

## Exhibit C

### Scope of Work and Schedule

This Scope of Work (SOW) implements the Cleanup Action Plan (CAP), Exhibit B to the Agreed Order to address soil and groundwater contamination at the Burlington Environmental Washougal Facility (Site) in Washougal, Washington. Burlington Environmental will implement this SOW to perform Site cleanup and shall furnish all personnel, materials, and services necessary for, or incidentally to, performing the cleanup action selected for the Site. All work completed for this SOW must meet the requirements of the Model Toxics Control Act (MTCA) Cleanup Regulations, Chapter 173-340 Washington Administrative Code (WAC) as referenced by the Dangerous Waste Regulations Chapter 173-303 WAC.

Implementation of the Cleanup Action Plan, including reports, plans, specifications, and documentation of actions must conform to the requirements of WAC 173-340-400. All aspects of construction must be performed under the oversight of a professional engineer registered in the State of Washington or a qualified technician under the direct supervision of a professional engineer registered in the State of Washington. Burlington Environmental will implement the Alternative A-2 remedy as specified in the CAP, Exhibit B, in accordance with the following schedule and requirements:

A. Inhalation Pathway Interim Measure (IPIM)

The IPIM was implemented to protect workers in Building 1 from VOCs. This interim measure will continue to be operated as long as necessary to protect human health.

B. Surface Cover and Grouting

Surface covers will be added in areas of the site that are unpaved to protect individuals from direct contact with soil and prevent surface water infiltration through soils with elevated concentrations of COCs.

Due to the possibility of contaminated groundwater migrating into the bedding of utility lines when the water table is elevated in the wet season, four locations of storm drain utility lines along the east side of the property line will be grouted.

C. The treatment remedy will be completed as follows:

1. Treatment near MC-14 will be accomplished with In-Situ Chemical Oxidation (ISCO) injections to treat 1,4-dioxane and VOCs in the Shallow Groundwater Zone. Bench scale testing will help determine the full-scale remedy. After the

initial injections, continued monitoring will be done to determine if more rounds are necessary.

2. Treatment in the former tank farm area and near the north fence line (near MC-118D) will be accomplished with In-Situ Bioremediation (ISB) injections utilizing carbohydrates and emulsified zero-valent iron (ZVI) targeting chlorinated VOCs remaining in the Silt Layer and the upper portion of the Lower Aquifer. Bench scale testing will help determine the full-scale remedy. After the initial injections, continued monitoring will be done to determine if more rounds are necessary.
3. Retaining contingent remedy technologies is necessary in the event the selected remedy does not meet design goals or CULs within the restoration time frame. The following technologies are retained as potential contingent remedies:
  - i. Permeable Reactive Barrier
  - ii. Full Scale In-Situ Chemical Oxidation, and
  - iii. Hydraulic Containment.

#### D. Engineering Design Report (EDR)

Burlington Environmental will submit a draft Engineering Design Report (EDR), Construction Plans and Specifications (CPS), and Operation and Maintenance Plans (OMP) which meet the requirements of WAC 173-340-400 and the CAP as follows:

4. Construction work plans for:
  - i. surface cover inspection and repair,
  - ii. grouting of the utility beds,
  - iii. ISCO treatment, and
  - iv. ISB treatment.
5. Health and Safety Plans
6. Draft Long-Term Controls Plans including a draft environmental covenant consistent with the Institutional Controls (ICs) proposed.
7. Identify all permits necessary to complete the cleanup.
8. Following implementation, a cleanup action construction report will be prepared consistent with WAC 173-340-400(6)(b).

Burlington Environmental will revise the draft EDR/CPS/OMP to address all Ecology comments. Construction and implementation of the cleanup action will be done in accordance with the Ecology approved EDR/CPS/OMP and in accordance with the Schedule below.

E. Institutional Controls

In accordance with the CAP, Exhibit B, and the Schedule below, appropriate institutional controls shall be described in a restrictive environmental covenant on the property. The covenant shall be executed by the property owner and recorded with the register of deeds in Clark County. This restrictive covenant will run with the land and be binding on the owner's successors and assigns. Institutional controls will be in accordance with WAC 173-340-440.

F. Periodic Review

WAC 173-340-420 requires periodic review at critical points throughout a cleanup period, but at minimum every 5 years. Ecology will publish a notice of the periodic review results in the Site Register to provide an opportunity for public comment. A periodic review consists of an evaluation by Ecology of site conditions and monitoring data after remedy construction to assure human health and the environment are being protected. These reviews are in addition to the on-going oversight and reports that will be submitted to Ecology by Burlington Environmental throughout the project.

Review criteria consist of evaluating the effectiveness of ongoing or completed cleanup actions, engineered controls, and institutional controls, as well as new information about hazardous substances, current and projected site and resource uses, the availability and practicability of more permanent remedies, and the availability of improved analytical techniques to evaluate compliance with cleanup levels (WAC 173-340-420(4)).

G. Compliance Monitoring Plans

Monitoring will be done in accordance with WAC 173-340-410 and the CAP (section 4.1.6)

Protection monitoring will be addressed in a site health and safety plan submitted as part of the EDR to Ecology for review and approval. Once approved by Ecology the site health and safety plan will be implemented per the schedule.

Performance and confirmational monitoring will be addressed by a groundwater monitoring program employing the existing monitoring well network to verify that

natural attenuation and degradation of COCs continue to occur, and that COC concentrations are trending toward CULs at the CPOC over time. The monitoring plan will also include a new QAPP and a SAP. Once approved by Ecology, the groundwater monitoring plan will be implemented per the schedule.

#### H. Schedule

Each of the documents required below are subject to Ecology’s review and approval. Ecology will approve, approve with conditions, or disapprove of such documents. If Ecology disapproves of a document, Ecology will provide comments to Burlington Environmental and the parties will establish a mutually agreed upon date for resubmittal of the document, not to exceed forty-five (45) days after Burlington’s receipt of Ecology’s comments. Burlington will then submit a revised document that addresses Ecology’s comments. If an extension to the schedule is required, the steps outlined in the Agreed Order #24122 will be utilized (see Terms and Conditions, Section I).

<b>Performance or Deliverable</b>	<b>Schedule</b>
Draft Bench Scale Testing Work Plan	Submit within 45 days following Ecology final approval of the CAP.
Implement bench scale testing	Initiate implementation of the bench scale testing within 45 days following approval of the Work Plan.
Bench scale testing report	Submit within 45 days following finalization of the results of bench scale testing.
Draft EDR for full scale remedy including the following supplementary documents OMP, CPS, Health and Safety Plan, QAPP, SAP, Groundwater Monitoring Plan and Vapor Intrusion Monitoring Plan (monitoring plans will be submitted as an appendix to the EDR).	Submit within 90 days following Ecology approval of the bench scale testing report.
Begin the implementation of ISCO and ISB treatments as per the EDR.	Initiate implementation within 90 days following the approval of the final EDR.

<p>If additional rounds of ISCO and ISB are determined to be necessary, a draft workplan will be developed.</p>	<p>Submit within 60 days following determination that additional rounds are necessary.</p>
<p>Implement institutional controls per the approved EDR.</p>	<p>Permanent institutional controls will be implemented when construction is complete.</p>
<p>Remedy Completion Report</p>	<p>Submit within 90 days of completing the construction of the full remedy.</p>
<p>Periodic Reviews</p>	<p>Minimum every 5 years from the anniversary date of the remedy completion. Periodic reviews will meet the requirements found in WAC 173-340-420.</p>
<p>Cleanup Completion Report (CCR)</p>	<p>Draft CCR: submit within 90 calendar days of receiving Ecology's letter concurring Site-wide cleanup standards are met.</p> <p>Final CCR: submit within 30 calendar days of receipt of Ecology's final comments on the draft CCR.</p>