

000001

L55.130

# RZA AGRA Alaska, Inc.

Engineering & Environmental Services

711 'H' Street, Suite 450  
Anchorage, Alaska 99501-3442  
(907) 276-6480  
FAX (907) 258-4128

January 22, 1993

A-1278

State of Alaska  
Department of Environmental Conservation  
Anchorage District Office  
800 E. Dimond Blvd., Suite 30470  
Anchorage, Alaska 99515

# RECEIVED

JAN 25 1993

DEPARTMENT OF  
ENVIRONMENTAL CONSERVATION  
WDO

Attention: Robert Weimer

Subject: Response to Request for Additional Information  
Former Bailey's Rent-All Site  
Spill #: 91-2-1-1-274-1 File #: L55.130

Dear Mr. Weimer:

As per your request of 24 November 1992, the following information is presented:

1. ADEC Statement:

"Based on the information provided, the soil cleanup level for this site should be level A (score 41) instead of level B (score 36) as indicated in the report. The depth to groundwater from the lowest point of contamination to the groundwater table is less than 5 feet (score 10 vs 8). The total volume of contamination is 175+ yards (score 5 vs 2)."

Response:

No groundwater was encountered while removing tanks from the subject site. As stated in our earlier report, groundwater in the vicinity of the subject site is reported to be about 15 feet in depth. The maximum depth of the zone of soil contamination appears to be 10 feet. Samples collected from the 12 foot depth (R-1, R-2, R-3 & R-4) were all non-detect for benzene, GRPH and DRPH. Until information is received indicating that a more shallow groundwater condition exists, we believe that we have used the correct depth to groundwater (5 to 15 feet).

The volume of contaminated soil was originally calculated at 90 cubic yards. This determination was based on the amount of soil remaining in the ground and containing a concentration greater than the most restrictive matrix value for the given constituent. At the time this Matrix score was calculated, we believe that this was the correct method for determining the volume of contaminated soil.

Using the criteria stated above, a total matrix score of 36 points (level B) appears appropriate for this site.

2. ADEC Statement:

"Numerous excavation samples (BS-1, BS-2, BS-3, BS-4, BS-5, BS-16, BS-17, BS-18, BS-20) indicate that contamination remains above site cleanup levels, including the stockpile soils that

*Need proof  
of depth of  
GW & GW  
sample  
if 17' or less  
to GW*  
*Report says  
130 cy*

State of Alaska  
Department of Environmental Conservation  
January 22, 1993

Response to Request for Additional Information  
Former Bailey's Rent-All Site  
Page 2

were returned to the excavation. It should be noted that 5 of these samples also exceed level B cleanup."

Response:

We do agree that samples BS-1, BS-2, BS-3 and BS-4 are above the regulatory cleanup levels established for benzene. However, as shown on Figure 2 and stated on page 4 of the closure report, an additional 2 feet of soil was excavated from below these sample locations. Analytical results of samples collected after the additional excavation was completed indicate non-detectable concentrations of benzene, and DRPH. GRPH concentrations vary from 1.4 to 1.9 ppm, well below the most stringent ADEC cleanup level. Analytical results for the samples representing soils that remained in the ground (R-1, R-2, R-3 and R-4) are presented in Table 1 of the site closure report.

With the exception of the DRPH concentration of sample BS-20, no other parameter tested for in this investigation exceeded the Level B cleanup criteria. The DRPH in sample BS-20 was 210 ppm, which exceeds the cleanup level by 10 ppm or 5%. Considering the overall analytical results for samples collected from stockpiles SS-1 and SS-2, it does not appear that this minor overage in the DRPH constituent above the level B cleanup limit should warrant additional cleanup efforts.

3. ADEC Statement:

"Conduct further Investigations to determine the full extent of the soil and possible groundwater contamination as required under 18 AAC 78.240."

Response:

It is apparent by ADEC Statement 2 (above) that there is a misunderstanding of the degree of petroleum hydrocarbon impacted soils that remain in the ground at the subject property. Please take another look at the results of the investigation provided in the site closure report, specifically Figure 2 and Table 1. If you then still believe that further investigations of soil contamination is justified, please let us know.

4. ADEC Statement:

"Develop and submit a Corrective Action Plan to respond to the contaminated soils at your site as required under 18 AAC 78.250."

Response:

As of this time, it appears that all contaminated soil at the site, with the possible exception of some minor DRPH impacted soils, represented by sample BS-20, have been stockpiled on site as stated in the closure report.

*45% of  
Soil above  
Level B  
Placed back  
in excav.*

State of Alaska  
Department of Environmental Conservation  
January 22, 1993

Response to Request for Additional Information  
Former Bailey's Rent-All Site  
Page 3

5. ADEC Statement:

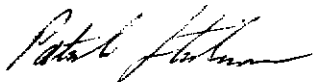
"Provide a soil treatment/disposal plan or a storage plan (as per the Guidance Manual for Underground Storage Tank Regulations 18 AAC 78) for the stockpiles at the site"

Response:

A soil treatment/disposal plan for the stockpiled soils at the subject site will be developed and presented to the ADEC after the stockpiles are sampled this coming June or July 1993. At this time, it appears that the petroleum hydrocarbon levels are such that, as an alternative, the soils could be disposed at the MOA landfill. However, additional testing would be required prior to obtaining permission to dispose at this facility.

It is our opinion that the Bailey Rent-all site is a very low potential environmental risk, having only minor amounts of low level petroleum hydrocarbon impacted soils remaining in the ground. After reviewing this letter and the closure report please let us know if you think additional investigation is appropriate for this site. Please respond by mid-May 1993 so that work can begin in a timely manner.

Sincerely,



Patrick Stidmon

PS:pmf

cc: Mr. Charles Homan

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000004

**DEPT. OF ENVIRONMENTAL CONSERVATION**

ANCHORAGE DISTRICT OFFICE  
800 E. DIMOND BLVD., SUITE 3-470  
ANCHORAGE, ALASKA 99515

(907) 349-7755

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

February 17, 1993

Mr. Fredrick J. Bailey  
C/O: Charles E. Homan  
PO Box 111969  
Anchorage, AK 99511

SUBJECT: Response to RZA AGRA's 1/22/93 letter  
Former Bailey's Rent All site, 101 E. Northern Lts. Blvd.  
Spill #: 91-2-1-1-274-1 File #: L55.130

Dear Mr. Bailey:

The Department has completed its review of RZA AGRA's January 22, 1993 response and the files for your 101 E. Northern Lts. Blvd site. The Department does not concur with letter's conclusions. The Department requests that the following be addressed:

1. The site still appears to be Level A (score 41). The UST closure report states that there are 130 cy of contaminated soil were found to be above Level B, and an additional 45 cy of contaminated soil was placed back in the excavation (score 8 vs. 5). Unless it can be demonstrated that the seasonal high groundwater is more than 17 feet below ground surface, we must use the more conservative score (10 vs. 8).
2. The Department still requests that you conduct further investigations to determine the full extent of the soil and possible groundwater contamination as required under 18 AAC 78.240. Please provide a plan for conducting this investigation this spring/summer.

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Mr. Fredrick J. Bailey  
February 17, 1993  
Page 2

Please submit the information requested above to the Department by **March 31, 1993**.  
If you have any questions, contact me at the Anchorage District Office.

Sincerely,

Robert Weimer  
Environmental Specialist

cc: Patrick Stidmon, RZA AGRA Alaska Inc.

RW/pf

Thank you for using Return Receipt Service.

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a & 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

**1.  Addressee's Address**

**2.  Restricted Delivery**  
Consult postmaster for fee.

**3. Article Addressed to:**  
Mr. Fredrick J. Bailey  
C/O: Charles E. Homan  
P.O. Box 111969  
Anchorage, AK 99511

**4a. Article Number**  
P 581 005 953

**4b. Service Type**

Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

**5. Signature (Addressee)**  
[Signature]

**6. Signature (Agent)**  
[Signature]

**7. Date of Delivery**  
2-19-93

**8. Addressee's Address (Only if requested and fee is paid)**

**PS Form 3811, December 1991 \* U.S.G.P.O. : 1992-307-530**

**DOMESTIC RETURN RECEIPT**

P 581 005 953

**RECEIPT FOR CERTIFIED MAIL**  
NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to <b>Fredrick J. Bailey</b>	
Street and No. <b>P.O. Box 111969</b>	
P.O., State and ZIP Code <b>Anchorage, AK 99511</b>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985

U.S.G.P.O. 1989-234-655

#3 L55,130

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# RZA AGRA Alaska, Inc.

*Engineering & Environmental Services*

711 'H' Street, Suite 450  
Anchorage, Alaska 99501-3442  
(907) 276-6480  
FAX (907) 258-4128

March 30, 1993

A-1278

**R E C E I V E D**  
**MAR 31 1993**  
DEPARTMENT OF  
ENVIRONMENTAL CONSERVATION  
ADO

Department of Environmental Conservation  
Anchorage District Office  
800 E. Dimond Blvd., Suite 3-470  
Anchorage, Alaska 99515

ATTN: Mr. Robert Weimer  
Environmental Specialist

RE: Response to ADEC's letter of 2/17/93  
Former Bailey's Rent All Site, 101 E. Northern Lts. Blvd.  
Spill #: 91-2-1-1-274-1 File #: L55.130

Dear Mr. Weimer:

The following is in response to your February 17, 1993 letter which in turn refers to our earlier correspondence of January 22, 1993. In your most recent response you indicate disagreement with our previous correspondence on one issue, namely:

1. The site still appears to be Level A (score 41) The UST closure report states that there are 130 cy of contaminated soil were found to be above Level B, and an additional 45 cy of contaminated soil was placed back in the excavation (score 8 vs. 5). Unless it can be demonstrated that the seasonal high groundwater is more than 17 feet below ground surface, we must use the more conservative score (10 vs. 8).

You have also requested additional studies be conducted as follows:

2. The Department still requests that you conduct further investigations to determine the full extent of the soil and possible groundwater contamination as required under 18 AAC 78.240. Please provide a plan for conducting this investigation this spring/summer.

In response to the initial comment we would again disagree with the higher scoring on the basis that first of all we feel the correct assumptions were made with regard to the Matrix interpretation at the time the work was completed and the initial score of 5 for volume of soils was appropriate. We recognize that since this time some differing interpretations have been made with regard to this aspect of the Matrix. No groundwater was encountered during the excavation process and the groundwater estimate used was, we believe, prudent. Thus we still contend that the Matrix score of 36 points is logical under the circumstances, and that level B procedures should be followed.

The second item requests that we conduct additional studies to determine the full extent of soil and groundwater contamination as required by 18 AAC 78.240.

The contamination was found, for the most part, to be relatively minimal probably resulting from minor spillage, during filling or fuel dispensing. The contaminated soils were removed at depth down to non-detect (ND) limits. This was after an initial excavation followed by a time delay to permit viewing of analytical results and finally removal of impacted soils to the aforementioned ND limits. No groundwater was

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Response to ADEC's Letter of 2/17/93  
Former Bailey's Rent All Site  
Spill #: 91-2-1-4-274-1 File #: L55.130

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March 30, 1993  
Page 2

encountered in the excavation. Under these circumstances it seems prudent to assume that; 1) groundwater or wells in the area should not be affected, and; 2) that removal of the potentially offending soils will lessen any risk of future impacts. Added to this it should be taken into consideration that the tanks themselves were relatively small, i.e. ranging from 275 to 900 gallons and in good condition when removed.

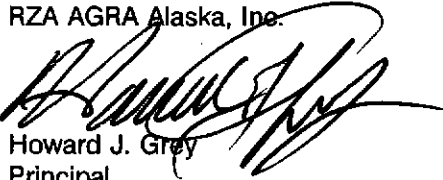
Based on the above information it would appear that requiring added work be conducted on the site would place an unnecessary financial burden on the owner. We would rather see future efforts expended on sampling and treatment or disposal of remaining stockpiled soils so that this effort can be brought to a near term successful conclusion.

As mentioned in our previous correspondence, a treatment or disposal plan will be developed in June or July of 1993 following additional testing of the stockpiled soils.

I appreciate your patience and cooperation on this matter and ask that you contact us if you have any questions.

Sincerely,

RZA AGRA Alaska, Inc.



Howard J. Grey  
Principal

HJG:pmf

c:\wp51\petty\letters\03251.hjg



000008

5/3/93

Stackpile to be sampled/  
disposed of this summer.

#1 + #2 still need  
to be addressed  
before NFA.

000009

# RZA AGRA Alaska, Inc.

Engineering & Environmental Services

711 'H' Street, Suite 450  
Anchorage, Alaska 99501-3442  
(907) 276-6480  
FAX (907) 258-4128

**R E C E I V E**

NOV 05 1993

DEPARTMENT OF  
ENVIRONMENTAL CONSERVATION  
ADO

November 2, 1993

Mr. Frederick Bailey  
c/o Mr. Charles Homan  
P.O. Box 111969  
Anchorage, Alaska 99511

*Check to  
see if  
8010 PCBs,  
Total metals,  
run previously*

Subject: Site Closure Report, Former Bailey's Rent All Property  
101 East Northern Lights Boulevard  
Anchorage, Alaska  
Spill No. 91-2-1-1-274-1  
File No. L55.130

Dear Mr. Bailey:

In order to request closure for the former Bailey's Rent All property (BAILEY'S), RZA AGRA Alaska, Inc. (AGRA) collected soil confirmation samples from the soil stockpile located at 101 East Northern Lights Boulevard in Anchorage, Alaska, on October 11, 1993.

Based on the matrix score sheet method presented in the Underground Storage Tank (UST) Regulations (Title 18, Alaska Administrative Code, Chapter 78), AGRA determined that the BAILEY'S facility met the criteria for Level B cleanup conditions. The determination of the cleanup level was based upon the following matrix score:

Depth to subsurface water (15 - 25 feet)	6
Mean annual precipitation (15 - 25 inches)	3
Soil type (coarse grained with fines)	8
Potential receptors (well within 0.5 mile)	12
Volume of contaminated soil (100 - 500 cubic yards)	8
<b>TOTAL SCORE</b>	<b>37</b>

The matrix score criteria were based upon facts presented in the Level I Environmental Site Assessment, December 1991, conducted by Howard Grey Associates (HGA).

In accordance with the ADEC UST Regulations, AGRA screened the soil stockpile to determine the areas of maximum residual petroleum impact. AGRA delineated a sampling grid to accurately document soil sample locations (see Figure 1). Based on an approximate stockpile volume of 130 cubic yards (CY), thirteen soil samples were screened using a Thermo Environmental Instruments, Inc. Model 580B Organic Vapor Meter (OVM) and the headspace screening techniques outlined in the AGRA Quality Assurance Program Plan (QAPP). Additional soil samples were collected from the sample grid locations which corresponded to the highest observed headspace readings. Four soil samples were collected for confirmation analysis. All confirmation samples were collected in accordance with the protocol established in the AGRA QAPP.

The soil samples were maintained in a chilled cooler under AGRA chain-of-custody and transferred to Commercial Testing and Engineering (CT&E) in Anchorage, Alaska, for quantitative analysis. All samples were analyzed for total petroleum hydrocarbons (TPH) by EPA Method 418.1, gasoline range petroleum hydrocarbons (GRPH) by EPA Method 8015, diesel range petroleum hydrocarbons (DRPH) by EPA Method 8100 Modified, and benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8020.

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BAILEY'S RENT ALL FACILITY UST SITE CLOSURE  
November 1993

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Page 2

Level B cleanup criteria permit the following maximum contamination levels:

Benzene	0.5 parts per million (ppm)
Total BTEX	15 ppm
GRPH	100 ppm
DRPH	200 ppm

No benzene was detected in the soil samples. The highest concentration of Total BTEX was detected in Sample No. SS-1 (0.204 ppm). The highest level of GRPH detected was 1.59 ppm (Sample No. SS-3) and the highest level of DRPH detected was 67.7 ppm (Sample No. SS-3). All analytical data indicate that the samples exceed the cleanup criteria for both Level B and Level A.

AGRA submitted soil samples for TPH analysis to determine if the soil was suitable for disposal at the Municipality of Anchorage (MOA) Landfill, in the event that an alternative disposal method was necessary. The analytical data indicate a maximum level of TPH (443 ppm) in Sample No. SS-3. This value is well below the maximum contamination level (MCL) of 1000 ppm for municipal disposal.

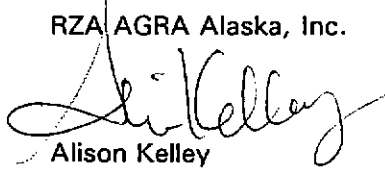
A copy of the analytical results is included with this letter.

Since all cleanup criteria are exceeded, the ADEC considers the soil non-regulated, as defined in Chapter Four of the Guidance Manual for Underground Storage Tanks (June 18, 1991). The soil can be uncovered and spread on the property; this is an ADEC-approved method which is indicated in the UST regulations. The soil can also be transferred from the site to the municipal landfill for disposal. However, AGRA strongly recommends on-site soil spreading as the most efficient and cost-effective disposal method.

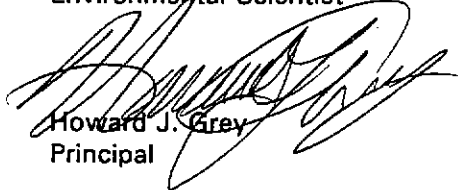
AGRA appreciates the opportunity to have been of service to Mr. Bailey and Bailey's Rent All. Please contact our office at 276-6480 if you have any questions.

Respectfully Submitted,

RZA AGRA Alaska, Inc.



Alison Kelley  
Environmental Scientist



Howard J. Grey  
Principal

enc: Analytical Results  
Figure 1

cc: Mr. Robert Weimer, ADEC, 800 E. Dimond Blvd, Suite 3-470,  
Anchorage, Alaska 99515.

000011

# COMMERCIAL TESTING & ENGINEERING CO.

ENVIRONMENTAL LABORATORY SERVICES

FEDERAL ID# 36-0937920

INVOICE 72051 10/29/93

5633 B STREET  
ANCHORAGE, AK 99518  
TEL: (907) 562-2343  
FAX: (907) 561-5301

Client BPO :  
PO Req# :  
Client PO : NONE RECEIVED  
Req.# :

Remit To:  
P O Box 10001-019  
Pasadena, CA 91110-1019

WORKorder Date : 10/13/93  
Chemlab Ref.# : 93.5412  
Account # : RZAAGRA

Report Printed : 10/29/93 @ 16:36

Bill To  
RZA-AGRA ALASKA, INC  
ATTN: DARRIN LAWLESS  
711 H STREET, SUITE 450  
ANCHORAGE AK 99501-3442

SEND REPORTS TO:  
RZA-AGRA ALASKA, INC  
ATTN: DARRIN LAWLESS  
711 H STREET, SUITE 450  
ANCHORAGE AK 99501-3442

Contact Person : DARRIN LAWLESS  
Phone : (907) 276-6480  
Ordered By : HOWARD GRAY

Special Instructions: JOB #31-01278 BAILEY'S RENTAL FACILITY. FAX PRELIMS TO ALISON AT 258-4128.

Client Sample Desc.	Code ***	Test	Parameter Tested	Method	Standard Charge	Discount Charge
SS-1	4	50031	Percent Solids	SM17 2540G	0.00	0.00
SS-1	4	30005	Hydrocarbons EPH	3510/3550/81	125.00	106.25
SS-1	4	75003	Total Petroleum Hydro	EPA 418.1	80.00	68.00
SS-1	4	10086	VPH & BTEX	EPA 8015M/80	120.00	102.00
SS-2	4	50031	Percent Solids	SM17 2540G	0.00	0.00
SS-2	4	30005	Hydrocarbons EPH	3510/3550/81	125.00	106.25
SS-2	4	75003	Total Petroleum Hydro	EPA 418.1	80.00	68.00
SS-2	4	10086	VPH & BTEX	EPA 8015M/80	120.00	102.00
SS-3	4	50031	Percent Solids	SM17 2540G	0.00	0.00
SS-3	4	30005	Hydrocarbons EPH	3510/3550/81	125.00	106.25
SS-3	4	75003	Total Petroleum Hydro	EPA 418.1	80.00	68.00
SS-3	4	10086	VPH & BTEX	EPA 8015M/80	120.00	102.00
SS-4	4	50031	Percent Solids	SM17 2540G	0.00	0.00
SS-4	4	30005	Hydrocarbons EPH	3510/3550/81	125.00	106.25
SS-4	4	75003	Total Petroleum Hydro	EPA 418.1	80.00	68.00
SS-4	4	10086	VPH & BTEX	EPA 8015M/80	120.00	102.00

TOTAL DUE \$ 1,105.00

\* Matrix ID 1 = Water 3 = Oil 5 = Other 7 = Solid  
2 = Gas 4 = Soil 6 = Liquid



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**COMMERCIAL TESTING & ENGINEERING CO.**

ENVIRONMENTAL LABORATORY SERVICES

REPORT of ANALYSIS

5633 B STREET  
ANCHORAGE, AK 99518  
TEL: (907) 562-2343  
FAX: (907) 561-5301

Chemlab Ref.# :93.5412-1  
Client Sample ID :SS-1  
Matrix :SOIL

Client Name :RZA-AGRA ALASKA, INC  
Ordered By :HOWARD GRAY  
Project Name :BAILEYS RENTAL FACILITY  
Project# :31-01278  
PWSID :UA

WORK Order :72051  
Report Completed :10/29/93  
Collected :10/11/93 @ 13:55 hrs.  
Received :10/11/93 @ 16:30 hrs.  
Technical Director:STEPHEN C. EDE  
Released By : *[Signature]*

Sample Remarks: SAMPLE COLLECTED BY: A.K. THE RATIO BETWEEN TOTAL PETROLEUM HYDROCARBONS-METHOD 418.1-AND OIL AND GREASE-METHOD 413.2-OF 0.44 INDICATES THE PRESENCE OF BIOGENIC HYDROCARBONS. 37.0 MG/OF EPH PATTERN IS NOT CONSISTENT WITH MIDDLE DISTILLATE FUEL. FINAL RESULTS.

Parameter	Results	QC Qual	Units	Method	Allowable Limits	Ext. Date	Anal Date	Init
Percent Solids	86.1		%	SM17 2540G			10/13	EAL
Hydrocarbons EPH	43.0		mg/Kg	3510/3550/8100M		10/18	10/21	JBH
Total Petroleum Hydro	250		mg/Kg	EPA 418.1		10/16	10/16	SMK
VPH & BTEX				EPA 8015M/8020				
Hydrocarbons VPH	1.41		mg/Kg	EPA 5030/8015m		10/13	10/18	WLS
Benzene	0.020	U	mg/Kg	EPA 8020		10/13	10/18	WLS
Toluene	0.082		mg/Kg	EPA 8020		10/13	10/18	WLS
Ethylbenzene	0.024		mg/Kg	EPA 8020		10/13	10/18	WLS
p&m Xylene	0.098		mg/Kg	EPA 8020		10/13	10/18	WLS
o-Xylene	0.020	U	mg/Kg	EPA 8020		10/13	10/18	WLS

\* See Special Instructions Above  
\*\* See Sample Remarks Above  
U = Undetected, Reported value is the practical quantification limit.  
D = Secondary dilution.

UA = Unavailable  
NA = Not Analyzed  
LT = Less Than  
GT = Greater Than



Member of the SGS Group (Société Générale de Surveillance)

000013

# COMMERCIAL TESTING & ENGINEERING CO.

ENVIRONMENTAL LABORATORY SERVICES

## REPORT of ANALYSIS

Chemlab Ref.# :93.5412-2  
 Client Sample ID :SS-2  
 Matrix :SOIL

5633 B STREET  
 ANCHORAGE, AK 99518  
 TEL: (907) 562-2343  
 FAX: (907) 561-5301

Client Name :REA-AGRA ALASKA, INC  
 Ordered By :HOWARD GRAY  
 Project Name :BAILEYS RENTAL FACILITY  
 Project# :31-01278  
 PWSID :UA

WORK Order :72051  
 Report Completed :10/29/93  
 Collected :10/11/93 @ 16:04 hrs.  
 Received :10/11/93 @ 16:30 hrs.  
 Technical Director:STEPHEN C. EDE  
 Released By : *C. EDE*

Sample Remarks: SAMPLE COLLECTED BY: A.K. THE RATIO BETWEEN TOTAL PETROLEUM HYDROCARBONS-METHOD 418.1-AND OIL AND GREASE-METHOD 413.2-OF 0.37 INDICATES THE PRESENCE OF BIOGENIC HYDROCARBONS. 43.0 MG/KG OF EPH PATTERN IS NOT CONSISTENT WITH MIDDLE DISTILLATE FUEL. FINAL RESULTS.

Parameter	Results	QC Qual	Units	Method	Allowable Limits	Ext. Date	Anal Date	Init
Percent Solids	83.0		%	SM17 2540G			10/13	EAL
Hydrocarbons EPH	50.1		mg/Kg	3510/3550/8100M		10/18	10/28	JBH
Total Petroleum Hydro	408		mg/Kg	EPA 418.1		10/16	10/16	SMK
VPH & BTEX				EPA 8015M/8020				
Hydrocarbons VPH	1.13		mg/Kg	EPA 5030/8015m		10/13	10/18	WLS
Benzene	0.025	U	mg/Kg	EPA 8020		10/13	10/18	WLS
Toluene	0.058		mg/Kg	EPA 8020		10/13	10/18	WLS
Ethylbenzene	0.025	U	mg/Kg	EPA 8020		10/13	10/18	WLS
p&m Xylene	0.043		mg/Kg	EPA 8020		10/13	10/18	WLS
o-Xylene	0.025	U	mg/Kg	EPA 8020		10/13	10/18	WLS

\* See Special Instructions Above

\* See Sample Remarks Above

U = Undetected, Reported value is the practical quantification limit.

D = Secondary dilution.

UA = Unavailable  
 NA = Not Analyzed  
 LT = Less Than  
 GT = Greater Than



Member of the SGS Group (Société Générale de Surveillance)

ENVIRONMENTAL SERVICES IN ALASKA, COLORADO, UTAH, ILLINOIS, OHIO, MARYLAND, WEST VIRGINIA, NEW JERSEY, SOUTH CAROLINA



**COMMERCIAL TESTING & ENGINEERING CO.**  
 ENVIRONMENTAL LABORATORY SERVICES

REPORT of ANALYSIS

5833 B STREET  
 ANCHORAGE, AK 99518  
 TEL: (907) 562-2343  
 FAX: (907) 561-5301

ChemLab Ref.# :93.5412-3  
 Client Sample ID :SS-3  
 Matrix :SOIL

Client Name :RZA-AGRA ALASKA, INC  
 Ordered By :HOWARD GRAY  
 Project Name :BAILEYS RENTAL FACILITY  
 Project# :31-01278  
 PWSID :UA

WORK Order :72051  
 Report Completed :10/29/93  
 Collected :10/11/93 @ 16:05 hrs.  
 Received :10/11/93 @ 16:30 hrs.  
 Technical Director:STEPHEN C. EDE  
 Released By : *[Signature]*

Sample Remarks: SAMPLE COLLECTED BY: A.K. THE RATIO BETWEEN TOTAL PETROLEUM HYDROCARBONS-METHOD 418.1-AND OIL AND GREASE-METHOD 413.2-OF 0.38 INDICATES THE PRESENCE OF BIOGENIC HYDROCARBONS. 55.5 MG/KG OF EPH PATTERN IS NOT CONSISTENT WITH MIDDLE DISTILLATE FUEL. FINAL RESULTS.

Parameter	Results	QC Qual	Units	Method	Allowable Limits	Ext. Date	Anal Date	Init
Percent Solids	77.5		%	SM17 2540G			10/13	EAL
Hydrocarbons EPH	67.7		mg/Kg	3510/3550/8100M		10/18	10/28	JBH
Total Petroleum Hydro	443		mg/Kg	EPA 418.1		10/16	10/16	SMK
VPH & BTEX				EPA 8015M/8020				
Hydrocarbons VPH	1.59		mg/Kg	EPA 5030/8015m		10/13	10/18	WLS
Benzene	0.030	U	mg/Kg	EPA 8020		10/13	10/18	WLS
Toluene	0.045		mg/Kg	EPA 8020		10/13	10/18	WLS
Ethylbenzene	0.030	U	mg/Kg	EPA 8020		10/13	10/18	WLS
p&m Xylene	0.051		mg/Kg	EPA 8020		10/13	10/18	WLS
o-Xylene	0.030	U	mg/Kg	EPA 8020		10/13	10/18	WLS

\* See Special Instructions Above  
 \*\* See Sample Remarks Above  
 U = Undetected, Reported value is the practical quantification limit.  
 D = Secondary dilution.  
 UA = Unavailable  
 NA = Not Analyzed  
 LT = Less Than  
 GT = Greater Than

000015

# COMMERCIAL TESTING & ENGINEERING CO.

ENVIRONMENTAL LABORATORY SERVICES

## REPORT of ANALYSIS

5633 B STREET  
ANCHORAGE, AK 99518  
TEL: (907) 562-2343  
FAX: (907) 561-5301

Chemlab Ref.# :93.5412-4  
Client Sample ID :SS-4  
Matrix :SOIL

Client Name :RZA-AGRA ALASKA, INC  
Ordered By :HOWARD GRAY  
Project Name :BAILEYS RENTAL FACILITY  
Project# :31-01278  
PW ID :UA

WORK Order :72051  
Report Completed :10/29/93  
Collected :10/11/93 @ 16:10 hrs.  
Received :10/11/93 @ 16:30 hrs.  
Technical Director:STEPHEN C. EDE  
Released By : *C. Hestrad*

Sample Remarks: SAMPLE COLLECTED BY: A.K. THE RATIO BETWEEN TOTAL PETROLEUM HYDROCARBONS-METHOD 418.1-AND OIL AND GREASE-METHOD 413.2-OF 0.46 INDICATES THE PRESENCE OF BIOGENIC HYDROCARBONS. 53.2 MG/KG OF EPH PATTERN IS NOT CONSISTENT WITH MIDDLE DISTILLATE FUEL. FINAL RESULTS.

Parameter	Results	QC Qual	Units	Method	Allowable Limits	Ext. Date	Anal Date	Init
Percent Solids	77.5		%	SM17 2540G			10/13	EAL
Hydrocarbons EPH	59.4		mg/Kg	3510/3550/8100M		10/18	10/28	JBH
Total Petroleum Hydro	352		mg/Kg	EPA 418.1		10/15	10/16	SMK
PH & BTEX Hydrocarbons VPH	0.772		mg/Kg	EPA 8015M/8020 EPA 5030/8015m		10/13	10/18	WLS
Benzene	0.020	U	mg/Kg	EPA 8020		10/13	10/18	WLS
Toluene	0.037		mg/Kg	EPA 8020		10/13	10/18	WLS
Ethylbenzene	0.020	U	mg/Kg	EPA 8020		10/13	10/18	WLS
m-Xylene	0.049		mg/Kg	EPA 8020		10/13	10/18	WLS
p-Xylene	0.020	U	mg/Kg	EPA 8020		10/13	10/18	WLS

\* See Special Instructions Above

\*\* See Sample Remarks Above

U Undetected, Reported value is the practical quantification limit.

D Secondary dilution.

UA = Unavailable  
NA = Not Analyzed  
LT = Less Than  
GT = Greater Than

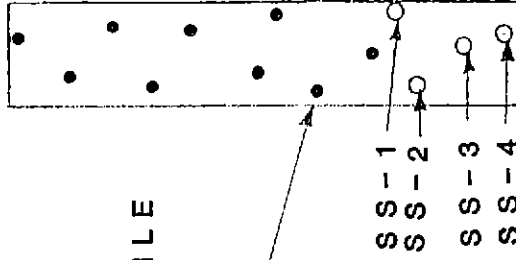
 **SGS** Member of the SGS Group (Société Générale de Surveillance)

ENVIRONMENTAL SERVICES IN ALASKA, COLORADO, UTAH, ILLINOIS, OHIO, MARYLAND, WEST VIRGINIA, NEW JERSEY, SOUTH CAROLINA

AUTO TRANSMISSION SHOP

"A" STREET

SOIL STOCKPILE



000016

NORTHERN LIGHTS BOULEVARD

- - SCREEN LOCATION
- - SCREEN/SAMPLE LOCATION

RZA AGRA Alaska, Inc. ENGINEERING & ENVIRONMENTAL SERVICES 711 H STREET SUITE 450 ANCHORAGE, ALASKA 99501-3442	W.O. 31-01278	BAILEY'S REST ALL
	DESIGN --	101 E. NORTHERN LIGHTS
	DRAWN AK	ANCHORAGE AK
	DATE 11-01-23	SAMPLE LOCATION
	SCALE NONE	MAP
	F.N.	FIGURE 1

NORTH