ROBINSON NOBLE

June 16, 2020

Panjini Balaraju
Washington Department of Ecology:
Southwest Regional Office
PO Box 47775
Olympia, Washington 98504

Subject: Mizukami-Gensco Groundwater Monitoring Sampling Event and Termination.

Dear Mr. Balaraju,

Robinson Noble, Inc. is pleased to submit this letter documenting the most recent groundwater sampling event at the Mizukami-Gensco Site, Washington State Department of Ecology (Ecology) FSID 9436194, located at 4524 South 20th Street E, Fife, Washington 98424.

The sampling event took place on November 5, 2019. At your request, we sampled one groundwater monitoring well (Well ID MW4B) to evaluate the presence or absence of groundwater impacts in the area proximal to the historical heating-oil spill. See Figures 1-2, attached, for the location of MW-4B.

The sampling was done using a submersible bladder pump with a low-flow controller. Prior to sampling, the groundwater was purged from the well until water quality parameters were stable. The attached groundwater sampling record documents the stabilization and sampling of the well.

A single groundwater sample was transported under chain-of-custody to Libby Environmental, LLC for analysis of diesel- and oil-range petroleum hydrocarbons, benzene, toluene, ethylbenzene, and xylenes using the NWTPH-Dx-Extended and USEPA 8021B analytical methods. As shown on the attached laboratory analytical report, none of the analytes were detected above the applicable laboratory reporting limits.

Since, the post-environmental covenant long-term groundwater monitoring program began, contaminants related to the historic heating-oil spill have not been detected above laboratory reporting limits. In our most recent discussions, you indicated that long-term groundwater monitoring could be terminated if our most recent groundwater analysis did not show detections above laboratory reporting limits. Since that is the case, on behalf of our client, we request that Ecology allow the termination of long-term groundwater monitoring activities. It is understood that the remaining obligations under the environmental covenant recorded on the subject will remain in force. Additionally, we request that Ecology concur that the remaining groundwater monitoring wells on site should be permanently decommissioned in accordance with WAC 173-160-381.

2105 South C Street
Tacoma, Washington 98402
P: 253.475.7711 | F: 253.472.5846

www.robinson-noble.com

17625 130th Avenue NE, Suite 102
Woodinville, Washington 98072
P: 425.488.0599 | F: 425.488.2330

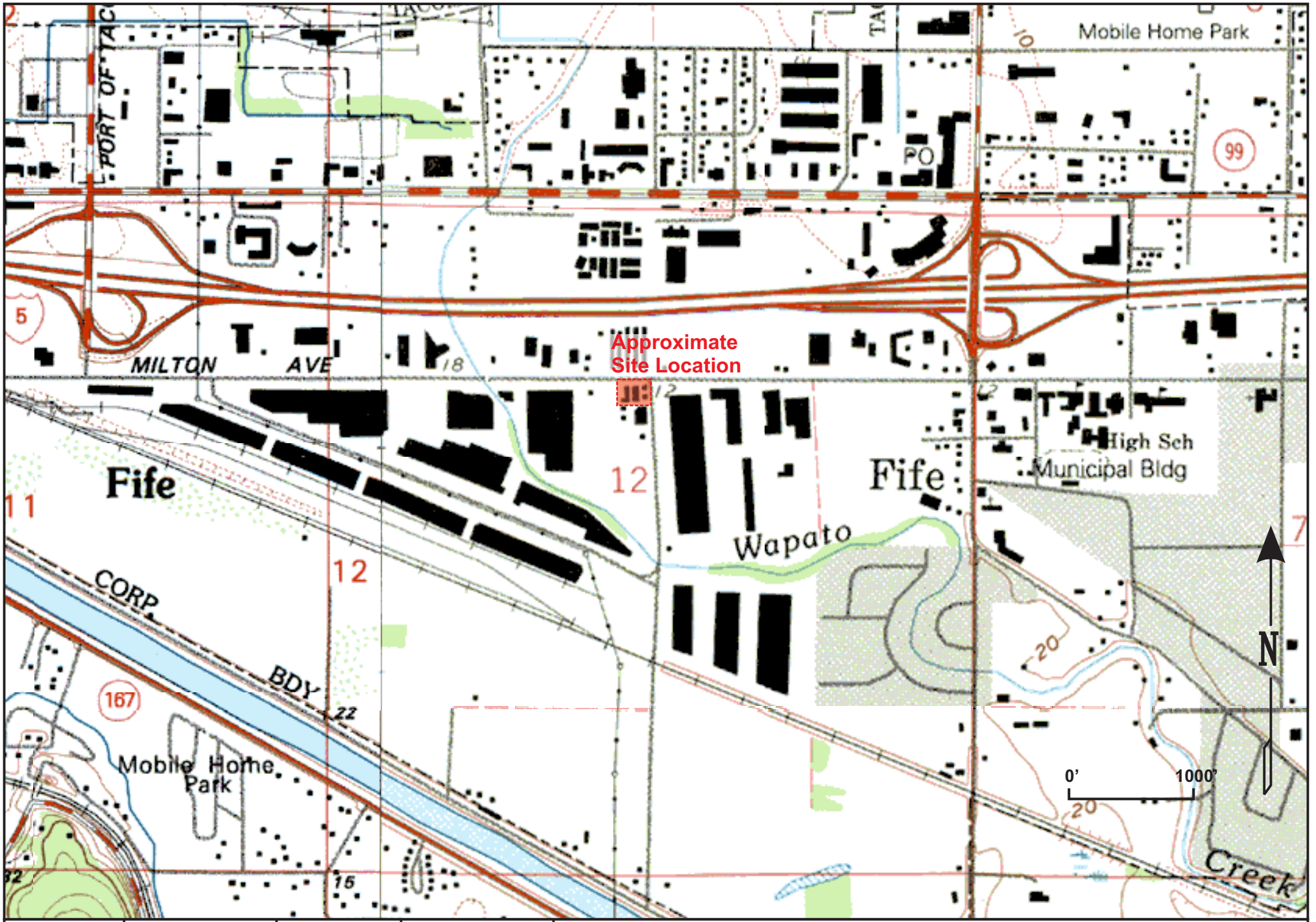
We appreciate Ecology's assistance in achieving resolution of the contaminant issues at this site. If you need any additional information please feel free to reach out to me at 253-475-771 or via email to jhildenbrand@robinson-noble.com.

Respectfully submitted,
Robinson Noble, Inc.

John F. Hildenbrand
Principal Environmental Scientist
Environmental Services Manager

CC: Tom Langseth
Rodney Ramos

ATTACHMENTS



ROBINSON NOBLE	Note: Image taken from USGS Puyallup Quad.	PM: JFH August 2013 2203-001B	Pierce County T 20 N/R 03 E - 12 Scale 1" = 1000'	Figure 1 Vicinity Map Mizukami Project: 20th Street/Remedial Investigation

ROBINSON NOBLE	Note: Image taken from USGS Terra Server Website	PM: JFH August 2013 2203-001B	Pierce County T 20 N/R 03 E - 12 Scale 1” = ~40’	Figure 2 Typical Historic Groundwater Flow Direction Mizukami Project: 20th Street/Remedial Investigation

Groundwater Sampling Record

Robinson Noble, Inc.
2105 South C Street
Tacoma, Washington 98402
(253) 475-7711

ROBINSON NOBLE

Project Name: Gensco

Project Number: 2203-001C

Project field book no.: _____

Well Name: MW-4B

Date: 11/5/19

Physical Setting

Depth to water (ft)	3.11'	Time collected:	15:21
Total well depth (ft)	10.05'	Collected by:	NRG and RWM
Screened interval (ft)	5-10'	Weather:	Overcast
Pumping method:	Bladder Pump	Notes/Comments:	Air bubbles in water-line, DO bounce
Pump setting:	6.00 fill/6.00 discharge		

Water Quality Results

Time	time (min)	Vol-ume (gal)	Temp (°C)	Specific Conduc-tivity (ms/cm /°C)	Total Dis-solved Solids (g/L)	Dis-solved Oxygen (mg/L)	pH	Oxidation Reduc-tion Potential (mV)	Turbidity (NTU)
15:26	0	START PURGE							
15:29	3	0.25	15.68	0.445	0.29	2.90	8.1	-90	13.6
15:32	6	0.5	15.63	0.455	0.296	5.80	7.99	-112	14.1
15:35	9	0.9	15.58	0.457	0.297	3.03	7.88	-118	16.4
15:38	12	1.1	15.55	0.461	0.300	2.48	7.78	-119	13.6
15:41	15	1.25	15.53	0.463	0.302	5.31	7.71	-120	11.6
15:44	18	1.5	15.47	0.464	0.302	4.12	7.64	-119	10.6
15:47	21	1.75	15.48	0.466	0.303	5.37	7.62	-120	9.96
15:50	24	2.0	15.41	0.468	0.304	5.25	7.67	-120	8.90
15:53	27	SAMPLE TIME							

Sampling

Time sampled:	15:53	Containers filled:	3 Voas and 1 Amber
t (min) sampled:	27	Sampled by:	RWM
Analysis performed:	NWTPH-DX Ext and 8021B BTEX	Laboratory name:	Libby Environmental
Date of delivery:	11/6/19	Date of analysis:	

Libby Environmental, Inc.
3322 South Bay Road NE • Olympia, WA 98506-2957

November 12, 2019

John Hildenbrand
Robinson Noble
2105 South C Street
Tacoma, WA 98402

Dear Mr. Hildenbrand:

Please find enclosed the analytical data report for the Gensco Project located in Fife, Washington.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. The sample(s) will be disposed of in 30 days unless we are contacted to arrange long term storage.

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
Senior Chemist
Libby Environmental, Inc.

Phone (360) 352-2110 • Fax (360) 352-4154 • libbyenv@gmail.com

Libby Environmental, Inc.

Chain of Custody Record

www.LibbyEnvironmental.com

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

Date: 11/6/19 Page: 1 of 1

Client: Robinson Noble
Project Manager: John Hildenbrand
Address: 2105 S C Street
Project Name: Gensco
City: Tacoma State: Wa. Zip: 98402
Location: Frank Albert Rd E City, State: Fife Wa.
Phone: 253-475-7711 Fax:
Collector: RWM Date of Collection: 11/5/19
Client Project # 2203-001C
Email:

Sample Number	Depth	Time	Sample Type	Container Type	VOC 8260	NWTPH-Gx	BTEX 8021	NWTPH-HCID	NWTPH-Dx	NWTPH-Dx/Dx	c PAH 8270	PAH 8270	Semi Vol 8270	PCB 8082	MTCA 5 Metals	RCRA 8 Metals			Field Notes
1 MW-4B	—	15:53	water	Amber/VOA			X			X									
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			
10																			
11																			
12																			
13																			
14																			
15																			
16																			
17																			

Relinquished by:	Date / Time	Received by:	Date / Time
[signature]	11/6/19 1315	[signature]	11-6-19 1318
Relinquished by:	Date / Time	Received by:	Date / Time
Relinquished by:	Date / Time	Received by:	Date / Time

Sample Receipt

Good Condition?	Y	N	
Temp.		°C	
Seals Intact?	Y	N	N/A
Total Number of Containers			

Remarks:
Standard TAT
EIM Please

TAT: 24HR 48HR 5-DAY

Distribution: White - Lab, Yellow - File, Pink - Originator

Libby Environmental, Inc.

3322 South Bay Road NE
Olympia, WA 98506
Phone: (360) 352-2110
FAX: (360) 352-4154
Email: libbyenv@gmail.com

GENSCO PROJECT
Robinson Noble
Fife, Washington
Libby Project # L191106-4
Client Project # 2203-001C

Analyses of BTEX (EPA Method 8260D) in Water

Sample Description		Method Blank	MW-4B
Date Sampled		N/A	11/5/19
Date Analyzed	PQL (µg/L)	11/8/19 (µg/L)	11/8/19 (µg/L)
Benzene	1.0	nd	nd
Toluene	2.0	nd	nd
Ethylbenzene	1.0	nd	nd
Total Xylenes	2.0	nd	nd
Surrogate Recovery			
Dibromofluoromethane		100	101
1,2-Dichloroethane-d4		102	98
Toluene-d8		98	95
4-Bromofluorobenzene		103	100

"nd" Indicates not detected at listed detection limit.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: Melissa Harrington

Libby Environmental, Inc.

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GENSCO PROJECT
Robinson Noble
Fife, Washington
Libby Project # L191106-4
Client Project # 2203-001C

QA/QC for BTEX (EPA Method 8260D) in Water

Matrix Spike Sample Identification: L191106-2

	Spiked Conc. (µg/L)	MS Response (µg/L)	MSD Response (µg/L)	MS Recovery (%)	MSD Recovery (%)	RPD (%)	Limits Recovery (%)	Data Flag
Benzene	5.0	5.3	4.2	106	84	23.2	65-135	
Toluene	5.0	5.2	4.4	104	88	16.7	65-135	
Ethylbenzene	5.0	4.7	4.1	94	82	13.6	65-135	
Total Xylenes	15.0	13.5	11.7	90	78	14.3	65-135	

Surrogate Recovery (%)	MS	MSD	
Dibromofluoromethane	107	108	65-135
1,2-Dichloroethane-d4	115	112	65-135
Toluene-d8	107	103	65-135
4-Bromofluorobenzene	102	99	65-135

ACCEPTABLE RPD IS 35%

ANALYSES PERFORMED BY: Melissa Harrington

Laboratory Control Sample

	Spiked Conc. (µg/L)	LCS Response (µg/L)	LCS Recovery (%)	LCS Recovery Limits (%)	Data Flag
Benzene	5.0	4.8	96	80-120	
Toluene	5.0	4.5	90	80-120	
Ethylbenzene	5.0	5.2	104	80-120	
Total Xylenes	15.0	15.4	103	80-120	

Surrogate Recovery			
Dibromofluoromethane	99	65-135	
1,2-Dichloroethane-d4	100	65-135	
Toluene-d8	98	65-135	
4-Bromofluorobenzene	119	65-135	

ANALYSES PERFORMED BY: Melissa Harrington

Libby Environmental, Inc.

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GENSCO PROJECT
Robinson Noble
Fife, Washington
Libby Project # L191106-4
Client Project # 2203-001C

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

Sample Number	Date Analyzed	Surrogate Recovery (%)	Diesel (µg/L)	Oil (µg/L)
Method Blank	11/7/19	123	nd	nd
MW-4B	11/7/19	121	nd	nd
Practical Quantitation Limit			200	400

"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: Evan Neims

Libby Environmental, Inc.

3322 South Bay Road NE
Olympia, WA 98506
Phone: (360) 352-2110
FAX: (360) 352-4154
Email: libbyenv@gmail.com

GENSCO PROJECT
Robinson Noble
Libby Project # L191106-4
Date Received 11/6/2019
Time Received 1:18 PM

Received By SC

Sample Receipt Checklist

Chain of Custody

1. Is the Chain of Custody complete?	☑ Yes	☐ No	
2. How was the sample delivered?	☐ Hand Delivered	☑ Picked Up	☐ Shipped

Log In

3. Cooler or Shipping Container is present.	☑ Yes	☐ No	☐ N/A
4. Cooler or Shipping Container is in good condition.	☑ Yes	☐ No	☐ N/A
5. Cooler or Shipping Container has Custody Seals present.	☐ Yes	☑ No	☐ N/A
6. Was an attempt made to cool the samples?	☑ Yes	☐ No	☐ N/A
7. Temperature of cooler (0°C to 8°C recommended)	0.0 °C		
8. Temperature of sample(s) (0°C to 8°C recommended)	9.5 °C		
9. Did all containers arrive in good condition (unbroken)?	☑ Yes	☐ No	
10. Is it clear what analyses were requested?	☑ Yes	☐ No	
11. Did container labels match Chain of Custody?	☑ Yes	☐ No	
12. Are matrices correctly identified on Chain of Custody?	☑ Yes	☐ No	
13. Are correct containers used for the analysis indicated?	☑ Yes	☐ No	
14. Is there sufficient sample volume for indicated analysis?	☑ Yes	☐ No	
15. Were all containers properly preserved per each analysis?	☑ Yes	☐ No	
16. Were VOA vials collected correctly (no headspace)?	☑ Yes	☐ No	☐ N/A
17. Were all holding times able to be met?	☑ Yes	☐ No	

Discrepancies/ Notes

18. Was client notified of all discrepancies?	☐ Yes	☐ No	☑ N/A

Person Notified: _____ Date: _____

By Whom: _____ Via: _____

Regarding: _____

19. Comments. _____