



PERIODIC REVIEW

**Unocal Bulk Plant 0885
Facility Site ID#: 1111**

**333 6th Avenue
Woodland, Washington 98674**

Southwest Region Office

TOXICS CLEANUP PROGRAM

October 2010

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1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to ensure that human health and the environment are being protected at the Unocal Bulk Plant 0885 (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were conducted under the Voluntary Cleanup Program. The cleanup actions resulted in concentrations of total petroleum hydrocarbons (TPH) exceeding MTCA Method A cleanup levels remaining at the Site. The MTCA Method A cleanup levels for soil are established under WAC 173-340-740(2). WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

- Whenever the department conducts a cleanup action;
- Whenever the department approves a cleanup action under an order, agreed order or consent decree;
- Or, as resources permit, whenever the department issues a no further action opinion
- And one of the following conditions exists:
 - (a) Institutional controls or financial assurance are required as part of the cleanup;
 - (b) Where the cleanup level is based on a practical quantitation limit;
 - (c) Where, in the department's judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

- (a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site;
- (b) New scientific information for individual hazardous substances of mixtures present at the site;
- (c) New applicable state and federal laws for hazardous substances present at the site;
- (d) Current and projected site use;
- (e) Availability and practicability of higher preference technologies; and
- (f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

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

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

Former Unocal Bulk Terminal #0885 is located at 333 6th Avenue in Woodland, Washington. The Site is surrounded to the north, south, and east by a Fleetwood Homes (Fleetwood) manufacturing facility. The west side of the Site is bounded by Burlington Northern Railroad tracks. The Columbia River is located approximately 2.3 miles to the west of the Site, and the Lewis River and Horseshoe Lake are located approximately 0.8 and 0.2 miles, respectively, to the east of the Site.

Historically, the Site was owned and operated by Union Oil Company of California (Unocal) until 2005, when Unocal merged with Chevron. From 1926 through 1992, the Site was used for bulk fuel storage and distribution. All of the Site structures, the aboveground fuel storage tanks, and the fuel dispenser lines were demolished and removed in 1992.

2.2 Site Investigations

In January 1992, Fleetwood contracted Professional Service Industries, Inc. (PSI) to conduct an environmental assessment at their property located adjacent to the Unocal Site. The assessment included drilling and sampling two soil borings, completing the borings as groundwater monitoring wells (MW-1 and MW-2), and collecting groundwater samples from the wells. Following completion of the work, Fleetwood discovered that the wells were mistakenly installed on the Unocal Site.

The results of the assessment showed that a soil sample from boring MW-2 contained concentrations of TPH that exceeded MTCA Method A cleanup levels. The groundwater samples from both wells contained benzene, toluene, ethylbenzene, and total xylenes (BTEX) concentrations that exceeded the Method A cleanup levels.

In 1994, EMCON conducted a subsurface soil investigation at the Site. The work consisted of drilling and sampling 12 soil borings (B-1 through B-6, and MW-3 through MW-8) and a hand auger boring (HB-1). Six of the borings (MW-3 through MW-8) were completed as groundwater monitoring wells. Soil sample analytical results showed that the samples collected from borings MW-7, B-1, and B-2 contained BTEX, TPH as gasoline (TPH-G), TPH as diesel (TPH-D), and/or TPH as oil (TPH-O) at concentrations that exceeded the MTCA Method A cleanup levels. The groundwater sample analytical results showed that the samples from wells MW-1, MW-5, and MW-7 contained BTEX, TPH-G, TPH-D, and/or TPH-O concentrations that exceeded the Method A cleanup levels.

From November 1994 through November 1999, GeoEngineers collected groundwater samples from the Site on a semiannual basis. Through 1999, the groundwater samples from wells MW-1, MW-5, and MW-7 contained BTEX, TPH-G, and/or TPH-D concentrations that exceeded the MTCA Method A cleanup levels.

In August 2001, Maul Foster Alongi (MFA) collected groundwater samples from wells MW-1, MW-4, and MW-7 to determine if 1,2-dibromoethane (EDB), 1,2-dichloroethane (EDC), or methyl tertiary-butyl ether (MTBE) were present in the groundwater. The groundwater sample analytical results showed that EDB, EDC, and MTBE were not present in any of the samples at concentrations greater than the method reporting limits (MRLs).

On October 25, 2001, MFA collected groundwater samples from all of the monitoring wells (MW-1, MW-3 through MW-6, and MW-8) at the Site for laboratory analysis. The groundwater sample analytical results showed that the samples from well MW-1 contained benzene, TPH-G, and TPH-D concentrations (14.4, 3,910, and 885 micrograms per liter [ug/L], respectively) that exceeded the MTCA Method A cleanup levels (5,800, and 500 ug/L, respectively). The samples from the other wells contained petroleum hydrocarbon concentrations below the MRLs.

In late 2005, ENSR Corporation (ENSR) conducted a soil and ground water investigation in the vicinity of MW-1. All ground water monitoring wells at the Site, except for MW-1, had four consecutive clean quarters of sample results by 2005. Geo-Tech Explorations advanced 17 push probes, identified as GP-1 through GP-5, and GP-8 through GP-19, to depths of 15 feet below ground surface (bgs) using a track-mounted Geoprobe direct-push rig. This work was performed in the vicinity of groundwater monitoring well MW-1. An ENSR geologist observed all probing activities, and collected soil and groundwater samples. All soil analytical results were below the MTCA Method A cleanup levels, with the exception of GP-11-13. Samples from GP-11 exceeded MTCA Method A cleanup levels for TPH-G (406 mg/kg) and benzene (0.113 mg/kg). All groundwater analytical results were above the applicable MTCA Method A cleanup levels for total petroleum hydrocarbons as gasoline.

Following the soil and groundwater investigation in 2005, MW-1 was abandoned in preparation for additional excavation activities. This additional excavation was intended to find and remove additional TPH-G and benzene source material that continued to contribute to ground water contamination in the vicinity of MW-1.

At the time of this review in October 2010, no additional source removal has been attempted at the Site. Ground water monitoring continued through 2006 in MW-3, MW-4, MW-5, MW-6, MW-8 and MW-9. An annual sampling event was conducted in April 2007 and 2008 in MW-9, the most downgradient well. Contamination was not detected in any of the wells during the 2006 sampling event, or in MW-9 during 2007 or 2008 sampling event.

2.3 Remedial Activities

In September 2001, MFA conducted soil excavation activities at the Site to remediate petroleum hydrocarbon-impacted soils. The impacted soil was present at three areas of the Site (former dispenser pumps/truck unloader area, boring/well MW-2 area, and former garage area). The impacted soil at all three areas was excavated (a total of three separate excavations), and the final area of each excavation ranged from approximately 400 to 2,900 square feet. The maximum depth of each excavation ranged from approximately 9 to 13 feet. The dispenser pumps/truck unloader area excavation (designated Excavation #1) was extended to a depth of approximately 1

foot below the low seasonal groundwater level, and approximately 8,250 gallons of impacted groundwater was pumped from the excavation. The recovered groundwater was transported to the Emerald Petroleum Service facility in Seattle, Washington, for treatment and disposal.

To evaluate the petroleum hydrocarbon concentrations at the final extents of the three excavations, MFA collected composite sidewall and/or floor samples from each excavation for laboratory analysis. The soil sample analytical results showed that the sidewall and floor samples did not contain BTEX, TPH-G, TPH-D, or TPH-O at concentrations exceeding the MRLs.

A total of approximately 1,990 cubic yards of soil was excavated from the three excavations. Based on field screening results, MFA segregated the soil into "clean" and contaminated stockpiles.

After receiving the sample analytical results, approximately 1,130 cubic yards of clean sand and gravel were used to backfill the excavations at depths below the high seasonal groundwater table (approximately 7 feet bgs). The "clean" excavated soil (approximately 960 cubic yards) was used to backfill the excavations at depths above the high seasonal groundwater table. A non-woven geotextile fabric was installed over the imported fill to prevent the infiltration of the finer-grained "clean" backfill material into the imported fill. A total of approximately 1,030 cubic yards of contaminated soil from the three excavations was transported to the Regional Disposal Company landfill in Roosevelt, Washington, for disposal.

During April 2005 through May 2005, 244,000 gallons of petroleum impacted groundwater was pumped from groundwater monitoring well MW-1 into a holding tank, through an activated carbon canister and re-injected up gradient into groundwater monitoring well MW-4. This operation was monitored throughout the duration of the project using groundwater samples collected from groundwater monitoring well MW-1, which was analyzed for TPH-G and BTEX. Upon the conclusion of the pump and treatment operation, groundwater samples collected from monitoring well MW-1 continued to exceed the MTCA cleanup levels for TPH-G. Therefore, an assessment was necessary to determine the limits of petroleum impacted soil affecting the groundwater.

2.4 Institutional Controls

An institutional control in the form of a restrictive covenant was recorded for the Site in 2002. The restrictive covenant imposes the following limitations:

1. No groundwater may be taken for any use from the Property.
2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.
3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

4. The Owner of the Property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.
5. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.
6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.
7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial activities conducted at the Property, and to inspect records that are related to the Remedial Action.
8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect; However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

The restrictive covenant is available as Appendix 6.3.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

Based upon the Site visit conducted on August 23, 2010, the compacted gravel and asphalt cover at the Site continue to provide an adequate barrier to direct exposure pathways (ingestion, contact) to contaminated soils. The Site is vacant and completely enclosed in chain link security fencing. A photo log is available as Appendix 6.4.

Soil and ground water contamination remain at the Site in the vicinity of decommissioned monitoring well MW-1. MW-1 was decommissioned in 2005, preventing continued monitoring of contaminated ground water. A single downgradient monitoring well (MW-9) was monitored on an annual basis through 2008. Currently, groundwater monitoring is not being conducted at the Site. Additionally, the location of the single downgradient monitoring well (MW-9) is not sufficient to evaluate groundwater contamination in the vicinity of former monitoring well MW-1.

The Restrictive Covenant for the Site was recorded with Cowlitz County and remains active. The Restrictive Covenant restricts ground water extraction for any use, activities that may expose contaminated soils contained at the Site, and prohibits any use of the property that is inconsistent with the Covenant.

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

There is no new relevant scientific information for the petroleum contaminants related to the Site.

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

Until a cleanup action plan is selected or a no further action determination is issued for the Site, current MTCA Method A cleanup levels will remain applicable for the Site. This periodic review was triggered by the implementation of institutional controls at the Site in 2002. MTCA Method A cleanup levels have not changed for contaminants of concern at the Site since 2002.

3.4 Current and projected Site use

The Site is currently vacant and access is restricted by chain link security fencing. There have been no changes in current or projected future Site or resource uses.

3.5 Availability and practicability of more permanent remedies

The remedy implemented included containment of hazardous substances. Containment is not an appropriate remedy for the Site. The hazardous materials remaining at the Site are not covered by structures or other access limitations. Additional source removal could be conducted at the Site to address remaining soil and ground water contamination.

3.6 Availability of improved analytical techniques to evaluate compliance with cleanup levels

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

4.0 CONCLUSIONS

- Soil and ground water cleanup levels have not been met at the Site and the cleanup actions completed at the Site fail to be protective of human health and the environment
- Capping and/or containment are not an appropriate remedy for the Site. A source of TPH-G and benzene continues to impact ground water. The remaining contamination at the Site is not encumbered by surface structures or Site access limitations. Additional remedial actions are required.
- Groundwater monitoring should continue at the Site. MW-9 is not adequate to evaluate groundwater contamination in the vicinity of former monitoring well MW-1.
- A Restrictive Covenant is in place for the property and is effective in protecting public health from exposure to contaminated ground water, as long as ground water monitoring demonstrates that the plume of petroleum hydrocarbon contamination remains contained at the.

Based on this periodic review, the Department of Ecology has determined that remedial actions conducted at the Site fail to be protective of human health or the environment. The requirements of the Restrictive Covenant are being satisfactorily met, but additional remedial actions are required. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the remedial actions is maintained.

4.1 Next Review

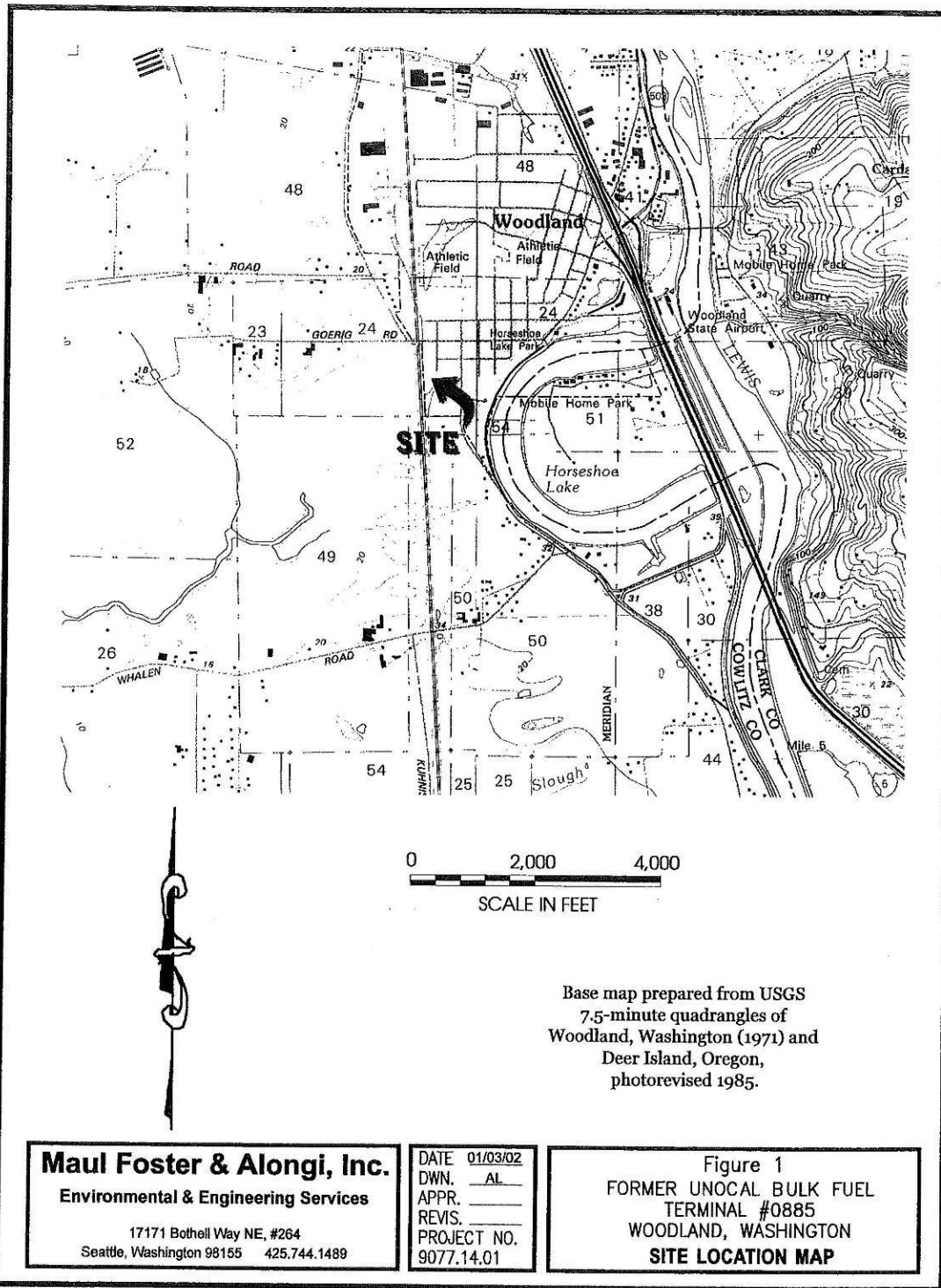
The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

- EMCON Northwest, Inc. *Phase II Investigation Report*. August 5, 1994.
- Maul Foster Alongi. *Results of Soil Excavation Activities*. January 29, 2002.
- Ecology. *Restrictive Covenant*. September 23, 2002.
- ENSR International. *Groundwater Remedial Action Summary Report*. June 30, 2005.
- Ecology. *Further Action Determination Letter*. November 3, 2005.
- ENSR International. *Soil and Groundwater Investigation Summary Report*. December 20, 2005.
- ENSR/AECOM. *Second Quarter 2006 Groundwater Monitoring*. June 22, 2006.
- Gettler-Ryan Inc. *Groundwater Monitoring Report*. June 5, 2008.
- Ecology. *Site Visit*. October 7, 2009

6.0 APPENDICES

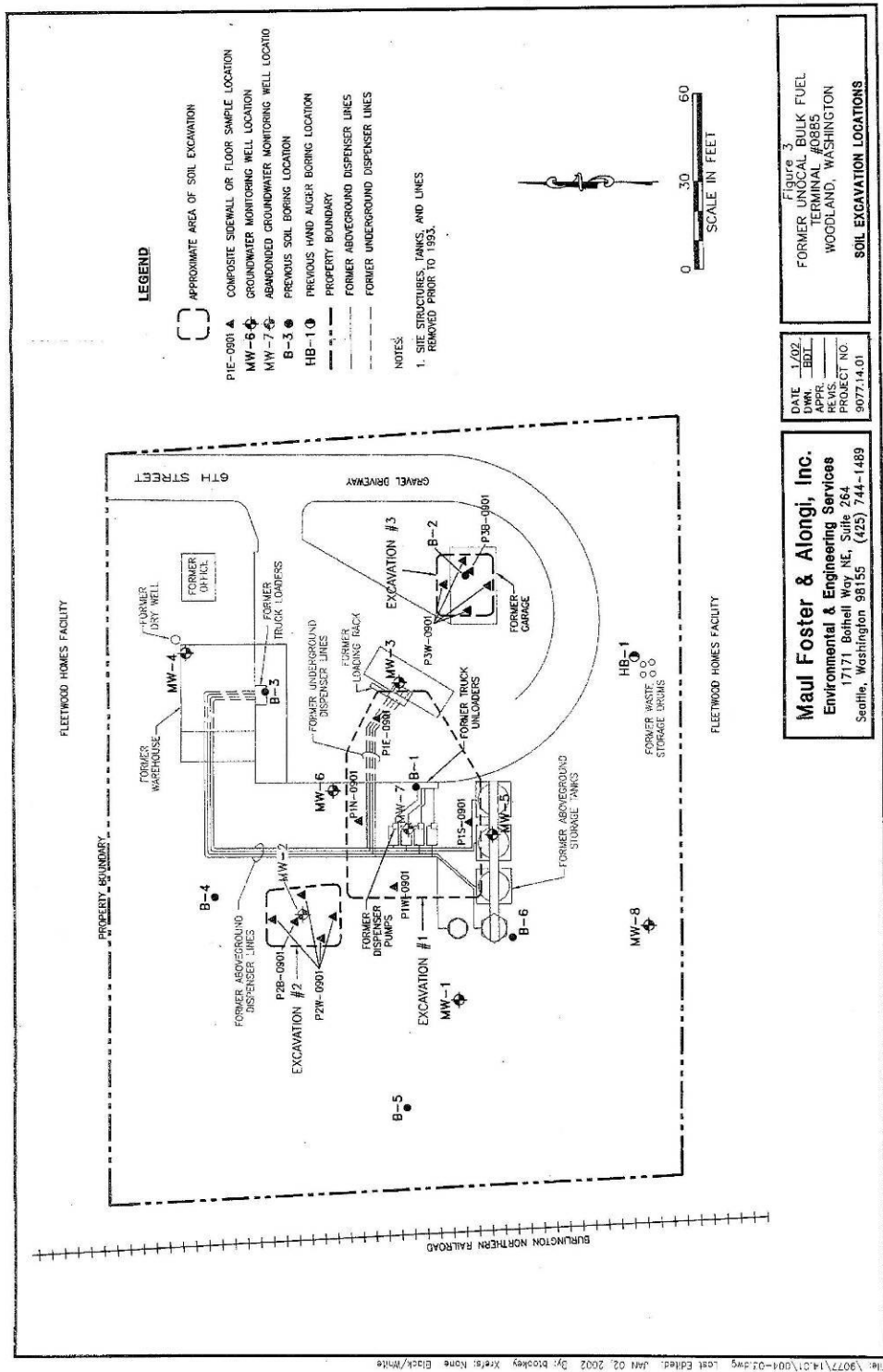
6.1 Vicinity Map



File: P:\9077.14.01\Figure 1 - Site Location Map Last edited: January 3, 2002 by: ataluen

LAYOUT: 1

6.2 Site Plan



File: \9077\14\01\04-01.dwg Last Edited: 04/02/2002 By: blocky Xref: None Black/White

6.3 2002 Restrictive Covenant

FROM KAREN BRUTON

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RECORDING REQUESTED BY:

Chicago Title Insurance Company
1312 Vandercook Way
Longview, WA 98632

RETURN RECORDED DOCUMENT TO:

Union Oil Company of California
376 South Valencia Avenue, A-138
Brea, CA 92823

ATTN: KAREN BRUTON

RESTRICTIVE COVENANT

G-98018

**FORMER UNOCAL BULK PLANT 0885
333 6TH STREET, WOODLAND, WASHINGTON**

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by Union Oil Company of California, a California corporation (hereafter referred to as "Unocal"), its successors and assigns, and the State of Washington Department of Ecology, its successors and assigns (hereafter referred to as "Ecology").

An independent remedial action (hereafter referred to as "Remedial Action") occurred at the property that is the subject of this restrictive covenant (hereafter referred to as "Restrictive Covenant"). The Remedial Action conducted at the property is described in the following documents, which are on file at Ecology's Southwest Regional Office:

1. Phase II Preliminary Contamination Assessment, Professional Service Industries, Inc., February 13, 1992
2. Phase 2 Investigation Report, EMCON Northwest, Inc., August 5, 1994
3. Results of Semiannual Ground Water Monitoring and Sampling, Nov/Dec 1994, GeoEngineers, Inc., February 10, 1995
4. Results of Semiannual Ground Water Monitoring and Sampling, May 1995, GeoEngineers, Inc., June 26, 1995
5. Results of Semiannual Ground Water Monitoring and Sampling, November 1995, GeoEngineers, Inc., January 11, 1996
6. Results of Semiannual Ground Water Monitoring and Sampling, May 1996, GeoEngineers, Inc., July 19, 1996
7. Results of Semiannual Ground Water Monitoring and Sampling, November 1996,

b/c

FROM KAREN BRUTON

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- GeoEngineers, Inc., January 28, 1997
8. Results of Semiannual Ground Water Monitoring and Sampling, May 1997, GeoEngineers, Inc., July 23, 1997
9. Results of Semiannual Ground Water Monitoring and Sampling, November 1997, GeoEngineers, Inc., January 7, 1998
10. Results of Semiannual Ground Water Monitoring and Sampling, May 1998, GeoEngineers, Inc., July 9, 1998
11. Results of Semiannual Ground Water Monitoring and Sampling, November 1998, GeoEngineers, Inc., January 5, 1999
12. Results of Ground Water Monitoring, May 1999, GeoEngineers, Inc., June 23, 1999
13. Results of Ground Water Monitoring, November 1999, GeoEngineers, Inc., December 22, 1999
14. Results of Groundwater Potability Evaluation, Maul Foster & Alongi, Inc., April 5, 2001
15. Results of Soil Excavation Activities, Maul Foster & Alongi, Inc., January 29, 2001

This Restrictive Covenant is required because the Remedial Action has resulted leaving residual gasoline hydrocarbons which exceed the Model Toxics Control Act Method A Residential Cleanup Levels established under WAC 173-340-740 in the groundwater at the site.

The undersigned, Unocal, is the fee owner of the real property in the County of Cowlitz, State of Washington (hereafter referred to as "Property"), that is subject to this Restrictive Covenant. The Property is legally described in Attachment A of this Restrictive Covenant, attached hereto and incorporated herein by this reference.

Unocal makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law, and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter individually and collectively referred to as "Owner").

Section 1. No groundwater may be taken for any use from the Property.

Section 2. Any activity on the Property that may interfere with the integrity of the

Bulk Plant No. 0885
333 6th Street
Woodland, Washington

FROM KAREN BRUTON

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Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. The Owner of the Property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial activities conducted at the Property, and to inspect records that are related to the Remedial Action.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit

Bulk Plant No. 0885
333 6th Street
Woodland, Washington

3

FROM KAREN BRUTON

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use of the Property or be of any further force or effect. However, such an instrument may
be recorded only if Ecology, after public notice and opportunity for comment, concurs.

Dated: 9/6/02

UNION OIL COMPANY OF CALIFORNIA
a California corporation

B By: *[Signature]*
ATTORNEY-IN-FACT

Bulk Plant No. 0885
333 6th Street
Woodland, Washington

FROM KAREN BRUTON

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ATTACHMENT A

Legal Description of the Property

That certain real property situate in the County of Cowlitz, State of Washington, as follows:

A tract of land in the Hans K. Craft Donation Land Claim and in the Northeast quarter of the Southwest quarter of Section 24, Township 5 North Range 1 West of the Willamette Meridian lying South of Goerigs Second Addition to Woodland and East of the East right of way line of the Northern Pacific Rail Road, more particularly described as follows to-wit:

BEGINNING at an iron pipe in the center of Sixth Street on the South boundary of Goerigs Second Addition to Woodland 410.0 feet South of a monument set at the intersection of the center lines of 6th Streets and Davidson Ave in Woodland;
thence West on the South boundary of Goerigs Second Addition 260 feet;
thence South 30 12' East 200 feet along the East line of the Northern Pacific Rail Road right of way;
thence East 260.0 feet;
thence North 30 12' West 200 feet to the point of beginning

Tax Parcel No.5-0680-010

Bulk Plant No. 0885
333 6th Street
Woodland, Washington

FROM KAREN BRUTON

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 3160136
 Page: 6 of 6
 CHICAGO TITLE INS - COV 24.08 88/23/2002 03:48P
 County

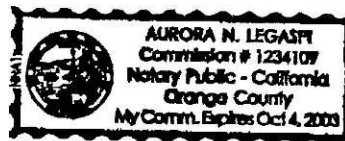
ALL PURPOSE ACKNOWLEDGEMENT

STATE OF CALIFORNIA)
) SS.
COUNTY OF ORANGE)

On September 6, 2002, before me, Aurora N. Legaspi, a Notary Public, personally appeared Brian J. Kelly, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument on behalf of said corporation.

Witness my hand and official seal.

Aurora N. Legaspi
Notary Public



ATTENTION NOTARY: Although the information requested below is optional, it could prevent fraudulent attachment of this certification to unauthorized document.

THIS CERTIFICATE
MUST BE ATTACHED
TO THE DOCUMENT
DESCRIBED AT RIGHT.

Title or Type of Document: Restrictive Covenant (BP#0885)

Number of Pages 5 Date of Document September 6, 2002

Capacity of Signer: Attorney-in-Fact

Signer Represents: Union Oil Company of California

Signer(s) Other Than Named Above : None

6.4 Photo log

Photo 1: Entrance to Site from Davidson Street – from the north



Photo 2: Central Portion of Site – from the north



Photo 3: Southern Portion of Site – from the southeast



Photo 4: Northwest Corner of Site Adjacent to Railroad Tracks – from the northwest

