

**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

In the Matter of Remedial Action by:

**Mr. Bradley R. Smith and Ms.
Brenda K. Maas
20606 179th Place SE
Monroe, WA 98272**

**Mr. Ray A. Nelson
43 Union Valley Rd
Chelan, WA 98816**

**EMERGENCY
ENFORCEMENT ORDER**

No. DE 7363

**TO: Mr. Bradley R. Smith and Ms. Brenda K. Maas
20606 179th Place SE
Monroe, WA 98272**

**Mr. Ray A. Nelson
43 Union Valley Rd
Chelan, WA 98816**

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EXHIBIT A. Site Diagram
 Property Location Map
 Photo of House and Garage

I. INTRODUCTION

The objective of the State of Washington, Department of Ecology (Ecology) under this Emergency Enforcement Order (Order) is to require remedial action at a facility where there has been a release or threatened release of hazardous substances. This Order requires Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson to perform an emergency interim action to eliminate exposure to person(s) drinking the groundwater, by providing commercially-available bottled drinking water as an alternate source of drinking water for anyone occupying property.

II. JURISDICTION

This Enforcement Order is issued pursuant to the Model Toxics Control Act (MTCA), RCW 70.105D.050(1).

III. PLP BOUND

This Enforcement Order shall apply to and be binding upon Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson. To the extent allowed by law, changes in ownership or corporate status shall not alter Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson's responsibility under this Order. Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall provide a copy of this Order to all agents, contractors, and subcontractors retained to perform work required by this Order, and shall ensure that all work undertaken by such agents, contractors, and subcontractors complies with this Order.

IV. DEFINITIONS

Unless otherwise specified herein, the definitions set forth in Chapter 70.105D RCW and Chapter 173-340 WAC shall control the meanings of the terms in this Order.

A. Site: The Site is referred to as the **Smith Maas Site** and is generally located at **22841 US Highway 97, Orondo, Washington, Douglas County (along the southeast Columbia River bank, between Cascade Foothills Road and Green's Canyon Road)**. The Site is defined by the extent of contamination caused by the release of hazardous substances at the Site. Based upon factors currently known to Ecology, the Site is more particularly described in the Site Diagram (Exhibit A). The Site constitutes a Facility under RCW 70.105D.020(4).

B. Potentially Liable Person (PLP): Refers to Mr. Bradley R. Smith and Ms. Brenda K. Maas, current property owners, and Mr. Ray A. Nelson, a former property owner.

C. Enforcement Order or Order: Refers to this Order and each of the exhibits to the Order. All exhibits are an integral and enforceable part of this Order. The terms "Enforcement Order" or "Order" shall include all exhibits to this Order.

V. FINDINGS OF FACT

Ecology makes the following findings of fact, without any express or implied admissions of such facts by Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson:

A. The Site is located on a 2.94 acre parcel (tax parcel 69900200600) and is occupied by a single family residence. The property is served by a domestic well and septic drainfield. A home heating oil fuel tank was located on the property prior to 2009. The well is located approximately 40 to 50 feet from the former fuel oil tank. Bordering this property to the north is the Columbia River. An orchard with residences and outbuildings is located across Highway 97 to the south. Adjacent to the west is vacant land with a ravine, where evidence of historic dumping on land and in the river was noted (barrels, household appliances, and machinery). Adjacent to the east is vacant land with an irrigation pump and pipeline servicing the upland orchard.

B. The property was previously owned by a Mr. Ray A. Nelson. On August 7, 2009, the property was sold by Mr. Nelson to Mr. Bradley R. Smith and Ms. Brenda K. Maas. Prior to sale of the property, Mr. Nelson (operating as Nelson & Noack Land Holdings LLC) contracted the pumping and removal of the home heating fuel oil tank contents (2009), located under the southeast corner of the house, and installation of a domestic well (June 1, 2009), located off the southeast corner of the garage.

C. Following installation of the domestic well, the tenant of the Smith Maas Property noted a fuel taste and odor in water supplied by the well. On December 15, 2009 and January 11, 2010 tap water samples were collected and analyzed. Benzene, total Naphthalenes, and Manganese in tap water exceeded both MTCA A cleanup levels (for unrestricted land use) and

human health risk-based standards. The well is currently the sole water supply to the tenants and is located approximately 200 feet from the Columbia River shoreline.

D. Groundwater concentrations of Benzene, Naphthalenes, and Manganese exceed cleanup levels and health risk-based standards as indicated in the chart below:

Contaminant	Groundwater concentration (µg/L)	MTCA A Cleanup level (µg/L)	Sample date
Benzene	5.64	5	1/11/10
Ethylbenzene	2.24	700	1/11/10
Xylenes	2.77	1,000	1/11/10
Naphthalene	312	160 for total naphthalenes	1/11/10
2-Methyl naphthalene	126	160 for total naphthalenes	1/11/10
NWTPH-Dx	290, ND	500	12/15/09, 1/11/10
Manganese	401	50 (cleanup level for staining and taste purposes) 300 is the lifetime health advisory level	1/11/10

µg/L = micrograms per liter or parts-per-billion (ppb)

VI. ECOLOGY DETERMINATIONS

A. Mr. Bradley R. Smith and Ms. Brenda K. Maas are "owners or operators" as defined in RCW 70.105D.020(12) of a "facility" as defined in RCW 70.105D.020(4).

B. Mr. Ray A. Nelson is a former "owner or operator" at the time of release pursuant to RCW 70.105D.040(1)(b).

B. Based upon all factors known to Ecology, a "release" or "threatened release" of "hazardous substance(s)" as defined in RCW 70.105D.020(20) and RCW 70.105D.020(7), respectively, has occurred at the Site.

C. Based upon credible evidence, PLP status letters and this enforcement order have been issued concurrently to Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson, pursuant to RCW 70.105D.040, -.020(16), WAC 173-340-500 and WAC 173-340-540 (emergency status).

D. Pursuant to RCW 70.105D.030(1) and -.050(1), Ecology may require PLPs to investigate or conduct other remedial actions with respect to any release or threatened release of hazardous substances, whenever it believes such action to be in the public interest. Based on the foregoing facts, Ecology believes the remedial actions required by this Order are in the public interest.

E. Under WAC 173-340-430, an interim action is a remedial action that is technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance, that corrects a problem that may become substantially worse or cost substantially more to address if the remedial action is delayed, or that is needed to provide for completion of a site hazard assessment, remedial investigation/feasibility study or design of a cleanup action. **Petroleum impacted groundwater is currently the property's sole source of drinking water and general household water supply. Concentrations of these contaminants in the water supply exceed applicable cleanup levels and health risk-based standards, and therefore pose a health risk to the current property occupants through ingestion, dermal, and inhalation pathways. These circumstances warrant an interim action consistent with WAC 173-340-430.**

F. **This enforcement order is considered an emergency order because of ongoing exposure of those occupying the property to contaminated well water.**

VII. WORK TO BE PERFORMED

Based on the Findings of Fact and Ecology Determinations, it is hereby ordered that Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson take the following remedial actions at the Site and that these actions be conducted in accordance with Chapter 173-340 WAC unless otherwise specifically provided for herein: They shall within 24 hours of receiving this enforcement order provide commercially-available bottled drinking water as an alternate source of drinking water for anyone occupying property. Provision of this alternate drinking water shall

continue until either the site is remediated to applicable cleanup standards, or the contaminated well on the property is no longer used by any occupant(s) for domestic purposes.

VIII. TERMS AND CONDITIONS OF ORDER

A. Public Notice

RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. For emergency orders, such notice will be mailed no later than ten (10) days after issuance of the Order. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that this Order is inadequate or improper in any respect.

B. Remedial Action Costs

Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall pay to Ecology costs incurred by Ecology pursuant to this Order and consistent with WAC 173-340-550(2). These costs shall include work performed by Ecology or its contractors for or on the Site under Chapter 70.105D RCW, including remedial actions and Order preparation, oversight, and administration. These costs shall include work performed both prior to and subsequent to the issuance of this Order. Ecology's costs shall include costs of direct activities and support costs of direct activities as defined in WAC 173-340-550(2). Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall pay the required amount within ninety (90) days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved staff, and the amount of time spent by involved staff members on the project. A general statement of work performed will be provided upon request. Itemized statements shall be prepared quarterly. Pursuant to WAC 173-340-550(4), failure to pay Ecology's costs within ninety (90) days of receipt of the itemized statement of costs will result in interest charges at the rate of twelve percent (12%) per annum, compounded monthly.

Pursuant to RCW 70.105D.055, Ecology has authority to recover unreimbursed remedial action costs by filing a lien against real property subject to the remedial actions.

C. Implementation of Remedial Action

If Ecology determines that Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson have failed without good cause to implement the remedial action, in whole or in part, Ecology may, after notice to Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson, perform any or all portions of the remedial action that remain incomplete. If Ecology performs all or portions of the remedial action because of Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson's failure to comply with its obligations under this Order, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall reimburse Ecology for the costs of doing such work in accordance with Section VIII.B (Remedial Action Costs), provided that Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson are not obligated under this Section to reimburse Ecology for costs incurred for work inconsistent with or beyond the scope of this Order.

Except where necessary to abate an emergency situation, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall not perform any remedial actions at the Site outside those remedial actions required by this Order, unless Ecology concurs, in writing, with such additional remedial actions.

D. Designated Project Coordinators

The project coordinator for Ecology is:

Laura Klasner
Toxics Cleanup Program, Central Regional Office
WA State, Department of Ecology
15 W. Yakima Ave.
Yakima, WA 98902-3452
(509) 454-7833

Within twenty-four (24) hours, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall inform Ecology of the identity and contact information of their project

coordinator(s). In the event no project coordinator is identified, Ecology will consider the PLPs themselves to be their own project coordinators.

Each project coordinator shall be responsible for overseeing the implementation of this Order. Ecology's project coordinator will be Ecology's designated representative for the Site. To the maximum extent possible, communications between Ecology and Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson, and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order shall be directed through the project coordinators. The project coordinators may designate, in writing, working level staff contacts for all or portions of the implementation of the work to be performed required by this Decree.

Any party may change its respective project coordinator. Written notification shall be given to the other party at least ten (10) calendar days prior to the change.

E. Access

RCW 70.105D.030(1)(a) authorizes Ecology or any Ecology authorized representative to enter all property at the Site that Mr. Bradley R. Smith, Ms. Brenda K. Maas, and/or Mr. Ray A. Nelson either owns, controls, or has access rights to, after reasonable notice unless an emergency prevents such notice. Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall make all reasonable efforts to secure access rights for those properties within the Site not owned or controlled by Mr. Bradley R. Smith, Ms. Brenda K. Maas, and/or Mr. Ray A. Nelson where remedial activities or investigations will be performed pursuant to this Order.

F. Sampling, Data Submittal, and Availability

With respect to the implementation of this Order, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall make the results of all sampling, laboratory reports, and/or test results generated by it or on its behalf available to Ecology. Pursuant to WAC 173-340-840(5), all sampling data shall be submitted to Ecology in both printed and electronic formats in accordance with Section VII (Work to be Performed), Ecology's Toxics Cleanup Program Policy

840 (Data Submittal Requirements), and/or any subsequent procedures specified by Ecology for data submittal.

If requested by Ecology, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall allow Ecology and/or its authorized representative to take split or duplicate samples of any samples collected by Mr. Bradley R. Smith, Ms. Brenda K. Maas, and/or Mr. Ray A. Nelson pursuant to the implementation of this Order. Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall notify Ecology seven (7) days in advance of any sample collection or work activity at the Site. Ecology shall, upon request, allow Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson and/or their authorized representative to take split or duplicate samples of any samples collected by Ecology pursuant to the implementation of this Order, provided that doing so does not interfere with Ecology's sampling. Without limitation on Ecology's rights under Section VIII.E (Access), Ecology shall notify Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson prior to any sample collection activity unless an emergency prevents such notice.

In accordance with WAC 173-340-830(2)(a), all hazardous substance analyses shall be conducted by a laboratory accredited under Chapter 173-50 WAC for the specific analyses to be conducted, unless otherwise approved by Ecology.

G. Retention of Records

During the pendency of this Order, and for ten (10) years from the date of completion of the work performed pursuant to this Order, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall preserve all records, reports, documents, and underlying data in its possession relevant to the implementation of this Order and shall insert a similar record retention requirement into all contracts with project contractors and subcontractors. Upon request of Ecology, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall make all such records available to Ecology and allow access for review within a reasonable time.

H. Resolution of Disputes

Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson may request Ecology to resolve factual or technical disputes which may arise during the implementation of this Order. Such request shall be in writing and directed to the signatory, or his/her successor(s), of this Order. Ecology resolution of the dispute shall be binding and final. Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson are not relieved of any requirement of this Order during the pendency of the dispute and remains responsible for timely compliance with the terms of this Order unless otherwise provided by Ecology in writing.

I. Extension of Schedule

1. An extension of schedule shall be granted only when a request for an extension is submitted in a timely fashion, generally at least thirty (30) days prior to expiration of the deadline for which the extension is requested, and when good cause exists for granting the extension. All extensions shall be requested in writing. The request shall specify:

- a. The deadline that is sought to be extended;
- b. The length of the extension sought;
- c. The reason(s) for the extension; and
- d. Any related deadline or schedule that would be affected if the extension were granted.

2. The burden shall be on Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson to demonstrate to the satisfaction of Ecology that the request for such extension has been submitted in a timely fashion and that good cause exists for granting the extension. The existence of good cause shall be determined by Ecology in its sole discretion. Good cause may include, but may not be limited to:

- a. Circumstances beyond the reasonable control and despite the due diligence of Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson including delays caused by unrelated third parties or Ecology, such as (but not limited to)

delays by Ecology in reviewing, approving, or modifying documents submitted by Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson;

b. Acts of God, including fire, flood, blizzard, extreme temperatures, storm, or other unavoidable casualty; or

However, neither increased costs of performance of the terms of this Order nor changed economic circumstances shall be considered circumstances beyond the reasonable control of Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson.

3. Ecology shall act upon any written request for extension in a timely fashion. Ecology shall give Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson written notification of any extensions granted pursuant to this Order. A requested extension shall not be effective until approved by Ecology.

4. An extension shall only be granted for such period of time as Ecology determines is reasonable under the circumstances. Ecology may grant schedule extensions exceeding ninety (90) days only as a result of:

- a. Delays in the issuance of a necessary permit which was applied for in a timely manner;
- b. Other circumstances deemed exceptional or extraordinary by Ecology; or

J. Reservation of Rights

Ecology reserves its rights under Chapter 70.105D RCW, including the right to require additional or different remedial actions at the Site should it deem such actions necessary to protect human health and the environment, and to issue orders requiring such remedial actions. Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the release or threatened release of hazardous substances at the Site.

K. Transfer of Interest in Property

Before any voluntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Site shall be consummated by Mr. Bradley R. Smith, Ms. Brenda K.

Maas, and/or Mr. Ray A. Nelson, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall provide for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Further, prior to Mr. Bradley R. Smith, Ms. Brenda K. Maas, and/or Mr. Ray A. Nelson's transfer of any interest in all or any portion of the Site, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall provide a copy of this Order to any prospective purchaser, lessee, transferee, assignee, or other successor in said interest; and at least thirty (30) days prior to any transfer, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and/or Mr. Ray A. Nelson shall notify Ecology of said transfer. Upon transfer of any interest, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and/or Mr. Ray A. Nelson shall restrict uses and activities to those consistent with this Order and notify all transferees of the restrictions on the use of the property.

L. Compliance With Applicable Laws

1. All actions carried out by Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements, including requirements to obtain necessary permits, except as provided in RCW 70.105D.090. At this time, no federal, state or local requirements have been identified as being applicable to the actions required by this Order.

2. Pursuant to RCW 70.105D.090(1), Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson are exempt from the procedural requirements of Chapters 70.94, 70.95, 70.105, 77.55, 90.48, and 90.58 RCW and of any laws requiring or authorizing local government permits or approvals. However, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall comply with the substantive requirements of such permits or approvals. At this time, no state or local permits or approvals have been identified as being applicable but procedurally exempt under this Section.

Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson have a continuing obligation to determine whether additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order. In the

event either Ecology or Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson determine that additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order, it shall promptly notify the other party of its determination. Ecology shall determine whether Ecology or Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall be responsible to contact the appropriate state and/or local agencies. If Ecology so requires, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall promptly consult with the appropriate state and/or local agencies and provide Ecology with written documentation from those agencies of the substantive requirements those agencies believe are applicable to the remedial action. Ecology shall make the final determination on the additional substantive requirements that must be met by Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson and on how Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson must meet those requirements. Ecology shall inform Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson in writing of these requirements. Once established by Ecology, the additional requirements shall be enforceable requirements of this Order. Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall not begin or continue the remedial action potentially subject to the additional requirements until Ecology makes its final determination.

3. Pursuant to RCW 70.105D.090(2), in the event Ecology determines that the exemption from complying with the procedural requirements of the laws referenced in RCW 70.105D.090(1) would result in the loss of approval from a federal agency that is necessary for the State to administer any federal law, the exemption shall not apply and Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson shall comply with both the procedural and substantive requirements of the laws referenced in RCW 70.105D.090(1), including any requirements to obtain permits.

IX. SATISFACTION OF ORDER

The provisions of this Order shall be deemed satisfied upon Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson's receipt of written notification from Ecology that Mr.

Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson have completed the remedial activity required by this Order, and that Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson have complied with all other provisions of this Enforcement Order. If, at any point in time, the contaminated well on the property is no longer used by any occupant(s) for domestic purposes, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson may notify Ecology of this fact. Upon any confirmation of this fact that is required by Ecology, this fact can form the basis for Ecology's determination that Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson have completed the remedial activity required by this Order. However, Ecology reserves the right to reinstate this Order if the contaminated well on the property is put back into use, and to issue other orders requiring remedial work at the Site.

X. ENFORCEMENT

Pursuant to RCW 70.105D.050, this Order may be enforced as follows:

- A. The Attorney General may bring an action to enforce this Order in a state or federal court.
- B. The Attorney General may seek, by filing an action, if necessary, to recover amounts spent by Ecology for investigative and remedial actions and orders related to the Site.
- C. In the event Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson refuse, without sufficient cause, to comply with any term of this Order, Mr. Bradley R. Smith, Ms. Brenda K. Maas, and Mr. Ray A. Nelson will be liable for:
 - 1. Up to three (3) times the amount of any costs incurred by the State of Washington as a result of its refusal to comply; and
 - 2. Civil penalties of up to twenty-five thousand dollars (\$25,000) per day for each day it refuses to comply.
- D. This Order is not appealable to the Washington Pollution Control Hearings Board. This Order may be reviewed only as provided under RCW 70.105D.060.

Effective date of this Order: 2-2-10

**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Valerie Bound

Valerie Bound
Section Manager
Toxics Cleanup Program
Central Regional Office
(509) 454-7886

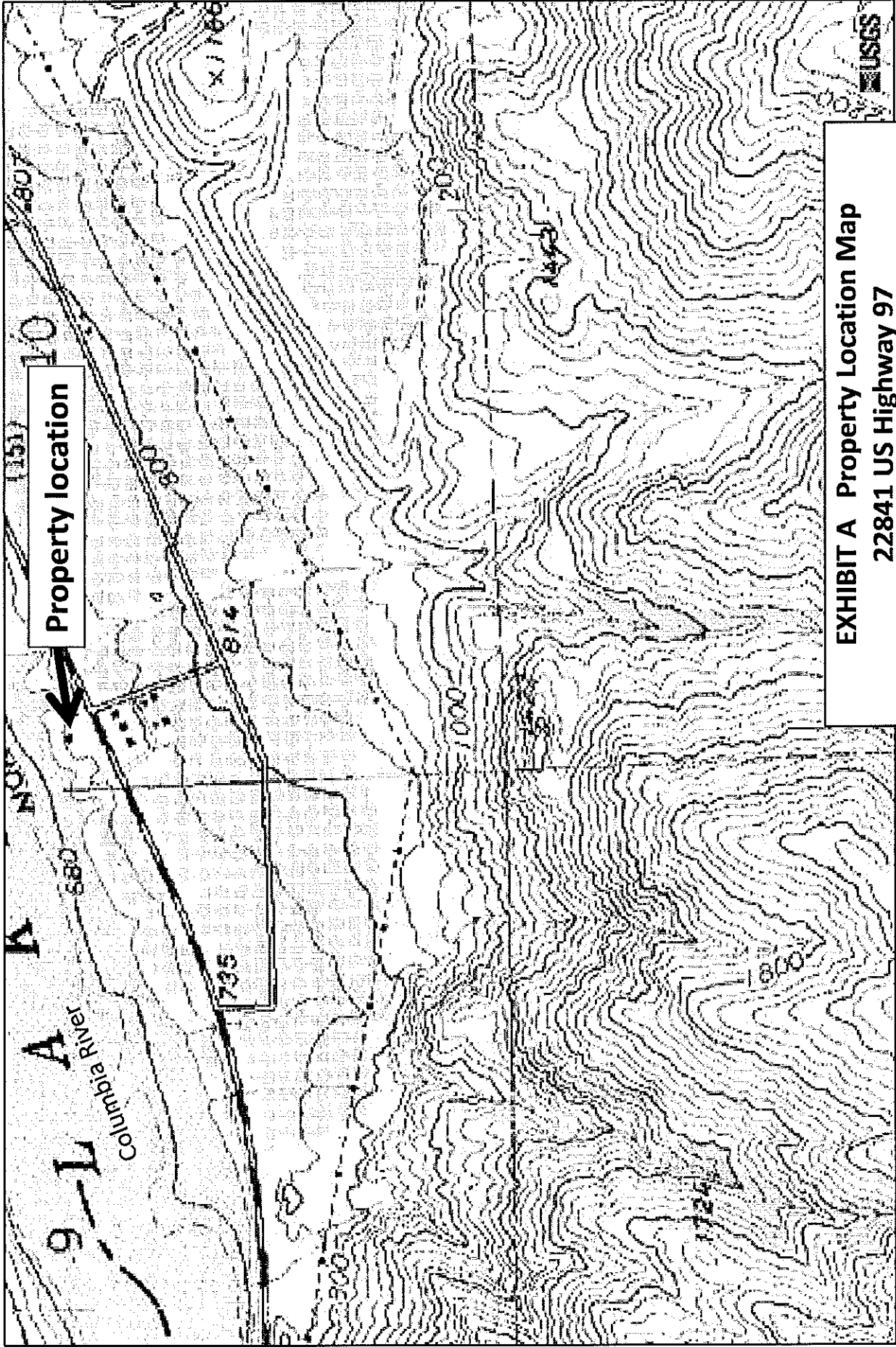


EXHIBIT A Property Location Map

22841 US Highway 97

Orondo, WA



EXHIBIT A Photo of house and garage