SHANNON & WILSON, INC.
GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS

SEATTLE
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ANCHORAGE
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December 18, 2002

Mr. Grant Yang
Washington Department of Ecology
Toxics Cleanup Program, Northwest Region
3190 160th Ave SE
Bellevue, WA 98008-5452

RE: CUSTOM-BILT METALS FACILITY REMEDIATION
AUBURN, WASHINGTON

Dear Mr. Yang:

On behalf of Mr. Peter Bueckert of TPD Auburn, we are requesting a separate NFA letter for Lot 1 of the Custom-Bilt Metals facility located at 233 D Street NW in Auburn, Washington. The basis for this request is the Independent Remedial Action Report Addendum that was submitted to you on October 9, 2002, augmented by additional subsurface data obtained in accordance with the Sampling and Analysis Plan that we submitted for your review along with that report. That additional information, which is provided as an attachment to this letter, includes a boring location map, logs of four borings that were drilled beneath the warehouse building and asphalt parking lot, and a tabulation of the analytical results for soil samples collected from those borings.

- Based on our review of the cleanup work that has been accomplished, combined with our additional sampling, it is our opinion that this lot has been fully remediated with the following exceptions:
  - Shallow soils underlying the ramp on the south side of the warehouse likely contain elevated levels of hydrocarbons and PAHs.
  - Shallow soils under part of the main part of the warehouse building contain PAHs at concentrations that exceed MTCA cleanup criteria.

The additional drilling and sampling did not detect any contamination below the asphalt-paved parking lot to the south of the building, nor were contaminants detected in a shallow groundwater sample collected under the building.

400 NORTH 34TH STREET · SUITE 100
P.O. BOX 300303
SEATTLE, WASHINGTON 98103
206·632·8020 FAX 206·695·6777
TDD: 1·800·833·6388

If you need any additional information or require clarification of any of the information provided, please contact me at (206) 695-6886 or dnc@shanwil.com, or Agnes Tirao at (206) 695-6881 or act@shanwil.com. We will be happy to assist you in any way to expedite your review. The property owner has requested that your letter be mailed to Mr. Peter Bueckert. His address is provided below. Also, if additional payment to Ecology is required before your letter can be mailed, please contact Mr. Bueckert or Mr. Tony Chiovari directly by telephone, as the sale of the property is pending the results of your review. The contact information for Custom-Bilt Metals is:

Mr. Peter Bueckert/Mr. Tony Chiovari
TPD, Auburn
9845 Joe Vargas Way
South El Monte California 91733
(626) 454-4852

We appreciate your consideration of this request.

Sincerely,

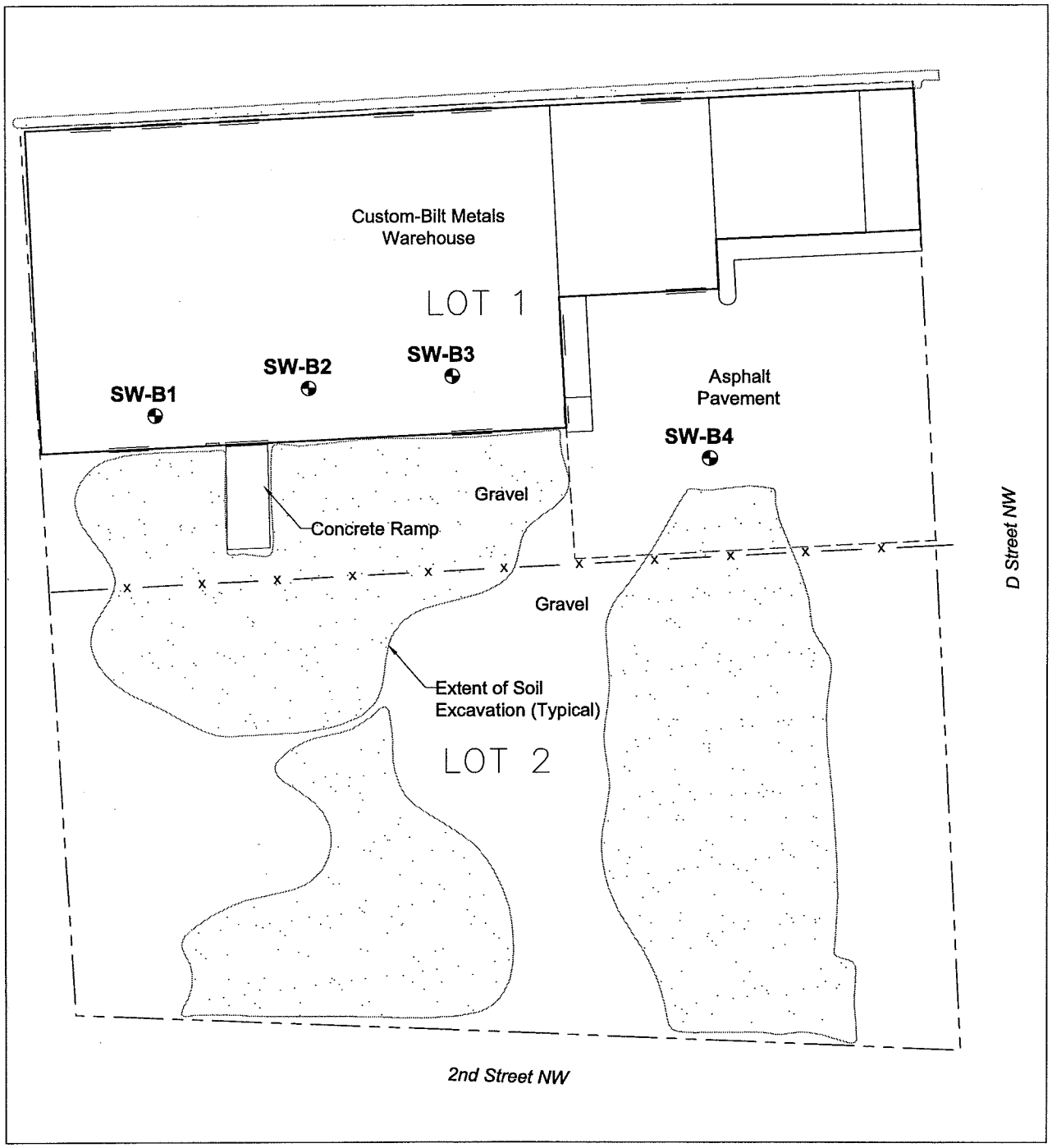
SHANNON & WILSON, INC.

Daniel N. Clayton
Vice President, Environmental Services

DNC/dnc

Attachments: Site Exploration Plan
Soil Classification and Log Key (2 pages)
Boring Logs (SW-B1 through SW-B4)
Summary of Analytical Results (2 pages)

c: Peter Bueckert, TPD, Auburn
Richard Lentini, Ryan, Swanson & Cleveland, PLLC



0 60 120

Scale in Feet

LEGEND

SW-B1 Boring Designation and Approximate Location

NOTE

Map adapted from Excavation Detail drawing prepared by Enco Environmental Corporation, dated 7-15-02.

Custom-Bilt Metals
Auburn, Washington

SITE AND EXPLORATION PLAN

December 2002 21-1-12074-006

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FIG.

Date: 12-13-2002 Author: SAC

File: I:\Drafting\21\1\12074-006\21-1-12074-006

Shannon & Wilson, Inc. (S&W), uses a soil classification system modified from the Unified Soil Classification System (USCS). Elements of the USCS and other definitions are provided on this and the following page. Soil descriptions are based on visual-manual procedures (ASTM D 2488-93) unless otherwise noted.

S&W CLASSIFICATION OF SOIL CONSTITUENTS

- MAJOR constituents compose more than 40 percent, by weight, of the soil. Major consituents are capitalized (i.e., SAND).
- Minor constituents compose 12 to 50 percent of the soil and precede the major constituents (i.e., silty SAND). Minor constituents preceded by "slightly" compose 5 to 12 percent of the soil (i.e., slightly silty SAND).
- Trace constituents compose 0 to 5 percent of the soil (i.e., slightly silty SAND, trace of gravel).

MOISTURE CONTENT DEFINITIONS

Dry	Absence of moisture, dusty, dry to the touch
Moist	Damp but no visible water
Wet	Visible free water, from below water table

ABBREVIATIONS

ATD	At Time of Drilling
Elev.	Elevation
ft	feet
FeO	Iron Oxide
HSA	Hollow Stem Auger
ID	Inside Diameter
in	inches
lbs	pounds
Mon.	Monument cover
N	Blows for last two 6-inch increments
NA	Not applicable or not available
NP	Non plastic
OD	Outside diameter
OVA	Organic vapor analyzer
PID	Photo-ionization detector
ppm	parts per million
PVC	Polyvinyl Chloride
SS	Split spoon sampler
SPT	Standard penetration test
USC	Unified soil classification
WLI	Water level indicator

GRAIN SIZE DEFINITION

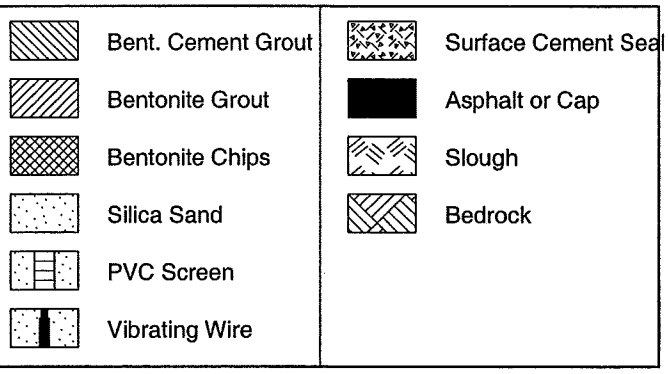
DESCRIPTION	SIEVE NUMBER AND/OR SIZE
FINES	< #200 (0.8 mm)
SAND* - Fine - Medium - Coarse	 #200 to #40 (0.8 to 0.4 mm) #40 to #10 (0.4 to 2 mm) #10 to #4 (2 to 5 mm)
GRAVEL* - Fine - Coarse	 #4 to 3/4 inch (5 to 19 mm) 3/4 to 3 inches (19 to 76 mm)
COBBLES	3 to 12 inches (76 to 305 mm)
BOULDERS	> 12 inches (305 mm)

* Unless otherwise noted, sands and gravels, when present, range from fine to coarse in grain size.

RELATIVE DENSITY / CONSISTENCY

COARSE-GRAINED SOILS		FINE-GRAINED SOILS	
N, SPT, BLOWS/FT.	RELATIVE DENSITY	N, SPT, BLOWS/FT.	RELATIVE CONSISTENCY
0 - 4	Very loose	Under 2	Very soft
4 - 10	Loose	2 - 4	Soft
10 - 30	Medium dense	4 - 8	Medium stiff
30 - 50	Dense	8 - 15	Stiff
Over 50	Very dense	15 - 30	Very stiff
		Over 30	Hard

WELL AND OTHER SYMBOLS



Custom Bilt Metals Facility
Kent, Washington

SOIL CLASSIFICATION AND LOG KEY

December 2002 21-1-12074-006

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FIG.
Sheet 1 of 2

UNIFIED SOIL CLASSIFICATION SYSTEM (USCS)
(From ASTM D 2487-98 & 2488-93)

MAJOR DIVISIONS			GROUP/GRAPHIC SYMBOL		TYPICAL DESCRIPTION
COARSE-GRAINED SOILS *(more than 50% retained on No. 200 sieve)*	Gravels *(more than 50% of coarse fraction retained on No. 4 sieve)*	Clean Gravels *(less than 5% fines)*	GW		Well-graded gravels, gravels, gravel/sand mixtures, little or no fines
			GP		Poorly graded gravels, gravel-sand mixtures, little or no fines
		Gravels with Fines *(more than 12% fines)*	GM		Silty gravels, gravel-sand-silt mixtures
			GC		Clayey gravels, gravel-sand-clay mixtures
	Sands *(50% or more of coarse fraction passes the No. 4 sieve)*	Clean Sands *(less than 5% fines)*	SW		Well-graded sands, gravelly sands, little or no fines
			SP		Poorly graded sand, gravelly sands, little or no fines
		Sands with Fines *(more than 12% fines)*	SM		Silty sands, sand-silt mixtures
			SC		Clayey sands, sand-clay mixtures
FINE-GRAINED SOILS *(50% or more passes the No. 200 sieve)*	Silts and Clays *(liquid limit less than 50)*	Inorganic	ML		Inorganic silts of low to medium plasticity, rock flour, sandy silts, gravelly silts, or clayey silts with slight plasticity
			CL		Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays
		Organic	OL		Organic silts and organic silty clays of low plasticity
	Silts and Clays *(liquid limit 50 or more)*	Inorganic	MH		Inorganic silts, micaceous or diatomaceous fine sands or silty soils, elastic silt
			CH		Inorganic clays or medium to high plasticity, sandy fat clay, or gravelly fat clay
		Organic	OH		Organic clays of medium to high plasticity, organic silts
HIGHLY-ORGANIC SOILS	Primarily organic matter, dark in color, and organic odor		PT		Peat, humus, swamp soils with high organic content (see ASTM D 4427)

NOTES

1. Dual symbols *(symbols separated by a hyphen, i.e., SP-SM, slightly silty fine SAND)* are used for soils with between 5% and 12% fines or when the liquid limit and plasticity index values plot in the CL-ML area of the plasticity chart.

2. Borderline symbols *(symbols separated by a slash, i.e., CL/ML, silty CLAY/clayey SILT; GW/SW, sandy GRAVEL/gravelly SAND)* indicate that the soil may fall into one of two possible basic groups.

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Kent, Washington

SOIL CLASSIFICATION AND LOG KEY

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FIG.
Sheet 2 of 2

ENVIRONMENTAL BOREHOLE LOG

Date Started 10/25/02	Location SW Corner of Warehouse	Depth Water First Encountered (ft) 12.0
Date Completed 10/25/02	Drilling Company Cascade Drilling	Drilling Method Hollow Stem Auger
Total Depth (ft) 14.0	Sampling Method Split-Spoon	Hammer: Weight (lbs) 140 Drop (in) 30
Borehole Diam. (in) 8	Ground Elev. (ft) NA	Monument Elev. (ft) NA / PVC Elev. (ft) NA

Depth (ft)	Environmental Sample Number	Interval	Blow Count Blows/Ft	Recovery(%)	PID (ppm)	Time	Depth (ft)	Lithologic Description	Soil Log	Well Log	Depth (ft)
								Ground Surface			
							0.5	Concrete.			
	1		100/12"	33		9:24		Medium dense to dense, brown, slightly silty, sandy GRAVEL and COBBLES; moist; (Fill) GP.			
	2		50/3"	0		9:34					
5							5.0				5
	SWB1-5.0		66	0		9:40		Medium dense to dense, gray, sandy GRAVEL, trace of silt, and clayey SILT; moist; GP/ML.			
	SWB1-7.0		6	100		9:57	8.0	Loose, dark brown PEAT (decomposing wood debris); moist; PT.			
							9.0	Loose, gray, clayey SILT; moist; ML.			
10	6		7	100		10:05	9.5	Loose, dark brown PEAT (decomposing wood debris); moist; PT.			10
							10.5				
	7		4	100		10:09	11.0	Loose, gray, clayey SILT; moist; scattered wood fragments; ML.		▽	
								Medium dense, dark gray, fine SAND; moist to wet; SP.			
	SWB1-12.5		26	100		10:23		- 6-inch layer of PEAT at 12 feet			
							14.0	BOTTOM OF BORING COMPLETED 10/25/2002			
15											15

Typ: EET Rev: ACT Log: ACT ENV_MASTER 21-12074.GPJ SHAN_WIL.GDT 12/16/02

NOTES

1. The stratification lines represent the approximate boundaries between soil types, and the transition may be gradual.
2. The discussion in the text of this report is necessary for a proper understanding of the nature of the subsurface materials.
3. Groundwater level, if indicated above, is for the date specified and may vary.
4. Refer to KEY for explanation of "Symbols" and definitions.
5. USCS designation is based on visual-manual classification unless otherwise noted.

LEGEND

2-inch O.D. Split Spoon Sample	▽ Ground Water Level ATD
3-inch O.D. Split Spoon Sample	▼ Ground Water Level in Well

Custom Bilt Metals Facility
Kent, Washington

LOG OF BORING SW-B1

December 2002 21-1-12074-006

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FIG.

ENVIRONMENTAL BOREHOLE LOG

Date Started 10/25/02	Location Mid-warehouse		Depth Water First Encountered (ft) 11.0
Date Completed 10/25/02	Drilling Company Cascade Drilling		Drilling Method Hollow Stem Auger
Total Depth (ft) 13.0	Sampling Method Split-Spoon		Hammer: Weight (lbs) 140 Drop (in) 30
Borehole Diam. (in) 8	Ground Elev. (ft) NA	Monument Elev. (ft) NA	PVC Elev. (ft) NA

Depth (ft)	Environmental Sample Number	Interval	Blow Count Blows/Ft	Recovery(%)	PID (ppm)	Time	Depth (ft)	Lithologic Description	Soil Log	Well Log	Depth (ft)
								Ground Surface			
							0.5	Concrete.			
								Medium dense, gray-brown, sandy GRAVEL, trace of silt; moist; (Fill) GP.			
	SWB2-2.0										
5							5.0	Medium dense, dark gray, sandy GRAVEL; trace of silt; moist; GP.			5
	SWB2-5.0		22	83		11:09					
							7.0	Medium dense, gray, fine SAND and clayey SILT; moist; SP/ML.			
	2		18	100		11:13	8.0	Medium dense, dark brown PEAT (decomposing wood debris); PT.			
							9.0	Medium dense, gray, fine SAND and clayey SILT; moist to wet; SP/ML.			
10	3		10	83		11:16					10
							10.5	Medium dense, dark brown PEAT (decomposing wood debris); moist; PT.		▽	
							11.5	Medium dense, dark gray, slightly fine gravelly, fine SAND; moist to wet; SP.			
	SWB2-11.0		15	42		11:20					
							13.0	BOTTOM OF BORING COMPLETED 10/25/2002			
15											15

NOTES

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2. The discussion in the text of this report is necessary for a proper understanding of the nature of the subsurface materials.
3. Groundwater level, if indicated above, is for the date specified and may vary.
4. Refer to KEY for explanation of "Symbols" and definitions.
5. USCS designation is based on visual-manual classification unless otherwise noted.

LEGEND

⊥	2-inch O.D. Split Spoon Sample	▽	Ground Water Level ATD
⊥⊥	3-inch O.D. Split Spoon Sample	▼	Ground Water Level in Well

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Kent, Washington

LOG OF BORING SW-B2

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FIG.

ENV_MASTER 21-12074.GPJ SHAN_WIL.GDT 12/16/02 Log: ACT Rev: ACT Typ: EET

ENVIRONMENTAL BOREHOLE LOG

Date Started 10/25/02	Location SE Corner of Warehouse	Depth Water First Encountered (ft) 10.0
Date Completed 10/25/02	Drilling Company Cascade Drilling	Drilling Method Hollow Stem Auger
Total Depth (ft) 11.0	Sampling Method Split-Spoon	Hammer: Weight (lbs) 140 Drop (in) 30
Borehole Diam. (in) 8	Ground Elev. (ft) NA	Monument Elev. (ft) NA / PVC Elev. (ft) NA

Depth (ft)	Environmental Sample Number	Interval	Blow Count Blows/Ft	Recovery(%)	PID (ppm)	Time	Depth (ft)	Lithologic Description	Soil Log	Well Log	Depth (ft)
								Ground Surface			
							0.5	Concrete.			
								Medium dense, gray-brown, sandy GRAVEL and COBBLES, trace of silt; moist; (Fill) GP.			
5							5.0	Medium dense, gray, fine gravelly SAND; moist; SP.			5
	SWB3-5.0		13	33		11:55	6.0	Stiff, gray, clayey SILT; moist; ML.			
	SWB3-7.0		8	100		12:04	8.0	Loose, dark brown PEAT (decomposing wood debris); moist; PT.			
							9.0	Medium dense, dark gray, fine SAND; moist to wet; SP.		▽	
10	SWB3-9.0		10	100		12:09					10
							11.0	BOTTOM OF BORING COMPLETED 10/25/2002			
15											15

NOTES

1. The stratification lines represent the approximate boundaries between soil types, and the transition may be gradual.
2. The discussion in the text of this report is necessary for a proper understanding of the nature of the subsurface materials.
3. Groundwater level, if indicated above, is for the date specified and may vary.
4. Refer to KEY for explanation of "Symbols" and definitions.
5. USCS designation is based on visual-manual classification unless otherwise noted.

LEGEND

⌶	2-inch O.D. Split Spoon Sample	▽	Ground Water Level ATD
⌶	3-inch O.D. Split Spoon Sample	▼	Ground Water Level in Well

Custom Bilt Metals Facility
Kent, Washington

LOG OF BORING SW-B3

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FIG

ENV_MASTER 21-12074.GPJ SHAN_WIL.GDT 12/16/02 Log: ACT Rev: ACT Typ: EET

ENVIRONMENTAL BOREHOLE LOG

Date Started 10/25/02	Location Asphalt Parking Lot		Depth Water First Encountered (ft) 7.5
Date Completed 10/25/02	Drilling Company Cascade Drilling		Drilling Method Hollow Stem Auger
Total Depth (ft) 9.5	Sampling Method Split-Spoon		Hammer: Weight (lbs) 140 Drop (in) 30
Borehole Diam. (in) 8	Ground Elev. (ft) NA	Monument Elev. (ft) NA	PVC Elev. (ft) NA

Depth (ft)	Environmental Sample Number	Interval	Blow Count Blows/Ft	Recovery(%)	PID (ppm)	Time	Depth (ft)	Lithologic Description	Soil Log	Well Log	Depth (ft)
								Ground Surface			
							0.2	Asphalt.			
							0.5	Brown, fine gravelly, silty SAND; moist; (Fill) SM.			
	SWB4-2.5		38	100		8:24		Loose to medium dense, gray and gray-brown, slightly gravelly to gravelly, fine SAND; moist; slight to no hydrocarbon odor; SP.			
	SWB4-4.0		13	33		8:30		- 4-inch, blue-gray, clayey SILT layer at 3.5 feet			
5	3		12	100		8:34	4.5	Loose, gray, clayey SILT; moist to wet; ML.			5
							5.0	Loose, dark brown PEAT (decomposing wood debris); moist; PT.			
	4		8	100		8:38	5.5	Very loose, gray, slightly fine sandy, clayey SILT; moist; numerous decomposing woody debris; ML.			
							6.3				
	SWB4-7.0						7.0	Very loose, dark brown PEAT (decomposing wood debris); moist; PT.		▽	
	SWB4-8.0		40	100		8:45		Medium dense, dark gray, fine SAND; moist to wet; trace of wood fragments; SP.			
10							9.5	BOTTOM OF BORING COMPLETED 10/25/2002			10
15											15

NOTES

1. The stratification lines represent the approximate boundaries between soil types, and the transition may be gradual.
2. The discussion in the text of this report is necessary for a proper understanding of the nature of the subsurface materials.
3. Groundwater level, if indicated above, is for the date specified and may vary.
4. Refer to KEY for explanation of "Symbols" and definitions.
5. USCS designation is based on visual-manual classification unless otherwise noted.

LEGEND

⊥	2-inch O.D. Split Spoon Sample	▽	Ground Water Level ATD
⊥⊥	3-inch O.D. Split Spoon Sample	▼	Ground Water Level in Well

Custom Bilt Metals Facility
Kent, Washington

LOG OF BORING SW-B4

December 2002 21-1-12074-006

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FIG

ENV_MASTER 21-12074.GPJ SHAN_WIL.GDT 12/16/02 Log: ACT Rev: ACT Typ: EET

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
CUSTOM-BILT METALS FACILITY

Location	Sample Number	Oil	Diesel	Gasoline	Chromium	Lead	PAHs
Soil Samples (mg/kg)							
SWB1	SWB1-5.0	ND	ND	ND	ND	29	D
	SWB1-7.0	ND	ND	ND	ND	ND	ND
	SWB1-12.5	ND	ND	ND	ND	ND	ND
SWB2	SWB2-2.0	ND	ND	ND	ND	ND	D
	SWB2-5.0	160	52	ND	ND	180	D
	SWB2-11.0	ND	ND	ND	ND	ND	ND
SWB3	SWB3-5.0	ND	ND	ND	ND	24	D
	SWB3-7.0	ND	ND	ND	ND	ND	ND
	SWB3-9.0	ND	ND	ND	ND	13	ND
SWB4	SWB4-2.5	110	ND	ND	ND	40	D
	SWB4-4.0	ND	ND	ND	ND	ND	ND
	SWB4-7.0	ND	ND	ND	ND	ND	ND
	SWB4-8.0 *	ND	ND	ND	ND	ND	ND
MTCA Method A		2,000	2,000	100	100	250	--
Groundwater Samples (µg/L)							
SWB1	SWB1-GW	ND	ND	ND	ND	ND	ND
MTCA Method A		500	500	800	50	15	--

NOTES:
* duplicate of SWB4-7.0
EPA = U.S. Environmental Protection Agency
D = detected, see Table 2
ND = not detected
mg/kg = milligrams per kilogram
µg/L = micrograms per liter

ANALYTICAL METHODS:
Diesel = Diesel range hydrocarbons by Method NWTPH-Dx
Gasoline = gasoline range hydrocarbons by Method NWTPH-Gx
Metals by EPA Method 6010B
Oil = Oil range hydrocarbons by Method NWTPH-Dx
PAHs = polynuclear aromatic hydrocarbons by Method EPA 8270C/SIM

MTCA = Washington Model Toxics Control Act Method A
Groundwater metals results are for dissolved metals.

TABLE 2
SUMMARY OF PAH ANALYTICAL RESULTS
CUSTOM-BILT METALS FACILITY

Location	SWB1	SWB2	SWB2	SWB3	SWB4	
Sample Number	SWB1-5.0	SWB2-2.0	SWB2-5.0	SWB3-5.0	SWB4-2.5	MTCA A
Naphthalene			0.014			
2-Methylnaphthalene	0.013		0.030			
1-Methylnaphthalene	0.011		0.024			
Acenaphthylene			0.031			
Fluorene			0.013			
Phenanthrene	0.018	0.029	0.22	0.030	0.014	
Anthracene			0.034			
Fluoranthene	0.013	0.030	0.30	0.065	0.015	
Pyrene	0.012	0.037	0.30	0.073	0.016	
Benzo[a]anthracene		0.012	0.14	0.037		0.1
Chrysene		0.012	0.17	0.042		0.1
Benzo[b]fluoranthene		0.0088	0.15	0.036		0.1
Benzo[k]fluoranthene		0.0088	0.14	0.035		0.1
Benzo[a]pyrene		0.013	0.17	0.042		0.1
Indeno[1,2,3-c,d]pyrene			0.14	0.027		0.1
Dibenz[a,h]anthracene			0.052	ND		
Benzo[g,h,i]perylene		0.0098	0.16	0.029		0.1
Total cPAHs		0.064	1.070	0.248		0.1

NOTES:
cPAHs = carcinogenic polynuclear aromatic hydrocarbons
MTCA A = Washington Model Toxics Control Act, Method A cleanup criteria