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DEPARTMENT OF ECOLOGY

Southwest Region Office

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June 12, 2023

Doug Pennington
Environmental Manager
Pape Properties, Inc.
355 Goodpasture Island Rd
Eugene, OR 97401
dpennington@pape.com

Re: Opinion on Site Investigation

- **Site Name:** Pape Group Pesticides
- **Site Address:** 7109-7723 48th St E. and 4708-4710 77th Ave. Court E., Fife, Pierce County, WA 98424
- **Facility/Site ID:** 36429
- **Cleanup Site ID:** 15534 and 15535
- **VCP Project ID:** SW1800

Dear Doug Pennington:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Pape Group Properties facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA),[1] chapter 70A.305 Revised Code of Washington (RCW).[2]

Issue Presented and Opinion

Ecology is responding to your request for opinion on the Phase I and Phase II Environmental Site Assessments (ESA) completed on the multiple properties purchased by Pape along 48th St E. and 77th Ave Court E. in Fife, Washington. Upon our review of the ESAs, it has been determined that further action is necessary to define the nature and extent of contamination at the Property and Site**.**

[1] https://apps.ecology.wa.gov/publications/SummaryPages/9406.html
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305

This opinion is based on an analysis of whether the ESA's meet the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Washington Administrative Code (WAC) Chapter 173-340 (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination in soil and groundwater associated with the following releases:

- Diesel-range petroleum hydrocarbons (TPH-D), organochlorine pesticides, and volatile organic compounds (VOCs).

The parcel(s) of real property associated with this Site are also located within the projected boundaries of the Tacoma Smelter Plume facility (FSID #89267963). At this time, we have no information that those parcel(s) are actually affected. This opinion does not apply to any contamination associated with the Tacoma Smelter Plume facility.

Basis for the Opinion

This opinion is based on the information contained in the documents listed as follows:

1. Phase I and Focused Phase II Environmental Site Assessments, Commercial Property 7109-7610 48th Street E. Fife, WA; Map 042017-3, Parcels: 047, 048, 008, 024, 025, 018, 039, 040, 037, 038, 029, and 031; BB&A Environmental, February 19, 2021.

2. Phase I and Focused Phase II Environmental Site Assessments, Residential Property 7619-7723 48th Street E. and 4708-4710 77th Avenue Court E., Fife, WA 98424; Pierce County Tax Lots 016, 026, 032, 035, and 036 of Map 0420173; BB&A Environmental, December 16, 2022.

These documents are kept in the Central Files of the Southwest Region Office of Ecology (SWRO) for review by appointment only. Information on obtaining those records can be found on Ecology's public records requests web page.[3] Some site documents may be available on Ecology's Cleanup Site Search web page.[4]

This opinion is void if any of the information contained in those documents is materially false or misleading.

[3] https://ecology.wa.gov/Footer/Public-records-requests
[4] https://apps.ecology.wa.gov/cleanupsearch/site/3420

Analysis of the Cleanup

Characterization of the Site.

Based on review of the activities conducted in the ESA Reports, Ecology has determined that the nature and extent of Site contaminants of concern (COC) have not been fully characterized in soil and groundwater and as such, the boundaries of the Site have not been adequately delineated. **Enclosure A** contains a location and facilities layout of the Site.

Ecology Comments

Based on the many individual addresses and/or Tax Lot (TL) designations that comprise the Site, Ecology's comments are summarized below per address and/or TL.

Ecology understands that the properties have been predominantly used for residential and agricultural purposes. Agricultural applications have been a rotating mix of grass and row crops (e.g., pumpkins from 2020). On-site residences have been constructed between 1940 and 1975 while the greenhouses were constructed in stages between the late 1980's and 2005. In addition, a service garage was developed on parcel 032 in 1985, a multi-family duplex was developed in 1997 on parcel 016, and nine greenhouses were constructed in stages between the late 1980's and 2005.

Recognized environmental conditions (RECs) that resulted from the Phase I ESAs included:

- Historical agricultural operations and potential use of herbicides and pesticides in the property fields;
- Long-term use, storage, and disposal of paints, thinners, petroleum products and potential solvents by the service garage on Parcel 032;
- Presence of several shop buildings, a 500-gallon and 1,000-gallon underground storage tank (UST) used to reportedly store gasoline, at address 7519 48th Street E;
- Presence of a 275-gallon heating oil aboveground storage tank (AST) and a 675-gallon UST at residence 7305 48th Street E; and
- Historical pesticide and herbicide use in 9 greenhouses, which operated at 7519 48th Street since 1990.

Based on soil boring activities conducted at the Site to depths of 10 feet below ground surface (bgs), subsurface stratigraphy consists of clayey silt and silt with fine-grained sand. Groundwater was found to occur at depths ranging from 8-10 feet bgs while groundwater flow was estimated to be oriented in a west-northwesterly direction towards the Puyallup River which lies 740 feet distant to the south and west.

Per the two aforementioned Phase I/Phase II ESA reports submitted with multiple addresses and tax lots, a summary of the Phase II ESA activities and Ecology recommendations for further action are summarized below by both ESA report and the site addresses and tax lots (TL) contained under each:

A. Phase I and Focused Phase II Environmental Site Assessments, Commercial Property 7109-7610 48th Street E Fife, WA; Map 042017-3, Parcels: 047, 048, 008, 024, 025, 018, 039, 040, 037, 038, 029, and 031; BB&A Environmental, February 19, 2021.

1. 7109 48th St E. (TL 042017-3-047 [1 acre]

a. Facilities

i. Residence (removed)

ii. Garage (removed)

iii. Grass Field

b. Phase II ESA Activities/Results:

i. Field composite soil sampling (AG COMP 1) completed for organochlorine pesticides (OCP)/chlorinated herbicide (CH) and total arsenic analyses.

1. OCP/CH. With the exception of dieldrin, the results indicated presence of several OCPs below the MTCA Method B cleanup level (CUL).

2. Arsenic. Arsenic was also detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for unrestricted land use (ULU).

c. Ecology Recommended Actions:

i. Conduct field composite soil sampling/analysis of organophosphorous (OPP) and carbamate pesticides. In addition, dioxin and metals should also be evaluated based on potential presence in fertilizers.[5]

ii. Reassess dieldrin soil exceedances by discrete sampling/analysis and remediate accordingly.

[5] https://apps.ecology.wa.gov/publications/documents/99310.pdf

2. 7111 48th St E. (TL 042017-3-048 [1.92 acre])

   a. Facilities

      i. Abandoned residence with 275-gallon AST in basement

      ii. Garage

      iii. Water well

      iv. Grass field

   b. Phase II ESA Activities/Results:

      i. Field composite soil sampling (AG COMP 2) completed for OCP/CH and total arsenic analyses.

         1. OCP/CH. Results indicated presence of several OCPs below the MTCA Method B CUL.

         2. Arsenic. Arsenic was also detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for ULU.

      ii. Determine potential presence of septic system/drainfield.

   c. Ecology Recommended Actions:

      i. Conduct field composite soil sampling/analysis of OPP/carbamate pesticides and dioxin and metals known to be present in various pesticide and fertilizer formulations.

      ii. Conduct soil boring/sampling beneath AST in basement for analysis of TPH-D, oil-range organics (TPH-O), and VOC.

      iii. Assess groundwater downgradient of suspected septic drainfield north of residence for halogenated VOC (HVOC).

3. 7223 48th St E. (TL 042017-3-008 [1.92 acre])

   a. Facilities

      i. Abandoned Trailer

      ii. Grass field

b. Phase II ESA Activities/Results:

i. Field composite soil sampling (AG COMP 3) completed for OCP/CH and total arsenic analyses.

1. OCP/CH. With the exception of dieldrin, the results indicated presence of several OCPs below the MTCA Method B CUL.

2. Arsenic. Arsenic was also detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for ULU.

c. Ecology Recommended Actions:

i. Conduct field composite soil sampling/analysis OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

ii. Reassess dieldrin soil exceedances by discrete sampling/analysis and remediate accordingly.

4. 7305 48th St E. (TL 042017-3-024 [1.95 acre]):

a. Facilities

i. Residence

ii. Garage with various chemicals.

iii. Row Crop/Field (Pumpkin)

iv. 675-gallon heating oil underground storage tank (HOUST) on west side of residence.

v. 275-gallon HOAST on west side of residence.

vi. Determined potential presence of septic system/drainfield north of residence.

b. Phase II ESA Activities/Results:

i. Conducted two 10-foot direct-push borings P5 and P6 adjacent to HOUST

1. Soil:

a. TPH-D detected at 271 and 517 milligrams per kilogram (mg/Kg) and less than the MTCA Method A cleanup level (CUL) for unrestricted land use (URLU).

b. Benzene, toluene, ethylbenzene, and total xylenes (BTEX) not detected in soil to a depth of 9.5-10' below ground surface (bgs).

2. Groundwater:

a. TPH-D detected at 1,640 and 5,460 micrograms per liter (µg/L) and greater than the MTCA A URLU of 500 µg/L. No BTEX detected in groundwater.

ii. Conducted field composite soil sampling (AG COMP 3) for OCP/CH and total arsenic analyses.

1. OCP/CH. With the exception of dieldrin, the results indicated presence of several OCPs below the MTCA Method B CUL.

2. Arsenic. Arsenic was also detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for ULU.

iii. Recommendations – Decommission HOUST; conduct limited soil/groundwater removal to attain cleanup.

c. Ecology Recommended Actions:

i. Concur with decommissioning HOUST and further assess/remediate nature and extent of impacted soil.

ii. Further assess extent of TPH-D-impacted groundwater and remediate. Use Table 830-1 (Required Testing for Petroleum Releases), as listed under WAC 173-340-900, for applicable analyses.

iii. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

iv. Assess subsurface soil outside of garage for TPH-G, TPH-D, TPH-O, and VOC.

v. Assess groundwater downgradient of potential septic drainfield for HVOC.

vi. Reassess dieldrin soil exceedances by discrete sampling/analysis and remediate accordingly.

vii. Implement assessment and NFA through VCP to eliminate administrative redundancy and conserve additional PLIA entry costs.

5. TL 042017-3-025 [1.95 acre]

    a. Facilities:

        i. Row Crop/Field (Pumpkin).

    b. Phase II ESA Activities/Results:

        i. Field composite soil sampling (AG COMP 4) conducted for OCP/CH and total arsenic analyses.

            1. OCP/CH. Results indicated presence of several OCPs below the MTCA Method B CUL.

            2. Arsenic. Arsenic was also detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for ULU.

    c. Ecology Recommended Activities:

        i. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

6. TL 042017-3-018 [2.53 acre]

    a. Facilities

        i. Agricultural field

    b. Phase II ESA Activities/Results:

        i. Field composite soil sampling (AG COMP 5) conducted for OCP/CH and total arsenic analyses.

            1. OCP/CH. Results indicated presence of several OCPs below the MTCA Method B CUL.

            2. Arsenic. Arsenic was also detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for ULU.

    c. Ecology Recommended Actions:

        i. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

7. 7501 48th St E. (TL 042017-3-040 [0.46 acre]):

   a. Facilities

      i. Residence

      ii. Attached Garage with various chemicals and 5-gallon buckets of used oil.

      iii. Water Supply well

      iv. Determined potential presence of septic system/drainfield north of residence.

   b. Phase II ESA Activities/Results:

      i. Field composite soil sampling (AG COMP 6) conducted for OCP/CH and total arsenic analyses.

         1. OCP/CH. Results indicated presence of several OCPs below the MTCA Method B CUL.

         2. Arsenic. Arsenic was also detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for ULU.

   c. Ecology Recommended Actions:

      i. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

      ii. Sample water and decommission water well consistent with WAC 173-160-381.

      iii. Conduct soil boring/sampling on east side of house/garage for TPH-G, TPH-D, TPH-O and VOC.

      iv. Assess groundwater downgradient of potential septic drainfield for HVOC.

8. 7511 48th St E. (TL 042017-3-039 [1.86 acre]):

   a. Facilities

      i. Water well present.

   b. Phase II ESA Activities/Results:

      i. Sampled water well for dissolved arsenic, nitrates, OCP/CH.

1. All results less than the laboratory method reporting limits (MRL).

ii. Field composite soil sampling (AG COMP 6) conducted for OCP/CH and total arsenic analyses.

1. OCP/CH. Results indicated presence of several OCPs below the MTCA Method B CUL.

2. Arsenic. Arsenic was also detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for ULU.

c. Ecology Recommended Actions:

i. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

ii. Decommission water well in accordance with WAC 173-160-381.

9. 7519 48th St E. (TL 042017-3-037 [1.65 acre]) + unidentified TL

a. Facilities

i. Residence.

ii. Presence of 500 and 1000-gallon gasoline USTs.

iii. 9 Greenhouses.

iv. 2 shop buildings with fuel stored in a 55-gallon drum.

v. Potential septic system/leachfield.

b. Phase II ESA Activities/Results:

i. Completed GPR survey to identify USTs

ii. Completed four 10-ft direct-push soil borings P1-P4;

1. 2 borings were drilled by each UST

2. Soil samples were collected from each boring at 7 feet bgs and analyzed for both TPH-G and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Results indicated no detections of TPH-G/BTEX above MRLs.

3. Groundwater samples collected from depths of between 8-10 feet bgs and analyzed for TPH-G and BTEX. Results did not indicate presence of TPH-G nor BTEX at or above the MRLs.

4. Determined presence of water well and well head.

5. Conducted soil composite sampling (AG COMP 6) in adjacent field and the greenhouses (samples GH Comp 1-9) for OCP/CH and total arsenic analyses.

   a. OCP/CH. Results indicated presence of several OCPs below the MTCA Method B CUL in AG COMP 6. Results from the GH Comp greenhouse samples indicated various OCps in samples GH Comp 1, 3, 8, and 9 and the CH 2,4-D in GH Comp 5, 6, 7, and 9 below the MTCA B CULs.

   b. Arsenic. Arsenic was detected below the MTCA Method A CUL of 20 milligrams per kilogram (mg/Kg) for ULU in both the AG COMP and GH Comp samples.

iii. Ecology Suggested Actions:

1. Decommission the two USTs and conduct impacted soil and groundwater assessment/removal as necessary.

2. Conduct soil boring around shop for TPH-G/D/O and VOC.

3. Conduct field composite soil sampling/analysis in field and greenhouses samples for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

4. Sample well water and decommission water well according to WAC 173-160-381.

5. Assess groundwater downgradient of potential septic drainfield north of residence for HVOC.

10. 7601 48th St E. (TL 042017-3-031 [2.15 acre]) + (TL 042017-3-029 [0.35 acre])

a. Facilities

i. Grass field.

b. Phase II ESA Activities/Results:

i. No field sampling conducted on parcel.

c. Ecology Recommended Actions:

i. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations unless it can be demonstrated that the parcel has never been farmed.

B. Phase I and Focused Phase II Environmental Site Assessments, Residential Property 7619-7723 48th Street East and 4708-4710 77th Avenue Court East, Fife, WA 98424; Pierce County Tax Lots 016, 026, 032, 035, and 036 of Map 0420173; BB&A Environmental, December 16, 2022.

1. 7619 48th St E. (TL 042017-3-032 [1.65 acre]):

a. Facilities:

i. Service Garage (SG) + Paint Booth

ii. Septic Drainfield

iii. Storage Container

iv. Diesel AST and Small Pond

v. Water Well

b. Phase II ESA Activities/Results:

i. Collected composite soil sample COMP-032 (12 grabs) for analysis of OCP/CH. Arsenic was not analyzed.

i. Soil dieldrin in COMP-032 detected below MTCA Method B CUL.

ii. Conducted 4 DP borings P1-P4 to depth of 15 feet bgs):

i. P1 - southeast of diesel AST and north (downgradient) of SG

ii. P2 - few feet northwest (downgradient) of paint booth portion of SG

iii. P3 - near septic tank and south of SG

iv. P4 - within septic drainfield near southwest property boundary.

iii. Subsurface soil determined to be silt and clay.

iv. Groundwater determined to exist at depths between 8 and 10 feet bgs

v. Soil TPH-G/D/O results from soil/water interface below laboratory MRLs.

vi. Groundwater results indicated TPH-D/O below MRLs; VOC below MRL's in P1 or P2 although cis-1,2-DCE and dibromochloromethane detected in borings P3 and P4 at 0.74 µg/L and 2.52 µg/L respectively.

c. Ecology Recommended Actions:

i. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

ii. Assess HVOC extent in groundwater near P3.

iii. Assess groundwater northwest of P4 and septic drainfield for HVOC.

2. 4710 77th Ave Court E. (TL 042017-3-035 [0.73 ac] + TL 042017-3-036 [0.44 acre])

a. Facilities:

i. Multi Family Residential + Septic Drainfield + Water Well

b. Phase II ESA Activities/Results:

i. Collected composite soil sample COMP-036 (12 grabs) for OCP/CH. Arsenic was not analyzed.

1. Results less than the laboratory MRLs.

c. Ecology Recommended Actions:

i. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

i. Assess groundwater west of septic drainfield for HVOC.

ii. Sample and decommission water well in accordance with WAC 173-160-381.

3. 7723 48th St E. (TL 042017-3-016 [1.83 ac] + TL 042017-3-026 [0.44 ac])

a. Facilities:

i. Residence with Garage

ii. Barn

iii. Shed with water well

iv. Former Small Residence with former water well

v. Septic Drainfield

b. Phase II ESA Activities/Results:

i. Collected composite soil sample COMP-016 (12 grabs) for OCP/CH. Arsenic was not analyzed.

i. OCP/CH. Results less than the laboratory MRLs.

c. Ecology Recommended Actions:

i. Sample groundwater downgradient of barn/shed for TPH-G/D/O, and VOC.

ii. Sample groundwater downgradient of septic drainfield for HVOC.

iii. Conduct field composite soil sampling/analysis for OPP/carbamate pesticides and dioxin and metals known to be present in various fertilizer and/or pesticide formulations.

iv. Sample and abandon current and former water well according to WAC 173-160-381.

Conceptual Site Model. Please complete a site conceptual model and depict on a standard schematic showing exposure pathways and receptors.

Terrestrial Ecological Evaluation. Please complete a Terrestrial Ecological Evaluation (TEE). Submit the TEE form with the appropriate deliverable that presents the TEE.

Establishment of Cleanup Standards.

Once the remedial investigation is complete for the Site, Ecology will need to concur with the cleanup levels and points of compliance you establish for the Site. Additional CUL's may apply as a result of the suggested activities. Under MTCA, cleanup standards consist of three primary components; (a) points of compliance,[6] (b) cleanup levels,[7] and (c) applicable state and federal laws.[8]

Points of Compliance: Points of compliance (POC) are the specific locations at the Site where cleanup levels must be attained.

[6] WAC 173-340-200 "Point of Compliance."
[7] WAC 173-340-200 "Cleanup level."
[8] WAC 173-340-200 "Applicable state and federal laws," WAC 173-340-700(3)(c).

Ecology provides the following table of standard points of compliance for the Site:

Media	Points of Compliance
Soil-Direct Contact	Based on human exposure via direct contact, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. *WAC 173-340-740(6)(d).* ***Ecology concurs that the standard point of compliance for soil direct contact is appropriate for the Site.***
Soil-Protection of Groundwater	Based on the protection of groundwater, the standard point of compliance is throughout the Site. *WAC 173-340-747.* ***Ecology specifies that the standard point of compliance for soil protection of groundwater is appropriate for the Site.***
Soil-Protection of Plants, Animals, and Soil Biota	Based on ecological protection, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. *WAC 173-340-7490(4)(b).* ***Ecology concurs with Terrestrial Ecological Evaluation (TEE) exclusion for the Site.***
Groundwater	Based on the protection of groundwater quality, the standard point of compliance is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site. *WAC 173-340-720(8)(b).* ***Ecology specifies that the standard point of compliance for groundwater is appropriate for the Site.***
Air Quality	Based on the protection of air quality, the point of compliance is indoor and ambient air throughout the Site. *WAC 173-340-750(6).*

Cleanup Levels. Cleanup levels are the concentrations of a hazardous substance in soil, water, air, or sediment that are determined to be protective of human health and the environment. Until groundwater is properly evaluated across the Site, soil and groundwater cleanup levels cannot be determined at this time.

Applicable Laws and Regulations. In addition to establishing minimum requirements for cleanup standards, applicable local, state, and federal laws may also impose certain technical and procedural requirements for performing cleanup actions.

You may also take interim actions to reduce Site contaminant concentrations at any time, consistent with WAC 173-340-430.

Limitations of the Opinion

Opinion Does Not Settle Liability with the State.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

Opinion Does Not Constitute a Determination of Substantial Equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action a party performs is substantially equivalent. Courts make that determination. *See* RCW 70A.305.080 and WAC 173-340-545.

State is Immune from Liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70A.305.170(6).

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our Voluntary Cleanup Program web site.[9] If you have any questions about this opinion, please contact me at 360-489-5347 or joe.hunt@ecy.wa.gov.

Sincerely,

Joseph B. Hunt, LHG
Toxics Cleanup Program
Southwest Regional Office

JH:JS

cc by email: Randall Boese, BB&A Environmental; rjboese@bbaenv.com
Jerome Lambiotte, Ecology; jerome.lambiotte@ecy.wa.gov
Quyen Keeton; qkeeton@tcphd.org
Ecology Site File

[9] https://www.ecy.wa.gov/vcp