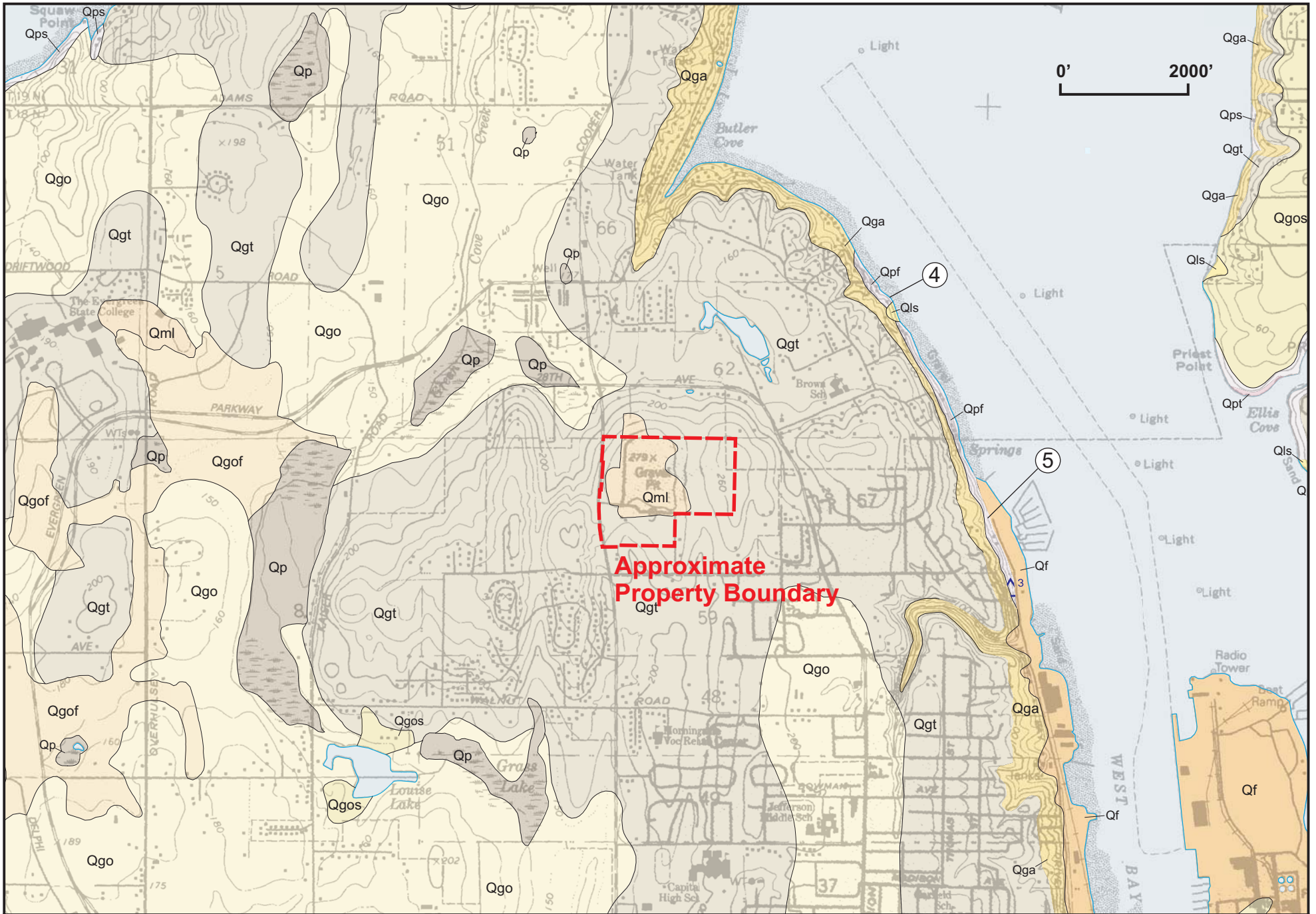
John F. Hildenbrand
Associate Environmental Scientist
Environmental Services Manager



Matt K. Rakow
Project Geologist

attachments

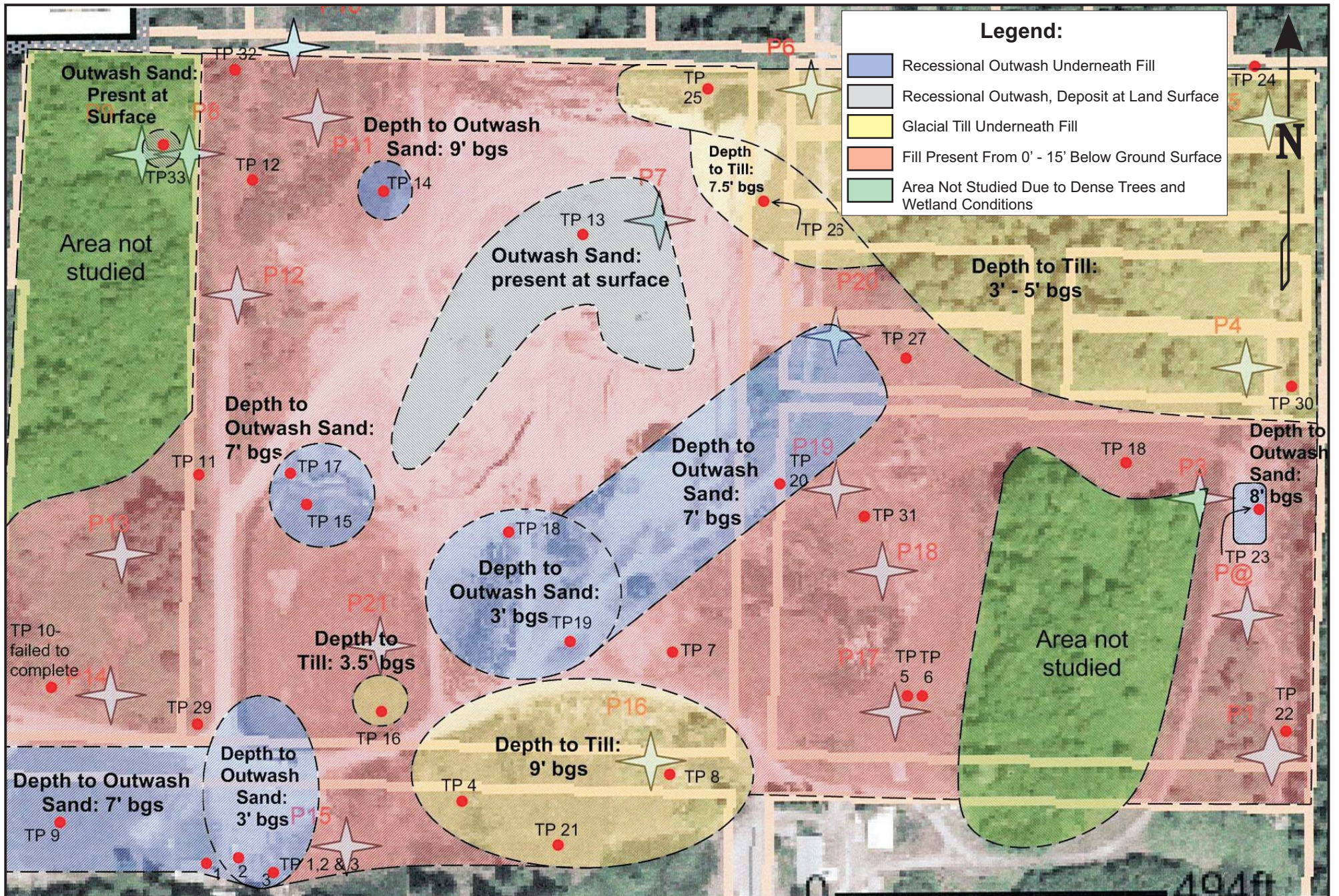


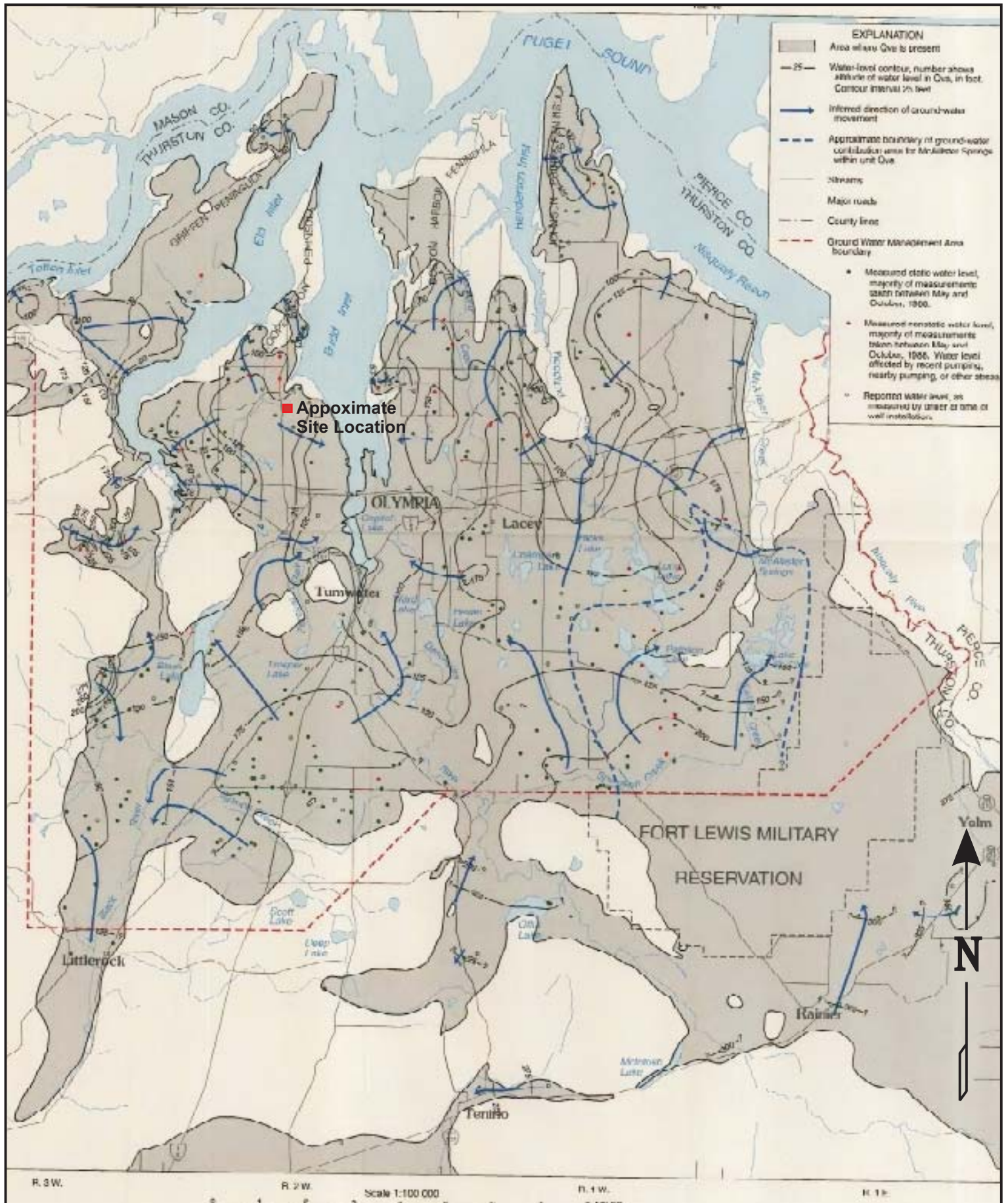


**Approximate
Property Boundary**











Libby Environmental, Inc.

4139 Libby Road N.E., Olympia, WA 98506-2518

January 24, 2008

John Hildenbrand
Robinson, Noble & Saltbush, Inc.
3011 Huson Street South
Suite A
Tacoma, WA 98409

Dear Mr. Hildenbrand:

Please find enclosed the analytical data report for the Sundberg Estates Project located in Olympia, Washington. Soil samples were received and analyzed for Hydrocarbon Identification by NWTPH-HCID on January 15, 2008.

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 also enclosed. All soil samples are reported on a dry weight basis.

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.

LIBBY ENVIRONMENTAL CHEMISTRY LABORATORY

SUNDBERG ESTATES PHASE II PROJECT

Olympia, Washington

Robinson, Noble & Saltbush, Inc.

Libby Project No.L080107-10

Hydrocarbon Identification by NWTPH-HCID for Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Gasoline (mg/kg)	Diesel (mg/kg)	Mineral Oil (mg/kg)	Heavy Oil (mg/kg)
Method Blank	1/15/2008	120	nd	nd	nd	nd
SETP9-1	1/15/2008	93	nd	nd	nd	nd
SETP11-1	1/15/2008	120	nd	nd	nd	nd
SETP12-1	1/15/2008	90	nd	nd	nd	nd
SETP13-1	1/15/2008	112	nd	nd	nd	nd
SETP14-1	1/15/2008	86	nd	nd	nd	nd
SETP15-1	1/15/2008	133	nd	nd	nd	nd
SETP16-1	1/15/2008	94	nd	nd	nd	nd
SETP17-1	1/15/2008	81	nd	nd	nd	nd
SETP18-1	1/15/2008	99	nd	nd	nd	nd
SETP19-1	1/15/2008	132	nd	nd	nd	nd
SETP20-1	1/15/2008	98	nd	nd	nd	nd
SETP20-1 Dup	1/15/2008	126	nd	nd	nd	nd
Practical Quantitation Limit			20	50	100	100

"nd" Indicates not detected at listed detection limits.

"D" Indicates detected above the listed detection limit.

"int" Indicates that interference prevents determination.

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

ANALYSES PERFORMED BY: Sherry Chilcutt

LIBBY ENVIRONMENTAL CHEMISTRY LABORATORY

SUNDBERG ESTATES PHASE II PROJECT

Olympia, Washington

Robinson, Noble & Saltbush, Inc.

Libby Project No.L080107-10

Hydrocarbon Identification by NWTPH-HCID for Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Gasoline (mg/kg)	Diesel (mg/kg)	Mineral Oil (mg/kg)	Heavy Oil (mg/kg)
Method Blank	1/15/2008	110	nd	nd	nd	nd
SETP21-1	1/15/2008	100	nd	nd	nd	nd
SETP22-1	1/15/2008	131	nd	nd	nd	nd
SETP23-1	1/15/2008	97	nd	nd	nd	nd
SETP24-1	1/15/2008	130	nd	nd	nd	nd
SETP25-1	1/15/2008	105	nd	nd	nd	nd
SETP26-1	1/15/2008	102	nd	nd	nd	nd
SETP27-1	1/15/2008	86	nd	nd	nd	nd
SETP28-1	1/15/2008	104	nd	nd	nd	nd
SETP29-1	1/15/2008	111	nd	nd	nd	nd
SETP30-1	1/15/2008	120	nd	nd	nd	nd
SETP31-1	1/15/2008	106	nd	nd	nd	nd
SETP32-1	1/15/2008	92	nd	nd	nd	nd
SETP32-2	1/15/2008	101	nd	nd	nd	nd
SETP33-1	1/15/2008	89	nd	nd	nd	nd
SETP33-1 Dup	1/15/2008	109	nd	nd	nd	nd
Practical Quantitation Limit			20	50	100	100

"nd" Indicates not detected at listed detection limits.

"D" Indicates detected above the listed detection limit.

"int" Indicates that interference prevents determination.

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

ANALYSES PERFORMED BY: Sherry Chilcutt

Libby Environmental, Inc.

Chain of Custody Record

4139 Libby Road NE
 Olympia, WA 98506
 Client: **RMS**

Ph: 360-352-2110
 Fax: 360-352-4154
 Date: 1-11-08
 Project Manager: John Hidenbrand
 Page: 2 of 2

Address: 253 1st St S, Hygon St Suite 103
 Phone: 253-954-7711 Fax: _____
 Client Project # 2283-004C

Location: Olympia
 Collector: MKE
 Date of Collection: 1-11-08

Sample Number	Depth	Time	Sample Type	Container Type	Analytes											Field Note# Containers		
					VOA 8021B	VOA 8021B BTEX Only	VOA 8260	SEMI VOL 8270	NWTPH-HCID	NWTPH-Gx	NWTPH-Dx	NWTPH-Dx Ext.	PAH 8270	PCBs 8082	MTCA 5 Metals			
1 SET P27-1	12.5	10:54	Soil	402														
2 " 1128-1	9.5	11:26																
3 29-1	7.5	13:18																
4 30-1	5'	13:59																
5 31-1	12'	14:24																
6 30-1	11.5'	15:37																
7 32-1	3'	15:40'																
8 32-2	11.5'	15:37																
9 33-1	5.5	16:00																
10																		
11																		
12																		
13																		
14																		
15																		
16																		
17																		
18																		

Relinquished by: [Signature] Date / Time: 1/11/08
 Received by: [Signature] Date / Time: 1/11/08 4:55

Sample Receipt:
 Good Condition?
 Cold?
 Seals Intact?
 Total Number of Containers: TAT 24HR 48HR 5-Day



Libby Environmental, Inc.

4139 Libby Road N.E., Olympia, WA 98506-2518

January 11, 2008

John Hildenbrand
Robinson, Noble & Saltbush, Inc.
3011 Huson Street South
Suite A
Tacoma, WA 98409

Dear Mr. Hildenbrand:

Please find enclosed the analytical data report for the Sundberg Estates Phase II Project located in Olympia, Washington. Mobile Lab Services were conducted on January 7, 2008. Soil samples were received and analyzed for Hydrocarbon Identification by NWTPH-HCID and Diesel & Oil by NWTPH-Dx/Dx Extended.

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 also enclosed. All soil samples are reported on a dry weight basis.

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.

LIBBY ENVIRONMENTAL CHEMISTRY LABORATORY

SUNDBERG ESTATES PHASE II PROJECT

Olympia, Washington

Robinson, Noble & Saltbush, Inc.

Libby Project No.L080107-10

Hydrocarbon Identification by NWTPH-HCID for Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Gasoline (mg/kg)	Diesel (mg/kg)	Mineral Oil (mg/kg)	Heavy Oil (mg/kg)
Method Blank	1/7/2008	101	nd	nd	nd	nd
SETP1-1	1/7/2008	111	nd	nd	nd	nd
SETP2-1	1/7/2008	92	nd	nd	nd	nd
SETP2-2	1/7/2008	122	nd	nd	nd	nd
SETP3-1	1/7/2008	104	nd	nd	nd	nd
SETP4-1	1/7/2008	91	nd	nd	nd	nd
SETP4-1 Dup	1/7/2008	69	nd	nd	nd	nd
SETP5-1	1/7/2008	103	nd	nd	nd	nd
SETP6-1	1/7/2008	87	nd	nd	nd	D
SETP7-1	1/7/2008	102	nd	nd	nd	nd
Method Blank	1/9/2008	107	nd	nd	nd	nd
SETP8-1	1/9/2008	97	nd	nd	nd	nd
Practical Quantitation Limit			20	50	100	100

"nd" Indicates not detected at listed detection limits.

"D" Indicates detected above the listed detection limit.

"int" Indicates that interference prevents determination.

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

ANALYSES PERFORMED BY: Sherry Chilcutt

LIBBY ENVIRONMENTAL CHEMISTRY LABORATORY

SUNDBERG ESTATES PHASE II PROJECT
Olympia, Washington
Robinson, Noble & Saltbush, Inc.

Libby Project No.L080107-10

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

Sample Number	Date Analyzed	Surrogate Recovery (%)	Diesel (mg/kg)	Mineral Oil (mg/kg)	Oil (mg/kg)
Method Blank	1/7/2008	101	nd	nd	nd
SETP6-1	1/7/2008	87	nd	nd	370
Practical Quantitation Limit			25	40	40

"nd" Indicates not detected at the listed detection limits.

"int" Indicates that interference prevents determination.

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

ANALYSES PERFORMED BY: Sherry Chilcutt

Chain of Custody Record

Libby Environmental, Inc.

4139 Libby Road NE
Olympia, WA 98506
Ph: 360-352-2110
Fax: 360-352-4154

Client: Robinson, Ronald S. Substation

Address:

Phone: 253-475-7711 Fax: 253-475-5844

Client Project #

Date: 1 17 08 Page: 1 of 1

Project Manager: Hildebrand

Project Name: Sundberg Estates Phase #

Location: Alpena Washington

Collector: W. V. M. H. Date of Collection: 1 17 08

Sample Number	Depth	Time	Sample Type	Container Type	Analytes										Field Note# Containers			
					VOA 8021B	VOA 8021B BTEX Only	SEM VOL 8270	NMTPH-HCID	NMTPH-GX	NMTPH-DX	NMTPH-DX EXL	PAH 8270	PCBs 8082	MTCA 5 Metals				
1 SETP1-1	7	11:32	Soil	40Z	X													
2 SETP2-2	3	12:01	Soil	40Z	X													
3 SETP2-2	6	12:01	Soil	40Z	X													
4 SETP3-1	6.2	12:39	Soil	40Z	X													
5 SETP4-1	10.5	13:15	Soil	40Z	X													
6 SETP5-1	2.5'	14:31	Soil	40Z	X													
7 SETP6-1	10.5	14:55	Soil	40Z	X													
8 SETP7-1	6'	15:11	Soil	40Z	X													
9 SETP8-1	9.75	16:13	Soil	40Z	X													
10																		
11																		
12																		
13																		
14																		
15																		
16																		
17																		
18																		

Relinquished by: Jeff Fekaw Date / Time: 1-17-08 Received by: M. J. ... Date / Time: 1-17-08 Remarks:

Relinquished by: _____ Date / Time: _____ Received by: _____ Date / Time: _____

Relinquished by: _____ Date / Time: _____ Received by: _____ Date / Time: _____

Good Condition? Cold? Seals Intact?

Sample Receipt: _____ Total Number of Containers: _____

TAT 24HR 48HR 5-Day

Libby Environmental, Inc.

4139 Libby Road NE
 Olympia, WA 98506
 Ph: 360-352-2110
 Fax: 360-352-4154

Chain of Custody Record

Date: _____ Page: _____ of _____

Client: _____

Project Manager: Abelombier

Address: _____

Project Name: 2nd Year Release Report #

Phone: _____

Location: _____

Client Project # _____

Collector: _____

Date of Collection: _____

Sample Number	Depth	Time	Sample Type	Container Type	Analytes										Field Note/# Containers										
					VOA 8021B	VOA 8021B BTEX Only	SEM VOL 8270	NMTPH-HCID	NMTPH-GX	NMTPH-DX	NMTPH-DX EXT	PAH 8270	PCBS 8082	MTCA 5 Metals											
1 SETP1-1	7	11:32	Soil	402																					
2 SETP2-2	3	12:01	Soil	402																					
3 SETP2-2	6	12:01	Soil	402																					
4 SETP3-1	6.2	12:29	Soil	402																					
5 SETP4-1	10.5	12:45	Soil	407																					
6 SETP5-1	2.5'	14:31	Soil	402																					
7 SETP6-1	1.5	14:52	Soil	402																					
8 SETP7-1	1.5	14:52	Soil	402																					
9 SETP8-1	1.5	14:52	Soil	402																					
10																									
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Relinquished by: [Signature] Date / Time: _____ Received by: _____ Date / Time: _____

Relinquished by: _____ Date / Time: _____ Received by: _____ Date / Time: _____

Relinquished by: _____ Date / Time: _____ Received by: _____ Date / Time: _____

Sample Receipt: _____

Good Condition? _____ Cold? _____

Seals Intact? _____

Total Number of Containers: _____

TAT 24HR 48HR 5-Day

LIBBY ENVIRONMENTAL CHEMISTRY LABORATORY

SUNDBERG ESTATES PHASE II PROJECT
 Olympia, Washington
 Robinson, Noble & Saltbush, Inc.

Libby Project No.L080107-10

Hydrocarbon Identification by NWTPH-HCID for Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Gasoline (mg/kg)	Diesel (mg/kg)	Mineral Oil (mg/kg)	Heavy Oil (mg/kg)
Method Blank	1/15/2008	110	nd	nd	nd	nd
SETP21-1	1/15/2008	100	nd	nd	nd	nd
SETP22-1	1/15/2008	131	nd	nd	nd	nd
SETP23-1	1/15/2008	97	nd	nd	nd	nd
SETP24-1	1/15/2008	130	nd	nd	nd	nd
SETP25-1	1/15/2008	105	nd	nd	nd	nd
SETP26-1	1/15/2008	102	nd	nd	nd	nd
SETP27-1	1/15/2008	86	nd	nd	nd	nd
SETP28-1	1/15/2008	104	nd	nd	nd	nd
SETP29-1	1/15/2008	111	nd	nd	nd	nd
SETP30-1	1/15/2008	120	nd	nd	nd	nd
SETP31-1	1/15/2008	106	nd	nd	nd	nd
SETP32-1	1/15/2008	92	nd	nd	nd	nd
SETP32-2	1/15/2008	101	nd	nd	nd	nd
SETP33-1	1/15/2008	89	nd	nd	nd	nd
SETP33-1 Dup	1/15/2008	109	nd	nd	nd	nd
Practical Quantitation Limit			20	50	100	100

"nd" Indicates not detected at listed detection limits.

"D" Indicates detected above the listed detection limit.

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ANALYSES PERFORMED BY: Sherry Chilcutt

LIBBY ENVIRONMENTAL CHEMISTRY LABORATORY

SUNDBERG ESTATES PHASE II PROJECT
 Olympia, Washington
 Robinson, Noble & Saltbush, Inc.

Libby Project No.L080107-10

Hydrocarbon Identification by NWTPH-HCID for Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Gasoline (mg/kg)	Diesel (mg/kg)	Mineral Oil (mg/kg)	Heavy Oil (mg/kg)
Method Blank	1/15/2008	120	nd	nd	nd	nd
SETP9-1	1/15/2008	93	nd	nd	nd	nd
SETP11-1	1/15/2008	120	nd	nd	nd	nd
SETP12-1	1/15/2008	90	nd	nd	nd	nd
SETP13-1	1/15/2008	112	nd	nd	nd	nd
SETP14-1	1/15/2008	86	nd	nd	nd	nd
SETP15-1	1/15/2008	133	nd	nd	nd	nd
SETP16-1	1/15/2008	94	nd	nd	nd	nd
SETP17-1	1/15/2008	81	nd	nd	nd	nd
SETP18-1	1/15/2008	99	nd	nd	nd	nd
SETP19-1	1/15/2008	132	nd	nd	nd	nd
SETP20-1	1/15/2008	98	nd	nd	nd	nd
SETP20-1 Dup	1/15/2008	126	nd	nd	nd	nd
Practical Quantitation Limit			20	50	100	100

"nd" Indicates not detected at listed detection limits.

"D" Indicates detected above the listed detection limit.

"int" Indicates that interference prevents determination.

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

ANALYSES PERFORMED BY: Sherry Chilcutt

Libby Environmental, Inc.

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Olympia, WA 98506
Ph: 360-352-2110
Fax: 360-352-4154

Chain of Custody Record

Date: 1-11-08 Page: 1 of 2

Project Manager: John Hildebrand

Project Name: Academy Estates

Location: Olympia

Collector: MKR Date of Collection: 1-10-08 / 1-11-08

Client: RAK

Address: 5011 3rd Avenue SE NW 108

Phone: 360-352-7549/11 Fax: 360-352-4154

Client Project # 276504C

Sample Number	Depth	Time	Sample Type	Container Type	VOA 8021B BTEX Only	VOA 8021B VOL 8270	NWTPH-HCID	NWTPH-GX	NWTPH-DX	NWTPH-DX EXT	PAH 8270	PCBS 8082	MTCAs 5 Metals	Field Note/# Containers
1	8'	8:40	Sail	402										
2														
3	10.5'	9:24												
4	10'	10:09												
5	8.5'	10:49												
6	10'	11:39												
7	7'	12:07												
8	7.5'	13:44												
9	9.5'	14:30												
10	7'	15:20												
11	6'	15:20												
12	9.5'	15:53												
13	10'	16:27												
14	8.5'	8:26												
15	10.0'	8:55												
16	7'	9:25												
17	10'	10:00												
18	8'	10:22												

Relinquished by: [Signature] Date / Time: 11/11/08 Received by: [Signature] Date / Time: 1/11/08 4:55 PM

Remarks: [Blank]

Relinquished by: [Signature] Date / Time: [Blank] Received by: [Signature] Date / Time: [Blank]

Relinquished by: [Signature] Date / Time: [Blank] Received by: [Signature] Date / Time: [Blank]

Good Condition? [Blank] Cold? [Blank] Seals Intact? [Blank]

Total Number of Containers: [Blank] TAT 24HR 48HR 5-Day [Blank]