

SOIL MANAGEMENT PLAN
PPI Mart
2285 E Isaacs Avenue, Walla Walla, Washington
Facility Site ID # 8187465

September 5, 2025

Prepared by:
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Geologic and Environmental Consulting Services



MSBA

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SOIL MANAGEMENT PLAN

PPI Mart
2285 E Isaacs Avenue, Walla Walla, Washington
Facility Site ID # 8187465

1.0 INTRODUCTION

Martin S. Burck Associates, Inc. (MSBA) has prepared this *Soil Management Plan* (SMP) to serve as general guidance for owners, operators, contractors, city, county, and state agencies, and/or individuals (Responsible Entities) who may perform actions that disturb or penetrate the protective cap at the site, not limited to, investigations, excavations, or miscellaneous subsurface disturbances, etc. (Subsurface Work) at the property located at 2285 E Isaacs Avenue, Walla Walla, Washington (site). The general site location is illustrated on Figure 1, and the general site features are illustrated on Figure 2.

2.0 PROPERTY DESCRIPTION AND REMEDIAL ACTION SUMMARY

The Site is located on Walla Walla County Tax Parcels 360722210032 and 360722210033. The area in and around the Site is used for commercial purposes. It was originally developed as a gas station in 1959 by Phillips 66, which operated the station until selling it to an independent owner in 1978. From 1982 to 1987, Mobil ran the station until it was purchased by Mountain Oil and then operated as a Pacific Pride station.

In 1987, Mountain Oil removed the original underground storage tanks (USTs) and installed: a 4,000-gallon unleaded gasoline tank, two 3,000-gallon gasoline tanks (one unleaded and one regular), a 15,000-gallon diesel tank, and a 2,000-gallon diesel tank. On August 10, 1993, about 1,400 gallons of unleaded gasoline were spilled due to an overfill from a delivery truck. The gasoline spread under the concrete slab and into the subsurface. An additional 10,000-gallon unleaded gasoline tank was subsequently installed in 1994.

2.1 Site Investigation

In August 1993, vapor monitoring wells were installed at both ends of each of the five underground storage tanks. A test pit was excavated to a depth of 16 feet below surface grade (bsg) at the north end of the concrete slab. Gasoline odors were detected in this trench, prompting the excavation of a second test pit a few feet to the north, which showed no visible or olfactory signs of contamination. To allow access to a portion of the tanks, approximately eight feet of the concrete slab along the southern edge was removed. A test pit was then excavated on the south side to a depth of 12 feet bsg, where petroleum-saturated soils and signs of past petroleum releases were observed.

Soil samples were collected from the bottoms of all three excavations and near the exposed ends of the tanks. One sample taken from an area between two of the tanks contained gasoline at 28,100 parts per million (ppm), exceeding the MTCA Method A cleanup level. Concentrations of benzene, toluene, ethylbenzene, and xylene (BTEX) compounds were also above their respective cleanup levels. The remaining soil samples were below applicable standards. All excavated soil was transported off-site for disposal at a landfill.

In October 1993, groundwater monitoring wells were installed, with petroleum detected in one well. Additional wells and soil borings were completed in January 1994, revealing further contamination in deep soil and groundwater, including a 1.55-foot layer of non-aqueous phase liquid (NAPL) petroleum.

By March 1994, more monitoring wells were added, including on a neighboring property. NAPL was found in several wells, and groundwater samples taken in April and May 1994 showed gasoline and BTEX concentrations exceeding cleanup standards across multiple locations.

2.2 Remedial Action

In September 1993, an in-situ bioremediation program was initiated to address petroleum-contaminated soils near the former USTs. Despite multiple treatment events, confirmation sampling showed that cleanup levels for gasoline and BTEX were not yet met. Subsequent remediation efforts included passive and manual recovery of NAPL, followed by installation of a groundwater pump-and-treat system in 1994. Treated groundwater was transported off-site for disposal.

Later in 1994, a combined groundwater pump-and-treat and soil vapor extraction (SVE) system was implemented and operated until October 1998. These combined efforts, including soil excavation and NAPL recovery, resulted in an estimated total removal of 1,200 to 1,500 gallons of petroleum hydrocarbons.

Residual petroleum-contaminated soil remains near the former UST area but is capped with asphalt and concrete. Groundwater monitoring has demonstrated that the residual soil contamination does not pose a threat to groundwater quality.

A total of 17 groundwater monitoring wells were installed between 1993 and 1998 to support remediation and long-term monitoring. Monitoring was conducted regularly from 1994 through 2012, transitioning to quarterly sampling in 2013. By June 2014, all contaminants of concern were below cleanup levels.

Based on these findings, the Department of Ecology determined that institutional controls would be sufficient to protect human health and the environment. A No Further Action (NFA) determination was issued for the Site on September 1, 2015.

3.0 IMPACTED SOIL AREA

Residual petroleum-contaminated soil exceeding the MTCA Method A CULs for unrestricted land use remains at the former UST area but is capped with asphalt and concrete. The contaminated soil containment area is shown on Figure 2.

4.0 PROPERTY USE LIMITATIONS

Ecology determined that institutional controls were necessary as part of the site closure to document remaining contamination, protect the cleanup work, and safeguard human health and the environment. On August 19, 2015, an environmental covenant (Covenant) was recorded for the Site to memorialize the institutional controls. A copy of the Covenant is included in Appendix A. This Covenant restricts activities on the property that could interfere with the remedial action or its operation, maintenance, inspection, or monitoring without prior written approval from Ecology. It also prohibits any actions that could threaten ongoing protection of human health or the environment, including activities that might release or worsen exposure to residual contamination. The Covenant requires that any transfer of interest in the property ensures continued operation, maintenance, and compliance with the Covenant. Leases must be limited to uses consistent with the Covenant, and all lessees must be informed of these restrictions. Any proposed use or activity inconsistent with the Covenant must be approved by Ecology at least 60 days in advance, with public notice and opportunity for comment before any amendment is made. The controls include containing contaminated soil under a protective cap of concrete and asphalt at least two inches thick, designed to minimize contaminant leaching and runoff. Activities that could damage this cap—such as drilling, digging, grading, excavation, installing utilities, or

applying excessive loads—are prohibited without prior approval from Ecology. The Grantor must report any damage to the cap within 48 hours and, unless an alternative plan is approved, promptly repair the damage and submit a report of the repairs within 30 days.

5.0 PROCEDURES FOR SUBSURFACE WORK

The following sections outline the procedures for planned subsurface work. Planned activities include 1) removing the protective cap, 2) decommissioning the current UST system, 3) installing a new UST system, and 4) replacing the protective cap. During this work, soil containing petroleum hydrocarbons (PHCs) may be removed from the subsurface and disposed at an approved landfill to facilitate removal of the Covenant or a reduction of the protective cap.

5.1 Ecology Advance Approval Required

As outlined in the Covenant, any site activity that could potentially harm or alter the cap requires written approval from Ecology in advance. No such activity will be allowed to proceed without obtaining this prior authorization.

5.2 Health and Safety

A site-specific and work-specific health and safety plan (HASP) is required for any Subsurface Work that may encounter soil containing contaminants of concern (COCs) within the contaminated soil containment area (Figure 2). In accordance with the Washington State Department of Labor and Industries (L&I) under Washington Administrative Code 296-843-12005, HASPs should identify potential site hazards, monitoring and compliance protocol, and present procedures for addressing hazards. A copy of the work-specific HASP is presented in Appendix B.

5.3 Pre-Work Tasks

Prior to beginning Subsurface Work at the site, the Responsible Entity should review/complete the following steps.

- Review *Guidance for Remediation of Petroleum Contaminated Sites* (GRPCS) (Ecology, revised June 2016, or later version, if available).

- Review *How to Meet Ecology's Construction Stormwater General Permit Requirements* (Ecology, revised August 2017, or later version, if available).
- Review *Methods for Dust Control* (Ecology, revised in July 2016)
- Contact Ecology to determine if the regulatory information included in this document (*SMP*) is still current and applicable.
- Consult with MSBA or another qualified Environmental Professional familiar with the criteria and requirements of the applicable Ecology and site-specific documents listed above.
- Obtain any/all necessary federal, state, and/or local permits.

Independently confirm the location of all utilities within the work area and adhere to the required utility notification protocols. Any/all Subsurface Work requires proper notification to the Utility Notification Center (UNC). The UNC can accept notifications 24 hours a day and be reached online at www.callbeforeyoudig.org or by calling 811. Utility locations on site maps are approximate and cannot be relied on or used to determine if work areas are clear of utilities. In addition to the required UNC locate, consulting with a private underground utility locating company is recommended.

5.4 Project Organization

Prior to any construction activities at the site, the contractor, property owner, and Environmental Professional will coordinate to ensure that the site requirements are met. The contacts below are subject to change.

Name	Responsibility	Phone Number	Email
Lee Petty	Contractor/Superintendent	(509) 987-3542	lee@lcr-construction.com
Keven Singh & Gary Kalkat	Property Owners	(509) 307-0940	nbakg66@live.com
Jon White	Environmental Professional	(541) 387-4422	Jwhite@MSBAenvironmental.com

5.5 Soil Management Protocol

Contractors performing subsurface work must manage any impacted soil they encounter in accordance with all applicable local, state, and federal regulations. Soil will be field screeded during excavation using a photoionization detector (PID) with 10.6 eV lamp for the presence of PHCs. If impacted soil is brought to the surface, it must be placed on impervious plastic sheeting and covered to prevent airborne transfer or loaded directly into a truck for off-site transport and disposal. Impacted soil may only be reused as backfill within the designated containment area beneath the cap. If disposed off-site, contaminated soil will be transferred to Finley Buttes Landfill in Boardman, Oregon, under an authorized manifest. Contractors must also implement measures to prevent track out of contaminated material by trucks and construction vehicles.

5.6 Groundwater and Liquids Management Protocol

Groundwater has been encountered at the site at depths ranging from approximately 22 to 38 feet bsg and is not expected to be encountered during subsurface work. Any liquids that come into contact with impacted soil, such as those used for decontaminating equipment or vehicles, must be properly managed onsite until they can be analyzed by an accredited laboratory and properly disposed of at an approved offsite facility.

6.0 REPORTING AND DOCUMENTATION

Laboratory reports, field notes, disposal documentation, photographs, and permits should be maintained throughout the project for future reporting. A narrative report summarizing the site activities, including data tables and maps, must be prepared and submitted to Ecology. The report should include recommendations for additional sampling and/or remediation, if warranted.

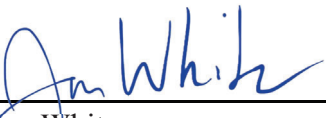
7.0 REMARKS AND SIGNATURES

The information/conclusions contained in this plan were arrived at in accordance with currently accepted professional geologic and environmental practices at this time and location. No warranties are intended or implied. This plan was prepared solely for the Kevin Singh and Gary Kalkat. Martin S. Burck Associates, Inc. is not responsible for the independent interpretations, conclusions, or actions of others derived from or based on the information presented herein.

Information and opinions presented in this plan are based on the collection and review of data from limited portions of the site, subsurface, and surroundings. Martin S. Burck Associates, Inc. is not responsible for conditions or specific portions of the site that are not investigated, for conditions that are not reported or properly presented, and for future activities or investigations that may alter the current condition or understanding of the site.

Please contact me at (541) 387-4422 if you have any questions regarding this report.


Sincerely,
Martin S. Burck Associates, Inc.



Jon White
Project Manager

9/5/2025
Date

Reviewed by:



Martin S. Burck, LG/RG
Licensed/Registered Geologist OR, WA, CA

9/5/2025
Date



Martin S. Burck

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Figures

Figure 1 Site Location Map

Figure 2 Site Plan

R.36E

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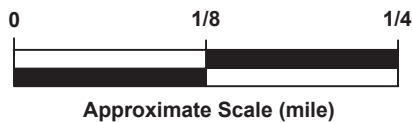
Adapted from: Walla Walla Quadrangle, Washington
 USGS Topographic Map, 2023
 7.5 Minute Series, Contour Interval 10 feet
 North American Vertical Datum of 1988



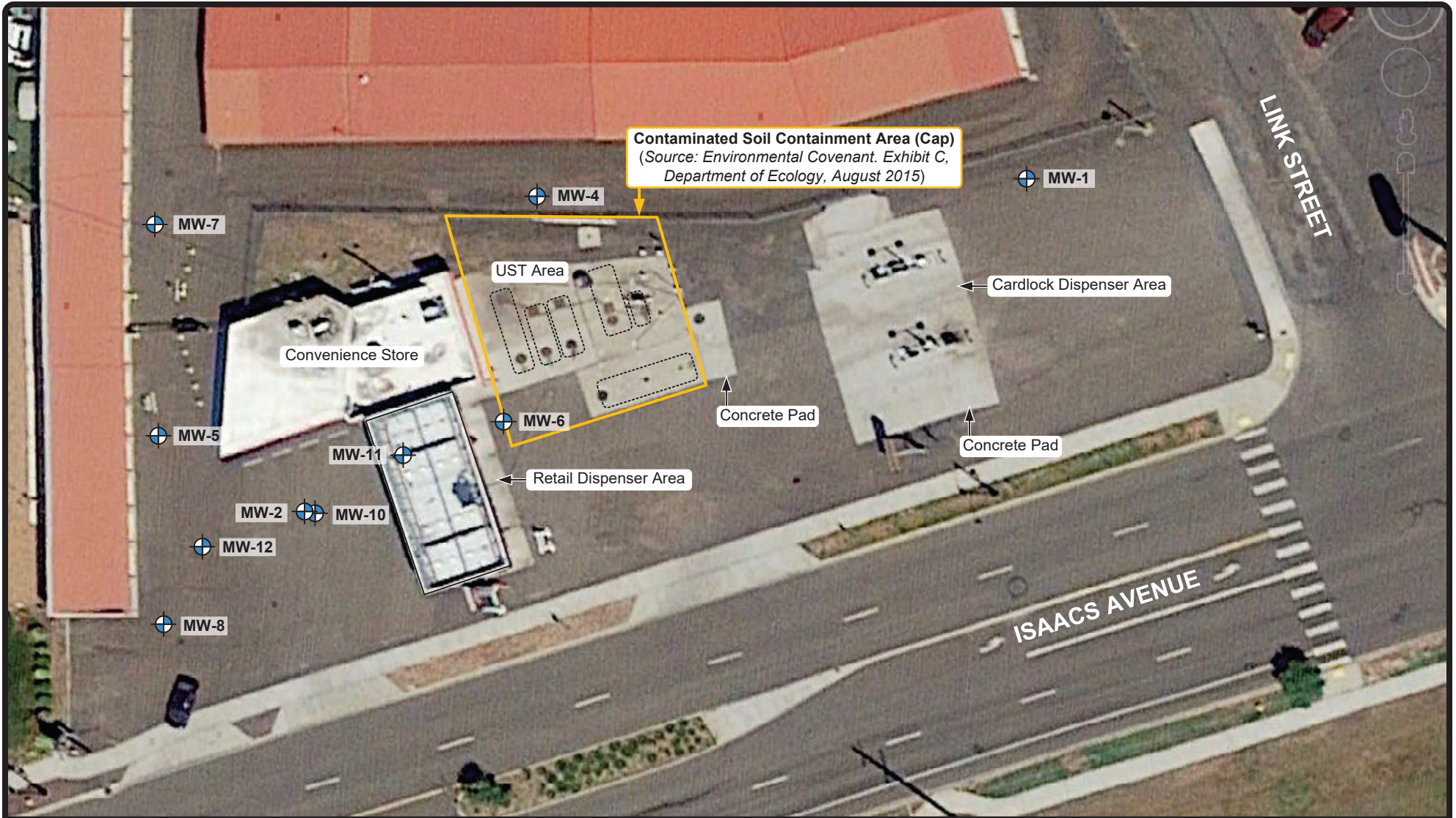
FIGURE 1

SITE LOCATION MAP

PPI Mart Property
 2285 Isaacs Avenue
 Walla Walla, WA 99362
 Facility Site ID # 8187465





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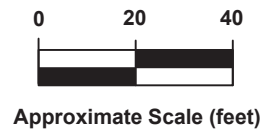


Adapted from Google Earth Imagery (Imagery Date: 12/30/15)

LEGEND

-  MW-8 Monitoring Well Location and ID
-  Underground Storage Tank Location

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Martin S. Burck Associates, Inc.
 Geologic and Environmental Consulting Services

FIGURE 2

SITE PLAN

PPI Mart Property
 2285 Isaacs Avenue
 Walla Walla, WA 99362
 Facility Site ID # 8187465

Appendix A

Environmental Covenant

After Recording Return
Original Signed Covenant to:
Patti Carter
Toxics Cleanup Program
Department of Ecology
4601 N. Monroe
Spokane, WA 99205

Environmental Covenant

Grantor: CIFFA Washington General Partnership
Grantee: State of Washington, Department of Ecology
Brief Legal Description: Sec22 T7N R36E Parcel A-1 of Short Plat (Portion of Tax 46J within NE1/4 NW1/4)
Tax Parcel Nos.: Walla Walla County Property ID 27937, Geo ID 360722210032

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. The Property that is the subject of this Covenant is part or all of a site commonly known as Mountain Oil Inc Isaacs property (FSID 8187465). The Property is legally described in Exhibit A, and illustrated in Exhibit B, both of which are attached (hereafter "Property"). If there are differences between these two Exhibits, the legal description in Exhibit A shall prevail.
- 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 principal contaminants remain on the Property:

Medium	Principal Contaminants Present
Soil	Petroleum Hydrocarbons
Groundwater	NA
Surface Water/Sediment	NA

- 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. This includes the following documents:

1. 2 December 1993 - *Site Characterization Report*, Pacific Pride, 2285 E. Isaacs, Walla Walla, Washington by Shannon Crowell, P.E.
2. 18 February 1994 - *Report of Geoenvironmental Services, Site Characterization*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
3. 22 June 1994 - *Progress Report Number 1, Supplemental Site Characterization Study and Interim Remedial Actions*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
4. 29 July 1994 - *Application for Notice of Construction, Soil and Groundwater Remediation*, Mountain Oil Pacific Pride Property, 2285 East Isaacs Avenue, Walla Walla, Washington by GeoEngineers, Inc.
5. 1 December 1994 - *Progress Report Number 2, Supplemental Site Characterization Study and Interim Remedial Actions*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
6. 3 April 1995 - *Progress Report Number 3, Remedial Action Monitoring, October 1994 to January 1995*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
7. 31 May 1995 - *Progress Report Number 4, Remedial Action Monitoring, January 1995 to April 1995*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
8. 8 August 1995 - *Progress Report Number 5, Remedial Action Monitoring, May 1995 to July 1995*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
9. 7 December 1995 - *Progress Report Number 6, Remedial Action Monitoring, August 1995 to November 1995*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
10. 26 April 1996 - *Progress Report Number 7, Remedial Action Monitoring, December 1995 to March 1996*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
11. 6 August 1996 - *Progress Report Number 8, Remedial Action Monitoring, April to July 1996*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
12. 2 December 1996 - *Progress Report Number 9, Remedial Action Monitoring, August to October 1996*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.
13. 18 February 1997 - *Progress Report Number 10, Remedial Action Monitoring, November 1996 to January 1997*, Pacific Pride Property, Walla Walla, Washington by GeoEngineers, Inc.

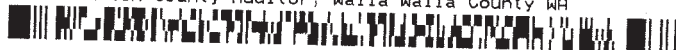


14. 9 June 1997 - *Progress Report Number 11, Remedial Action and Groundwater Monitoring, February Through April 1997*, 2285 East Isaacs Avenue, Walla Walla, Washington by GeoEngineers, Inc.
15. 16 February 1998 - *Progress Report Number 12, Remedial Action and Groundwater Monitoring, May Through December 1997*, 2285 East Isaacs Avenue, Walla Walla, Washington by GeoEngineers, Inc.
16. 4 March 1998 - *January 1998 Groundwater Monitoring*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
17. 26 June 1998 - *April 1998 Groundwater Monitoring*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
18. 14 August 1998 - *July 1998 Groundwater Remediation Activities*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
19. 19 January 1999 - *October and November 1998 Groundwater Monitoring and Site Characterization Activities*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
20. 19 November 1999 - *1999 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
21. 11 May 2001 - *2000 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
22. 11 February 2002 - *2001 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
23. 21 February 2003 - *2002 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
24. 30 December 2003 - *2003 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
25. 19 November 2004 - *2004 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
26. 6 December 2005 - *2005 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
27. 20 December 2006 - *2006 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
28. 16 January 2008 - *2007 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
29. 21 November 2008 - *2008 Groundwater Monitoring Report*, Mountain Oil



Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.

30. 13 November 2009 – *2009 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
31. 16 November 2010 – *2010 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
32. 16 November 2011 – *2011 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
33. 24 January 2013 – *2012 Groundwater Monitoring Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.
34. 17 December 2014 – *2013-2014 Groundwater Monitoring and Groundwater Compliance Confirmation Report*, Mountain Oil Facility, 2285 East Isaacs Avenue, Walla Walla, Washington by ERM.



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

CIFFA Washington General Partnership, 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. 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. Containment of Soil/Waste Materials.

The remedial action for the Property is based on containing contaminated soil under a cap consisting of concrete and asphaltic concrete pavement, each at least 2 inches thick, and located as illustrated in Exhibit C. The primary purpose of this cap is to minimize leaching of contaminants to groundwater and prevent runoff from contacting contaminated soil. As such, the following restrictions shall apply within the area illustrated in Exhibit C:

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.

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.
- 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 related records.
- 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 within the area of the Property described/illustrated in Exhibit C, 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]: 8-19-15 AND RECORDED WITH THE WALLA WALLA COUNTY AUDITOR UNDER RECORDING NUMBER [RECORDING NUMBER]: 2015-07261 CV. 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 24 hours of the discovery of the event.
- d. Any required written notice, approval, or communication shall be personally delivered or sent by first class mail to the following persons. Any change in this contact information shall be submitted in writing to all parties to this Covenant.

Pete Kmet	Environmental Covenants Coordinator Washington State Department of Ecology Toxics Cleanup Program P.O. Box 47600 Olympia, WA 98504 – 7600 (360) 407-6000
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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 site 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.
- b. By signing this agreement, per RCW 64.70.100, the original signatories to this agreement, other than Ecology, agree to waive all rights to sign amendments to and termination of this Covenant.

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 or paragraph or exhibit of this Covenant may be used to aid in the interpretation of that section or paragraph or exhibit but does not override the specific requirements in that section or paragraph.

The undersigned Grantor warrants he/she holds the title to the Property and has authority to execute this Covenant.

EXECUTED this 31 day of July, 2015

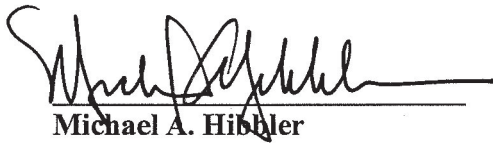
CIFFA Washington General Partnership


SIGNATURE

OWNER
TITLE

Dated: 7-31-2015

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY


Michael A. Hibbler

Section Manager, Toxics Cleanup Program
TITLE

Dated: 2 August 2015

GRANTOR CORPORATE ACKNOWLEDGMENT

STATE OF Washington
COUNTY OF Walla Walla

On this 31 day of July, 2015, I certify that Richard W. Harvey personally appeared before me, acknowledged that he/she is the owner of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he/she was authorized to execute said instrument for said corporation.

Randal Scott Stober
Notary Public in and for the State of
Washington, residing at Walla Walla County
My appointment expires 7-31-17



Exhibit A

LEGAL DESCRIPTION

A tract of land in the northeast ¼ of the northwest ¼ of Section 22, Township 7 North, Range 36 East, Willamette Meridian, City and County of Walla Walla, Washington, being described more particularly as follows:

Commencing at the northwest corner of said northeast ¼ of the northwest ¼ of Section 22; thence S89°54'03"E along the north line of said northeast ¼ of northwest ¼ of Section 22 a distance of 601 feet; thence S00°27'18"E parallel to the west line of said northeast ¼ of northwest ¼ of Section 22 a distance of 404.09 feet to a point on the northerly right of way line of East Isaacs Avenue; thence N72°17'35"E along said north right of way line a distance of 47.11 feet to the true point of beginning for this legal description;

Thence N00°27'18"W 137.00 feet;

Thence S89°54'47"E 157.00 feet;

Thence N76°12'40"E 117.04 feet to a point on the westerly right of way line of Link Street;

Thence southeasterly along said westerly right of way line along a curve to the right having a radius of 410.80 feet, a central angle of 9°33'54", and having a length of 68.58 feet, being subtended by a chord that bears S22°29'22"E 68.58 feet;

Thence S17°42'25"E along said westerly right of way line 6.60 feet to a point on the northerly right of way line of East Isaacs Avenue;

Thence S72°17'35"W along said north right of way line 312.59 feet to the true point of beginning.

Subject to a 100.00 foot wide easement along the south and east lines of the tract described above.

Also subject to a 10-foot by 60-foot access easement as shown in the accompanying short plat.



Exhibit B
PROPERTY MAP

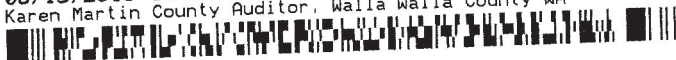
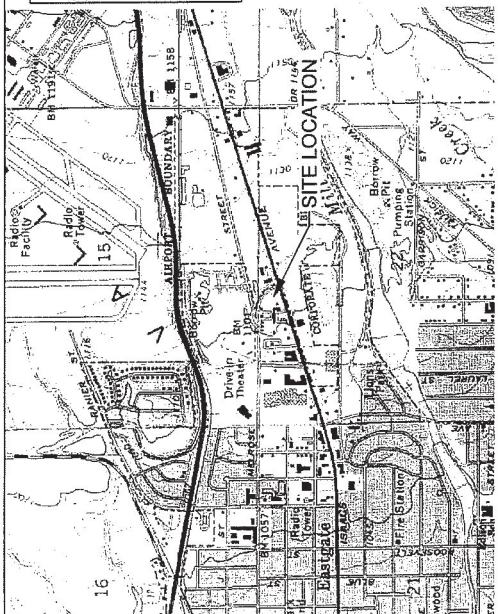


Exhibit C

MAP ILLUSTRATING LOCATION OF RESTRICTIONS





LEGEND

- MW-4 MONITORING WELL
- ASW-1 AIR SPARGING WELL
- STORM WATER DRYWELL
- GASOLINE SPILL SOURCE LOCATION
- UNDERGROUND STORAGE TANK
- UST
- CONTAMINATED SOIL CONTAINMENT AREA

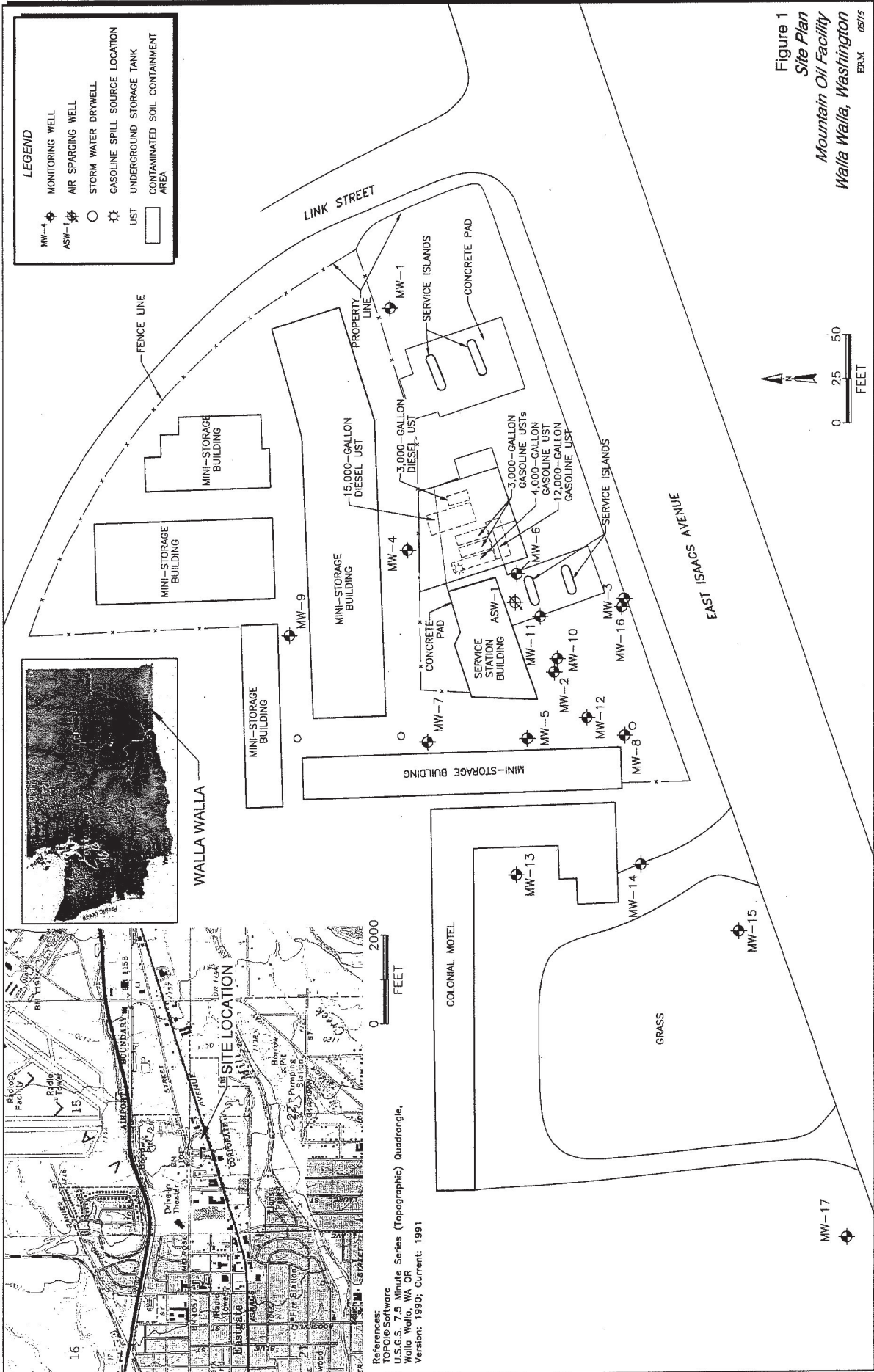


Figure 1
 Site Plan
 Mountain Oil Facility
 Walla Walla, Washington
 ERM 05/15

Exhibit D

SUBORDINATION AGREEMENT

KNOW ALL PERSONS, That Cliff A Washington General Partnership, the owner and holder of that certain Environmental Covenant (Instrument) bearing the date the 31 day of July, 2015, executed by EPA, and recorded in the office of the County Auditor of Walla Walla County, State of Washington, on the 19 August, 2015, under Auditor's File Number 2015-07261^{CV}, does hereby agree that said Instrument shall be subordinate to the interest of the State of Washington, Department of Ecology, under the environmental (restrictive) covenant dated July 31, 2015, executed by _____, and recorded in Walla Walla County, Washington under Auditor's File Number 2015-07261.CV

Dated 8-18, 2015.

NAME

Robert W. Jackson Co-OWNER

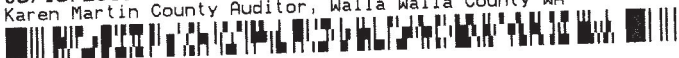
STATE OF
COUNTY OF

Washington
Walla Walla



On this 18 day of August, 2015, I certify that Robert W. Jackson personally appeared before me, and acknowledged that he/she is the individual described herein and who executed the within and foregoing instrument and signed the same at his/her free and voluntary act and deed for the uses and purposes therein mentioned.

Randal Scott Stober
Notary Public in and for the State of
Washington, residing at Walla Walla Co.
My appointment expires 7-31-17.



Appendix B

Health and Safety Plan

MARTIN S. BURCK ASSOCIATES, INC.

200 North Wasco Court, Hood River, OR 97031
Phone 541.387.4422 855.387.4422 Fax 541.387.4813
MSBA@MSBAenvironmental.com



Geologic and Environmental Consulting Services

HEALTH AND SAFETY PLAN

A. GENERAL INFORMATION

Project Name:	<u>LCR - PPI Mart - Walla Walla</u>	Project Number:	<u> </u>
Location:	<u>2285 E Isaacs Avenue, Walla Walla, Washington</u>		
Client	<u>Kevin Singh and Gary Kalkat</u>		
Plan Prepared By:	<u>Jon White</u>	Date:	<u>9/5/25</u>
Plan Approved By:	<u>Martin S. Burck</u>	Date:	<u>9/5/25</u>
Project Start Date:	<u>9/15/2025</u>		

B. SITE DESCRIPTION

Facility History: The Site is located on Walla Walla County Tax Parcels 360722210032 and 360722210033. The area in and around the Site is used for commercial purposes. It was originally developed as a gas station in 1959 by Phillips 66, which operated the station until selling it to an independent owner in 1978. From 1982 to 1987, Mobil ran the station before it was purchased by Mountain Oil, which then operated it as a Pacific Pride station.

General Site Description:

Site is an active retail and cardlock refueling station with two dispenser areas investigation and cleanup activities were performed. The site received a no further action determination, however contamination is still present in soil beneath and surrounding the USTs beneath the concrete/asphalt cap.

C. PROJECT OBJECTIVE (S)

Replace the current UST system with a new UST system and remove remaining contaminated soil to facilitate removal of environmental covenant, if feasible.

Work Activities Planned:

Remove protective cap. Excavate and stockpile residual soil containing PHCs. Decommission UST system. Collect soil and groundwater samples for analysis. Dispose of soil containing PHCs, if warranted. Install new UST system. Replace concrete/asphalt cap.

D. PROJECT ORGANIZATION

Team Member	Responsibility	Training
Jon White	WA Site Assessor	OSHA 40-Hour HAZWOPER and 8-hour Refresher, Ecology Site Assessor
Josh Owner	Project Manager	OSHA 40-Hour HAZWOPER and 8-hour Refresher, Ecology Site Assessor

E. CHEMICAL HAZARD ANALYSIS

Contaminant	PEL	IDLH	LEL/UEL	Flash Point	Routes of Exposure
Gasoline	Not applicable	Not applicable	1.4 / 7.6%	- 45 F	Inhalation, Absorption, Ingestion, Direct Contact (dermal)
Diesel	Not applicable	Not applicable	1.3 / 6.0 %	125 F	Inhalation, Absorption, Ingestion, Direct Contact (dermal)
Oil	Not applicable	Not applicable	NA	200F	Inhalation, Absorption, Ingestion, Direct Contact (dermal)
Benzene	1 ppm	500 ppm	1.2 / 7.8%	12 F	Inhalation, Absorption, Ingestion, Direct Contact (dermal)
Toluene	200 ppm	500 ppm	1.1 / 7.1%	40 F	Inhalation, Absorption, Ingestion, Direct Contact (dermal)
Ethylbenzene	100 ppm	800 ppm	1.2 / 6.8%	59 F	Inhalation, Absorption, Ingestion, Direct Contact (dermal)
Xylenes	100 ppm	900 ppm	0.9 / 7.0%	81 F	Inhalation, Absorption, Ingestion, Direct Contact (dermal)
Naphthalene	10 ppm	250 ppm	0.9 / 5.9%	174 F	Inhalation, Absorption, Ingestion, Direct Contact (dermal)

F. OTHER HAZARDS

Heat Stress: Yes
Stay hydrated, monitor the heat index, and take breaks as required

Cold Stress: No

Excessive Noise: Yes
Wear ear plugs, as warranted

Confined Space of Entry: No

Open Excavation: Yes
Stay safe distance from open excavation. Place temporary warning/construction fencing around excavation deeper than 4 feet when no active work is occurring.

Welding/Cutting: No

Heavy Equipment Operation: Yes
Stay alert. Always wear safety vest/hard hat and make eye contact with equipment operator when entering work area. Site is a retail/cardlock refueling facility.
Beware of trucks and vehicles entering and exiting the site for loading, unloading, and refueling.

Slip, Trip, Fall Hazards: Yes
Stay alert. Keep a clean work area and keep unused tools properly stored

Overhead Utilities: No

Waterways: No

Underground Utilities: Natural gas, storm/sanitary sewers, electric, fiber optic and water lines

Utility Location Service: Utility Notification Center
Phone Number: 1.800.332.2344

G. PERSONAL PROTECTIVE EQUIPMENT

The following PPE will be utilized or available for use:

- X Safety Glasses
- X Hard Hat
- X Steel-Toed Boots
- X Ear Plugs
- X Gloves (Nitrile or Latex)
- Respirator (1/2 Face with Organic Cartridge)
- Hip/Chest Waders
- Other

H. DECONTAMINATION

The decontamination procedures for personnel will include washing affected PPE or equipment with soap and water. The decontamination procedure for sampling equipment will include washing with Liquinox detergent followed by two rinses with tap water and a third final rinse with deionized water. All decontamination water will be contained, analyzed and disposed, as warranted.

I. AMBIENT AIR MONITORING

Activity	Instruments	Action Level	Frequency
Not Applicable			

J. PERSONNEL AIR MONITORING (1910.120(h))

Activity/Location	Contaminants	NIOSH/OSHA PROTOCOL
Not Applicable		

K. CONTINGENCY PLAN

Emergency Equipment on Site: (Location)

- First Aid Kit: Vehicle
- Fire Extinguishers: Vehicle
- Telephone: Vehicle
- Eye Wash/Safety Shower: Site Bathroom
- Other: _____

L. SIGN-OFF

All personnel have read the above plan and are familiar with its provisions. All personnel have received appropriate (OSHA) hazardous materials training to provide adequate safety to each individual commensurate with the work to be performed.

Name (Please Print)	Signature
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

M. LOCAL EMERGENCY NUMBERS (To be determined at site) :

HOSPITAL	Name:	Providence St. Mary Medical Center
	Address:	401 W Poplar St
		Walla Walla, WA 99362
	Phone:	(509) 897-3320
	Travel Time:	10 minutes
	Directions Attached:	Yes
	Map Attached:	Yes
PARAMEDICS	Name:	Walla Walla Ambulance
	Phone:	Call 911 (emergency) or (509) 527-4429
FIRE DEPT	Name:	Walla Walla Fire Department
	Phone:	911 (emergency) or (509) 529-4083
LOCAL POLICE	Name:	Walla Walla Police Department
	Phone:	911 (emergency) or (509) 527-4434

From: wa@occinc.com
To: [Jon White](#)
Subject: Ticket: 25389796
Date: Friday, September 5, 2025 4:56:58 PM

WASHINGTON UTILITY NOTIFICATION CENTER

***DO NOT REPLY TO THIS EMAIL ***

This ticket is valid for 45 days from the time the ticket was placed. The expiration date and time is 10/20/2025 4:15 PM .

Washington Ticket#:	25389796	2 FULL BUSINESS DAYS	
Transmit Date:	9/05/25	Time:	4:56 PM
Original Call Date:	9/05/25	Time:	4:05 PM
Work to Begin Date:	9/15/25	Time:	8:00 AM

Caller Information

Company:	MARTIN S. BURCK ASSOCIATES	Type:	CONTRACTOR
Contact Name:	JONATHAN WHITE	Phone:	(541) 387-4422
Alt. Contact:	JOSH OWEN	Phone:	(541) 387-4422
Best Time:		Fax:	
Address:	200 WASCO CT; HOOD RIVER, OR 97031		
Caller Email:	jwhite@msbaenvironmental.com		

Dig Site Information

Type of Work:	UST DECOMMISSIONING AND INSTALLATION
Work Being Done For:	PPI MART

Dig Site Location

County:	WALLA WALLA	State:	WA
Place:	WALLA WALLA		
Address / Street:	2285 E ISAACS AVENUE		
Nearest Intersection:	LINK STREET		

Location of Work:

WORK WILL BE PERFORMED ACROSS ENTIRE GAS STATION. AREA NOT MARKED IN WHITE. MARK ENTIRE GAS STATION PROPERTY AND ADJACENT RIGHT-OF-WAYS ALONG LINK STREET AND E ISAACS AVE

Remarks:

AREA NOT MARKED IN WHITE. MARK ENTIRE GAS STATION PROPERTY AND ADJACENT RIGHT-OF-WAYS ALONG LINK STREET AND E ISAACS AVE

Type of Excavator: CONTRACTOR

Directional Drilling: NO

Area White Lined: NO

Reason Why Area is Not White Lined: SITE NOT VISITED (DISTANCE/CONDITIONS)

Type(s) of Excavation Equipment: BACKHOE / TRACKHOE

Work Order Number:

Map Twp: 7N Rng: 36E Sect-Qtr: 15-SW-SE,22-NW-NE

Excavation Coordinates for # Polygons: 1

Poly 1: NW Lat: 46.0780399 Lon: -118.2967386 SE Lat: 46.0772164 Lon: -118.2951967

Members Notified

District	Company	Marking Concerns	Customer Service	Repair
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CNG01	CASCADE NAT GAS-WALLA WALLA	(509)524-1880	(888)522-1130	(888)522-1130
CREA01	COLUMBIA REA, INC	(509)526-4041	(509)526-4041	(509)526-4041
POCK01	POCKETINET COMMUNICATIONS	(509)593-4707	(509)526-5026	(509)593-4707
PPLS07	PACIFIC POWER	(425)392-6412	(888)221-7070	(888)221-7070
QLNWA06	CTLQL-CENTURYLINK	(800)778-9140	(800)283-4237	(800)573-1311
WALLA01	CITY OF WALLA WALLA	(509)527-4380	(509)527-4380	(509)527-4380

Excavator Responsibilities

- * Please click on the following link to verify and confirm that the area covered represents the correct and complete work site area.

[Link To Map for C EMAIL](#)

- * If the area covered is incomplete or inaccurate, it is your responsibility to notify the center immediately to update and correct the locate. Failure to do so could result in a delay or an incomplete utility locate.

- * Any other utilities or notification centers not listed, you will need to contact separately.

- * To review this ticket, see the full status history and any future status updates, visit wa.itic.occinc.com

- * The utilities should mark any lines they own and operate in the area of excavation described on the ticket. Click [here](#) for a description of what utilities will typically locate. Any private lines, not located by the utility, would require a private locator. Click [here](#) for a list of private locators in Washington.



Map data ©2025 Google 1000 ft

2285 E Isaacs Ave
Walla Walla, WA 99362

- ↑ 1. Head south toward E Isaacs Ave
12 sec (115 ft)
- ↪ 2. Turn right onto E Isaacs Ave
Pass by Baskin-Robbins (on the right in 0.5 mi)
4 min (1.2 mi)
- ↶ 3. Turn left onto N Division St
1 min (0.4 mi)

Follow E Alder St and E Poplar St to S 5th Ave
3 min (1.1 mi)

- ↪ 4. Turn right onto E Alder St
0.5 mi
- ⤷ 5. At the traffic circle, continue straight onto E Poplar St
0.1 mi
- ⤷ 6. At the traffic circle, continue straight to stay on E Poplar St
0.5 mi

Continue on S 5th Ave to your destination

-
- 1 min (0.2 mi)
- ↶ 7. Turn left onto S 5th Ave
-
- 354 ft
- ↷ 8. Turn right
-
- 312 ft
- ↑ 9. Continue straight
- i Destination will be on the left**
-
- 148 ft

401 W Poplar St
Walla Walla, WA 99362