
# Periodic Review
# Walla Walla Farmers Co-op
# Facility Site ID 769
# Cleanup Site 916

Prepared by
Washington State Department of Ecology
Eastern Regional Office
Toxics Cleanup Program
Spokane, WA

January 2013

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# 1.0 INTRODUCTION

This report presents the Washington State Department of Ecology's (Ecology) second periodic review for the Walla Walla Farmers Co-op site (Site). This periodic review is applicable as part of the site cleanup process under the Model Toxics Control Act (MTCA), Ch. 70.105D RCW, implemented by Ecology. Periodic reviews evaluate post-cleanup site conditions and monitoring data to assure human health and the environment are being protected, and are required for sites where an institutional control is part of the cleanup action.

Cleanup actions were conducted by the Walla Walla Farmers Co-op (Co-op) in 1991. Actions at the Site were triggered by an Ecology Notice of Penalty in 1985. The cleanup action under this notice was initiated prior to full implementation of MTCA. The completed actions addressed contaminated soils, but residual groundwater contamination remained. Groundwater monitoring has been ongoing since completion of the cleanup action. Ecology has determined a periodic review, also referred to as a five year review, of the site is appropriate.

When evaluating whether human health and the environment are being protected, the factors Ecology should consider as per WAC 173-340-420(4) include:

1. The effectiveness of ongoing or completed cleanup actions.
2. New scientific information for individual hazardous substances of mixtures present at the site.
3. New applicable state and federal laws for hazardous substances present at the Site.
4. Current and projected site use.
5. Availability and practicability of higher preference technologies.
6. The availability of improved analytical techniques to evaluate compliance with cleanup levels.

Notice of this periodic review will be placed in Ecology's site register and will be available for public comment.

# 2.0 SUMMARY OF SITE CONDITIONS

## 2.1 SITE DESCRIPTION AND HISTORY

The Site is located at 111 Ninth Ave, Walla Walla, in Walla Walla County, Washington near the intersection of N. Eighth Ave. and W. Rose St. (Figure 1). It is currently used as a farm chemical storage, mixing, and handling facility. The southeast part of the property operates as a gas station and convenience store. It is owned by the Walla Walla Farmers Cooperative, an association which operates on a non-profit cooperative basis as an agent for its members. The Co-op's former store and office have been at the present location since 1947, but the warehouse and fertilizer shop were originally owned and operated by Pacific Supply. The Co-op purchased these other facilities in 1963. Past and present operations consist of loading solid or liquid farm chemicals into containers for transport to a client, and then rinsing the transport containers.

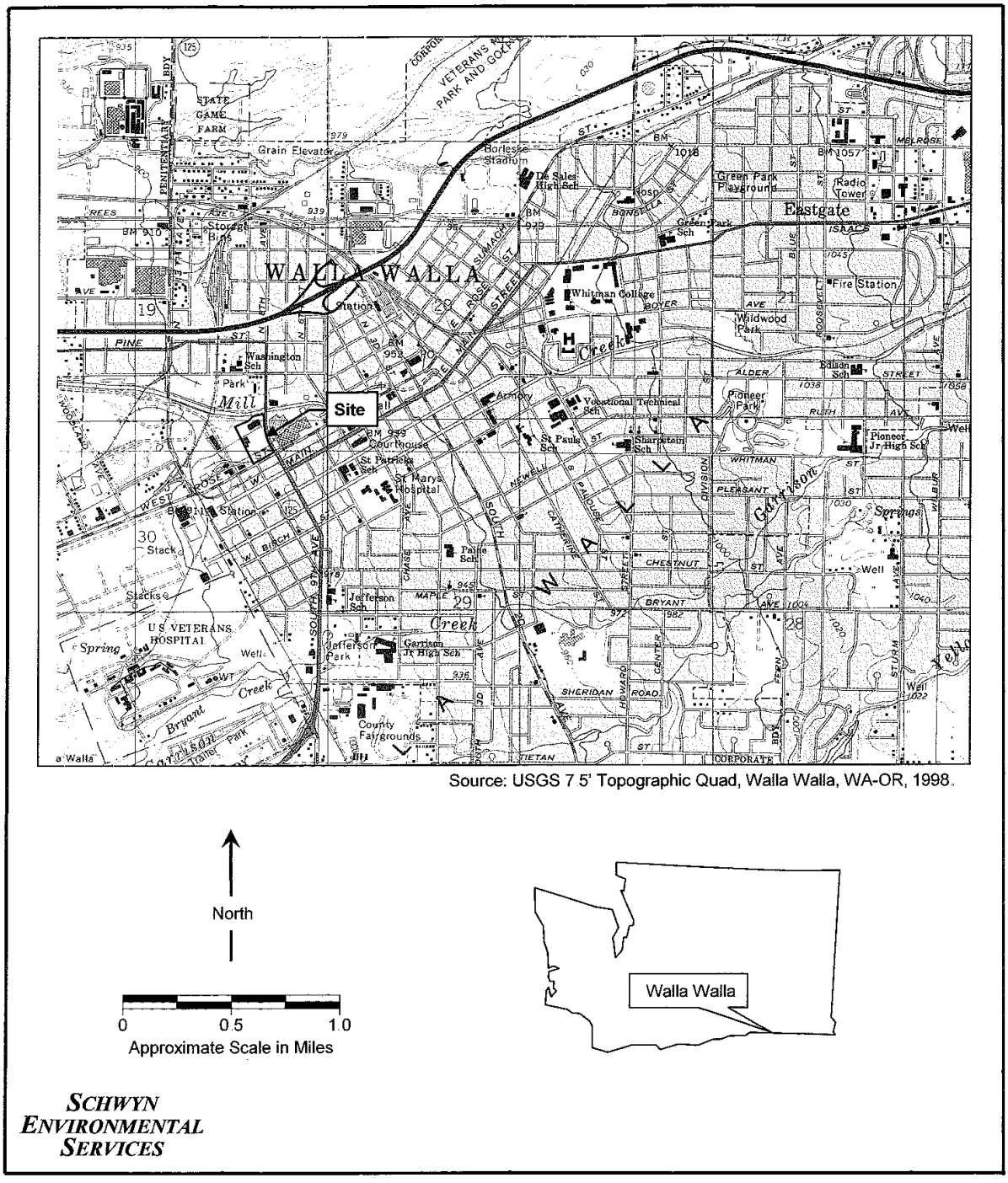


Figure 1. Site Map

In the past, rinsing wheeled pesticide/herbicide and fertilizer sprayers also took place. Initially, rinsing the transport containers and sprayers happened directly on the ground with no rinse water control. In 1966, to manage rinse water a concrete slab was installed, along with drain lines, a concrete septic tank, and a drainfield. In 1978, the drainfield failed. After investigating, it was determined the septic tank had filled with silt and spilled over into the drainfield which later became plugged. A second septic tank was installed in line with the first, and the silt sludge from the first tank was removed and disposed off site by the Co-op. The location(s) of disposal is unknown. Additionally, a dry well and new drainfield were constructed to replace the failed one. Between 1979 and 1982, an estimated 4,000 to 5,000 gallons of silt sludge were removed from the septic tanks and disposed off-site. In 1985, an additional 1,000 gallons of silt sludge were removed and disposed off-site. The drainfield was taken out of use and replaced with an evaporation pond in June 1986.

Depth to groundwater at the site ranges between 7 and 13 feet below ground surface, and flow direction is generally to the west and southwest. Mill Creek borders the north side of the property and flows to the southwest. It is a concrete-lined channel until it reaches the northeast corner of the property, where it becomes unlined. At that point, it is a losing reach of the stream.

## 2.2 SITE INVESTIGATIONS AND CLEANUP

A series of investigations and cleanup actions have taken place regarding soil and groundwater contamination at the Site. The following paragraphs chronologically list the separate activities and investigations completed. The reports documenting these investigations can be found at Ecology's Eastern Regional Office in Spokane.

A complaint about illegal sludge dumping began the investigatory work at the Site with the collection of sludge samples by Ecology in May 1985. Samples of the sludge were collected and analyzed for pesticides. Sample results confirmed lindane and chlordane were present in the sludge. Ecology issued a Notice of Penalty in 1985 in response to the lack of waste characterization and illegal dumping of sludge. This notice, in part, required the Co-op to conduct soil and groundwater investigations to define the nature and extent of contamination, submit plans for cleanup of contamination, and implement a groundwater and surface water monitoring program. In response to this notice, the Co-op made plans for an environmental investigation in 1987. The drainlines connecting the wash pad with the old drainfield were removed. The drainfield was then excavated, six monitoring wells were installed to collect groundwater samples, and soil samples were collected from several test pits (Figure 2). The Phase I Hydrogeologic Investigation was completed in November 1987, indicating the presence of 2, 4-dichlorophenoxyacetic acid (2, 4-D) and chlordane in soil, and nitrate and various herbicides in groundwater.

A second phase Hydrogeologic Investigation was completed in May 1989, which involved the installation of a seventh monitoring well and additional groundwater sampling. The samples confirmed the presence of nitrate and various herbicides in groundwater. Additionally, an exposure assessment was completed in September 1989. Ecology performed a Site Hazard Assessment and ranking in August 1990 under the newly established MTCA regulation. The

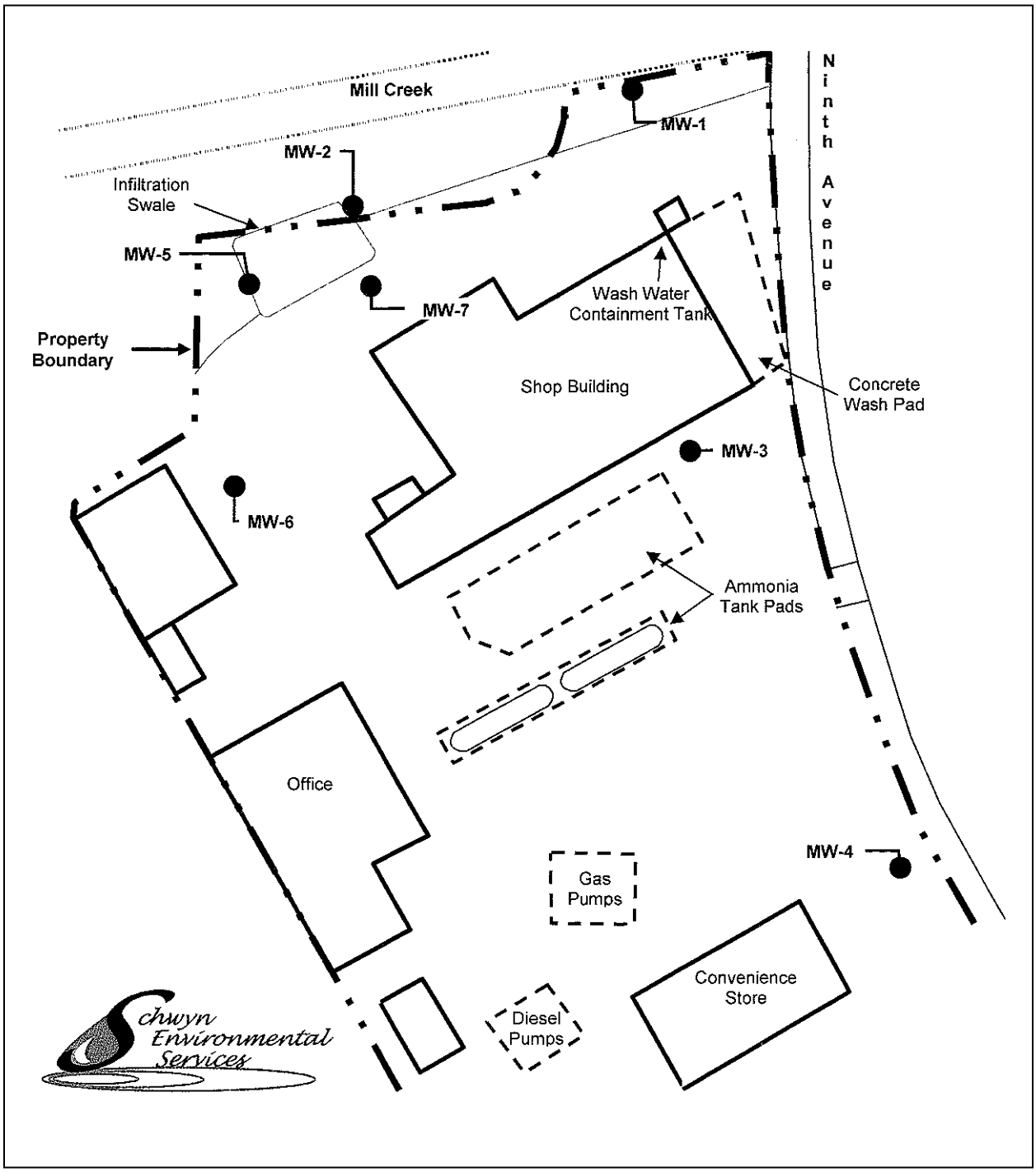


Figure 2. Well Location Map

Site was ranked a 1 because the toxic and chemical characteristics of the contaminants in the groundwater created risks. In September 1990, a Remedial Action Workplan was submitted to and approved by Ecology, under which part of the drainfield excavation took place in the summer of 1991. A Drainfield Area Cleanup Plan was then submitted in December 1991 to address the remaining issues with the drainfield. This plan included re-excavating the drainfield and former drainlines, engineering modifications to the storm water and wash water handling facilities, and installing a concrete wash pad. Ecology approved the storm water collection and disposal plan in December 1992. Finally, an asphalt cap was placed over the former drainfield and drainlines in late 1993. It is assumed an unknown amount of contaminated soil may remain below the asphalt cap and the building adjacent to the wash pad or both.

In October 1991, the Compliance Monitoring Plan (CMP) was implemented, which involved the semiannual collection of groundwater samples for chlordane, simazine, diallate, triallate, pronamide, alachlor, dinoseb, 2,4-D, picloram, DDT/DDD, nitrate, and nitrite. Groundwater quality measurements, such as pH and conductivity, were also taken. Method C cleanup criteria were used because of the industrial nature of the property. Since then, a series of modifications and amendments to the CMP have been implemented, and are documented here. If sampling for a certain contaminant was terminated, it was because it had not been detected in four quarters of groundwater monitoring.

January 1992

- Sampling frequency changed to quarterly.

January 1993

- Termination of DDT/DDD sampling in wells 2, 5, and 7.
- One final sampling of creek (for a total of 1 year of creek monitoring)
- Termination of sampling in wells 3 and 4.
- Termination of sampling for 2,4-D and picloram in all wells
- Lab method changed.

March 1993

- Termination of field pH and conductivity measurements.
- Termination of sampling for dinoseb in wells 1 and 6
- Termination of Ecology notification for MTCA exceedances.

Late 1993

- Monitoring didn't happen during this quarter due to installation of asphalt cap.

December 1995

- Termination of sampling for dinoseb in remaining wells.

January 1998

- Sampling frequency changed to semiannual
- Termination of sampling of well 4.
- Ammonia analysis removed.

May 1998

- Termination of sampling from wells 2, 3, and 7.
- Conditional point of compliance set at the property boundary (wells 5 and 6).
- Determination was made that MTCA Method B cleanup levels apply for monitoring.

September 2000

- Termination of sampling for nitrite, diallate, simazine, pronamide, triallate, alachlor.
- One-time sampling of wells 2 and 7 for chlordane and nitrate.

May 2001

- Lab analysis changed from technical chlordane to alpha-gamma chlordane.

March 2006

- Sampling frequency changed from semi-annual to annual (fall).
- Groundwater levels measured only annually.

November 2006

- One-time resample of wells 2 and 7.

On May 4, 1994, a restrictive covenant was placed on the property. This restrictive covenant documents the presence of contaminated groundwater and soils on defined areas of the property, and restricts activities in these areas to prevent exposure to pesticides. It also limits the property to industrial use, and requires Ecology notification of a property sale.

The first periodic review was performed by Ecology in November 2007. The periodic review concluded no changes would be made at the Site and groundwater monitoring would continue on an annual basis. The groundwater monitoring reports are provided to Ecology after completion of the annual sampling event.

## 2.3 CHEMICAL PROPERTIES OF CHLORDANE

Chlordane is the only pesticide which continues to be present in groundwater. Chlordane has several chemical properties that affect its presence and movement in the environment. Chlordane is a highly chemically stable organochlorine pesticide, and although this property proves useful for nuisance pest control, it also means it persists for a long time in the environment and is difficult to break down. Chlordane does not chemically degrade, is not broken down by water or air, and is only slightly degraded by ultraviolet light. Mass transfer through volatilization can occur, although this is typically more common at shallow depths where more contact with air is present. The most common means for reduction in soil concentration is through volatilization. It is highly stable and immobile when bound to soil.

Chlordane is highly insoluble in water, and tends instead to bind to soil particles. In most cases, it isn't present in water; however, groundwater contamination at the Site is well-documented. It is expected that at high enough concentrations, there is no more sorption capacity of the soil and it can enter groundwater. Chlordane is most commonly removed from groundwater through sorption to soil, although some volatilization does occur.

## 3.0 PERIODIC REVIEW

### 3.1 REGULATION

A periodic review of the cleanup action takes place at least every five years after the initiation of the cleanup action under MTCA. A periodic review is required at MTCA sites where any of the following occur:

- Ecology conducts a cleanup action.
- Ecology approves a cleanup action under an order, agreed order, or consent decree.
- As resources permit, whenever Ecology issues a no further action opinion.

AND one of the following conditions exists:

- An institutional control and/or financial assurance is required as part of the cleanup action.
- The cleanup level is based on a practical quantitation limit as provided under WAC 173-340-707.
- Modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

The requirements for investigation and cleanup at the Site were conducted under the regulatory authority at the time the penalty was issued in 1985. Although the action was not taken under MTCA, elements of MTCA can be applied in the determination of impacts to human health and the environment at the Site. The Site does have an institutional control and is undergoing long-term groundwater monitoring. Ecology has determined it is appropriate to complete a periodic review of this site to document the actions that have taken place and to apply the following review criteria (Sections 3.3 through 3.8) to the cleanup action.

### 3.2 BASIS

This review is based on documents describing the actions listed in Section 2.2, a field inspection of the Site, interviews with Co-op representatives, and compliance monitoring reports.

### 3.3 THE EFFECTIVENESS OF ONGOING OR COMPLETED CLEANUP ACTIONS, INCLUDING THE EFFECTIVENESS OF ENGINEERED CONTROLS AND INSTITUTIONAL CONTROLS IN LIMITING EXPOSURE TO HAZARDOUS SUBSTANCES REMAINING AT THE SITE

The concrete cap over the wash pad area and the asphalt cap over the former drainfield currently provide protection from direct contact with any contaminated soils, and prevent infiltration of surface water through contaminated soils. A restrictive covenant was recorded and is in place, which limits the use of the site. These limitations include industrial use only, limitations on groundwater withdrawal and use, and no disturbance of pavement or removal of soils. A copy is provided as Appendix A.

Concentrations of contaminants have decreased. In Section 2.2, the history of contaminant sampling was presented, and groundwater was analyzed for 12 chemicals. As sampling progressed over time, many contaminants were only present below cleanup levels or no longer detected. As explained in Section 2.2, existing groundwater sampling is only for chlordane and nitrate. Figures 3 and 4 show the trends for both these contaminants over the past 15 years.

Dashed lines represent the gap in sampling at monitoring wells 2 and 7, since the November 2000 and November 2006 events were one-time. The straight dot-dash line represents the cleanup level for each contaminant. These levels are based on Method B values calculated in accordance with MTCA at the time of revisions to the CMP in 1998. In reviewing these graphs, it should be noted that for chlordane, the laboratory methodology changed in May 2001 (see Section 3.8). Because of this change, much of the variability in the concentrations is gone. MW-5 hasn't had any detection above cleanup levels since the methodology changed. The sample result for monitoring wells 2 and 7 after the change is among the lowest detection since sampling began. Concentrations appear to be below cleanup levels at the currently-sampled wells.

Nitrate concentration trends are generally below cleanup levels. However, there was one exceedance of the nitrate cleanup level in monitoring well 6. Also, all five nitrate samples at monitoring well 6 are higher than nearly every other sample collected at this well. Although the well generally does not exceed cleanup levels, these higher measurements may indicate a change in site conditions. Trends here will continue to be monitored.

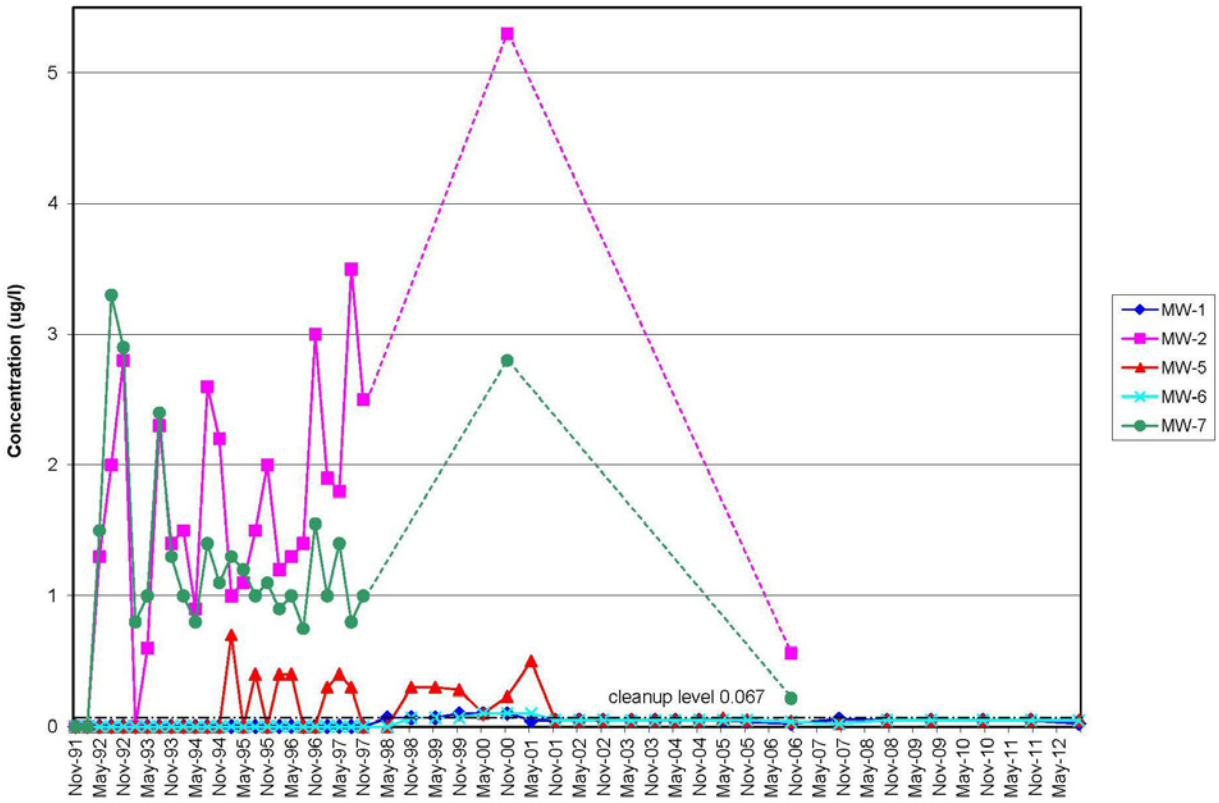


Figure 3. Chlordane Concentrations

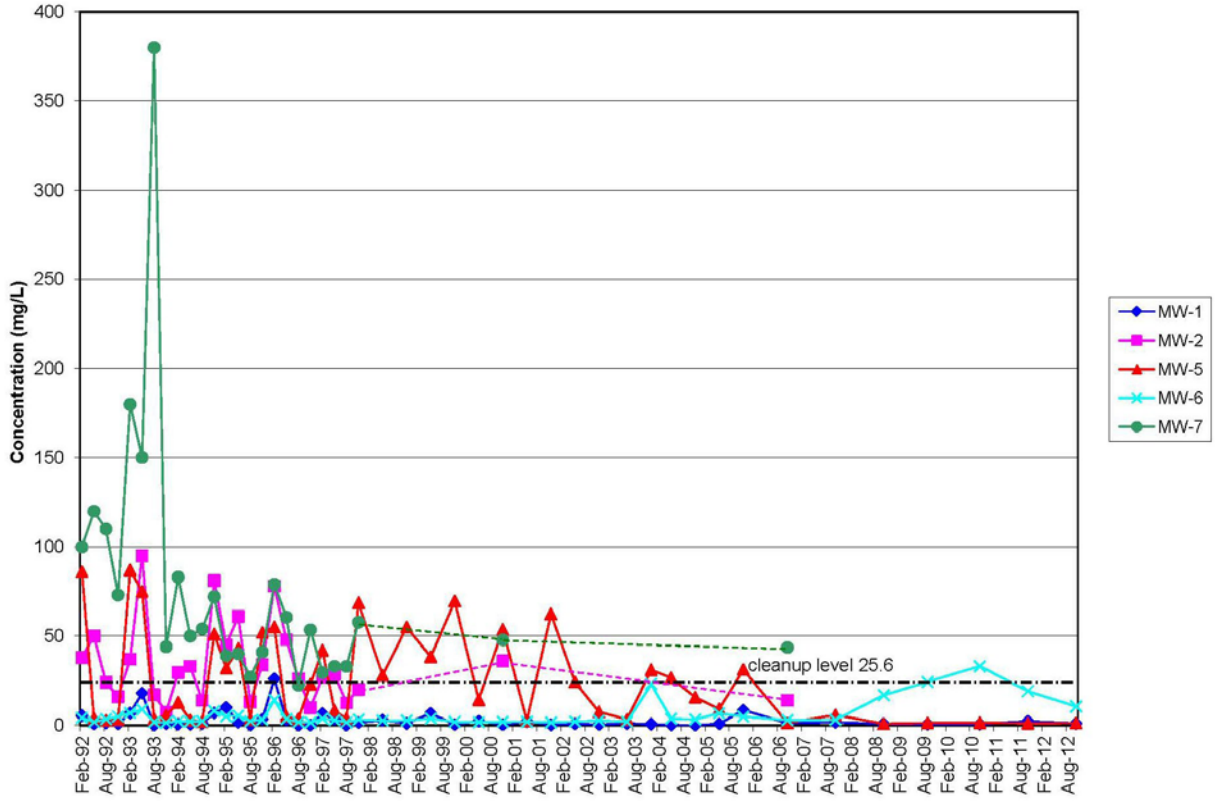


Figure 4. Nitrate Concentrations

The difficulty in measuring the progress of cleanup is that monitoring is not currently performed at the only two wells that exceeded cleanup levels in the last ten years (well 2 and well 7). Since a conditional point of compliance was established at the property boundary in 1998 (see Section 2.2), monitoring only needs to be done at wells along the property boundary. Ecology has determined the current monitoring plan is insufficient to determine whether or not cleanup has been achieved. Given the conditional point of compliance, monitoring well 2 should be added to the CMP in replacement of monitoring well 1. This will provide adequate monitoring of the site boundary, and will provide enough data to make informed decisions on the site status. Monitoring should continue on an annual basis, but can be increased to semi-annual or quarterly if there is a need for faster data collection.

### 3.4 NEW SCIENTIFIC INFORMATION FOR INDIVIDUAL HAZARDOUS SUBSTANCES OR MIXTURES PRESENT AT THE SITE

No new scientific information is available for chlordane or nitrate.

### 3.5 NEW APPLICABLE STATE AND FEDERAL LAWS FOR HAZARDOUS SUBSTANCES PRESENT AT THE SITE

The previous periodic review documented the changes in the MTCA (CH 173-340 WAC) and none of those changes affected the cleanup action.

No new state or federal laws are in place related to chlordane or nitrate. However, there are state and federal initiatives in place dealing with persistent bioaccumulative toxins (PBTs). Chlordane is considered a PBT. The goals of these initiatives are to reduce the use and availability of these chemicals. The cleanup action at the Site is consistent with these objectives.

### 3.6 CURRENT AND PROJECTED SITE AND RESOURCE USES

The Site continues to be used as a pesticide storage and handling facility, and gas station. The facility's use of potentially contaminating materials (petroleum fuel, herbicides) is managed and undergoes periodic inspections by Ecology's Underground Storage Tank Program and Hazardous Waste Program. Use has not changed since the cleanup activities occurred. Ecology is not aware of any expected changes in property or resource use. However, with the growth of the community, the Site is now located in an area that is undergoing development. The future potential still exists for a change in site use. In that case, the restrictive covenant would govern any future development.

### 3.7 THE AVAILABILITY AND PRACTICABILITY OF MORE PERMANENT REMEDIES

A "permanent" cleanup action is defined in MTCA as a cleanup action in which cleanup standards can be met without further action being required. The Site currently meets groundwater cleanup standards at the conditional point of compliance (property boundary). However, chlordane still exceeds groundwater cleanup levels at wells located at the interior of the property. The actions already taken at the property can be considered permanent; however, because contaminated soils remain and the potential exists for interior groundwater contamination to migrate off-site, other remedies will be considered here.

The asphalt cap provides acceptable protection for the direct contact pathways for human and ecological receptors. It also prevents the infiltration of rainwater from above. Nitrogen-containing pesticides, chlorinated herbicides, and nitrite concentrations have decreased with time to levels below the detection limits or cleanup criteria. However, concentrations of chlordane and nitrate persist in groundwater. This may mean the residual concentration of chlordane in soils under the asphalt cap and buildings is high enough to cause it to continue to be present in groundwater. Groundwater can still move up from below and mobilize contamination.

A remedy that would resolve the persistent contaminants is the removal of soils contaminated with chlordane and disposal at a permitted landfill. These soils are likely present under the asphalt cap and under the perimeter of the building next to the asphalt cap. Removal of contaminated soils would eliminate the source of chlordane to groundwater, but would be difficult and costly to implement.

Biodegradation of chlordane is not expected to readily occur. Other technologies are available to remove chlordane from groundwater, including treatment or filtration. However, these technologies are not usually relied upon until source removal has occurred. Thus they will not be considered here.

In order to evaluate the feasibility of other remedial actions, the definition of "practicable" must be evaluated. MTCA defines practicable as "capable of being designed, constructed and implemented in a reliable and effective manner including consideration of cost." For a more expensive remedial action to be selected, its benefits must be greater than the additional costs. For this periodic review, the evaluation will be qualitative in nature.

The current remedial action remains protective for direct contact for humans and ecological receptors. It prevents erosion of potentially chlordane-contaminated soils. Although groundwater is impacted, no contaminated groundwater is currently leaving the site or impacting nearby surface water, nor are active drinking water wells affected.

If excavation and off-site disposal were considered, the following issues would be pertinent. In order to excavate and dispose of chlordane-contaminated soil, a review of Resource Conservation and Recovery Act (RCRA, 40 CFR Parts 260-279) rules needs to be completed to determine where the excavated soil can be disposed. Chlordane-contaminated soil is a listed U-coded hazardous waste, because it is a spill residue of a chemical with a hazardous characteristic (toxicity). As such, the soil could be incinerated or disposed of at a subtitle C landfill. If disposed of at a landfill, it would be subject to Land Disposal Restrictions (LDR, 40 CFR Part 268) and treatment may be required. Because there isn't any soil concentration data, it is unknown if treatment would be required. Treatment requirements may be lesser than those required by LDR if the wastes are Corrective Action Management Unit (CAMU)-eligible. Conservatively, it will be assumed treatment would not be required and thus would present the least expensive alternative as compared to treatment/disposal and incineration.

The afore-mentioned soil removal actions would be very expensive. However, since contamination is currently not leaving the Site, human and environmental receptors are protected from direct exposure, and deed restrictions are in place, the additional level of protection afforded by complete removal is not justified by the additional cost.

### 3.8 THE AVAILABILITY OF IMPROVED ANALYTICAL TECHNIQUES TO EVALUATE COMPLIANCE WITH CLEANUP LEVELS

Chlordane and nitrate are the two chemicals that remain contaminants of concern for which groundwater samples are currently analyzed. No improved analytical techniques are available.

## 4.0 CONCLUSIONS

Ecology has determined the remedy at the Walla Walla Farmers Co-op is generally protective of human health and the environment. Further soil cleanup may be necessary in the future if a land use change occurs or if the facility ceases/modifies operations. The measures taken for the original cleanup action remain protective today. However, existing compliance monitoring is inadequate to make future site status decisions. Ecology will require a modification of the Compliance Monitoring Plan to replace monitoring well 1 with monitoring well 2. Monitoring will continue to take place at a minimum of once a year. This schedule may be increased to semi-annual or quarterly at the discretion of the Co-op. The existence of institutional controls in the form of deed restrictions confirms site uses will remain consistent with the presence of contamination. Further periodic reviews will be required as long as institutional controls are in place at the site, in accordance with WAC 173-340-420(7).

## 5.0 REFERENCES CITED

Sweet-Edwards/EMCON, Inc., 1987, Walla Walla Farmers Co-op Hydrogeologic Investigation

Sweet-Edwards/EMCON, Inc., 1989, Walla Walla Farmers Co-op Phase II Hydrogeologic Investigation

Sweet-Edwards/EMCON, Inc., 1990, Walla Walla Farmers Co-op Remedial Action Workplan

Sweet-Edwards/EMCON, Inc., 1991, Walla Walla Farmers Co-op Drainfield Area Cleanup Plan

EMCON Northwest Inc., 1992, Walla Walla Farmers Co-op Ground Water Compliance Monitoring Plan

Washington State Department of Ecology, 1996, Model Toxics Cleanup Act Regulation Chapter 173-340 WAC

Washington State Department of Ecology, 2001, Model Toxics Cleanup Act Regulation Chapter 173-340 WAC

# APPENDIX A

## DEED RESTRICTIONS

9405398

DECLARATION OF RESTRICTIVE ENVIRONMENTAL COVENANTS

9405398

Walla Walla Farmers Co-Op, Inc. is the owner (hereafter the "Owner") of the real property (hereafter the "Property") located in Walla Walla County, Washington described more particularly in Annex "A" and shown more specifically in Annex "B", both annexes being incorporated herein by this reference. The Property has been the subject of remedial action under chapter 70.105D RCW. Because hazardous substances have been left on the property using an "Industrial Soil" cleanup standard under WAC 173-340-745, this restrictive covenant is required by WAC 173-340-440.

The Owner does hereby declare the following limitations, restrictions, and uses to which the Property may be put, and specifies that such declarations shall constitute covenants to run with the land. These covenants shall be binding on the present fee owner, his/her successors and assigns, and any other future owner of any interest in the Property.

1. Those portions of the Property designated as Areas "A", "B", and "C" in Annex "B" may be used only for Industrial purposes as defined in and allowed under the City of Walla Walla Ordinance No. A3671 (Walla Walla Zone Code), enacted April 10, 1991, as of the date of this Restrictive Environmental Covenant.

2. The Owner of the Property must give written notice to the Washington State Department of Ecology (hereafter "Ecology"), or to a successor agency, of the Owner's intent to convey any interest in the Property. No conveyance of any interest in the Property shall be consumated by the Owner without adequate and complete provision for the continued operation, maintenance, and monitoring of the Ecology approved remedial action.

3. A portion of the Property designated as Area "A" in Annex "B" contains contaminated ground water. No ground water shall be used for any purpose from that portion of the property designated as Area "A" unless such withdrawl is reviewed and approved by Ecology after public notice and comment.

4. A portion of the Property designated as Area "B" in Annex "B" has pesticide contaminated soils. Such Area "B" has a clean soil cover and has been capped by an engineered asphalt pavement. No soils shall be removed or the area otherwise disturbed unless such action is reviewed and approved by Ecology after public notice and comment.

5. A portion of the Property designated as Area "C" in Annex "B" has petroleum contaminated soils. The major portion of Area "C" is presently beneath a shop building constructed on the premises. The contaminated soil shall not be removed or otherwise disturbed in Area "C" unless such action is reviewed and approved by Ecology after public notice and comment.

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6. The Owner shall allow Ecology's authorized representatives the right to enter the Property at reasonable times for the purpose of evaluating compliance with the approved remedial actions, to take samples, to monitor remedial activities conducted at the site, and to inspect records which are related to to the approved remedial actions.

7. The Owner of the Property and the Owner's assigns and successors in interest have the right at all times under WAC 173-340-440, -740, and -745, as amended or replaced, to record an instrument which provides that this Restrictive Environmental Covenant shall no longer limit use of the Property or be of any further force or effect, provided, that any instrument which eliminates the force or effect of this Restrictive Environmental Covenant may be recorded only with the concurrence of Ecology, or a successor agency, which may concur only after public notice and comment.

DATED this 5th day of May, 1994.

WALLA WALLA FARMERS CO-OP, INC.

By: Edward M Meliah
Edward M. Meliah
Secretary/Treasurer

STATE OF WASHINGTON )
ss:
County of Walla Walla )

On this 5th day of May, 1994 before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared EDWARD M. MELIACH to me known to be the Secretary/Treasurer, of WALLA WALLA FARMERS CO-OP, INC., and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that they are authorized to execute the said instrument and that the seal affixed is the corporate seal of said corporation.

WITNESS my hand and official seal hereto affixed the day and year first above written.

DIANA CANTY PIERCE NOTARY PUBLIC STATE OF WASHINGTON COMMISSION EXPIRES OCT. 15, 1997

Diana Canty Pierce
Notary Public in and for the State of Washington, residing at Walla Walla.

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# WALLA WALLA FARMERS CO-OP LEGAL DESCRIPTION

Parcel 1:

A PARCEL OF LAND IN THE SOUTHEAST 1/4 AND SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 19 AND THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 30, TOWNSHIP 7 NORTH, RANGE 36 EAST, WILLAMETTE MERIDIAN, WALLA WALLA COUNTY, WASHINGTON, SAID PARCEL BEING DESCRIBED MORE PARTICULARLY AS FOLLOWS:

BEGINNING AT A POINT ON THE NORTHERLY LINE OF WEST ROSE STREET THAT IS 10.00 FEET EASTERLY, AS MEASURED ALONG SAID NORTHERLY LINE OF WEST ROSE STREET, FROM THE WESTERLY LINE OF VACATED 10TH AVENUE NORTH, AS SHOWN ON THE PLAT OF REESE'S ADDITION, FILED IN VOLUME A OF PLATS AT PAGE 13, WALLA WALLA COUNTY BOOK OF PLATS;

THENCE N58°38'01"E 370.13 FEET ALONG SAID NORTHERLY LINE OF WEST ROSE STREET TO THE INTERSECTION OF SAID NORTHERLY LINE OF WEST ROSE STREET WITH THE WESTERLY LINE OF 9TH AVENUE, FORMERLY MULLAN AVENUE;

THENCE N31°21'16"W 99.02 FEET ALONG SAID WESTERLY LINE OF 9TH AVENUE TO THE BEGINNING OF A CURVE TO THE RIGHT, TO WHICH A RADIAL LINE BEARS S58°38'44"W 995.00 FEET;

THENCE CONTINUING NORTHERLY ON SAID WESTERLY LINE OF 9TH AVENUE ALONG SAID CURVE 519.29 FEET TO A POINT TO WHICH A RADIAL LINE BEARS S88°32'53"W 995.00 FEET;

THENCE N1°27'07"W 19.11 FEET ALONG SAID WESTERLY LINE OF 9TH AVENUE TO THE NORTHEASTERLY CORNER OF THAT PARCEL DESCRIBED IN VOLUME 80, INSTRUMENT NO. 7803420, WALLA WALLA COUNTY BOOK OF DEEDS;

THENCE S76°46'39"W 159.50 FEET ALONG THE NORTHERLY LINE OF SAID PARCEL DESCRIBED IN VOLUME 80, INSTRUMENT NO. 7803420;

THENCE S55°00'39"W 356.00 FEET ALONG THE NORTHERLY LINE OF THOSE PARCELS DESCRIBED IN VOLUME 80, INSTRUMENT NO. 7803420 AND VOLUME 264, INSTRUMENT NO. 362438, WALLA WALLA COUNTY BOOK OF DEEDS;

THENCE S10°30'39"W 7.48 FEET;

THENCE S31°19'51"E 633.20 FEET ALONG THE WESTERLY LINE OF SAID PARCEL DESCRIBED IN VOLUME 264, INSTRUMENT NO. 362438 TO THE POINT OF BEGINNING FOR THIS LEGAL DESCRIPTION.

Parcel 2

A tract of land in the South half of the Southeast Quarter of Section 19 Township 7 North Range 36 East of the Willamette Meridian, Walla Walla County, Washington said tract being described more particularly as follows:

Commencing at the Northwest corner of said southeast Quarter of Section 19, thence South 01°24'04" East 2662.45 feet along the West line of said Southeast Quarter of Section 19 to the Southwesterly corner thereof; Thence North 69°30'01" East 1235.51 feet to a point on the Easterly line of that parcel described at Auditor's File Number 537816; thence along said Easterly line by the following courses: North 10°30'39" East 7.48 feet; North 55°00'39" East 93.00 feet to the true point of beginning for this legal description; thence departing said East line and running North 01°27'07" West 118.74 feet to a point on the Southerly right of way line of the Mill Creek Flood Control District, said point being on a curve concave to the North having a radius of 1617.10 feet; thence Easterly along the South right of way line of the Mill Creek Flood Control District following said curve a distance of 188.33 feet, the chord of said curve following a bearing of North 81°07'40" East for a distance of 188.22 feet to the beginning of a non-tangent curve concave to the Northwest having a radius of 60.00 feet; thence Northeasterly along said curve a distance of 94.24 feet, the chord of said curve following a bearing of North 31°58'54" East for a distance of 84.85 feet; thence North 77°53'50" East 144.43 feet to the intersection of said South right of way line of the Mill Creek Flood Control District with the West right of way line of Mullan Avenue; thence South 01°27'07" East 62.73 feet along said West right of way line to the intersection of said West right of way line with the East line of that parcel described at Auditor's File Number 537816; thence South 76°46'39" West 159.50 feet along said East line; thence South 55°00'39" West 262.97 feet along said East line; to the true point of beginning for this legal description.

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IN WALLA WALLA CO WASH
BY
MAY 5 1 58 PM '94
JANICE E. BATES
COUNTY AUDITOR
N
0 25 50
SCALE IN FEET
KEY
AREA A– Area of potentially affected ground water
AREA B– Area of pesticide contaminated soils
AREA C– Areas of hydrocarbon contaminated soils
WALLA WALLA FARMERS CO-OP
WALLA WALLA, WASHINGTON
DRAINFIELD AND UST EXCAVATION
DATE 8/92
DWN. JJB
APPR.
REVS.
PROJECT NO.
T0501.13
emcon
Northwest, Inc.
MULLAN AVENUE
MILL CREEK
ANNEX "B"
MONITORING WELL NO. 1
MONITORING WELL NO. 2
MONITORING WELL NO. 3
MONITORING WELL NO. 4
MONITORING WELL NO. 5
MONITORING WELL NO. 6
WAREHOUSE
DRY FERTILIZER STORAGE
ANHYDROUS TANK
SCALE
PUMP
GUARD RAIL
GRAVEL AREA
TELEPHONE BOOTH
OFFICE AND STORE
CONCRETE