THIRD PERIODIC REVIEW REPORT
FINAL

HOKO LOGGING CAMP
Facility Site ID#: 38613568
Cleanup Site ID#: 1501

Hoko Ozette Road
Sekiu, WA 98381

Southwest Regional Office
TOXICS CLEANUP PROGRAM

July 2022

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1.0 INTRODUCTION

This document is the second periodic review conducted by the Washington State Department of Ecology (Ecology) of post-cleanup conditions and monitoring data to ensure that human health and the environment are being protected at the Hoko Logging Camp site (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). The second periodic review was completed in July of 2016. This periodic review will evaluate the period from August 2016 through July 2021.

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP). The cleanup actions resulted in concentrations of diesel-and-oil range total petroleum hydrocarbons (TPH-D and TPH-O) remaining at the Site in soil that exceeds MTCA Method A cleanup levels. The MTCA Method A cleanup level for soil were established under WAC 173-340-740(2). WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

- Whenever the department conducts a cleanup action.
- Whenever the department approves a cleanup action under an order, agreed order or consent decree.
- Or, as resources permit, whenever the department issues a no further action (NFA) opinion.
- And one of the following conditions exists:
    (a) Institutional controls or financial assurance are required as part of the cleanup.
    (b) Where the cleanup level is based on a practical quantitation limit.
    (c) Where, in the department's judgment, 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.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

(a) 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.

(b) New scientific information for individual hazardous substances of mixtures present at the Site.

(c) New applicable state and federal laws for hazardous substances present at the Site.

(d) Current and projected Site use.

(e) Availability and practicability of higher preference technologies.

(f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

The department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

The Hoko Logging Camp Site is located approximately 15 miles south of Sekiu, Washington, on Hoko Ozette Road. The Site is surrounded by forest, with a county road to the west and a private residential property to the southwest. The Site is currently vacant and overgrown with trees and brush. Following remedial activities at the Site, a restrictive covenant was recorded for the property and a no further action determination was issued by Ecology in 2002. A Site Vicinity Map and a Site Plan are available as Appendix 6.1 and Appendix 6.2, respectively.

Rayonier operated Hoko Camp as a logging base and locomotive fueling station for their logging railroad locomotives from approximately the late 1920s until the late 1960s. It is believed that steam locomotives operated at the camp for much of the period of operation. The fuel used for the steam locomotives was a heavy oil product. Most locomotive maintenance was conducted at other sites. Dismantling of the site buildings, foundations, and rail lines occurred after the camp operation ceased in the 1960's. The Site was re-forested after dismantling. The Site is currently located on one of the timberland properties managed by Rayonier. A portion of the property including the camp site was recently logged allowing access and visibility.

2.2 Site Investigations

Landau Associates representative visited the Hoko Camp site on September 28 and 29, 2000, to conduct a reconnaissance investigation. The purpose of reconnaissance was to collect soil samples and document the site conditions. Conditions observed during the reconnaissance visit included: approximate positions of former railroad grades for main line and sidings; metal, timbers and concrete footings that were the apparent remains of camp structures; and heavy petroleum product presence at four locations (Area A, B, C, and D) including one area (Area C) with product residue extending down-slope from the former main railroad grade. Soil sample locations and the Site conditions including Areas A, B, C, and D during the reconnaissance visit are shown on reconnaissance site map and Site Map in Appendix 6.2.

No other total petroleum hydrocarbons (TPH) contamination was identified. The heavy petroleum hydrocarbon fuel was apparently released sometime during the camp operation or during dismantling of the camp. The amount of heavy fuel oil released was not known. The TPH material on the slope appeared to have migrated east of the former railroad tracks in part through two 10-inch culverts. During the reconnaissance, both backhoe explorations and shallow hand explorations were conducted to confirm the apparent extent of surface and near-surface product.

As a component of reconnaissance sampling, petroleum product and soil samples were analyzed for TPH-D and TPH-O, polychlorinated biphenyls (PCBs), and volatile organic compounds (VOCs). The results of the reconnaissance testing showed:

- Petroleum contamination was primarily surficial and defined a relatively shallow lower boundary between contaminated and uncontaminated soil.

- Petroleum detections were a single degraded heavy hydrocarbons (oil range) product.
- No PCBs were detected.
- Relatively low concentrations of VOCs were detected in petroleum product samples and soil samples. Detected VOCs were commonly petroleum-related compounds such as toluene and xylenes. Two other VOCs (acetone and methylene chloride) were detected. Both acetone and methylene chloride are common laboratory solvents and the detections were attributed to laboratory sources.

2.3 Cleanup Levels

WAC 173-340-704 states that MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for this Site. The cleanup actions conducted at the Site were determined to be “routine”, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A Table for each hazardous substances.

2.4 Remedial Activities

As discussed previously, four areas with TPH that required cleanup were identified. No other areas with TPH above cleanup levels were identified. The areas were designated as Areas A, B, C, and D, as described below:

- Areas A and B are in the vicinity of the former logging camp’s sidings and main railroad track at the northern end of the Site. The Hoko Camp Site and Areas A and B are located on the first terrace, which is not closer than approximately 200 feet from the river.
- Area C extends down the slope from the first terrace towards the Hoko River.
- Area D is adjacent to the grade of the former main rail line south of Area B on the first terrace.

2.4.1 Soil Excavation - Areas A, B, and D

The TPH contaminated soil was excavated from areas A, B, and D using earth moving equipment on August 28, 29, and 30, 2001. The extent of excavation was based on cleanup visual observations and sampling results. Following confirmation soil sampling and review of the results from the mobile laboratory, the excavation were determined to be clean and available for backfill. Excavations were backfilled with clean soil, compacted with grading equipment, graded to match the Site conditions, and covered with forest debris. Figures 4 and 5 in Appendix 6.3 show the extent of excavation and soil sampling locations. Soil sample results are included as Appendix 6.4.

2.4.2 Soil Excavation - Area C

The TPH material in Area C extended from the former railroad grade down the slope to near the Hoko River. Based on the discussions with Clallam County in conjunction with the Shoreline Exemption, no machinery was used to conduct excavation on the slope above the river. Accordingly, excavation of Area C material was conducted manually using hand tools (i.e., shovels) on August 27, 28, 30, and 31, 2001.

The TPH occurred both as hard surface crust and locally as a buried 2- to 6-inch layer of brown biodegraded tarry petroleum product mixed with the subsurface humus. The immobility of the highly viscous oil is evident by its remaining on a steep slope for the past 40 to 70 years. The buried tarry TPH in Area C was observed to be bound by humus and tree roots and covered under years of forest debris.

A partial excavation of TPH was conducted in Area C. Approximately five to eight cubic yards of TPH material was excavated in Area C using manual (shovel) methods. Manual excavation extended to depths from approximately 0.5 feet to 2.5 feet in depth.

Following confirmation sampling and review of the TPH analysis results from the mobile laboratory, the Area C excavations were backfilled and graded with hand shovels. Excavations were backfilled with clean soil, compacted by foot, raked to match the grade of the slope, and covered with a heavy layer of forest litter material to prevent erosion on the steep slope.

A field decision was made to remove the accessible surface TPH material and accessible deeper TPH material in Area C, but to restrict deeper hand excavation to areas that were less likely to threaten the stability of soil and trees on the upper slope. The result of this decision was that “islands” of TPH material remain buried on the upper slope of Area C adjacent to trees. The observations supporting this decision included:

- Apparently healthy red alder and conifer trees (at least 30 years old) growing in the humus, organic soil, and degrading TPH product.
- The presence of earthworms in and around the degrading TPH product.
- Roots, root tips, root masses of living trees extend into and were present above degrading TPH product.

These observations made clear that removal of soil with TPH product would require cutting the trees removing the stumps and removing up to 3 feet or more of the shallow soil from the slope. Even a more limited excavation approach around the roots could have compromised the stability of the trees and would have caused trees to fall exposing the roots, thereby exposing TPH and affecting soil stability on the slope above the river. When considering the relative benefits from complete vs. partial removal, the benefit of partial removal of TPH material and protection of habitat conditions on the slope outweighed that of complete removal due to the high potential of damage to existing forest habitat (soil, river, and trees) and sensitive areas (slope stability). Additionally, forest management regulations are unlikely to allow timber harvesting on the slope above the river. Accordingly, the TPH material remaining in Area C slope was not disturbed. Figure 6 in Appendix 6.3 shows the approximate extent of excavation,

soil sampling locations, and the area where the TPH contamination was left on the Site. Appendix 6.4 includes the TPH soil cleanup levels and confirmation soil sample results.

2.5 Restrictive Covenant

A Restrictive Covenant (RC) was recorded for the Site on January 14, 2003 and an NFA determination for the Site was issued on May 28, 2002. The Covenant was required because the Remedial Action resulted in residual TPH concentrations exceeding MTCA Method A cleanup levels in soils on the slope of Area C. The RC imposes the following limitations.

Section 1: Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped area include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork, cutting down or removal of fallen trees or other vegetative growth.

Section 2: Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3: Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4: The owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5: The Owner must restrict leases to uses and activities consistent with the Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6: The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this EC. Ecology may approve any inconsistent use only after public notice and comment.

Section 7: The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, to determine compliance with this Covenant, and to inspect records that are related to the Remedial Action.

Section 8: The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this EC shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

The Restrictive Covenant is available in Appendix 6.5.

3.0 PERIODIC REVIEW

3.1 Effectiveness of Completed Cleanup Actions

Based upon the Site visit conducted on May 11, 2021, the Site is vacant and overgrown with trees and shrubs. The Site is not used for any human activity and is relatively inaccessible. The Site use and condition continues to reduce exposure pathways (ingestion and direct contact) to contaminated soils. A photo log is available in Appendix 6.6.

The Restrictive Covenant for the Site was recorded and is in place. This Restrictive Covenant prohibits activities that will result in the release of contaminants that remain as part of the cleanup without Ecology's approval, and prohibits use of the property that is inconsistent with the Covenant. This Restrictive Covenant serves to assure the long term protective property use and integrity of the property surface.

3.2 New Scientific Information for Individual Hazardous Substances for Mixtures Present at the Site

Cleanup levels at the Site were based on regulatory standards rather than calculated risk for chemicals and/or media. These standards were sufficient to be protective of Site-specific conditions. There is no new relevant scientific information for hazardous substances remaining at the Site.

3.3 New Applicable State and Federal Laws for Hazardous Substances Present at the Site

MTCA Method A cleanup levels for contaminants of concern at the Site have not changed since the NFA determination was issued on May 28, 2002.

3.4 Current and Projected Site Use

The Site is currently vacant. This use is not expected to change in the near future and is not likely to have a negative impact on the risk posed by hazardous substances contained at the Site.

3.5 Availability and Practicability of Higher Preference Technologies

The remedy implemented included excavation and disposal of majority of TPH contaminated soils and containment of remaining soils/hazardous substances. The implemented remedy is continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

3.6 Availability of Improved Analytical Techniques to Evaluate Compliance with Cleanup Levels

The analytical methods used at the time of the remedial actions were capable of detection below Site cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

4.0 CONCLUSIONS

- The cleanup actions completed at the Site appears to be protective of human health and the environment.
- Soil cleanup levels for TPH have not been met at the Site; however, under WAC 173-340-740(6) (d), the cleanup action could comply with cleanup standards if the long-term integrity of the containment system was ensured and the requirements for containment technologies in WAC 173-340-360(8) have been met.
- The Restrictive Covenant for the property is in place and will be effective in protecting public health from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this review, Ecology has determined that the remedial actions conducted at the Site continue to be protective of human health and the environment. The requirements of the Restrictive Covenant are being satisfactorily followed and no additional remedial actions are required at this time. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the surface cover is maintained.

4.1 Next Review

The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

Department of Ecology. Second Periodic Review Report, Hoko Logging Camp. July 2016.

Department of Ecology. Restrictive Covenant dated January 14, 2003.

Department of Ecology. No Further Action Letter. May 28, 2002.

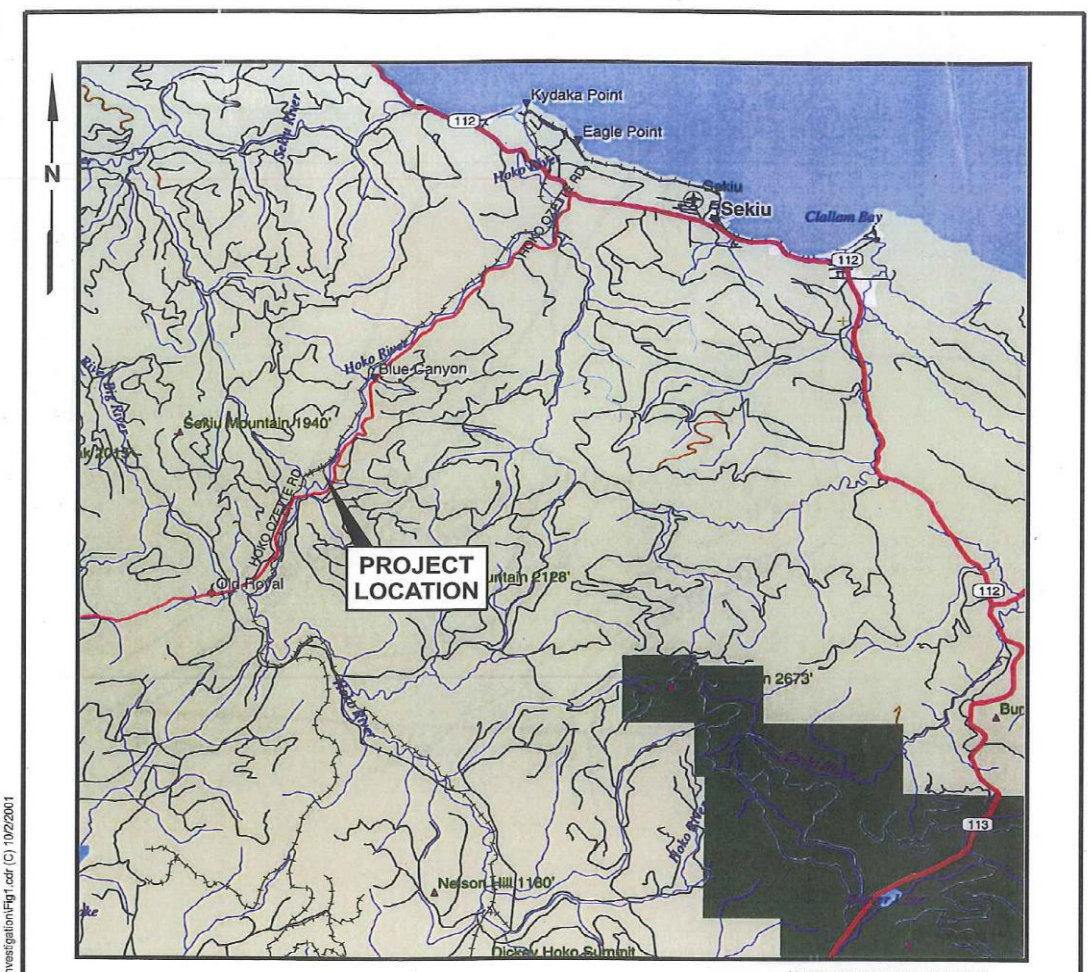
Landau Associates, Inc., Technical Memorandum - Reconnaissance Sampling Results, Hoko Camp, Forks, Washington. October 22, 2001.

Landau Associates, Inc., Independent Cleanup Action Report, Former Hoko Logging Camp, Sekiu, Washington. March 31, 1998.

Department of Ecology. Site Visit May 11, 2021.

6.0 APPENDICES

6.1 Vicinity Map



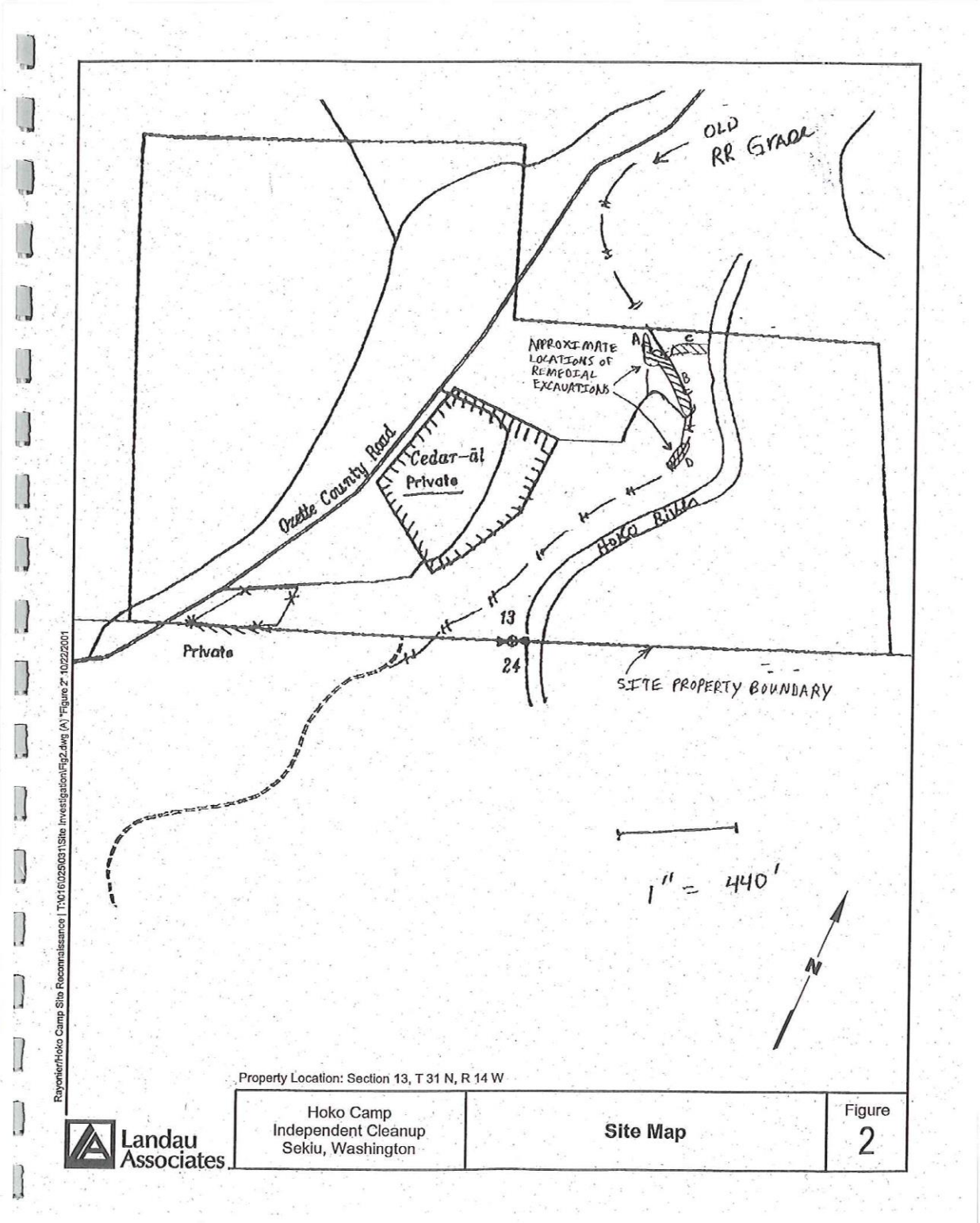
Not To Scale

Landau Associates	Hoko Camp Independent Cleanup Sekiu, Washington	**Vicinity Map**

Figure 1

RayonierHoko Camp Site Reconnaissance | TM016\025\031\Site Investigation\Fig1.cdr (C) 10/2/2001

6.2 Site Plan


OLD RR GRADE
APPROXIMATE LOCATIONS OF REMEDIAL EXCAVATIONS
A
B
C
D
Cedar-all
Private
Ozette County Road
Hoko River
Private
13
24
SITE PROPERTY BOUNDARY
1" = 440'
N
Property Location: Section 13, T 31 N, R 14 W
Landau Associates
Hoko Camp
Independent Cleanup
Sekiu, Washington
Site Map
Figure
2
Rayonier/Hoko Camp Site Reconnaissance | T:\016\025\031\Site Investigation\Fig2.dwg (A) *Figure 2* 10/22/2001

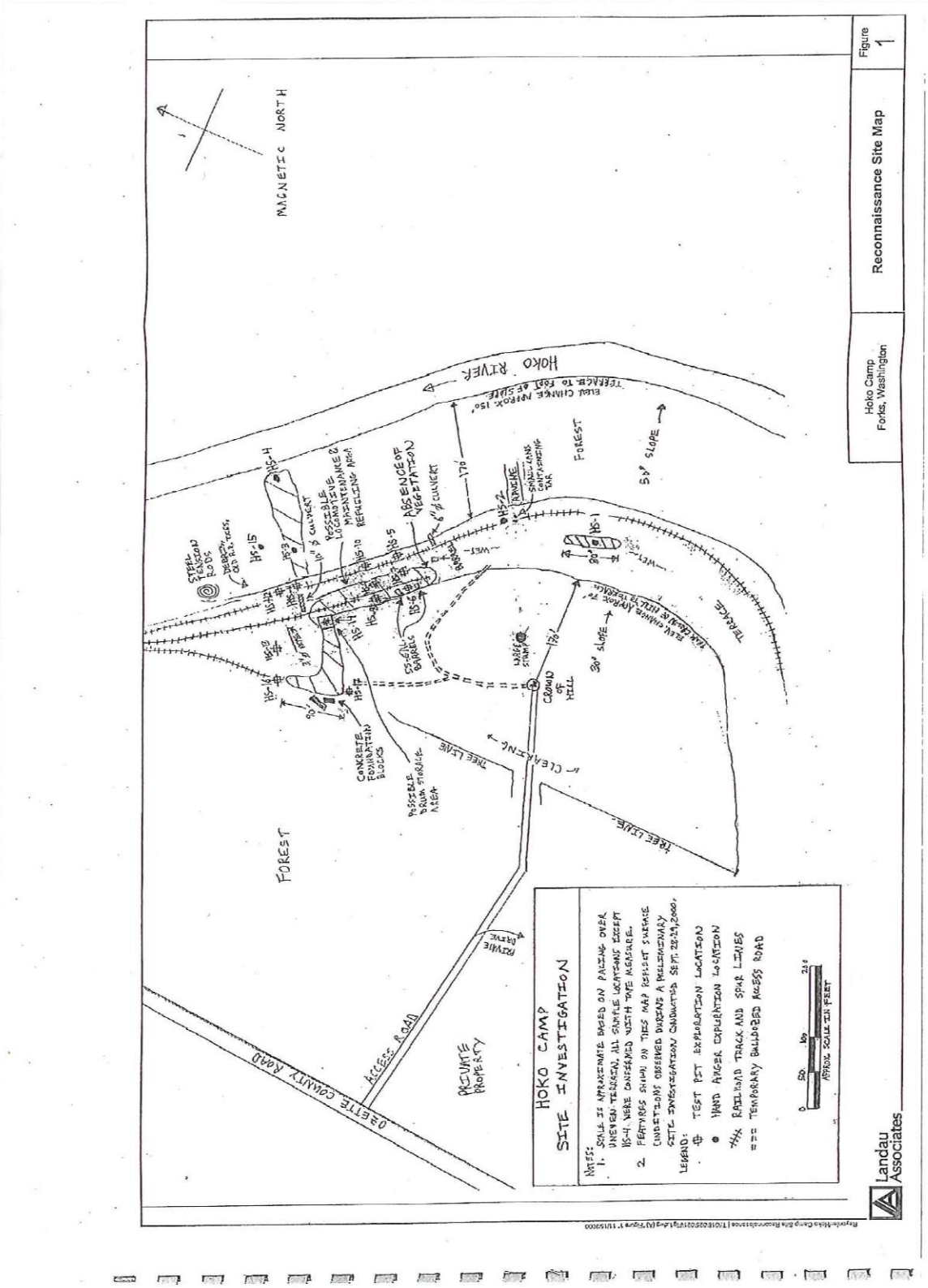
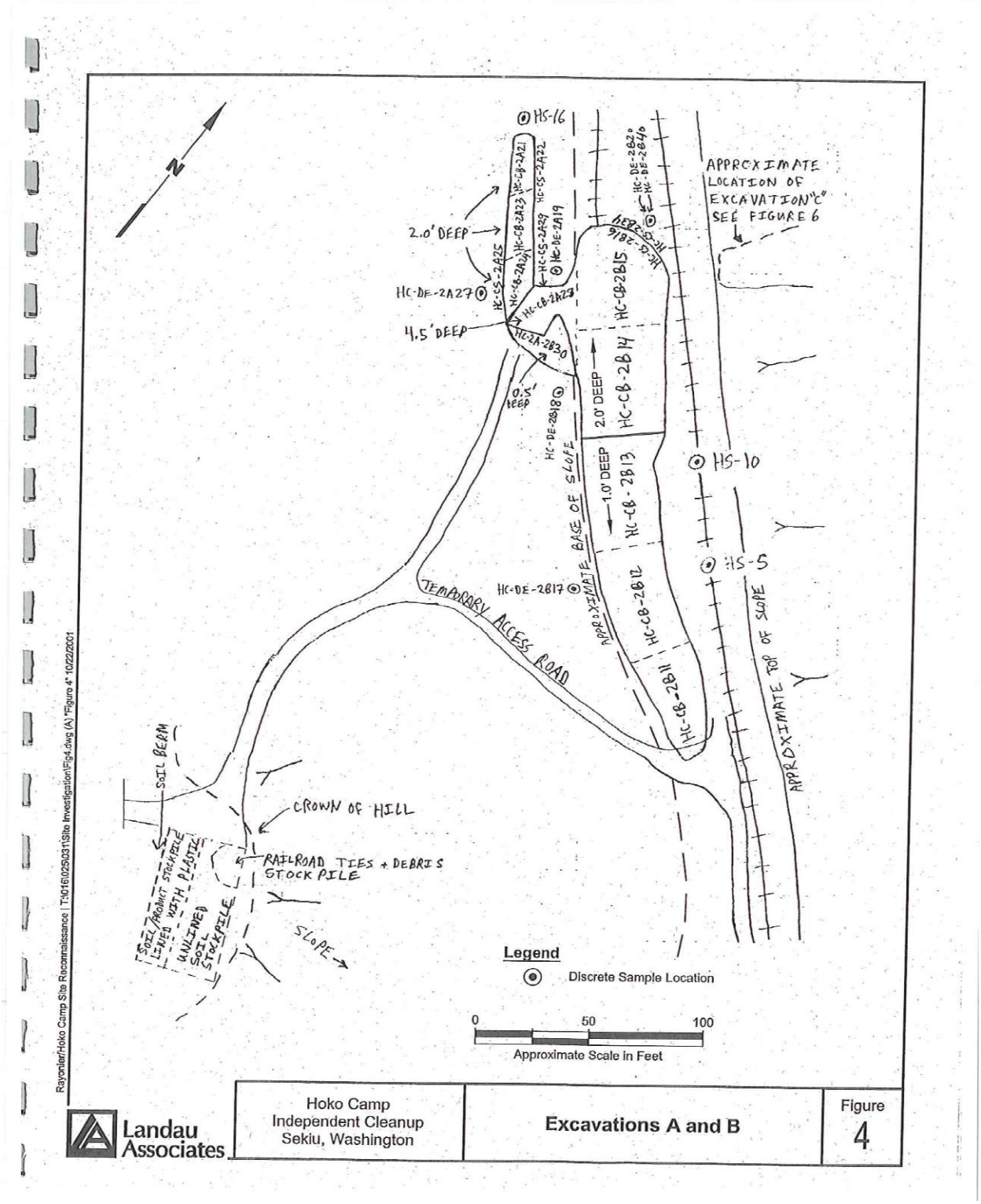


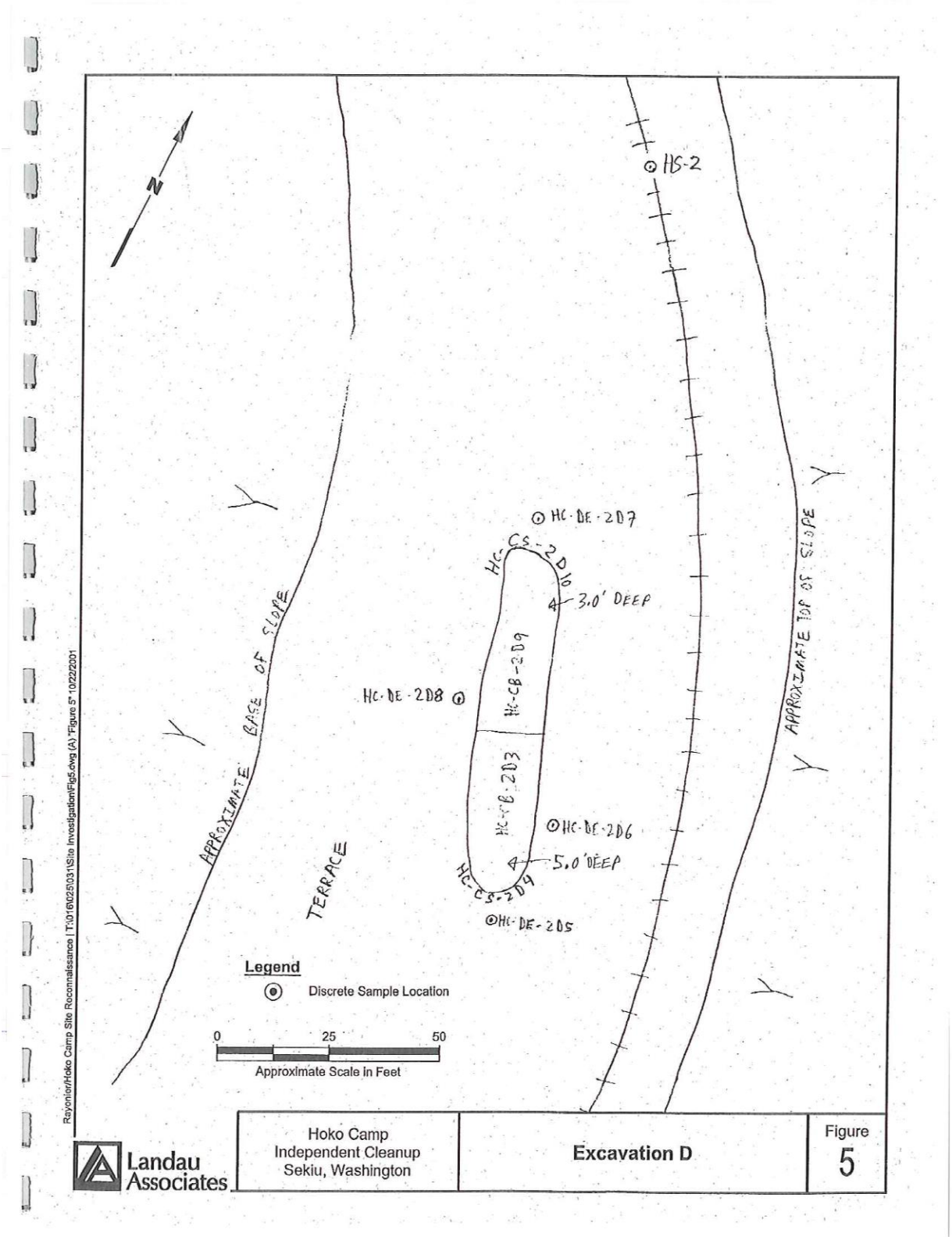
Figure 1
Reconnaissance Site Map
Hoko Camp
Forks, Washington
MAGNETIC NORTH
HOKO RIVER
FOREST
50' SLOPE
TERRACE
30' SLOPE
CLEARING
TREE LINE
ACCESS ROAD
OLETTE COUNTY ROAD
PRIVATE PROPERTY
CONCRETE FOUNDATION BLOCKS
POSSIBLE DRUM STORAGE AREA
SCALE
FEET
HOKO CAMP
SITE INVESTIGATION
Landau Associates

6.3 Extent of Soil Excavations – Areas A, B, C, and D

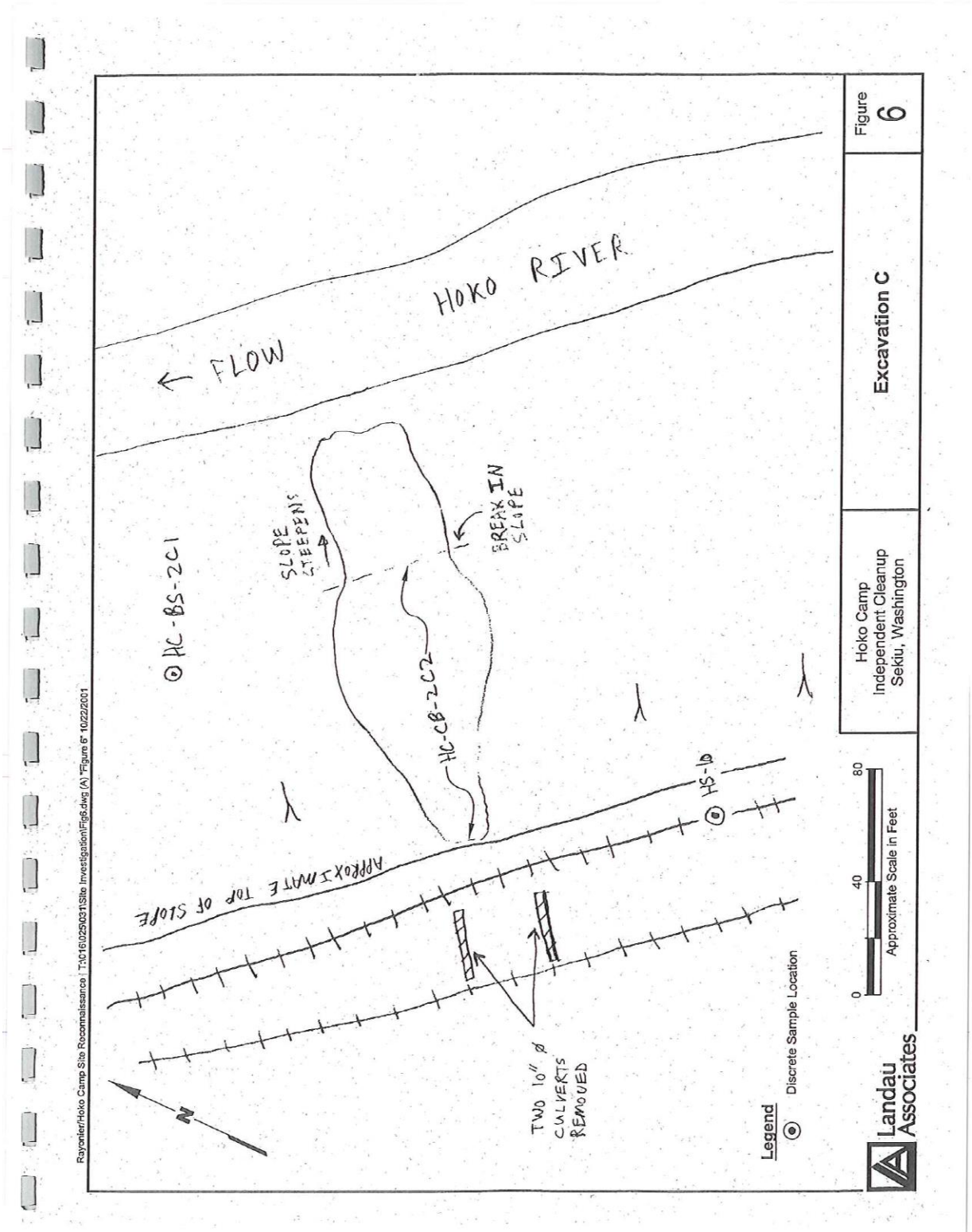
Extent of Soil Excavation Areas A and B



Extent of Soil Excavation – Area D



Extent of Soil Excavation – Area C



6.4 Soil Cleanup Levels and Confirmation Soil Sample Results

TABLE 2
CLEANUP INDICATOR PARAMETERS AND CLEANUP LEVELS (a)
RAYONIER HOKO CAMP INDEPENDENT CLEANUP

Constituent	MTCA Method A WAC 173-340-740	MTCA (WAC 173-340-7493) Terrestrial Ecological Evaluation Table 749-3 Soil Biota/Wildlife levels (b)	Hoko Camp Cleanup Levels
TPH-D	2000 mg/kg	200/6000 mg/kg (b)	2000 mg/kg
TPH-O	2000 mg/kg	(c)	2000
PAH (carcinogenic) (d)	0.1 mg/kg (e)	12 mg/kg (e)	0.1 mg/kg

(a) MTCA Table 830-1 identifies testing requirements for various petroleum products. cPAH testing required. Testing for naphthalene not required if method A values used.

(b) Terrestrial ecological evaluation required. Site does not qualify for exemption or simplified ecological evaluation. Table 749-3 lists terrestrial ecological values for plants, soil biota, and wildlife that are expected to be protective (very conservative) at any MTCA site and that can eliminate substances from further consideration under WAC 173-340-7493(2)(a)(1). It is expected that the risks to plants and soil biota can be qualitatively shown to be below levels of concern; thus, the wildlife number would become the ecologically protective concentration.

(c) No ecological value listed, but cleanup level for TPH-O can be argued to be more than that for TPH-D.

(d) MTCA method A Table 740-1 requires that TPH also be tested for other toxic components including cPAHs and PCBs that were previously tested. Table 830-1, however, identifies selected constituents associated with each weight of oil.

(e) PAH (carcinogenic) value is for the sum of cPAHs. Benzo(a)pyrene is the cPAH for which the method A cleanup level was determined. Conversion of other cPAHs to benzo(a)pyrene toxicity required using a total equivalency quotient (TEQ) method from WAC 173-340-708. No plant or soil biota value listed in Table 749-3 for benzo(a)pyrene. Listed ecological value is for wildlife from MTCA Table 749-3.

TABLE 5
CARCINOGENIC POLYNUCLEAR AROMATIC HYDROCARBON (cPAH) RESULTS
RAYONIER HOKO CAMP INDEPENDENT CLEANUP

Page 1 of 1

Location: / Lab ID:	Cleanup Level	HC-CB-2D3 S10906-3	HC-CB-2B11 S10906-3	HC-CB-2B11 Dup. S10906-3	HC-CB-2B15 S10906-3	HC-CB-2A28 S10906-3	HC-CB-2A21 S10906-3
Units mg/kg							
cPAH (EPA method 8270)							
Benzo(a)anthracene		<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Chrysene		<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Benzo(b)fluoranthene		<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Benzo(k)fluoranthene		<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Benzo(a)pyrene		<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Indeno(1,2,3-cd)pyrene		<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Dibenz(a,h)anthracene		<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Total cPAH	0.1 (a)						

(a) MTCA Table 740-1 cleanup level for cPAH references benzo(a)pyrene.

TABLE 4
TOTAL PETROLEUM HYDROCARBON RESULTS
RAYONIER HOKO CAMP INDEPENDENT CLEANUP

	Cleanup Level	HC-BS-2C1 (a) Soil	HC-CB-2C2 (a) Soil	HC-CS-2D3 (a) Soil	HC-CS-2D3 Dup. (a) Soil	HC-CS-2D4 (a) Soil	HC-CS-2D4 Dup. (a) Soil	HC-DE-2D5 (a) Soil	HC-CB-2D9 (a) Soil	HC-CS-2D10 (a) Soil
PETROLEUM HYDROCARBONS (mg/kg) (NWTPH-Dx)										
Diesel Range	2000 (c)	<20	<20	<20	<20	<20	<20	<20	<20	<20
Oil Range	2,000	<40	<40	<40	<40	<40	<40	<40	<40	<40

TABLE 4
TOTAL PETROLEUM HYDROCARBON RESULTS
RAYONIER HOKO CAMP INDEPENDENT CLEANUP

	Cleanup Level	HC-DE-2B18 (a) Soil	HC-DE-2A19 (a) Soil	HC-DE-2B20 (a) Soil	HC-DE-2B40 (a) Soil	HC-CB-2A21 (a) Soil	HC-CS-2A22 (a) Soil	HC-CB-2A23 (a) Soil	HC-CB-2A24 (a) Soil
PETROLEUM HYDROCARBONS (mg/kg) (NWTPH-Dx)									
Diesel Range	2000 (c)	<20	<20	<20	32	<20	<20	<20	<20
Oil Range	2,000	<40	<40	<40	<40	<40	<40	<40	<40

TABLE 4
TOTAL PETROLEUM HYDROCARBON RESULTS
RAYONIER HOKO CAMP INDEPENDENT CLEANUP

	Cleanup Level	HC-CB-2B11 (a) Soil	HC-CB-2B12 (a) Soil	HC-DE-2D6 (a) Soil	HC-CB-2B14 (a) Soil	HC-CB-2B14 Dup. (a) Soil	HC-CB-2B15 (a) Soil	HC-CS-2B16 (a) Soil	HC-DE-2B17 (a) Soil
PETROLEUM HYDROCARBONS (mg/kg) (NWTPH-Dx)									
Diesel Range	2000 (c)	<20	<20	<20	<20	<20	<20	570	<20
Oil Range	2,000	<40	<40	<40	<40	<40	<40	460	<40

TABLE 4
TOTAL PETROLEUM HYDROCARBON RESULTS
RAYONIER HOKO CAMP INDEPENDENT CLEANUP

	Cleanup Level	HC-CS-2A25 (a) Soil	HC-CB-2A28 (a) Soil	HC-CS-2A29 (a) Soil	HC-CB-2A30 (b) Soil	HC-CS-2A34 (b) Soil	HC-CS-2A34 Dup. (b) Soil	HC-CB-2B13 (b) Soil	HC-DE-2A27 (b) Soil
PETROLEUM HYDROCARBONS (mg/kg) (NWTPH-Dx)									
Diesel Range	2000 (c)	82	<20	<20	<20	<20	<20	<20	<20
Oil Range	2,000	110	<40	<40	210	<40	<40	<40	<40

(a) Sample analyzed by mobile laboratory.
(b) Sample analyzed by fixed.
(c) The terrestrial ecological value for soil biota (TPH diesel) is 200 mg/kg. The results are also below 200 mg/kg.

6.5 Restrictive Covenant

2003 1099230 Clallam County

FILED FOR RECORD AT THE REQUEST OF RTOC
RECORDED IN RECORDS/CLALLAM CO.
2003 JAN 14 AM 9:07

AFTER RECORDING RETURN TO:
Donald L. Schwendiman
Rayonier Timberlands Operating Co.
3625 – 132nd Ave SE, Suite 200
Bellevue WA 98006-1323

RESTRICTIVE COVENANT

DOCUMENT TITLE(s):
1. **Restrictive Covenant**

REFERENCE NUMBER(s) OF DOCUMENTS ASSIGNED OR RELEASED
None

GRANTOR(s):
1. **Rayonier Timberlands Operating Company L.P.**

GRANTEE(s):
1. **N/A**

LEGAL DESCRIPTION:

PART OF THE SW ¼ OF THE SE ¼ OF SECTION 13, TOWNSHIP 31 NORTH, RANGE 14 WEST, W.M., CLALLAM COUNTY, WASHINGTON, MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTH ¼ CORNER OF SAID SECTION 13; THENCE N18°55'04"W A DISTANCE OF 410.32 FEET TO A ¾" IRON PIPE AS SHOWN ON SURVEY FILED IN VOLUME 37, PAGE 50 RECORDS OF CLALLAM COUNTY, WASHINGTON; THENCE N55°15'00"E A DISTANCE OF 257.03 FEET TO A ¾" IRON PIPE AS SHOWN ON SAID SURVEY; THENCE N27°42'00"E A DISTANCE OF 307.00 FEET TO A 1" PIPE AS SHOWN ON SAID SURVEY; THENCE N53°19'33"E A DISTANCE OF 538.49 FEET TO A ½" REBAR WITH PLASTIC CAP STAMPED LS 29269 AND THE TRUE POINT OF BEGINNING; THENCE N86°57'40"E A DISTANCE OF 57.31 FEET TO A ½" REBAR WITH PLASTIC CAP STAMPED LS 29269; THENCE N11°15'11"E A DISTANCE OF 77.20 FEET TO A ½" REBAR WITH PLASTIC CAP STAMPED LS29269; THENCE S68°12'30"W A DISTANCE OF 96.80 FEET TO A ½" REBAR WITH PLASTIC CAP STAMPED LS 29269; THENCE S22°20'00"E A DISTANCE OF 46.29 FEET TO THE TRUE POINT OF BEGINNING.

ASSESSOR'S PROPERTY TAX PARCEL/ACCOUNT NUMBER(s):

143113-003000

RESTRICTIVE COVENANT

RAYONIER TIMBERLANDS OPERATING COMPANY, L.P.

HOKO RIVER SITE

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by Rayonier Timberlands Operating Company, L.P., its successors and assigns (hereafter "RTOC"), and the State of Washington Department of Ecology, its successors and assigns (hereafter "Ecology").

An independent remedial action (hereafter "Remedial Action") occurred at the property that is the subject of this Restrictive Covenant. The Remedial Action conducted at the property is described in the following documents: Hoko Camp, Reconnaissance Sampling Results, January 4, 2001, by Landau Associates, and Independent Cleanup Action, Former Hoko Logging Camp, Sekiu, WA, by Landau Associates, October 22, 2001. These documents are on file at Ecology's SWRO.

This Restrictive Covenant is required because the Remedial Action resulted in residual concentrations of total petroleum hydrocarbons which exceed the Model Toxics Control Act Method A Residential Cleanup Level for soil established under WAC 173-340-704(1)(b).

RTOC is the fee owner of real property (hereafter "Property") in the County of Clallam, State of Washington, that is subject to this Restrictive Covenant. The Property is legally described in Attachment A of this Restrictive Covenant which is made a part hereof by reference.

RTOC makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter "Owner").

Section 1. Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped areas include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork, cutting down or removal of fallen trees or other vegetative growth.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action, to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Remedial Action.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

RAYONIER TIMBERLANDS OPERATING COMPANY, L.P.

By: Rayonier Timberlands Management, Inc.
Managing General Partner

By: Donald L. Schwendiman
Donald L. Schwendiman
Assistant Secretary

Date Signed: Jan 21, 2002

STATE OF WASHINGTON)
) SS.
County of KING)

I certify that I know or have satisfactory evidence that Donald L. Schwendiman is the person who appeared before me, and that said person acknowledged that he signed this instrument, on

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stated that he was authorized to execute this instrument and acknowledged it as the Assistant Secretary of Rayonier Timberlands Management Inc. to be the free and voluntary act of such party for the uses and purposes mentioned in the instrument.

Given under my hand and official seal this 21st day of January, 2002.

Michelle S. Verlander
Notary Public in and for the
State of Washington
Residing at Kent
My appointment expires: 6/09/2004

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ATTACHMENT A

PART OF THE SW ¼ OF THE SE ¼ OF SECTION 13, TOWNSHIP 31 NORTH, RANGE 14 WEST, W.M., CLALLAM COUNTY, WASHINGTON, MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTH ¼ CORNER OF SAID SECTION 13; THENCE N18°55'04"W A DISTANCE OF 410.32 FEET TO A ¾" IRON PIPE AS SHOWN ON SURVEY FILED IN VOLUME 37, PAGE 50 RECORDS OF CLALLAM COUNTY, WASHINGTON; THENCE N55°15'00"E A DISTANCE OF 257.03 FEET TO A ¾" IRON PIPE AS SHOWN ON SAID SURVEY; THENCE N27°42'00"E A DISTANCE OF 307.00 FEET TO A 1" PIPE AS SHOWN ON SAID SURVEY; THENCE N53°19'33"E A DISTANCE OF 538.49 FEET TO A ½" REBAR WITH PLASTIC CAP STAMPED LS 29269 AND THE TRUE POINT OF BEGINNING; THENCE N86°57'40"E A DISTANCE OF 57.31 FEET TO A ½" REBAR WITH PLASTIC CAP STAMPED LS 29269; THENCE N11°15'11"E A DISTANCE OF 77.20 FEET TO A ½" REBAR WITH PLASTIC CAP STAMPED LS29269; THENCE S68°12'30"W A DISTANCE OF 96.80 FEET TO A ½" REBAR WITH PLASTIC CAP STAMPED LS 29269; THENCE S22°20'00"E A DISTANCE OF 46.29 FEET TO THE TRUE POINT OF BEGINNING.

6.6 Photo Log

Photo 1. Dirt road to the Site and current general Site condition/overgrown wooded Area – from Southwest.

Photo 2. Current general Site condition/overgrown wooded area – from west.

Photo 3. Part of former boiler scrap metal – from northwest.

Photo 4. Part of former boiler scrap metal – from north.

Photo 5. Scrap rebar used in the former logging operation – from south.

Photo 6. Scrap rebar used in the former logging operation – from southeast.

Photo 7. Cable used in the former logging operation – from the west.

Photo 8. Cables used in the former logging operation – from northwest.

Photo 9. Hoko River – from the southeast.

Photo 10. Former train and truck service shop – from the east.