Engineering and Institutional Controls Plan

Cap Sante Marine Site
Anacortes, Washington
Ecology Consent Decree No. 9917

for
Washington State Department of Ecology
on Behalf of Port of Anacortes

August 6, 2014

GeoEngineers
Earth Science + Technology

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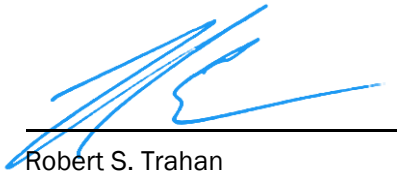

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LIST OF ABBREVIATIONS AND ACRONYMS

bgs	Below ground surface
CAP	Cleanup Action Plan
cPAHs	Carcinogenic polycyclic aromatic hydrocarbons
Ecology	Washington State Department of Ecology
EICP	Engineering and Institutional Controls Plan
FS	Feasibility Study
GeoEngineers	GeoEngineers Inc.
MTCA	Model Toxics Control Act
mg/kg	Milligram per kilogram
MLLW	Mean lower low water
PAHs	Polycyclic aromatic hydrocarbons
Port	Port of Anacortes
Site	Cap Sante Marine Site
TEQ	Toxicity equivalent
TPH	Total petroleum hydrocarbons
RCW	Revised Code of Washington
RI	Remedial Investigation
UST	Underground Storage Tank
WAC	Washington Administrative Code

1.0 INTRODUCTION

This document describes the Engineering and Institutional Controls Plan (EICP) for the Cap Sante Marine Site (Site) located along the western shoreline of the Cap Sante Marina in Anacortes, Washington (Figure 1). The Site includes portions of the Former Cap Sante Marine Lease Area and Fisherman's Work and Parking Area (see Figure 2) that have been environmentally impacted by historical uses. The Site is referenced in the Washington State Department of Ecology (Ecology) databases as the Cap Sante Marine Site (Ecology Facility/Site Identification No. 67532227) and is subject to cleanup actions in accordance with Ecology Consent Decree No. 9917 (Consent Decree). Because residual contamination exceeding Model Toxics Control Act (MCTA) cleanup levels remains in-place at the Site following implementation of Ecology's Cleanup Action Plan (CAP; Ecology 2013), engineering and institutional controls will be utilized to prevent human/terrestrial wildlife exposure.

The purpose of this EICP is to provide a summary of the current Site conditions, identify the engineering and institutional controls that will be utilized at the Site and to provide guidelines for the monitoring and maintenance of the Site controls to ensure compliance with Ecology's selected cleanup action. Compliance monitoring will be performed by the Port of Anacortes (Port) to confirm natural attenuation performance and ensure that groundwater conditions at the point of compliance (i.e., point at which groundwater discharges to the surface waters of Fidalgo Bay) do not exceed MTCA cleanup levels, in accordance with the Groundwater Monitoring and Sampling and Analysis Plan (SAP; GeoEngineers, 2014).

2.0 BACKGROUND

2.1. Site History

The Site and surrounding area was originally a portion of the Fidalgo Bay tide flats, which were filled to the approximate current grades between the 1940s and early 1950s using dredged material from the adjacent federal waterway. The property was acquired by the Port in 1956 and was leased to a series of tenants who operated a boatyard and marina support area providing small boat storage, boat launch, boat maintenance, and offshore fueling facilities. From the late 1970s to 2007, Cap Sante Marine, Ltd. occupied the Former Cap Sante Marine Lease Area and provided small vessel storage, launch, and minor maintenance services. Vessel fueling was historically provided from a float located offshore from the Site. Fuel (gasoline, diesel, and two-stroke oil pre-mix) was supplied to the float via a series of underground pipelines that were supplied by the former USTs that were located within the Former Cap Sante Marine Lease Area.

During the early 1980s, petroleum fuel was observed seeping into the marine waters at several locations east of the Site which were the result of leaking USTs and/or associated product lines. Although the USTs and supply lines were repaired in 1982, petroleum seepage continued to be observed at the Site. In 1984, the Port installed and operated a petroleum recovery system under order from the U.S. Coast Guard to control the observed fuel seepage. The petroleum recovery system consisted of an interceptor recovery trench system coupled with a recovery well. The recovery trench extended to a depth of about 8 to 10 feet below ground surface (bgs). After six

months of operation, petroleum seepage into the harbor was no longer observed and product recovery operations ceased. During operation of the recovery system approximately 1,250 gallons of fuel were recovered from the trench. In 1985 the Port discontinued product recovery operations and replaced the old USTs with two new 12,000 gallon fuel tanks. Fueling service at the Site was discontinued and the fuel float facility was demolished in 2006 as part of Site redevelopment activities. In 2007, USTs and supply lines at the Site were removed by the Port during a MTCA interim action completed to address residual petroleum contamination in that area of the Site.

2.2. Area Redevelopment and Current Use

Area redevelopment was completed in the northern portion of the Site (Former Cap Sante Marine Lease Area) in conjunction with the 2007 interim action (further described below) and included shoreline habitat restoration, construction of an engineered retaining block wall and public access walkway (esplanade). Habitat restoration in this portion of the Site involved shoreline grading to habitat-specific elevations, placement of habitat substrate material (sand and gravel), planting with native plants and installation of logs in the upper intertidal and backshore area. The block wall extends from the boat launch (southwest corner of the interim action area) to the Central Pier (north of the interim action area) and separates the upland portion of the Site from the shoreline/habitat restoration area. The esplanade parallels the upland side of the block wall and provides public access along the waterfront. In 2010, a new restaurant with surface parking was constructed west of the esplanade.

In the southern portion of the Site (Fisherman's Work and Parking Area), some redevelopment has been completed since the construction of the current asphalt surface which provides access to the boat launch and marina facilities as well as vehicle and boat trailer parking and the temporary staging of fishing boat supplies. In 2008, a new esplanade was constructed south of the T Dock (see Figure 2) separating the waterfront from the upland area. The shoreline along the western edge of the Fisherman's Work and Parking Area is protected from wind and wave erosion by a sloped rock revetment extending from the boat launch to the south along the shoreline.

The Former Cap Sante Marine and Fisherman's Work and Parking Areas are shown relative to the current property and surrounding area layout on Figure 2.

2.3. Summary of Site Conditions

Several environmental investigations have been conducted at the Site, beginning with an initial soil investigation in 1983 (Hart Crowser, 1983), and culminating in the Remedial Investigation (RI) and Feasibility Study (FS) completed in 2013 (GeoEngineers, 2013). Environmental investigations completed at and/or adjacent to the Site include:

- Petroleum Seepage Study in 1983 (Hart Crowser, 1983);
- Dredge Material Characterization in 2000 (Hart Crowser, 2000);
- Limited Environmental Due Diligence Investigation in 2004 (Floyd Snider McCarthy, 2004);
- Limited Environmental Due Diligence Investigation in 2005 (Floyd|Snider, 2005);
- Cap Sante Marine Area Remedial Investigation in 2007 (Landau, 2007b);
- Shallow Soil Characterization in 2007 (GeoEngineers, 2007), and;

- Soil and groundwater investigation related to the former Shell Oil Tank Farm Site in 2011 and 2012 (GeoEngineers, 2012).

Based on the results of previous environmental studies, an interim action was completed by the Port to address petroleum and metals contaminated soil in the vicinity of the historical USTs. Results of confirmation soil samples obtained during the interim action remedial excavation activities (GeoEngineers, 2008) as well as the post-interim action groundwater monitoring results (GeoEngineers, 2009a; GeoEngineers, 2009b) demonstrated that the interim action was successful in addressing contamination in this portion of the Site.

Subsequent RI studies (studies completed by GeoEngineers in 2011 and 2012) confirmed that previously identified contamination in the southwest portion of the Cap Sante Marine Lease Area and in the northeast portion of the Fisherman's Work Area was present in limited areas at the Site. Contamination at these locations was determined to be the result of historical operations and uses of the Cap Sante Marine Site (Ecology, 2013). The known soil and groundwater conditions at the Site are summarized in the following sections (Sections 2.3.1 and 2.3.2).

2.3.1. Current Soil Conditions

Soil in the vicinity of the Site generally consists of dredged fill material overlying native marine sediment (silts and sands) and glacial deposits. The dredged fill material is comprised of fine to medium sand with varying amounts of silt and gravel and extends from the ground surface to depths of approximately 5 to 12 feet bgs. Within the Interim Action area (Figure 2), imported sand and gravel used to backfill the excavation extends to depths ranging from 2 to 18 feet bgs.

In the southwest portion of the Former Cap Sante Marine Lease Area and the northeast portion of the Fisherman's Work and Parking Area, residual gasoline- and diesel-range petroleum hydrocarbons, and polycyclic aromatic hydrocarbons (PAHs) are present in soil at concentrations exceeding regulatory cleanup levels. Detected concentrations of these contaminants are summarized in the following table.

Contaminant of Concern	Range of Detections (mg/kg)	Site Cleanup Level[1] (mg/kg)
Petroleum Hydrocarbons (TPH)		
Gasoline-Range Hydrocarbons	23 to 650	100
Diesel-Range Hydrocarbons	11 to 16,000	2,000
Polycyclic Aromatic Hydrocarbons (PAHs)		
Benzo(a)anthracene	0.0072 to 0.14	0.137
Chrysene	0.01 to 0.16	0.137
cPAHs (TEQ method)	0.12 to 3.03	0.137

Note:
[1]Cleanup levels for the Site are established by the CAP.
mg/kg = milligrams per kilogram
cPAHs = carcinogenic polycyclic aromatic hydrocarbons

Gasoline- and diesel-range petroleum hydrocarbon and PAHs exceeded soil cleanup levels established by the CAP in soil at depths ranging from approximately 8 to 14 feet bgs in the southwest portion of the former Cap Sante Marine Lease Area and in soil at depths ranging from approximately 3 to 10 feet bgs in the northeast portion of the Fisherman's Work and Parking Area. The approximate extent of petroleum hydrocarbon and PAH contamination in soil is shown relative to the Former Cap Sante Marine and Fisherman's Work and Parking Areas on Figure 3 and in cross-section on Figure 4.

2.3.2. Current Groundwater Conditions

Three hydrogeologic units have been identified at the Site, including: (1) a shallow, unconfined aquifer occurring in the dredged fill; (2) a native silt confining unit; and (3) a deeper, confined aquifer. Measured depth to groundwater in the vicinity of the Site ranges from approximately 4 to 6 feet bgs (approximately elevation 7 to 8.5 feet mean lower low water [MLLW]). Observed groundwater flow direction is predominantly to the east toward the Cap Sante Marina. Based on the results of tidal studies completed at the Site, tidal influence on groundwater levels and flow direction appears to be limited with a 0.8-foot fluctuation in groundwater levels in near shore wells during a high-low tide cycle. Measured fluctuation in groundwater levels away from the shore (approximately 100 to 200 feet) is approximately 0.1 feet.

Results of groundwater monitoring activities following the completion of the 2007 interim action indicated that groundwater in the vicinity of the historical USTs did not exceed cleanup levels established by the CAP. Additionally, results of the 2012 RI study indicated that residual contamination located in the southwest portion of the Former Cap Sante Marine Area and northeast portion of the Fisherman's Work and Parking Area does not exceed cleanup levels for groundwater at the Site. Continued groundwater monitoring (compliance groundwater monitoring) will be completed in accordance with the SAP to evaluate natural attenuation performance and ensure that contaminant concentrations do not exceed regulatory cleanup levels at the point of compliance.

2.4. Environmental Site Controls

In accordance with the CAP, engineering controls in the form of protective barriers and institutional controls in the form of an environmental covenant are being utilized to prevent human and terrestrial wildlife exposure to residual Site contamination. Within portions of the Former Cap Sante Marine Lease Area and Fisherman's Work and Parking Area, petroleum hydrocarbons and/or PAH contaminated soil is isolated from direct exposure by existing infrastructure. In the vicinity of the Fisherman's Work and Parking Area (i.e., Monitoring and Maintenance Area A; see Figure 3), existing utility infrastructure including an above ground electrical transformer and buried power, phone and water lines as well as concrete and/or asphalt paved surfaces serve as a physical barrier to prevent exposure to residual Site contaminants. In the vicinity of the Former Cap Sante Marine Lease Area (i.e., Monitoring and Maintenance Area B; see Figure 3), asphalt and concrete paved surfaces and/or topsoil within landscaped areas serve as a physical barrier to prevent exposure to residual Site contaminants.

In addition to engineering controls, an environmental covenant has been established for the property generally located east of Q Avenue between 11th Street and 14th Street. The

environmental covenant is included in Appendix A. The legal description of the "Property" is defined as:

- Anacortes Tide Lands Tract 8, Plate 10, together with the south half of vacated 11th Street, the west half of vacated R Avenue, the north half of vacated 13th Street and vacated alley, as per City of Anacortes Ordinance No. 1201 dated November 6, 1956, situated in Section Nineteen (19), Township Thirty-Five (35) North, Range Two (2) East of W.M. situate in Skagit County, State of Washington; and
- The east 270 feet of Anacortes Tide Lands Tract 31, Plate 10, together with the south half of vacated 13th Street and the west half of vacated R Avenue, as per City of Anacortes Ordinance No. 1201 dated November 6, 1956, situated in Section Nineteen (19), Township Thirty-Five (35) North, Range Two (2) East of W.M. situate in Skagit County, State of Washington.

In accordance with the environmental covenant, existing protective concrete, asphalt and/or topsoil cover materials located within Monitoring and Maintenance Areas A and B are to be maintained. Furthermore, unmanaged activities within these areas that may result in the release or exposure of the contaminated soil to the environment, creating a new exposure pathway is prohibited with the exception of activities that temporarily disturb the capped areas, such as utility trenching or other maintenance activities. For these activities that temporarily disturb the protective barriers within these areas, the Port will seek written approval from Ecology prior to the start of work and the protective surfaces will be restored upon conclusion of the activity to meet their original function. Additionally, temporary disturbance activities within these areas that involve worker contact with contaminated soil must be conducted by individuals that have the appropriate training and certifications for working on hazardous waste sites in conformance with state and federal regulations and must follow a site-specific health and safety plan. Contaminated materials that are generated by these activities will also require appropriate safe handling procedures, stormwater controls, and consideration of off-site disposal options for the specific indicator hazardous substances if they are unable to be returned to the subsurface.

Accordingly, this EICP summarizes monitoring and maintenance activities that will be performed by the Port in order to maintain the integrity of the protective barriers. Monitoring and maintenance of the site controls are described below in Section 3.0.

3.0 MONITORING AND MAINTENANCE OF SITE CONTROLS

Monitoring and maintenance of site controls will consist of routine reconnaissance visits and performing corrective actions as necessary to address conditions that may compromise the integrity of the protective barriers that will be utilized to isolate residual Site contamination within Monitoring and Maintenance Areas A and B. Monitoring and maintenance of site controls with these areas including restricted activities, corrective actions and requirements for the disturbance of potentially contaminated material is presented in the following sections. Current Site conditions and the approximate extent of residual soil contamination are shown on Figure 3 and in cross-section on Figure 4.

3.1. Monitoring And Maintenance Areas

Based on previous environmental studies, residual petroleum hydrocarbon and PAH contamination in soil has been identified in two relatively small isolated areas. To prevent direct contact to soil with residual contamination by the general public and wildlife, and to ensure that proper precautions are employed when handling this material during temporary soil disturbance activities, Monitoring and Maintenance Areas A and B are established as areas in which the integrity of the protective barriers must be maintained. Monitoring and Maintenance Areas A and B are defined as follows:

- Monitoring and Maintenance Area A is defined as a 90-foot long by 90-foot wide area surrounding the isolated pocket of residual petroleum hydrocarbon and PAH contaminated soil located in the northeast portion of the Fisherman's Work and Parking Area (see Figure 3). The northwest corner of this area is marked by a nail in the asphalt pavement (Control Point A-1) located 67 feet west of the southeast corner of the B-Dock railing. The southwest corner of this area is marked by a nail in the asphalt pavement (Control Point A-2) located 90 feet south of Control Point A-1. The northeast and southeast corners of this area extend 90 feet east of Control Points A-1 and A-2, respectively, toward Cap Sante Marina.
- Monitoring and Maintenance Area B is defined as a 143-foot long by 115 foot wide area surrounding the isolated pocket of residual petroleum hydrocarbon and PAH contaminated soil located in the southwest portion of the Former Cap Sante Marine Lease Area (see Figure 3). The southeast corner of this area (Control Point B-1) is marked by a nail in asphalt pavement located 12 feet south of the southeast corner of the office building. The northeast corner of this area (Control Point B-2) is located 143 feet north of Control Point B-1 and is marked by the intersection of the northern concrete curb of the landscaped area and the third parking stall dividing line south from the northern edge of the landscaped area. The southwest and northwest corners of this area extend 115 feet west of Control Points B-1 and B-2, respectively, toward O Avenue.

The purpose of Monitoring and Maintenance Areas A and B is to define the specific portions of the Site in which disturbance to the existing protective barriers (i.e., topsoil in landscaped areas and/or paved areas) will be limited and in which monitoring and maintenance activities described by this EICP will be performed.

3.2. Maintenance of the Existing Protective Barriers

The current function of the existing soil and paved (asphalt and concrete) surfaces within Monitoring and Maintenance Areas A and B will be maintained to prevent exposure to the underlying soil contamination to wildlife and the general public. Activities for maintaining the existing protective barriers within Monitoring and Maintenance Areas A and B include but are not limited to the following:

- Repairs to the asphalt and/or concrete paved surfaces where cracks and/or breaches of the barrier that expose the underlying soil regardless of whether they are attributed to natural or man-made activities.
- Maintenance of the vegetative cover in areas where topsoil serves as a protective barrier.

- Maintenance of the established stormwater management systems to ensure that stormwater on the surface of the pavement caps drain freely.
- Maintenance of the bioswale located in the southwest portion of the Former Cap Sante Marine Lease Area to keep the system functional.
- Protective barriers located on steep slopes (i.e., rock revetment) will be maintained to prevent erosion.

3.3. Restricted Activities

Activities with Monitoring and Maintenance Areas A and B that result in the exposure of residual soil contamination is restricted without first notifying Port and obtaining written approval from Ecology. The boundaries of Monitoring and Maintenance Areas A and B have been established based on the existing soil quality analytical data. Soil or paved surfaces disturbed outside of these areas is not subject to this EICP. Conversely, it should be assumed that soil disturbed inside the monitoring areas may contain contaminants of concern and is subject to this EICP. The Port should notify on-site workers, maintenance crews and tenants of the Site restrictions described below. In the event that temporary soil disturbance activities become necessary within Monitoring and Maintenance Area A or B, the Port must be consulted prior to the initiation of the work and the EICP must be followed.

3.3.1. *Protective Soil Barriers*

To maintain the integrity of the protective soil barriers in landscaped areas, activities that will expose soil below 1-foot from the local ground surface, including the application of loads in excess of the cap load bearing capacity, drilling, digging, piercing the cap with sampling device (i.e., post, stake or similar device), grading, excavation, installation of underground utilities or removal of the cap is not permitted without prior consultation with the Port and written approval from Ecology.

Gravel access roads overlying soil in portions of Monitoring and Maintenance Area B may be maintained by grading and/or adding aggregate material. Grading activities however, must be surficial (less than a few inches) in nature.

3.3.2. *Protective Asphalt and Concrete Pavement Barriers*

To maintain the integrity of the protective asphalt and concrete barriers, activities that may damage the paved surface (i.e., create cracks that will decrease the life span of the paved surface) such as application of loads in excess of the cap load bearing capacity or activities such as drilling, digging, piercing the cap with sampling device (i.e., post, stake or similar device), grading, excavation, installation of underground utilities or removal of the cap is not permitted without prior consultation with the Port and written approval from Ecology.

3.3.3. *Shoreline Revetment*

To maintain the integrity of the armored slope located within the eastern portion of Monitoring and Maintenance Area A, activities that will result in uncontrolled soil erosion or that expose soil retained by the armored revetment are not permitted without prior consultation with the Port.

3.4. Monitoring and Maintenance Program

Annual monitoring will be performed to evaluate the integrity of the protective barriers and/or the stability of the shoreline within Monitoring and Maintenance Areas A and B. Annual monitoring will be performed until which time the residual contaminated soil is removed or is otherwise remediated. Monitoring and Maintenance Areas A and B are shown relative to the Site on Figure 3. Additional monitoring events may be elected during non-routine activities such maintenance work that disturbs subsurface soil or other activities or events that could potentially compromise the integrity of the protective barriers within these areas. Evidence of damage to the protective surfaces or instability of the shoreline slope must be reported to the Port so that arrangements for corrective actions/repairs, as necessary, are implemented to maintain the integrity of the protective barriers. Corrective actions are further discussed in Section 3.5.

The monitoring program will consist of reviewing as-built plans and/or base maps showing the current layout of the Site and surrounding area. In addition, previous monitoring reports and maintenance records will be reviewed prior to visiting the Site to evaluate if any previously documented anomalies or maintenance related issues were identified and confirm that repairs or corrective actions were implemented to maintain the function of the protective barriers located within Monitoring and Maintenance Areas A and B.

Upon visiting the Site, a visual reconnaissance will be performed by walking the parameter of Monitoring and Maintenance Areas A and B as well as, completing multiple transects across the area to be able to visually observe the entire surface within these areas. Transects will be completed at intervals that are no greater than 20 feet apart. During the visual reconnaissance, evidence of the following will be evaluated:

- Breaching, cracking, deformation and/or erosion within landscaped or paved areas.
- Signs of invasive plant species (i.e., weeds) within the paved areas causing cracks that could decrease the life span of the paved surface.
- Signs of erosion or potential instability in the armored slope of the shoreline area in the eastern portion of Monitoring and Maintenance Area A.
- Signs of staining or sheens along shoreline in the eastern portion of Monitoring and Maintenance Area A indicating a potential release of Site contaminants to the surface water. If evidence of staining or sheen is observed in this area, confirm that the observation is the result of a release from the Site and not related to inadvertent releases or discharges of petroleum-related products within other areas of the Cap Sante Marina by digging in several inches into the soil underlying the armor stone and evaluating for evidence of petroleum sheen.
- Signs of a blockage or breach within the stormwater system, including bioswales, conveyance channels and at the ends of the conveyance piping.
- Evidence of any other anomalies or non-routine activities that may compromise the integrity of the protective barriers or result in the release of Site contaminants.

Each monitoring event will be documented by completing a written report that includes a description of the observed Site conditions noting areas of interest on a log or map. Additionally,

photographs documenting the current condition Site as wells as any areas of interest that may require a corrective action will be obtained. Conditions that do not comply with the EICP will be identified and corrective actions will be undertaken to achieve compliance with the EICP. An example Engineering and Institutional Monitoring and Maintenance Report Form for documenting the review of previous monitoring events as well as the current conditions of the Site is presented in Appendix B.

Monitoring reports will be retained by the Port and made available for regulatory review upon request. An annual report documenting the condition of the Site controls, soil disturbance activities (if any) and corrective activities taken (if any) for ensuring that the function of the Site controls are maintained will be submitted to Ecology. If conditions are observed that may lead to damage of the protective barriers, the Port will implement corrective actions (see Section 3.5) within 90 days of the observation. If damage is observed to the protective barriers, the Port will notify Ecology within 48 hours of the observation, promptly implement repairs and submit a report to Ecology within 30 days of completing the repair.

Additionally, if soil disturbance activities are performed within Monitoring and Maintenance Area A or B, the Port will review the details of the proposed action to ensure that the elements of this EICP are followed, obtain written approval from Ecology to proceed, complete a follow up site visit within 30 days of the completion date and submit a report to Ecology documenting restoration of the protective barriers.

3.5. Corrective Actions

If a monitoring event identifies existing or potential conditions or activities that may threaten the integrity of the protective barriers at the Site, corrective actions may be required. Corrective actions will be evaluated and determined on a case-by-case basis. These actions may involve providing reminders to on-site workers, maintenance crews and tenants of the activities that are prohibited in the protected areas. Corrective actions for physical problems within the landscaped, paved or shoreline areas will be managed by the Port. Correcting physical problems with the protective barriers may involve the following:

- Placing and compacting new fill or subgrade materials;
- Re-grading, reseeding, or replanting landscaped areas;
- Modifying drainage patterns;
- Patching or sealcoating pavement; and
- Removing debris or repairing the stormwater drainage system.

Recommendations for corrective actions to address existing or potential conditions or activities identified by the monitoring event will be documented using the example Engineering and Institutional Monitoring and Maintenance Report Form (see Appendix B). The Port will review the corrective action recommendations and implement a selected corrective action within 90 days of the observed condition. If the selected corrective action cannot be implemented within 90 days of the initial observed condition or action, or if the selected corrective action will result in a permanent modification to the current Site control, Ecology will be consulted.

The corrective action taken and implantation date will be recorded on the monitoring form in which the initial condition was observed. A summary of corrective action(s) taken or proposed by the Port will be described in the annual monitoring report submitted for Ecology review.

3.6. Requirements for Disturbing Potentially Contaminated Soil

In the event that it becomes necessary to disturb soil within Monitoring and Maintenance Area A or B, the Port will identify proper soil management procedures prior to initiating the work. Such on-site work must not begin until the Port has reviewed the proposed work and provides authorization to proceed. Proper handling procedures must be established for soil disturbed in these areas, as further described below.

3.6.1. *Soil Excavation and Stockpile Management Procedures*

As described in Section 2.3, petroleum hydrocarbon and PAH contamination has been identified in soil between approximately 8 and 14 feet below bgs in Monitoring and Maintenance Area A and approximately 3 and 10 feet bgs in Monitoring and Maintenance Area B. Soil generated from these areas will be segregated and stockpiled for permitted offsite disposal. Overburden soil (i.e., soil generated above 8 feet in Monitoring and Maintenance Area A and 3 feet in Monitoring and Maintenance Area B) will be evaluated for the presence of contamination using field screening methods described in Section 3.6.4. Soil that does not show field screening evidence of contamination and is geotechnically suitable for reuse will be segregated and stockpiled for use as backfill. Soil that does not show field screening evidence of contamination and is not geotechnically suitable for reuse will be segregated and stockpiled for offsite disposal. Soil in which field screening evidence of contamination is observed will not be reused and will be segregated and stockpiled for offsite disposal.

Best management practices (BMPs) will be used to minimize the potential for cross-contamination of soil during excavation, handling, stockpiling, loading and/or transporting activities. Segregation and stockpiling of excavated soil will be conducted as close as practicable to the excavation areas. Stockpiles should be placed on and covered by durable plastic sheeting and bermed to control runoff, or in roll-off or other covered and labeled containers. Access to the temporarily stockpiled/secured soil will be restricted by a properly labeled fence or other barrier pending recuse as backfill or offsite disposal.

3.6.2. *Dewatering and Wastewater Management*

Contingency measures shall be established to address stormwater and/or other excavation water that accumulates in an excavation and comes into contact with contaminated soil during future work. If dewatering is necessary, any recovered stormwater and/or excavation water will be collected for permitted disposal (i.e., City of Anacortes sanitary sewer and/or liquid waste receiving facility such as Emerald Services, Marine Vacuum Services, Philips Services or similar). Best management practices shall be employed to prevent leaks, spills or releases of the recovered excavation/stormwater water.

3.6.3. *Waste Disposal Characterization*

Stockpiled soil that is not geotechnically suitable for reuse, yields field screening evidence of contamination and/or is generated from the zone of identified contamination will be sampled at a

frequency determined by the receiving landfill for waste disposal characterization. Soil samples will be submitted to an offsite laboratory for chemical analysis of Site contaminants including gasoline-, diesel- and heavy oil-range petroleum hydrocarbons and PAHs or as otherwise requested by the receiving facility.

Wastewater generated will be sampled for chemical analysis at an Ecology-certified laboratory for chemical analysis of Site contaminants including gasoline-, diesel- and heavy oil-range petroleum hydrocarbons and PAHs or as otherwise requested by the receiving facility.

Waste disposal authorization will be obtained prior to the transport and/or offsite disposal of soil and/or water generated from the Site. Applicable state and federal regulations will be followed in the offsite disposal of Site generated soil and/or wastewater.

3.6.4. *Field Screening*

Soil generated by the disturbance activity will be screened in the field for the presence of petroleum hydrocarbons to determine whether soil is acceptable for reuse. Soil in which oil-staining or petroleum odors are observed will be considered contaminated and subject to waste disposal characterization as described in Section 3.6.3.

Within the unsaturated zone, dark brown, gray or black staining zone may indicate petroleum contamination. In the vicinity of the water table, green, blue-gray or gray staining may indicate petroleum contamination. Water that is in contact with soil should be observed for visible oil, oil beads and/or sheen.

3.6.5. *Restoration*

Upon completion of the soil disturbance activity, the ground surface will be restored to its pre-existing condition. The Port will consult with Ecology prior to making permanent changes or modifications to the ground surface that alters its original function.

3.6.6. *Health and Safety*

Any soil disturbance activities within the restricted area must be conducted in accordance with the requirements of the Washington Industrial Safety and Health Act (RCW 49.17) and the federal Occupational Safety and Health Act (29 CFR 1910, 1926). Regulations include requirements that workers are to be protected from exposure to contaminants and that excavations are to be properly shored.

3.7. Emergency Maintenance Activities

It is possible that soil excavation may be required at the Site in the future for emergency maintenance activities. For example, it may be necessary to excavate soil to repair a broken water line or other existing infrastructure. In the event that emergency digging is required within the restricted area, the Port should be notified within 72-hours of the activity so that Site conditions may be evaluated, Ecology notified as appropriate and corrective actions/repairs taken (if necessary) to ensure that the protective barriers (if disturbed) are restored to their original function.

4.0 LIMITATIONS

This report has been prepared for the exclusive use of the Port of Anacortes, their authorized agents and regulatory agencies in their evaluation of the Cap Sante Marine Site located in Anacortes, Washington. No other party may rely on the product of our services unless we agree in advance and in writing to such reliance.

Within the limitations of scope, schedule and budget, our services have been executed in accordance with generally accepted environmental science practices in this area at the time this report was prepared. No warranty or other conditions express or implied should be understood. Any electronic form, facsimile or hard copy of the original document (email, text, table, and/or figure), if provided, and any attachments are only a copy of the original document. The original document is stored by GeoEngineers, Inc. and will serve as the official document of record.

5.0 REFERENCES

Floyd Snider McCarthy, Inc., "Letter Report, Results of Limited Environmental Due Diligence Investigation, Cap Sante Boat Haven - Anacortes, Washington," prepared for the Port of Anacortes, June 14, 2004.

Floyd|Snider, "Limited Environmental Due Diligence Investigation Report, Former Shell Oil Tank Farm, Cap Sante Marine Lease Area," prepared for the Port of Anacortes, November 8, 2005

GeoEngineers, Inc., "Interim Action Report, Cap Sante Marine, Ecology Agreed Order No. DE-07TCPHQ-4197, Anacortes, Washington," GEI File No. 5147-005-03, prepared for the Port of Anacortes, December 9, 2008.

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GeoEngineers, Inc., "Groundwater Monitoring Sampling and Analysis Plan, Cap Sante Marine, Anacortes, Washington, Ecology Consent Decree No. 9917," GEI File No. 5147-005-10, prepared for the Washington State Department of Ecology on behalf of Port of Anacortes, May 30, 2014.

Hart Crowser & Associates Inc., "Petroleum Seepage Study, Port of Anacortes, Anacortes Washington," prepared for the Port of Anacortes, November 1, 1983.

Hart Crowser & Associates Inc., "Dredge Material Characterization, Cap Sante Marina, Anacortes Washington," prepared for Cap Sante Marina, June 16, 2000.

Landau Associates (2007a), "Work Plan, Remedial Investigation/Feasibility Study and Interim Action, Cap Sante Marine Lease Area, Anacortes, Washington," prepared for the Port of Anacortes, June 19, 2007.

Landau Associates (2007b), "Landau Associates, Investigation Data Report, Cap Sante Marine Lease Area, Anacortes, Washington," prepared for the Port of Anacortes, August 21, 2007.

FIGURES

GeoEngineers

N
W E
S

2,000 0 2,000

Feet

Notes:
1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. can not guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.
3. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without permission.

Data Sources: ESRI Data & Maps

Projection: NAD 1983 UTM Zone 10N

Vicinity Map

Cap Sante Marine Site
Anacortes, Washington

Figure 1

Path: \\sea\Projects\5\5147005\GIS\5147005_VicinityMap.mxd Map Revised: 12 March 2013 amanza

Path: \\sea\projects\5\5147005\GIS\5147005l0_SitePlan_REV031414.mxd Map Revised: 14 March 2014 maugust

Data Source: Base aerial provided by the Port of Anacortes, dated March, 2013. Skagit County GIS.

Projection: NAD 1983 StatePlane Washington North FIPS 4601 Feet

Notes:
1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

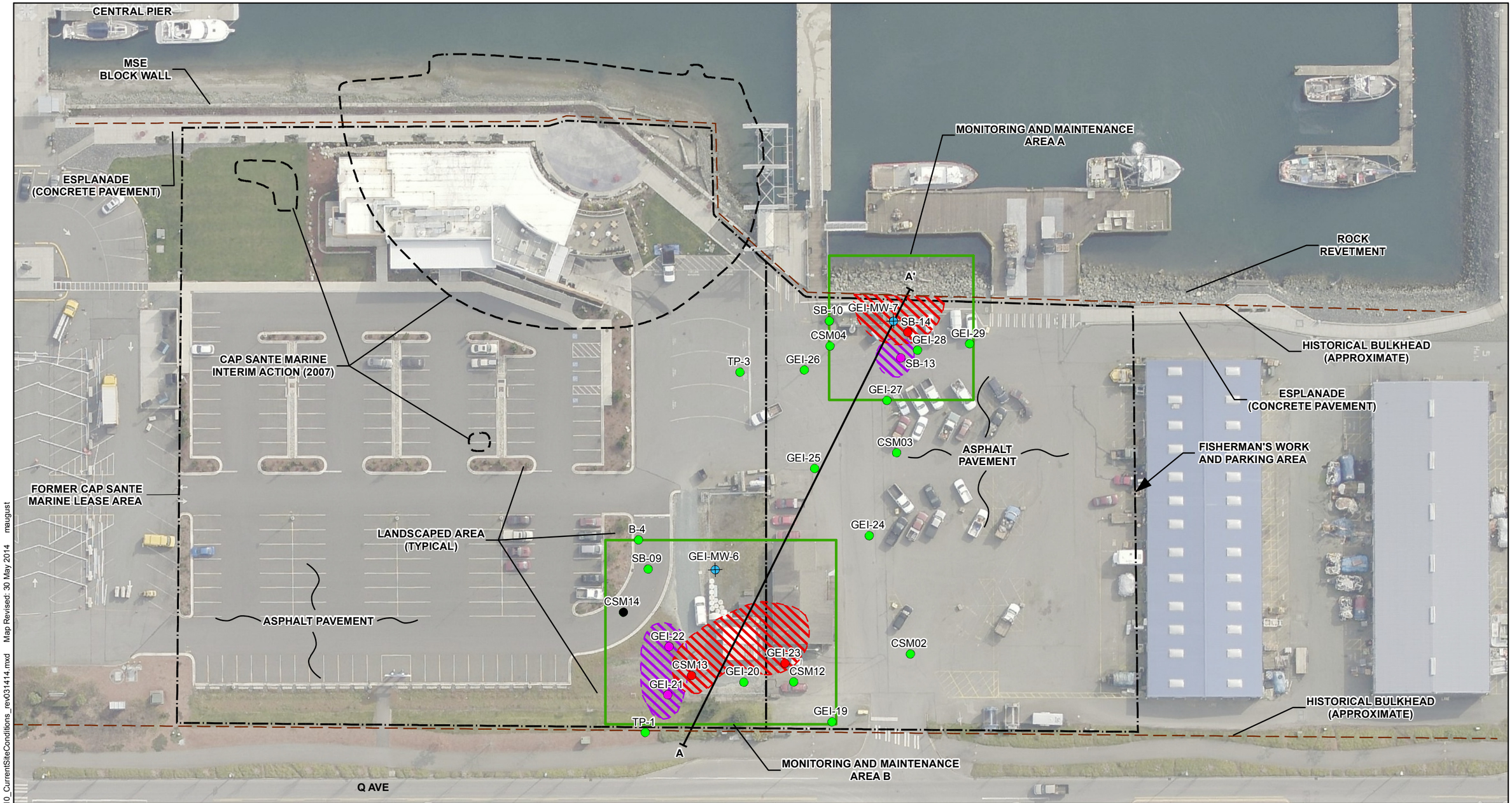
N E S W

0 50 100 200
Feet

Site Plan

Cap Sante Marine Site
Anacortes, Washington

Figure 2



Path: \\sea\projects\5\514700510\GIS\514700510_CurrentSiteConditions_rev031414.mxd Map Revised: 30 May 2014 maugust

Data Source: Base aerial provided by the Port of Anacortes, March 2013. Skagit County GIS.

Projection: NAD 1983 StatePlane Washington North FIPS 4601 Feet

Notes:
1. Sampling locations in the vicinity of the areas identified to contain COCs exceeding site cleanup levels are shown on this figure.
2. The locations of all features shown are approximate.
3. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

Legend

- Remedial Investigation Soil Sample Location
- Monitoring Well Location
- TPH Exceedance of Soil Cleanup Level
- PAHs Exceedance of Soil Cleanup Level
- TPH and PAHs Less Than Soil Cleanup Level
- TPH and PAHs Less Than Groundwater Cleanup Level
- Cross Section A-A' (see Fig. 4)

Areas With Contaminant of Concern (COCs) Exceeding Soil Cleanup Level

- Approximate Area of TPH Exceedance in Soil
- Approximate Area of PAH Exceedance in Soil

PAH - Polycyclic Aromatic Hydrocarbons
TPH - Petroleum Hydrocarbons (Gasoline, Diesel and/or Heavy Oil)

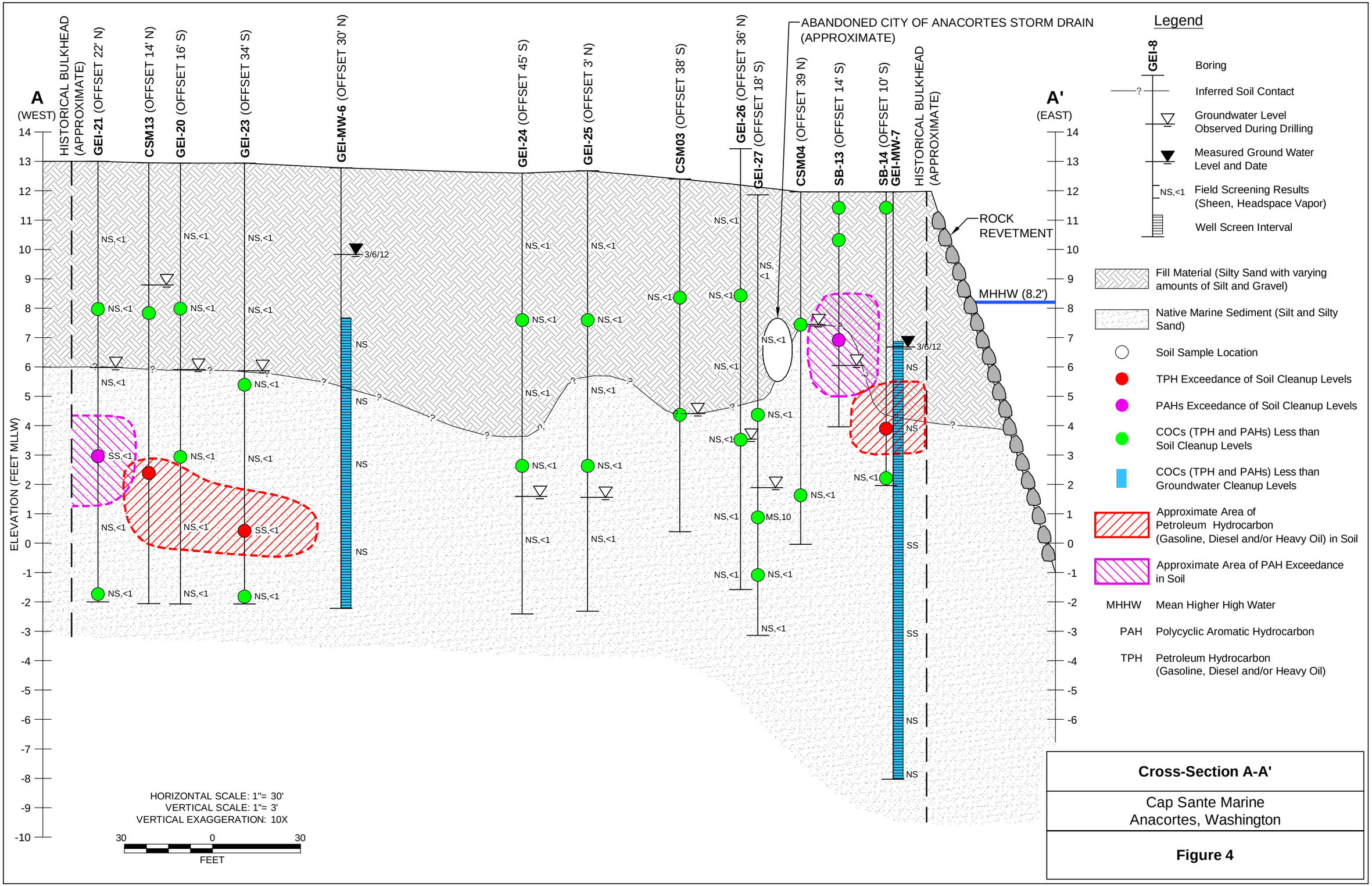
N W E S

60 0 60
Feet

Current Site Conditions

Cap Sante Marine Site
Anacortes, Washington

Figure 3



Cross-Section A-A'

Cap Sante Marine
Anacortes, Washington

Figure 4

P:\515\47005\09\CAD\515147005-09 FIG 4 CROSSSECTION AA.DWG\TAB:CROSS-SECTION AA MODIFIED BY TMICHAUD ON MAR 20, 2014 - 11:48

APPENDICES

GeoEngineers

APPENDIX A
Environmental Covenant

After recording return to:

Nicholas M. Acklam
Toxics Cleanup Program
Washington State Department of Ecology
Post Office Box 47600
Olympia, WA 98504-7600

201408050034
Skagit County Auditor
8/5/2014 Page 1 of 11 11:03AM
$82.00

DOCUMENT:	**ENVIRONMENTAL COVENANT**
GRANTOR:	**PORT OF ANACORTES**
GRANTEE:	**WASHINGTON STATE DEPARTMENT OF ECOLOGY**
BRIEF LEGAL DESCRIPTION:	**PTN. TR 8, PL 10, ANACORTES TIDE LANDS; AND PTN. TR 31, PL 10, ANACORTES TIDE LANDS**
TAX PARCEL #S:	**P32951; P32984**
CROSS REFERENCE:	**NONE**

ENVIRONMENTAL COVENANT

RECITALS

A. This document is an environmental (restrictive) covenant (hereafter "Covenant") executed pursuant to the Model Toxics Control Act ("MTCA"), Chapter 70.105D RCW and Uniform Environmental Covenants Act ("UECA"), Chapter 64.70 RCW.

B. This Covenant applies to (i) a portion of Skagit County tax parcel number P32951 and (ii) a portion of Skagit County tax parcel number P32984. Both tax parcels are legally described in Exhibit "A" attached hereto and are part of a site commonly known as Cap Sante Marine, facility ID #67532227. The portions of each parcel to which this Restrictive Covenant attaches are depicted in Exhibit "B" attached hereto, and are collectively referred to hereinafter as the "Property".

C. The Property is the subject of remedial action under MTCA. This Covenant is required because residual contamination remains on the Property after completion of remedial actions. Specifically, the following principle contaminants remain on the Property:

Medium	Principle Contaminants Present
Soil	Gasoline, diesel, and heavy oil range petroleum hydrocarbons and/or carcinogenic polycyclic aromatic hydrocarbons (cPAHs)

D. It is the purpose of this Covenant to restrict certain activities and uses of the Property to protect human health and the environment and the integrity of remedial actions conducted at the site. Records describing the extent of residual contamination and remedial actions conducted are available through the Washington State Department of Ecology ("Ecology"). This includes the following documents: Remedial Investigation and Feasibility Study and Cleanup Action Plan.

E. This Covenant grants the Washington State Department of Ecology, as holder of this Covenant, certain rights specified in this Covenant. The right of the Washington State Department of Ecology as a holder is not an ownership interest under MTCA, Chapter 70.105D RCW or the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") 42 USC Chapter 103.

COVENANT

The Port of Anacortes, as Grantor and fee simple owner of the Property, hereby grants to the Washington State Department of Ecology, and its successors and assignees, (hereafter "Ecology") the following covenants. Furthermore, it is the intent of the Grantor that such covenants shall run with the land and be binding on all current and future owners of any portion of, or interest in, the Property.

Section 1. General Restrictions and Requirements.

The following general restrictions and requirements shall apply to the Property:

a. Interference with Remedial Action. The Grantor shall not engage in any activity on the Property that may impact or interfere with the remedial action and any operation, maintenance, inspection or monitoring of that remedial action without prior written approval from Ecology.

b. Protection of Human Health and the Environment. The Grantor shall not engage in any activity on the Property that may threaten continued protection of human health or the environment without prior written approval from Ecology. This includes, but is not limited to, any activity that results in the release of residual contamination that was contained as a part of the remedial action or that exacerbates or creates a new exposure to residual contamination remaining on the Property.

c. Continued Compliance Required. Grantor shall not convey any interest in any portion of the Property without providing for the continued adequate and complete operation, maintenance, and monitoring of remedial actions and continued compliance with this Covenant.

d. Leases. Grantor shall restrict any lease for any portion of the Property to uses and activities consistent with this Covenant and notify all lessees of the restrictions on the use of the Property.

e. Amendment to the Covenant. Grantor must notify and obtain approval from Ecology at least sixty (60) days in advance of any proposed activity or use of the Property in a

manner that is inconsistent with this Covenant.[1] Before approving any proposal, Ecology must issue a public notice and provide an opportunity for the public to comment on the proposal. If Ecology approves the proposal, the Covenant will be amended to reflect the change.

Section 2. Specific Prohibitions and Requirements.

In addition to the general restrictions in Section 1 of this Covenant, the following additional specific restrictions and requirements shall apply to the Property.

a. Commercial Land Use. The remedial action for the Property is based on a cleanup designed for commercial property. As such, the Property shall be used in perpetuity only for commercial land uses as that term is defined in the rules promulgated under Chapter 70.105D RCW. Prohibited uses on the Property include, but are not limited to, residential uses, childcare facilities, K-12 public or private schools, parks, grazing of animals, and growing of food crops.

b. Containment of Soil. The remedial action for the Property is based on containing contaminated soil. The Cap Sante Marine Lease Area cap consists of plantings (bark and small shrubs) and gravel. The Fisherman's Work and Parking Area cap consists of asphalt. Exhibit C attached hereto illustrates these two capped areas. The primary purpose of this cap is to contain contamination and mitigate risk of direct human/terrestrial wildlife contact with contaminated soils. As such, the following restrictions shall apply within the area illustrated in Exhibit C:

(i) With the exception of activities carried out consistent with Section 2 (b)(ii), any activity on the Property that will compromise the integrity of the cap including: drilling; digging; piercing the cap with sampling device, post, stake or similar device; grading; excavation; installation of underground utilities; removal of the cap; or, application of loads in excess of the cap load bearing capacity, is prohibited without prior written approval by Ecology. The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to the cap. Unless an alternative plan has been approved by Ecology in writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within thirty (30) days of completing the repairs.

(ii) Activities that temporarily disturb the capped areas, such as utility trenching or other maintenance actions shall restore the protective cap upon conclusion of the activity. Intrusive activities in the capped areas that involve worker contact with contaminated soil shall be conducted by individuals that have the appropriate training and certifications for working on hazardous waste sites and in conformance with a site-specific health and safety plan. Prior to conducting any activities that will disturb the capped areas; the Grantor shall provide written notice to Ecology.

Section 3. Access.

a. The Grantor shall maintain clear access to all remedial action components necessary to construct, operate, inspect, monitor and maintain the remedial action.

---

[1]Examples of inconsistent uses are: using the Property for a use not allowed under the covenant (for example, mixed residential and commercial use on a property that is restricted to industrial uses); OR, drilling a water supply well when use of the groundwater for water supply is prohibited by the covenant.

b. The Grantor freely and voluntarily grants Ecology and its authorized representatives, upon reasonable notice, the right to enter the Property at reasonable times to evaluate the effectiveness of this Covenant and associated remedial actions, and enforce compliance with this Covenant and those actions, including the right to take samples, inspect any remedial actions conducted on the Property, and to inspect records related to the remedial action.

c. No right of access or use by a third party to any portion of the Property is conveyed by this instrument.

Section 4. Notice Requirements.

a. Conveyance of Any Interest. The Grantor, when conveying any interest in any part of the Property including, but not limited to title, easement, leases, and security or other interests, must:

i. Notify Ecology at least thirty (30) days in advance of the conveyance.

ii. Include in the conveying document a notice in substantially the following form as well as a complete copy of this Covenant:

NOTICE: THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL COVENANT GRANTED TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY ON [DATE] AND RECORDED WITH THE SKAGIT COUNTY AUDITOR UNDER RECORDING NUMBER [RECORDING NUMBER]. USES AND ACTIVITIES ON THIS PROPERTY MUST COMPLY WITH THAT COVENANT, A COMPLETE COPY OF WHICH IS ATTACHED TO THIS DOCUMENT.

iii. Unless otherwise agreed to in writing by Ecology, provide Ecology with a complete copy of the executed document within thirty (30) days of the date of execution of such document.

b. Reporting Violations. Should the Grantor become aware of any violation of this Covenant, Grantor shall promptly report such violation to Ecology.

c. Emergencies. For any emergency or significant change in site conditions due to Acts of Nature (for example, flood, fire) resulting in a violation of this Covenant, the Grantor is authorized to respond to such an event in accordance with state and federal law. The Grantor must notify Ecology of the event and response actions planned or taken as soon as practical, but no later than within twenty-four (24) hours of the discovery of the event.

d. Notice. Any required written notice, approval, or communication shall be personally delivered or sent by first class U.S. mail to the following persons. Any change in this contact information shall be submitted in writing to all parties to this Covenant.

Chris Johnson Port of Anacortes 100 Commercial Avenue Anacortes, WA 98221 (360) 293-3134	Environmental Covenants Coordinator Washington State Department of Ecology Toxics Cleanup Program Post Office Box 47600 Olympia, WA 98504-7600 (360) 407-6000

As an alternative to providing written notice and change in contact information by mail, these documents may be provided electronically in an agreed upon format at the time of submittal.

Section 5. Modification or Termination.

a. If the conditions at the Property requiring a Covenant have changed or no longer exist, then the Grantor may submit a request to Ecology that this Covenant be amended or terminated. Any amendment or termination of this Covenant must follow the procedures in Chapter 64.70 RCW and Chapter 70.105D RCW and any rules promulgated under these chapters.

Section 6. Enforcement and Construction.

a. This Covenant is being freely and voluntarily granted by the Grantor.

b. Grantor shall provide Ecology with an original signed Covenant and proof of recording within ten (10) days of execution of this Covenant.

c. Ecology shall be entitled to enforce the terms of this Covenant by resort to specific performance or legal process. All remedies available in this Covenant shall be in addition to any and all remedies at law or in equity, including Chapter 70.105D RCW and Chapter 64.70 RCW. Enforcement of the terms of this Covenant shall be at the discretion of Ecology, and any forbearance, delay or omission to exercise its rights under this Covenant in the event of a breach of any term of this Covenant is not a waiver by Ecology of that term or of any subsequent breach of that term, or any other term in this Covenant, or of any rights of Ecology under this Covenant.

d. The Grantor, upon request by Ecology, shall be obligated to pay for Ecology's costs to process a request for any modification or termination of this Covenant and any approval required by this Covenant.

e. This Covenant shall be liberally construed to meet the intent of the Model Toxics Control Act, Chapter 70.105D RCW and Uniform Environmental Covenants Act, Chapter 64.70 RCW.

f. The provisions of this Covenant shall be severable. If any provision in this Covenant or its application to any person or circumstance is held invalid, the remainder of this Covenant or its application to any person or circumstance is not affected and shall continue in full force and effect as though such void provision had not been contained herein.

g. A heading used at the beginning of any section, paragraph or exhibit of this Covenant may be used to aid in the interpretation of that section, paragraph or exhibit but does not override the specific requirements in that section, paragraph or exhibit. The undersigned representative of Grantor warrants that the Port of Anacortes holds the title to the Property and has authority to execute this Covenant.

GRANTOR:

PORT OF ANACORTES

Robert Hyde Actg Ex. Chris S. Johnson
Executive Director

Dated: 7-11-14

GRANTEE:

WASHINGTON STATE, DEPARTMENT OF ECOLOGY

Jim Pendowski
Program Manager, Toxics Cleanup Program

Dated: 7/18/14 7/21/14 by SP

STATE OF WASHINGTON)
) ss.
COUNTY OF SKAGIT)

On this 11th day of July, 2014, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Chris Johnson Actg Robert Hyde, known to me to be the Executive Director of the **PORT OF ANACORTES** 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 he was authorized to execute the said instrument on behalf of the corporation.

Given under my hand and official seal this 11th day of July, 2014.

JULIENNE M. LINDSEY NOTARY PUBLIC STATE OF WASHINGTON COMMISSION EXPIRES 7-24-16

Julienne M. Lindsey
Print Name: Julienne M. Lindsey
NOTARY PUBLIC in and for the
State of Washington, residing at Anacortes, WA

STATE OF WASHINGTON)
) ss.
COUNTY OF Thurston)

On this 21 day of July, 2014, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared, Jim Pendowski, known to me to be the Program Manager of the Toxics Cleanup Program of the **WASHINGTON STATE DEPARTMENT OF ECOLOGY**, and acknowledged the said instrument to be the free and voluntary act and deed of the State of Washington, for the uses and purposes therein mentioned, and on oath stated that he was authorized to execute the said instrument on behalf of the State of Washington.

Given under my hand and official seal this 21 day of July, 2014.

ANN M. LOWE NOTARY PUBLIC STATE OF WASHINGTON COMMISSION EXPIRES AUG. 15, 2015

Ann M Lowe
Print Name: Ann M. Lowe
NOTARY PUBLIC in and for the
State of Washington, residing at Olympia, WA

EXHIBIT A

LEGAL DESCRIPTIONS

Tax Parcel No. P32951

Anacortes Tide Lands Tract 8, Plate 10, together with the south half of vacated 11th Street, the west half of vacated R Avenue, the north half of vacated 13th Street and vacated alley, as per City of Anacortes Ordinance No. 1201 dated November 6, 1956, situated in Section Nineteen (19), Township Thirty-Five (35) North, Range Two (2) East of W.M.

Situate in Skagit County, State of Washington.

Tax Parcel No. P32984

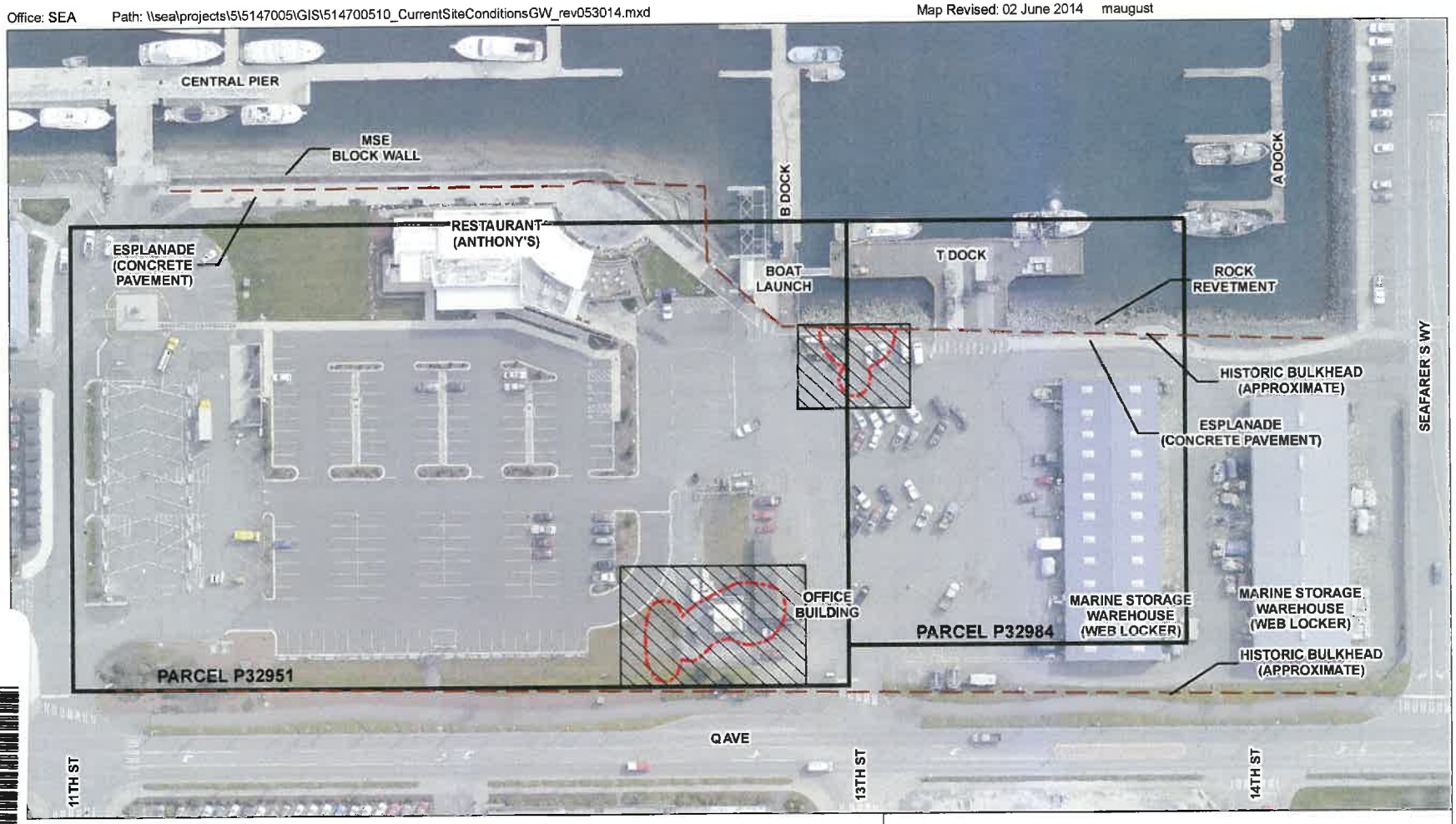
The east 270 feet of Anacortes Tide Lands Tract 31, Plate 10, together with the south half of vacated 13th Street and the west half of vacated R Avenue, as per City of Anacortes Ordinance No. 1201 dated November 6, 1956, situated in Section Nineteen (19), Township Thirty-Five (35) North, Range Two (2) East of W.M.

Situate in Skagit County, State of Washington.

EXHIBIT B

PROPERTY MAP

Office: SEA Path: \\sea\projects\5\5147005\GIS\514700510_CurrentSiteConditionsGW_rev053014.mxd Map Revised: 02 June 2014 maugust



Legend

- Approximate area of subsurface contamination that remains on site
- Tax parcel boundary
- Restrictive Covenant Area

120 0 120
Feet

Restrictive Covenant Area

Cap Sante Marine Site
Anacortes, Washington

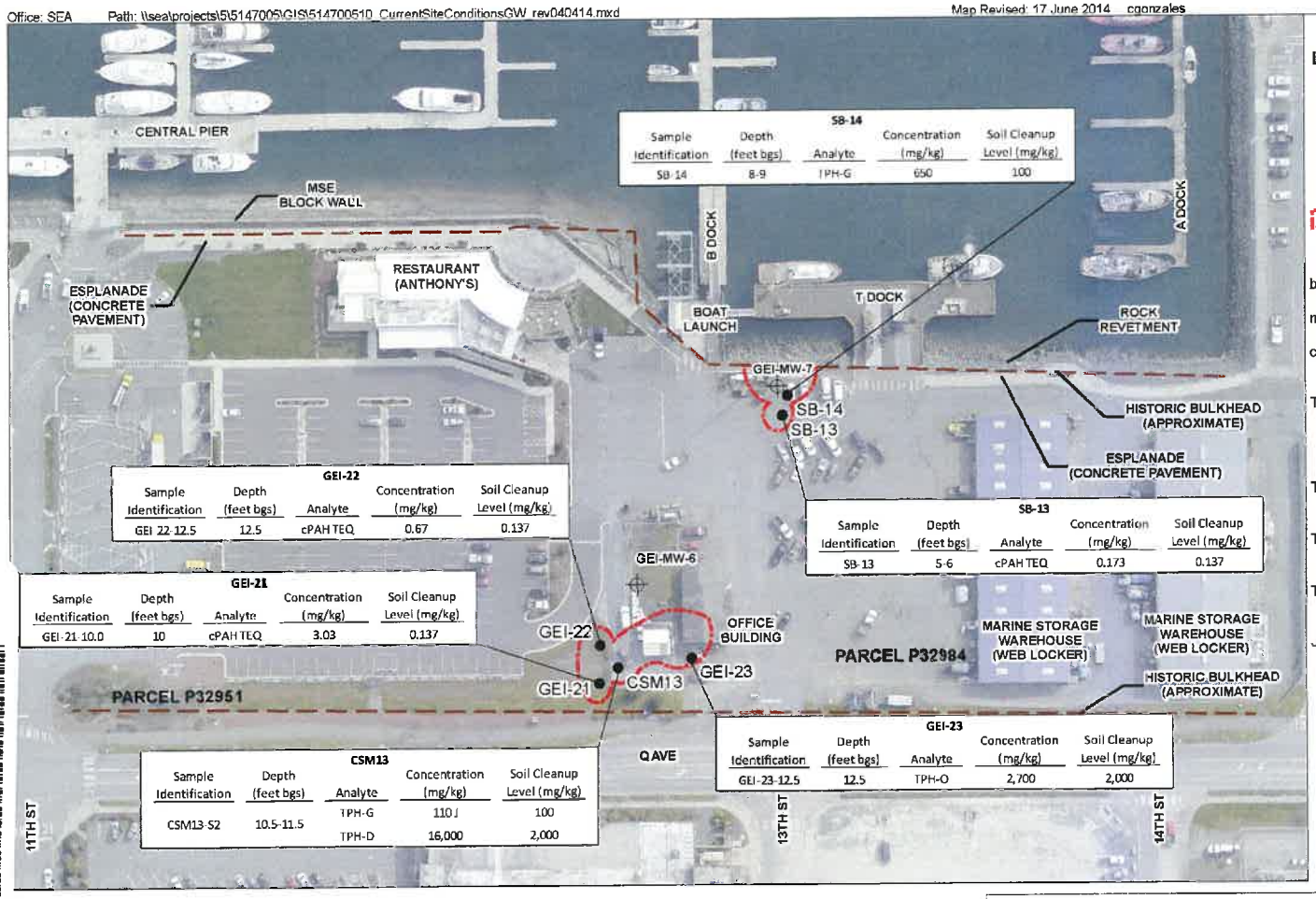
GeoEngineers

Exhibit B

EXHIBIT C

CAPPED AREAS

Office: SEA Path: \\sea\projects\5\5147005\GIS\5147005I0_CurrentSiteConditionsGW_rev040414.mxd Map Revised: 17 June 2014 cgonzales



SB-14

Sample Identification	Depth (feet bgs)	Analyte	Concentration (mg/kg)	Soil Cleanup Level (mg/kg)
SB-14	8-9	TPH-G	650	100

GEI-22

Sample Identification	Depth (feet bgs)	Analyte	Concentration (mg/kg)	Soil Cleanup Level (mg/kg)
GEI-22-12.5	12.5	cPAH TEQ	0.67	0.137

SB-13

Sample Identification	Depth (feet bgs)	Analyte	Concentration (mg/kg)	Soil Cleanup Level (mg/kg)
SB-13	5-6	cPAH TEQ	0.173	0.137

GEI-21

Sample Identification	Depth (feet bgs)	Analyte	Concentration (mg/kg)	Soil Cleanup Level (mg/kg)
GEI-21-10.0	10	cPAH TEQ	3.03	0.137

GEI-23

Sample Identification	Depth (feet bgs)	Analyte	Concentration (mg/kg)	Soil Cleanup Level (mg/kg)
GEI-23-12.5	12.5	TPH-O	2,700	2,000

CSM13

Sample Identification	Depth (feet bgs)	Analyte	Concentration (mg/kg)	Soil Cleanup Level (mg/kg)
CSM13-S2	10.5-11.5	TPH-G	110 J	100
		TPH-D	16,000	2,000

Legend

- Soil boring location with contaminant concentration greater than soil clean level
- Monitoring well location
- Approximate area of subsurface contamination that remains on site

bgs	below ground surface
mg/kg	milligrams/kilograms
cPAH	Carcinogenic polycyclic aromatic hydrocarbons
TEQ	Total toxic equivalent concentraton of benzo-(a)pyrene (WAC 173-340-708 (8) (e))
TPH-G	Total petroleum hydro-carbons as gasoline
TPH-D	Total petroleum hydro-carbons as diesel
TPH-O	Total petroleum hydro-carbons as heavy oil
J	Estimated value

Data Source: ESRI Data and Maps, Skagit County.

Projection: NAD 1983 StatePlane Washington North FIPS 4601 Feet

Notes:
1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

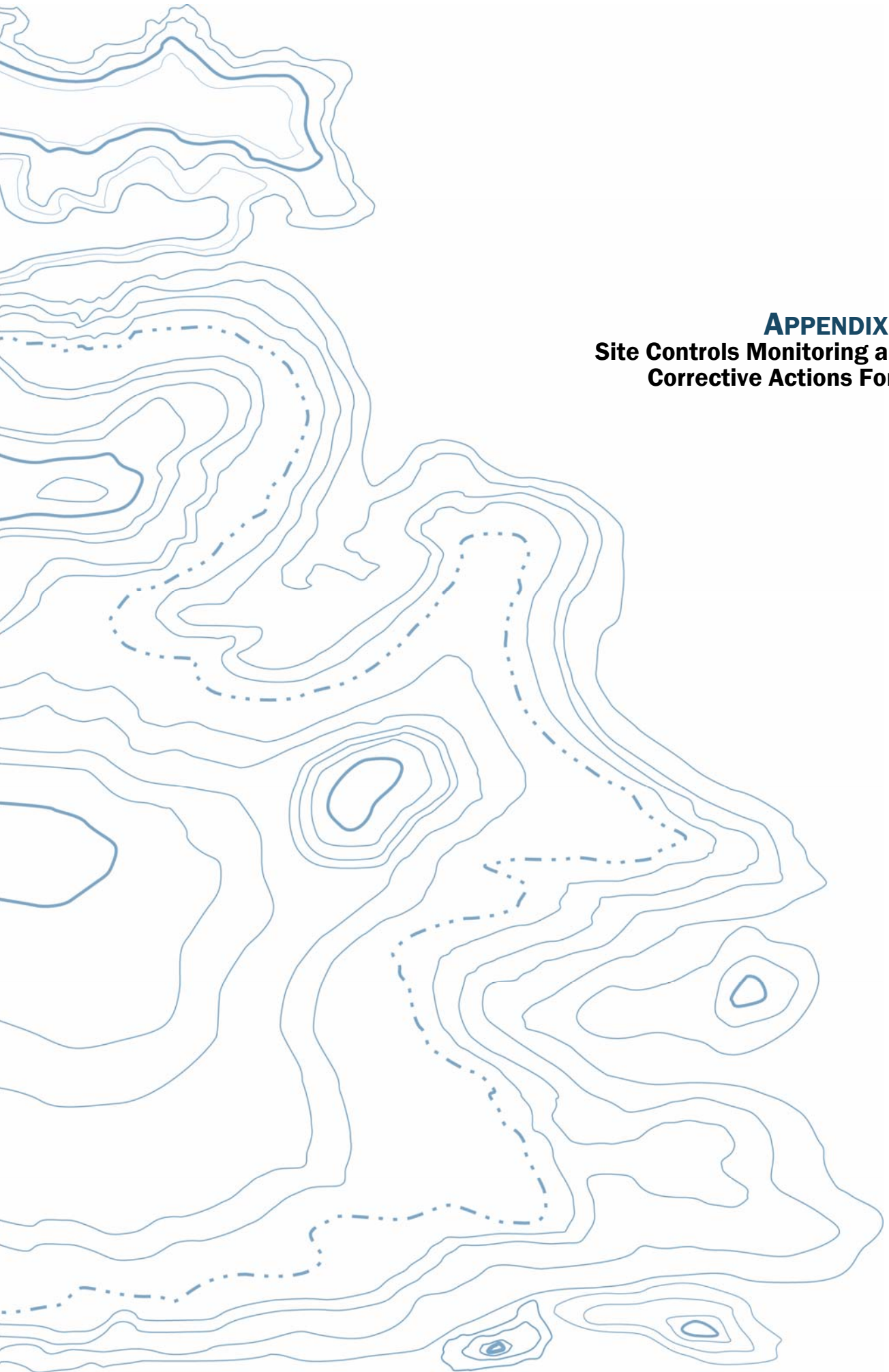
120 0 120
Feet

Site Plan

Cap Sante Marine Site
Anacortes, Washington

GeoEngineers

Exhibit C



APPENDIX B
Site Controls Monitoring and Corrective Actions Form

Engineering and Institutional Controls Monitoring Report

Site Name:	Date:
Monitoring Event Completed By (name, title, organization):	

A. General Instructions

1. All checklist items must be completed and detailed comments made to document the results of the site controls evaluation.
2. The completed checklist is part of the field record of the evaluation. Additional pages should be used (as necessary) to ensure a complete record is made. Number, date, initial and attach additional pages to this checklist upon completion.
3. Any checklist line item marked in a SHADED BOX must be fully explained or an appropriate reference to previous reports provided. The explanation should include the rational for conclusions and recommendations, if appropriate. Annotated the attached site maps as appropriate to provide additional detail.
4. An evaluation of the site controls should consist of a complete site walk including the perimeter and multiple transects across the Site no greater than 20 feet apart to fully evaluate the condition of site controls and features specifically described in this checklist.
5. Photographs of the site controls and/or site features should be taken to document the overall condition of the site. In addition, all anomalous features or new features (such as changes or damage to the exiting site controls) should also be photographed. Attach any photographs of the site to this checklist upon completion of the site evaluation.

B. Preparation (to be completed prior to site visit)	**YES**	**NO**	**EXPLANATION**
1. Site as-built plans and/or base maps reviewed?			
2. Previous monitoring report reviewed?			
a. Were anomalies or site changes identified on the previous report?			
b. Was maintenance performed on areas with identified anomalies?			
3. Site Maintenance and repair records reviewed?			
a. Has site repair resulted in a change from as-build conditions?			
b. Are revised as-built drawings available that reflect repair changes?			

C. Evaluation of Controls (to be completed during site visit)	**YES**	**NO**	**EXPLANATION**
1. Changes in adjacent property conditions?			
a. Any change in adjacent property tenants?			
b. Any change in property use /features?			
c. Any utility and/or maintenance work completed?			
d. Any erosion of adjacent property surfaces?			
e. Changes in surrounding vegetation?			
2. Changes in property conditions?			
a. Any change in adjacent property ownership?			
b. Any change in property tenant(s)?			
c. Any change in property use /features?			
d. Any utility, repair and/or maintenance work completed?			
3. Integrity of protective soil areas threatened?			
a. Evidence of disturbance, excavation or grading?			
b. Evidence of animal burrowing?			
c. Evidence of erosion (wind or water)?			
d. Change in vegetation cover?			
e. Evidence of ponded water (excluding bioswale)?			

Site Name:	Date:

C. **Evaluation of Controls** (continued)	YES	NO	EXPLANATION
4. Integrity of protective paved (asphalt and concrete) areas threatened?			
a. Evidence of disturbance, excavation, grading?			
b. Evidence of cracking?			
c. Evidence of erosion/subsidence?			
d. Evidence of ponded water?			
f. Evidence of invasive plant species (weeds)?			
5. Integrity of shoreline area?			
a. Evidence of disturbance, excavation, grading?			
b. Evidence of erosion/subsidence?			
c. Evidence of ponded water?			
d. Evidence of staining or sheens along shoreline? If yes, is the staining or sheen emanating from the Site?			
g. If yes, is the staining or sheen emanating from the Site?			
6. Photographs taken documenting current Site conditions?			

D. **Conclusions and Recommendations**	YES	NO	EXPLANATION
1. Is there visual evidence of an imminent threat to the integrity of the soil, paved or shoreline areas?			
2. Are follow-up site evaluations required?			
3. Are existing maintenance actions satisfactory?			
4. Are existing repair actions satisfactory?			
5. Are other maintenance/repair actions necessary?			

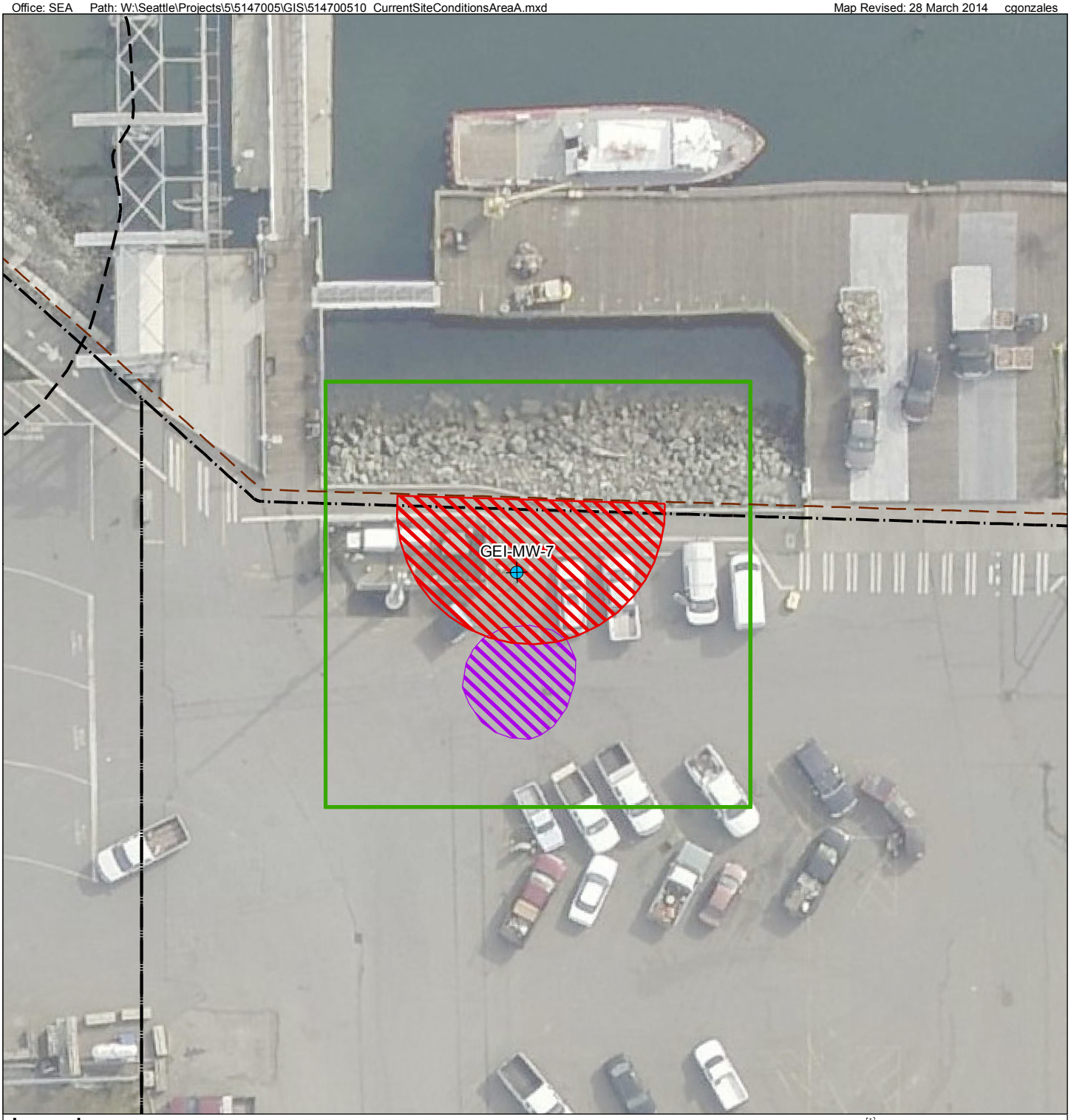
6. Corrective/Maintenance Action(s) Required:

7. Corrective/Maintenance Action Implemented:

Date Implemented:_____

8. Additional Comments:

Name:	Signature:
Title:	Date:



Legend

Monitoring Well Location

Areas With Contaminant of Concern (COCs)

Approximate Area of PAH Exceedance in Soil

Approximate Area of TPH Exceedance in Soil

PAH Polycyclic Aromatic Hydrocarbons

TPH Petroleum Hydrocarbons (Gasoline, Diesel and/or Heavy Oil)

N E S W

30 0 30

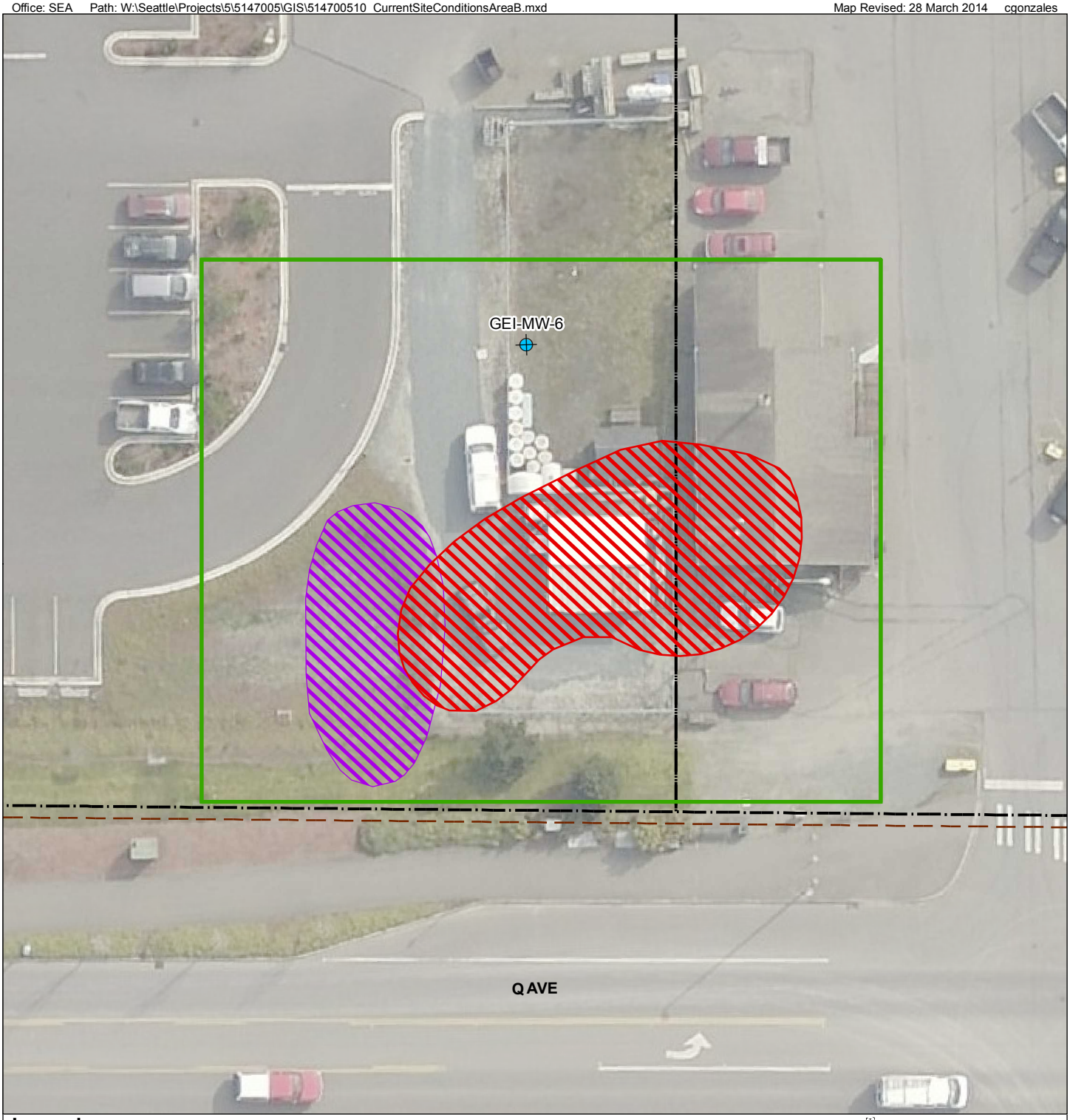
Feet

Data Source: Base aerial provided by the Port of Anacortes, March 2013. Skagit County GIS.
Projection: NAD 1983 StatePlane Washington North FIPS 4601 Feet
Notes:
1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

Monitoring and Maintenance Area A

Cap Sante Marine Site
Anacortes, Washington

Figure 1



Legend

Monitoring Well Location

Areas With Contaminant of Concern (COCs)

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Feet

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Monitoring and Maintenance Area B

Cap Sante Marine Site
Anacortes, Washington

Figure 2

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