



Third Periodic Review Spokane Custom Wood Treating

**724 North Perry Street, Spokane, Spokane County
Facility Site ID 690, Cleanup Site ID 1319**

Toxics Cleanup Program, Eastern Region

Washington State Department of Ecology
Spokane, Washington

August 2022

Document Information

This document is available on the Department of Ecology's [Spokane Custom Wood Treating cleanup site page](#)¹.

Related Information

- Cleanup site ID: 1319
- Facility site ID: 690

Contact Information

Toxics Cleanup Program

Eastern Regional Office
Ted Uecker, Site Manager
4601 N. Monroe St.
Spokane, WA 99205
Phone: 509-342-5564

Website²: [Washington State Department of Ecology](#)

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¹ <https://apps.ecology.wa.gov/cleanupsearch/site/1319>

² <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup>

³ <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region
360-407-6300

Northwest Region
206-594-0000

Central Region
509-575-2490

Eastern Region
509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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Introduction

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to assure human health and the environment are being protected at the former Spokane Custom Wood Treating site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). This is the third periodic review conducted for this Site. Ecology completed the first periodic review in February 2010 and the second periodic review in November 2015. This periodic review evaluates December 2016 through July 2022.

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP). The cleanup actions resulted in residual concentrations of diesel-range petroleum hydrocarbons (TPH-D), heavy oil-range petroleum hydrocarbons (TPH-O), pentachlorophenol (PCP), and polycyclic aromatic hydrocarbons (PAHs) that exceeded MTCA Method A cleanup levels for soil established under WAC 173-340-740(2). Ecology determined that institutional controls in the form of a restrictive covenant would be required for the site to be eligible for a no further action (NFA) determination. WAC 173-340-420(2) requires Ecology to conduct a periodic review of a site every five years under the following conditions:

- 1) Whenever Ecology conducts a cleanup action;
- 2) Whenever Ecology approves a cleanup action under an order, agreed order, or consent decree;
- 3) Or, as resources permit, whenever Ecology issues a no further action opinion;
- 4) 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 Ecology shall consider include [WAC 173-340-420(4)]:

- a) The effectiveness of ongoing or completed cleanup actions.
- b) New scientific information for individual hazardous substances or mixtures present at the Site.
- c) New applicable state and federal laws for hazardous substances present at the Site.
- d) Current and projected Site and resource uses.
- e) Availability and practicability of more permanent remedies.

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

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

Summary of Site Conditions

Site history

The Site is in a mixed-use area and is bordered by ongoing construction and the Spokane River to the west, vacant land to the north, a parking structure to the south and southwest, and residential properties to the southeast and east.

During operations, the Site contained a wood treatment facility, a storage yard, an office building, and a private residence. In 2008, Iron Bridge LLC constructed a single two-story office building. The Site is currently zoned M2 - manufacturing, allowing for commercial and light industrial use.

Spokane Custom Wood Treating (SCWT) was a commercial lumber preservative treatment facility that operated since the mid-1970s. Pentachlorophenol (PCP) dissolved in diesel fuel or fuel oil was used as a wood preservative until approximately 1989. A one-percent solution of copper naphthenate, reportedly dissolved in diesel fuel or fuel oil, was used instead of PCP until the facility shut down in 1996.

SCWT was owned by Layrite Products Company. Layrite underwent bankruptcy proceedings in 1997. Tri-West Mortgage foreclosed on the property and was the trustee/owner until the Site and the adjacent former Layrite property was transferred to Iron Bridge LLC.

Depth to groundwater ranges from approximately 26 to 31 feet below ground surface (bgs); groundwater flow direction is southwest. Soils at the Site consist of gravelly loam or silt loam over coarse sands, gravels, cobbles and boulder sized materials. The Spokane River is approximately 400 feet to the west.

A vicinity map is in Appendix A, and a Site plan is in Appendix B.

Remedial actions

Following foreclosure proceedings after the Layrite bankruptcy, facility decommissioning, waste management, and cleanup were conducted in 1997 and 1998. Six 55-gallon drums of PCP and diesel-contaminated rainwater from within the concrete block vault were disposed offsite. A vacuum-pressure vessel was also removed and sold.

Between May 1998 and July 2000, work conducted at the Site included work plans, facility closure and decommissioning, site investigation, soil and groundwater characterization, limited soil cleanup, and management and disposal/treatment of generated hazardous and special wastes.

Regulatory requirements for facility closure of the wood treatment plant were discussed with Ecology's Hazardous Waste and Toxics Reduction personnel on Site in July 1998. Material directly associated with the facility treatment area was designated as F032 hazardous waste. The upper portions of the treatment building that were to be managed as typical demolition debris were removed in November 1998.

During Site demolition, the F032-designated hazardous waste material around the vault, including drip pads, hoist foundation, and in-ground vault concrete and concrete block, was segregated and transported to a licensed treatment, storage, and disposal facility. Obvious and visibly impacted surface and near-surface soils immediately around and underneath the hazardous-waste-designated components were also excavated and manifested as F032.

During initial Site work, an underground storage tank was identified in the northwest corner of the property. Approximately 200 gallons of water were pumped from the tank. The steel tank had an approximate capacity of 900 gallons. Moderate to severe rust was observed on the exterior bottom, sides, and ends of the tank. Confirmation samples were collected from the limits of the tank excavation. Laboratory analysis did not detect gasoline or benzene, toluene, ethylbenzene, or xylenes (BTEX).

Three soil samples were collected from the vicinity of the former wood treatment structures (building, concrete pads) in November 1998 after Site demolition activities. The samples were collected to determine in-situ concentrations of contaminants of concern – TPH-D, PCP, and PAHs – and to provide baseline data for potential contaminant concentrations. Results indicated TPH-D, TPH-O, PCP, and individual PAHs were present at concentrations exceeding MTCA Method A cleanup levels.

Remedial activities were conducted in March 1999 for three areas of concern, including:

- The hoist and vault area formerly beneath the south end of the wood treatment building
- The dip tank area along the eastern property boundary
- An area of near-surface contamination northwest of the dip tank

The dip tank area was excavated to approximately 6 feet bgs. The excavation was limited to prevent undermining or structural damage to the commercial building on the adjacent property.

Confirmation soil samples from the three excavated areas indicated that concentrations of TPH-D, TPH-O, PCP, and PAHs exceeding cleanup levels remained in the hoist/vault area and the dip tank area. Based on these results, a subsurface drilling and groundwater monitoring program was conducted. Seven soil borings (B1 through B7) were installed; six borings were completed as monitoring wells (MW1 through MW6).

Soil and groundwater samples were analyzed for TPH-D, TPH-O, PCP, PAHs. Results indicated soil contamination above cleanup levels in boring B5 (MW4) at 35 feet bgs. Soil samples collected from B5 at 40 and 45 feet bgs did not detect any concentrations exceeding cleanup levels.

Based on results of the Site characterization, remedial action (excavation), and subsurface investigation, two residual affected soil areas remain at the Site: the hoist/vault area and the dip tank area. TPH-D, TPH-O, PCP, and PAH-impacted soils remain in both areas. A summary of the maximum residual contaminant concentrations in soil is in Table 1.

Table 1. Summary of residual soil contaminant of concern locations and concentrations – hoist and vault area

Notes: All results reported in milligrams per kilogram (mg/kg) or parts per million (ppm). All results followed by an asterisk indicate concentration above Model Toxics Control Act cleanup levels (Method A or B).

Acronyms and abbreviations: bgs – below ground surface, NA – not analyzed or available, ND – not detected above laboratory reporting limits, PAH – polycyclic aromatic hydrocarbons, PCP – pentachlorophenol, TPH-D – diesel-range total petroleum hydrocarbons, TPH-O – heavy oil-range total petroleum hydrocarbons

Sample no.	Sample location	TPH-D	TPH-O	PCP	Total PAHs
DP3	Center of vault at 7 ft. bgs	101	ND	ND	ND
DP4	Southwest corner of vault at 8 ft. bgs (bottom at sidewall)	4,100*	15.5	89.5*	7.541*
TP111	Southwest corner of vault at 5 ft. bgs (sidewall)	NA	NA	523*	27.67*
DP5	North center of vault at 9 ft. bgs (bottom at sidewall)	3,950*	328*	56.2*	5.873*
TP101	Northeast corner of vault at 9 ft. bgs (bottom at sidewall)	NA	NA	52.8*	5.449*
TP13	Center of hoist excavation at 17 ft. bgs (bottom center)	NA	NA	117*	10.448*
B535	Boring B5 at 35 ft. bgs	2,070*	229*	13.5*	ND

Approximately 110 cubic yards of petroleum-contaminated soil was removed from the Site and transported to Graham Road Landfill. Approximately 70 cubic yards of hazardous waste (F032) were also removed and disposed of at Arlington Subtitle C Hazardous Waste Landfill facility in Arlington, OR. Estimated residual contaminated soil remaining at the hoist/vault and dip tank area was 1,531 cubic yards.

On-site containment and isolation using engineering controls was chosen as the cleanup alternative for the remaining contaminated soils. The Site is currently developed as the Iron Bridge Office Campus. Engineering controls were designed within the final plan to contain and isolate residual affected soil. Controls included impervious surface covers in the form of asphalt and concrete, and stormwater management systems.

Cleanup levels and points of compliance

WAC 173-340-704 states 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 contaminants at 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 substance.

For soil, the point of compliance is the area where the soil cleanup levels shall be attained. For soil cleanup levels based on the protection of groundwater, as they are for this Site, the point of compliance is established as soils throughout the Site.

Groundwater monitoring

Monitoring wells were completed in soil borings B1 through B3 and B5 (MW1 through MW4) in March 1999 at the Site. No monitoring well was installed in B4. Borings B6 and B7 (MW5 and MW6) were installed in February 2001 across North Perry Street on the western adjacent property to identify potential off-site contamination.

Groundwater samples were collected from MW1 through MW4 in March 1999 and August 2000. Monitoring wells MW5 and MW6 were sampled in February 2001. Subsequent sampling events for all six wells were conducted in July and October 2002, and January, June, and September 2003.

Concentrations of TPH-D were non-detect in all six monitoring wells for at least four quarters. The last detectable concentration of TPH-D was in MW4 in March 1999. PAH concentrations were not detected above MTCA Method A cleanup levels in any of the six monitoring wells since February 2002; the last four quarters were non-detect. PCP was last detected in MW2 in July 2002; the last four quarters were non-detect for PCP.

Restrictive Covenant

Ecology determined the Site would be eligible for an NFA determination if institutional controls were used to document the remaining contamination and protect the remedial actions. In 2004, institutional controls in the form of a restrictive covenant (Covenant) were recorded for the Site. Ecology sent an NFA letter to the property owner and changed the Site status to reflect an NFA determination.

The Covenant recorded for the Site in 2004 imposes the following limitations:

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.

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.
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.
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.
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.
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 Covenant. Ecology may approve any inconsistent use only after public notice and comment.
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.
8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this 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.

A copy of the Covenant is in Appendix C.

Periodic Review

Effectiveness of completed cleanup actions

During the Site visit Ecology conducted on July 22, 2022, there were no indications that the integrity of the remedial action has been compromised. There was no evidence of Site excavation or visual indications of disturbance within the Site boundary. Construction work was ongoing on the western adjacent parcel during the Site visit. The Site continues to be occupied by a two-story office building owned and operated by Iron Bridge, LLC, and is surrounded by a mix of commercial and residential properties. A photo log is in Appendix D.

Direct contact

Cleanup actions were intended to eliminate human exposure to contaminated soils and groundwater at the Site. Exposure pathways to contaminated soils (ingestion, direct contact) were reduced by remedial excavation and protective Site surfaces including asphalt, building foundations, roadways, and landscaped areas.

Protection of groundwater

Soils with TPH, PCP, and PAHs at concentrations exceeding MTCA Method A cleanup levels remain at the Site; however, the majority of the contaminated soil source material has been removed. Groundwater monitoring data indicates that soil contamination has not impacted groundwater quality. Due to the removal of any significant source material, the age of the release, and the empirical evidence that groundwater has not been impacted by contaminated soils, residual contaminated soils are not likely to pose a threat to groundwater quality in the future.

Institutional controls

Institutional controls in the form of a Covenant were implemented at the Site in 2004. The Covenant remains active and discoverable through the Spokane County Auditor's Office. There is no evidence a new instrument has been recorded that limits the effectiveness or applicability of the Covenant. This Covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup without Ecology's approval, and prohibits any use of the property that is inconsistent with the Covenant. This Covenant serves to assure the long-term integrity of the surface cover and the remedial action.

Summary

Soils with TPH, PCP, and PAHs at concentrations exceeding the MTCA Method A cleanup level are still present at the Site. However, the structures and concrete or asphalt surfaces prevent human exposure to this contamination by ingestion and direct contact with soils. The Covenant for the property will ensure the integrity of the caps will be protected through property use restrictions.

New scientific information for individual hazardous substances or mixtures present at the Site

There is no new relevant scientific information for the hazardous substances remaining at the Site.

New applicable state and federal laws for hazardous substances present at the Site

There are no new applicable or relevant state or federal laws for hazardous substances remaining at the Site.

Current and projected site and resource uses

The Site is used for commercial purposes. There have been no changes in current or projected future Site or resource uses. The current Site use is not likely to have a negative impact on the protectiveness of the remedy.

Availability and practicability of more permanent remedies

The remedy implemented included containing hazardous substances, and it 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.

Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the remedial action were capable of detection below MTCA Method A cleanup levels, which are the most stringent. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

Conclusions

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

Based on this periodic review, Ecology has determined the requirements of the Covenant are being followed. No additional remedial actions are required by the property owner. It is the

property owner's responsibility to continue to inspect the Site to assure the integrity of the cap is maintained.

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.

References

SLR Corporation. *Remedial Investigation and Cleanup Action Report*. May 2003.

SLR Corporation. *Independent Remedial Action Report – 7th Ground Water Monitoring Report*. October 10, 2003.

Ecology. *Spokane Custom Wood Treating VCP Review*. January 9, 2004.

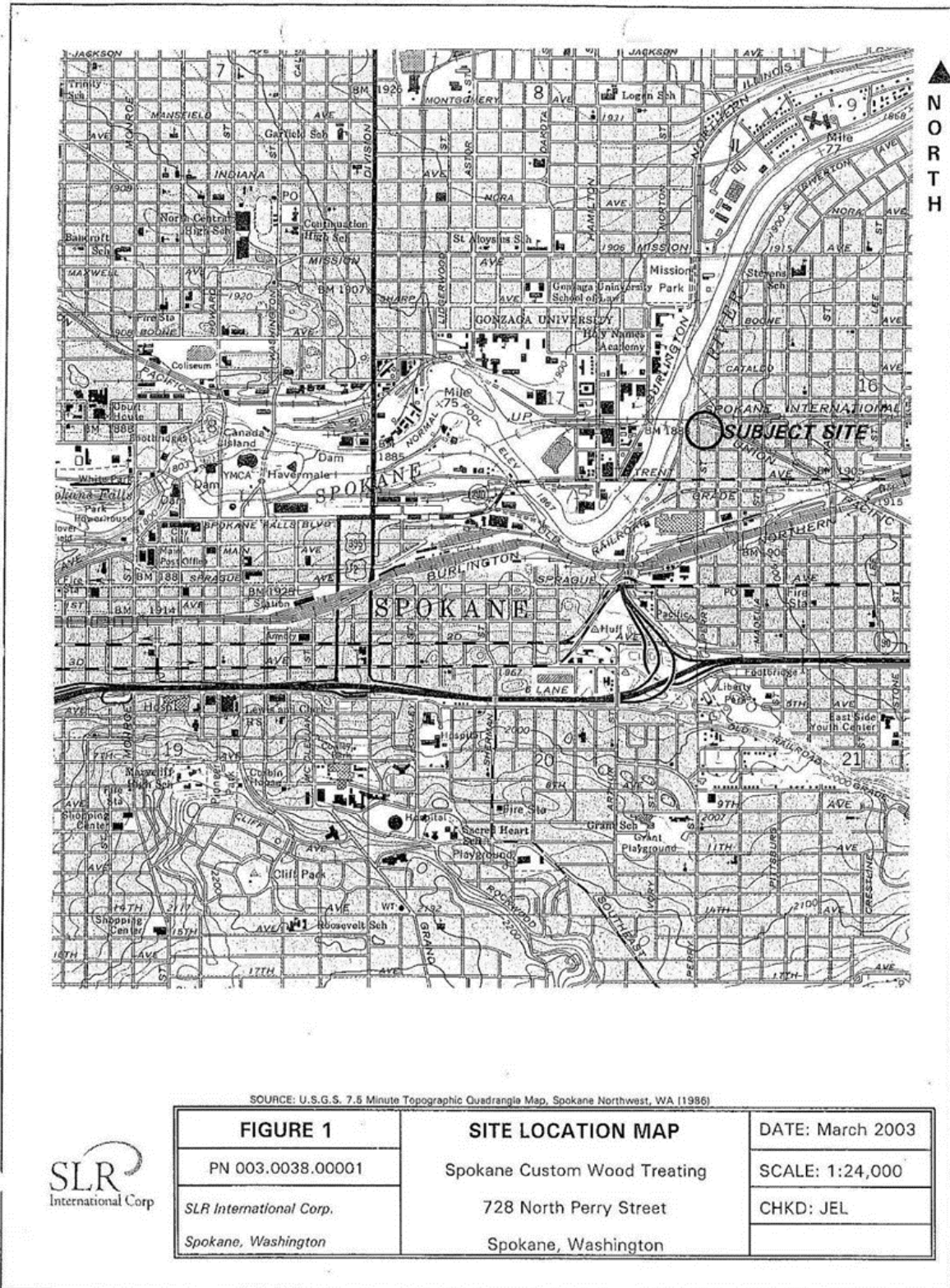
Ecology. *Restrictive Covenant*. March 1, 2004.

Ecology. *No Further Action Determination*. March 8, 2004.

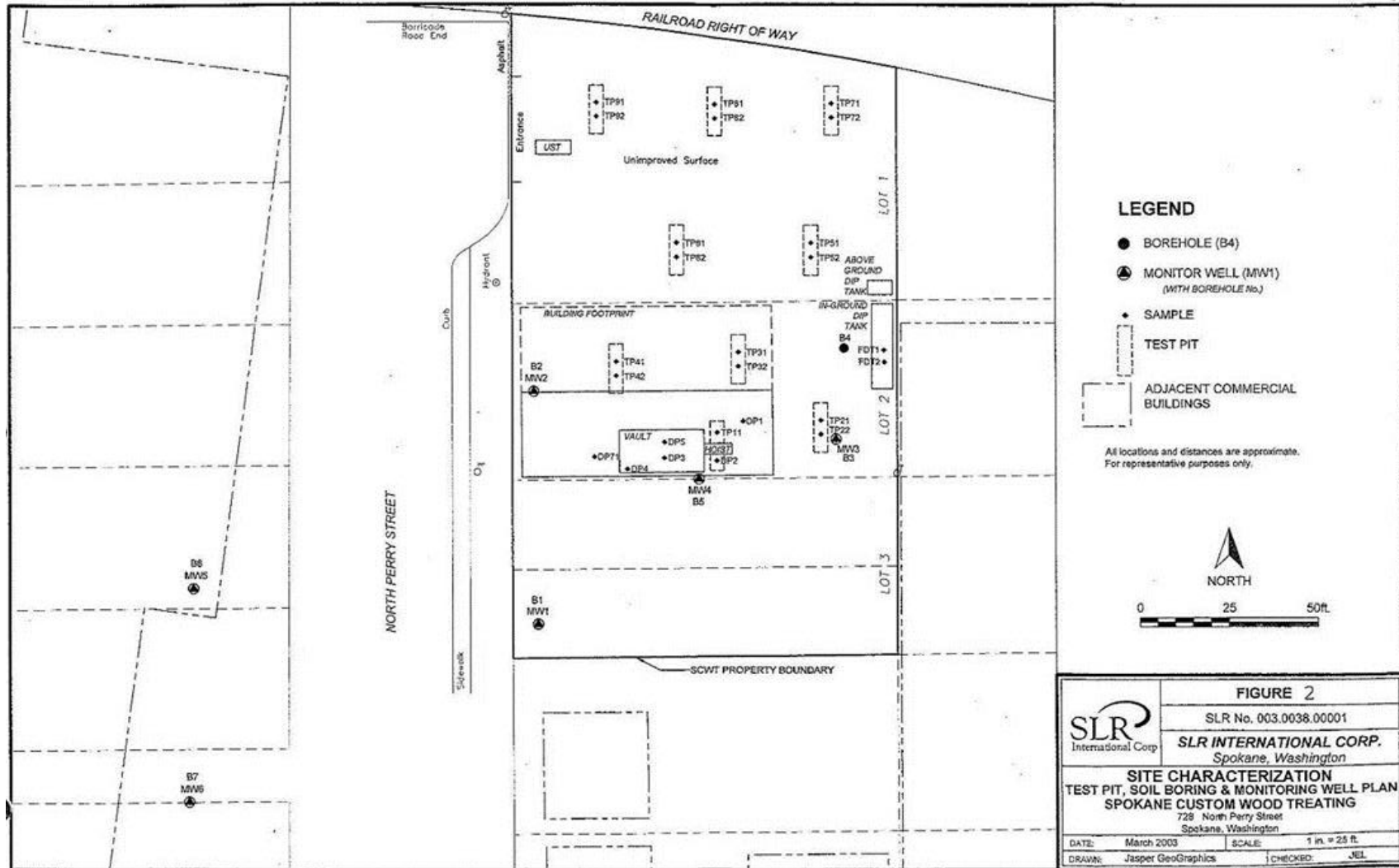
Ecology, *Second Periodic Review*. November 2015.

Ecology, *Site Visit*, July 22, 2022.

Appendix A. Vicinity Map



Appendix B. Site Plan



Appendix C. Restrictive Covenant

sent by: IRON BRIDGE LLC;

009 5321702;

MAR-2-04 8:20AM;

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Spokane Co, WA

Return To
Iron Bridge, LLC
PO Box 6
Colbert, WA 99005

**RESTRICTIVE COVENANT
FORMER SPOKANE CUSTOM WOOD TREATING SITE
IRON BRIDGE, LLC OWNER, IRON BRIDGE CAMPUS, 728 N. PERRY ST.**

The Property is legally described AS FOLLOWS:

The South 25 feet of:

Parcel No. 35163.0701- Lot 1, Block 9, Amended School Section 16

Parcel No. 35163.0702-Lot 2, Block 9, Amended School Section 16

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1) (f) and (g) and WAC 173-140-440 by Iron Bridge, LLC, its successors and assigns, 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:

1. Abridged Work Plan for Facility Closure, Spokane Custom Wood Treating, 728 North Perry Street, Spokane, Washington: Leppo Consultants, Inc., September 1998.
2. Remedial Investigation and Cleanup Action Report, Spokane Custom Wood Treating, 728 North Perry Street, Spokane, Washington: SLR International Corp., May 2003



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3. Independent Remedial Action Report, 6th Ground Water Monitoring Event (June 5, 2003), Spokane Custom wood Treating at 728 North Perry Street, Spokane, Washington: SLR International Corp., June 24, 2003.
4. Independent Remedial Action Report, 7th Ground Water Monitoring Event (September 26, 2003), Spokane Custom Wood Treating at 728 North Perry Street, Spokane, Washington: SLR International Corp., October 10, 2003.

These documents are on file at Ecology's Eastern Regional Office (ERO).

This Restrictive Covenant is required because the Remedial Action resulted in residual concentrations of petroleum hydrocarbons, pentachlorophenol, and polyaromatic hydrocarbons which exceed the Model Toxics Control Act Method A Residential Cleanup Levels for soil established under WAC173.340.740.

The undersigned, Iron Bridge, LLC, is the fee owner of real property (hereafter "Property") in the County of Spokane, State of Washington that is subject to this Restrictive Covenant.

Iron Bridge, LLC 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 used 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, or any activities that may cause migration of the hazardous substances.

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.



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The term 'document' means reports prepared regarding the remedial action as well as Ecology's NFA letter.

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.

IRON BRIDGE, LLC

A handwritten signature in black ink, appearing to read 'Kent D. Hull'.

Kent D. Hull, Managing Partner

Feb 27, 2004

Date



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LIMITED LIABILITY COMPANY ACKNOWLEDGEMENT

STATE of WASHINGTON _____)
COUNTY of SPOKANE _____)

On this 27th day of February, 2004, before me personally appeared Kent D. Hull, to me known to be the Managing Partner of Iron Bridge, LLC, the Limited Liability Company that executed the foregoing instrument, and acknowledged it to be the free and voluntary act and deed of said Limited Liability Company for the uses and purposes therein mentioned; and an oath stated that he is authorized to execute said instrument for and on behalf of said Limited liability Company.

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



Janet M. Petty
NOTARY PUBLIC in and for the State of
Washington, Residing at Wenatchee, WA
My Commission Expires: FEB, 2006

Appendix D. Photo Log

Photo 1: Spokane Custom Wood Treating Site, Iron Bridge Campus Building – from the south



Photo 2: Construction on Parcel West of Site – from the southeast



Photo 3: Construction on Parcel West of Site – from the east



Photo 4: Vacant Land North of Site – from the southeast



Photo 5: Typical Site Landscaping – from the southeast

