



WASHINGTON STATE  
DEPARTMENT OF  
E C O L O G Y

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Southwest Regional Office  
Toxics Cleanup Program  
PO Box 47775  
Olympia, WA 98504-7775  
360-407-6240

### TRANSMITTAL MEMO

Date: August 21, 2013

TO: Mr. Mark Conan  
Plaid Pantries, Inc

RE: Plaid Pantry 23  
SW1166

Subject: Explanation of Timeline

**NOTE:** The determination date is the date Ecology approved the No Further Action status for the site. Final payment, EIM Data submission, once received, the NFA letter was released.

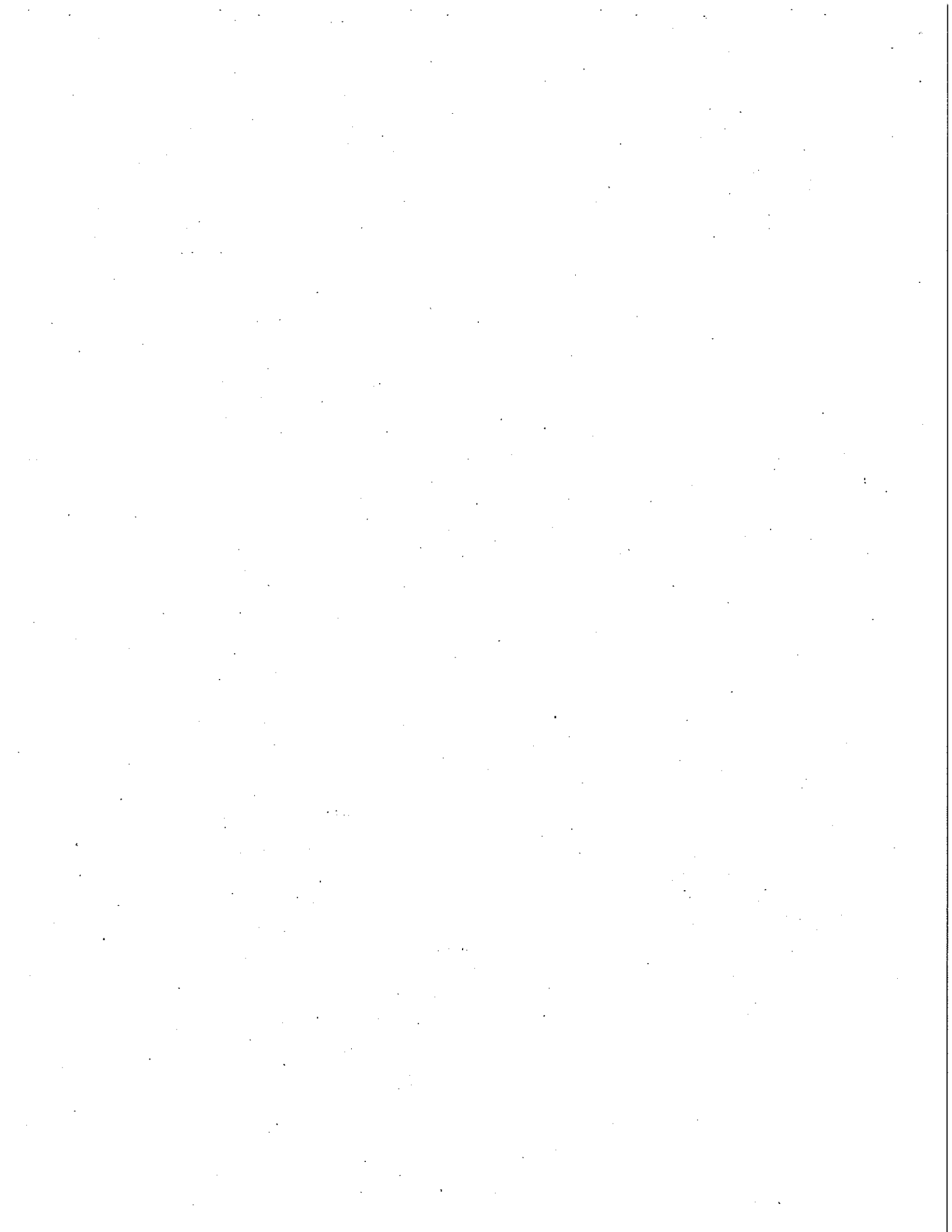
Ecology Determination date: August 20, 2013

Email Customer Notification: July 23, 2013

Payment received date: August 13, 2013

EIM Data successfully uploaded: March 1, 2013

Ecology Determination letter mailed/sent: August 21, 2013





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

August 21, 2013

Mr. Mark Conan  
Plaid Pantries, Inc  
10025 SW Allen Boulevard  
Beaverton, Oregon 97005

**Re: No Further Action at the following Site:**

- **Site Name:** Plaid Pantry 23
- **Site Address:** 5210 East Fourth Plain Boulevard, Vancouver, Washington
- **Facility/Site No.:** 78978458
- **Site Cleanup No.:** 10545
- **VCP Project No.:** SW1166

Dear Mr. Conan:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Plaid Pantry 23 facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

**Issue Presented and Opinion**

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Is further remedial action necessary to clean up contamination at the Site?

**NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.**

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

**Description of the Site**

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This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Total petroleum hydrocarbons in the gasoline-range (TPH-G) into the Soil and Groundwater.
- Volatile Organic Compounds (VOCs) into the Soil and Groundwater.
- Metals into the Groundwater.



**Enclosure A** includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

### **Basis for the Opinion**

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This opinion is based on the information contained in the following documents:

1. ESS Environmental, Inc. (ESS), **Final Site Characterization Report and Request for No Further Action Determination, Plaid Pantries Store #23, Vancouver, Washington**, dated March 5, 2013.
2. Department of Ecology Opinion Letter, **Further Action at the following Site: John's Auto Wrecking**, dated August 23, 2011.

Those documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. You can make an appointment by calling the SWRO resource contact at (360) 407-6365.

### **Analysis of the Cleanup**

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Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

#### **1. Characterization of the Site.**

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

The Site is located at 5210 East Fourth Plain Boulevard in Vancouver, Washington. The Site was operated as a Plaid Pantry convenience store and refueling station from 1982 to 2002. Plaid Pantry operated three gasoline underground storage tanks (USTs) at the Site during that time: one 10,000-gallon and two 12,000-gallon single-wall steel tanks with single-wall distribution piping. From 1998 to 2002, when the USTs were removed from service, the USTs were out of compliance by not being upgraded with a lining and/or cathodic protection.

In 1991, PEMCO conducted an environmental assessment of the down-gradient Gramor parcel west of the Site and found VOC soil contamination above the applicable MTCA Method A Soil Cleanup Levels (CULs) for unrestricted land uses; TPH-G was not analyzed for. In a 1995 follow-on investigation conducted by Dames and Moore, benzene and total xylenes were found in groundwater above their applicable MTCA Method A Groundwater CULs. The consultant determined that the parcel was not the source of the contamination and notified Ecology. In January 1997, Ecology placed the Site on the *Confirmed and Suspected Contaminated Sites List*.

In February 1998, PNG Environmental, Inc. (PNG) conducted a Site investigation of the Plaid Pantry parcel and concluded there were TPH-G, VOCs, and total lead above their applicable MTCA Method A CULs in the Site groundwater. Additional contamination was released when the driller penetrated a fuel distribution line. PNG estimated a release of 8 gallons of gasoline. The B-6 soil sample had the highest reported TPH-G soil concentration at the Site with a concentration of 4,400 milligram per kilogram (mg/kg); the MTCA Method A Soil CUL for TPH-G was 30 mg/kg due to benzene being present at the Site. PNG installed two soil vapor extraction (SVE) wells at B-6 to remediate petroleum-contaminated soil (PCS).

From 2002 to 2010, PNG conducted remedial activities at the Site, including a Site Characterization in 2005, UST decommissioning activities (removing three USTs and associated piping) in 2006, enhanced *in situ*<sup>1</sup> remedial actions by injecting solution of oxygenating-compounds (ORC) into the subsurface in June 2008, and groundwater monitoring activities from 2007 to 2010. The quarterly groundwater monitoring events at six monitoring wells, with the last four event results either not detected above their applicable MTCA Method A CULs or were not detected at the laboratory reporting limit, indicated the constituents of concern (COCs) concentrations were protective at all wells.

On October 31, 2011, Ecology reviewed the reports describing the remedial investigation and work activities described above. Ecology issued a Further Action Opinion Letter requesting additional investigative soil and groundwater sampling activities be completed at the Site, further investigation of subsurface magnetic anomalies, and correcting reporting requirement deficiencies. Ecology specifically noted a rebound pattern with COC contamination concentrations in MW-7 whenever the groundwater depth was 14 feet below ground surface (bgs) or deeper.

In March 2013, ESS submitted a report entitled *Final Site Characterization Report and Request for No Further Action Determination*. In the report, ESS described the additional investigative activities surrounding the magnetic anomalies, soil confirmation sampling analytical results, groundwater sampling analytical results, and monitoring well elevation survey data. In an earlier report, the magnetic anomalies had been thought to be a former waste oil tank and a former decommissioned-in-place UST. Borings advanced with an air-knife identified the first anomaly as shallow concrete debris and piping. A field trace of the pipes indicated they were relic features, currently not utilized for any purpose at the Site. Field observations and surveying indicated no soil contamination. The second anomaly, thought to be the UST, was also found to be relic piping; field screening also indicated no additional soil contamination was present. Three additional soil samples were collected near boring locations B-7, B-6, and B-13 where earlier soil sample analytical results indicated the soil TPH-G and lead concentrations were still present above the applicable MTCA Method A CULs. ESS advanced the three soil borings at the requested depths and locations, and collected the requested soil samples for analysis. Analytical results indicated these location samples were below the applicable MTCA Method A Soil CULs or were not detected at the

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<sup>1</sup> Clean up or remediation of a polluted site is performed using and simulating the natural processes in the soil.

laboratory reporting level. Groundwater sample analytical results from selected monitoring wells (MW-6 and MW-7) collected during conditions established by Ecology indicated the COC concentration rebound effect was no longer present.

Based on their Site characterization and cleanup actions, ESS recommended a No Further Action Opinion for the Site from Ecology. Ecology agrees with that recommendation.

**2. Establishment of cleanup standards.**

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

Applicable MTCA Method A CULs for soil and groundwater were used to characterize the Site. Standard points of compliance were used for the Site. The point of compliance for protection of groundwater was established in the soils throughout the Site. For soil cleanup levels based on human exposure via direct contact or other exposure pathways where contact with the soil is required to complete the pathway, the point of compliance was established in the soils throughout the Site from the ground surface to 15 feet bgs. In addition, the point of compliance for the groundwater was established throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth that could potentially be affected by the Site.

**3. Selection of cleanup action.**

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The method selected to remediate the contaminated soil involved source removal, excavation of contaminated material, and off-Site disposal of the contaminated soil. The cleanup actions meet the minimum requirements of WAC 173-340-360(2). The cleanup actions supported by the analytical data indicate the soil and groundwater on the Site are protective of human health and the environment, meet the state cleanup standards, and for this Site, demonstrates a permanent solution was applied to the Site cleanup.

**4. Cleanup.**

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

PNG decommissioned and removed three USTs from the Site in 2006. PNG excavated approximately 590 tons of PCS from the Site and disposed of it the Wasco County Landfill in Oregon. PNG applied ORC to the UST excavation floor and sidewalls prior to backfilling the excavation. PNG then injected approximately 3,000 pounds of ORC into subsurface soil and groundwater to help remove residual groundwater impacts. PNG also installed two SVE wells to remediate residual PCS near the pump islands.

Soil sample analytical results indicated the PCS was removed from the UST excavation; however, no confirmation soil sample was collected from the southwest corner of the UST excavation near B-6, the location with the highest TPH-G concentration. Subsequent soil sample analytical results, from this location (B-6/B-23) and others (B-7/B-22 and B-13/B-24), indicated the residual soil contamination was below the applicable MTCA Method A CULs or was not detected at the applicable laboratory reporting limits.

ESS (PNG) provided at least four quarters of groundwater analytical results that indicated all groundwater COCs were below the applicable MTCA Method A CULs or were not detected at the applicable laboratory reporting limits.

#### **Listing of the Site**

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Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List.

#### **Limitations of the Opinion**

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**1. Opinion does not settle liability with the state.**

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion does not:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

**2. Opinion does not constitute a determination of substantial equivalence.**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

**3. State is immune from liability.**

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70.105D.030(1)(i).

**Termination of Agreement**

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Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#SW1166).

For more information about the VCP and the cleanup process, please visit our web site: [www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm](http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm). If you have any questions about this opinion, please contact me by phone at (360) 407-7404 or e-mail at [erad461@ecy.wa.gov](mailto:erad461@ecy.wa.gov).

Sincerely,



Eugene Radcliff, L.G., Site Manager  
SWRO Toxics Cleanup Program

GER/ksc: Plaid Pantry 23 Site NFA SW1166 08212013

Enclosures (10): A – Description and Diagrams of the Site  
Figure 1 Site Vicinity Map  
Figure 3 Supplemental Soil Sampling Locations  
Table 1 Soil Analytical Results – Gasoline and Related Constituents (mg/Kg)  
Table 4 Groundwater Analytical Results Summary – Gasoline and Related Constituents (µg/L)

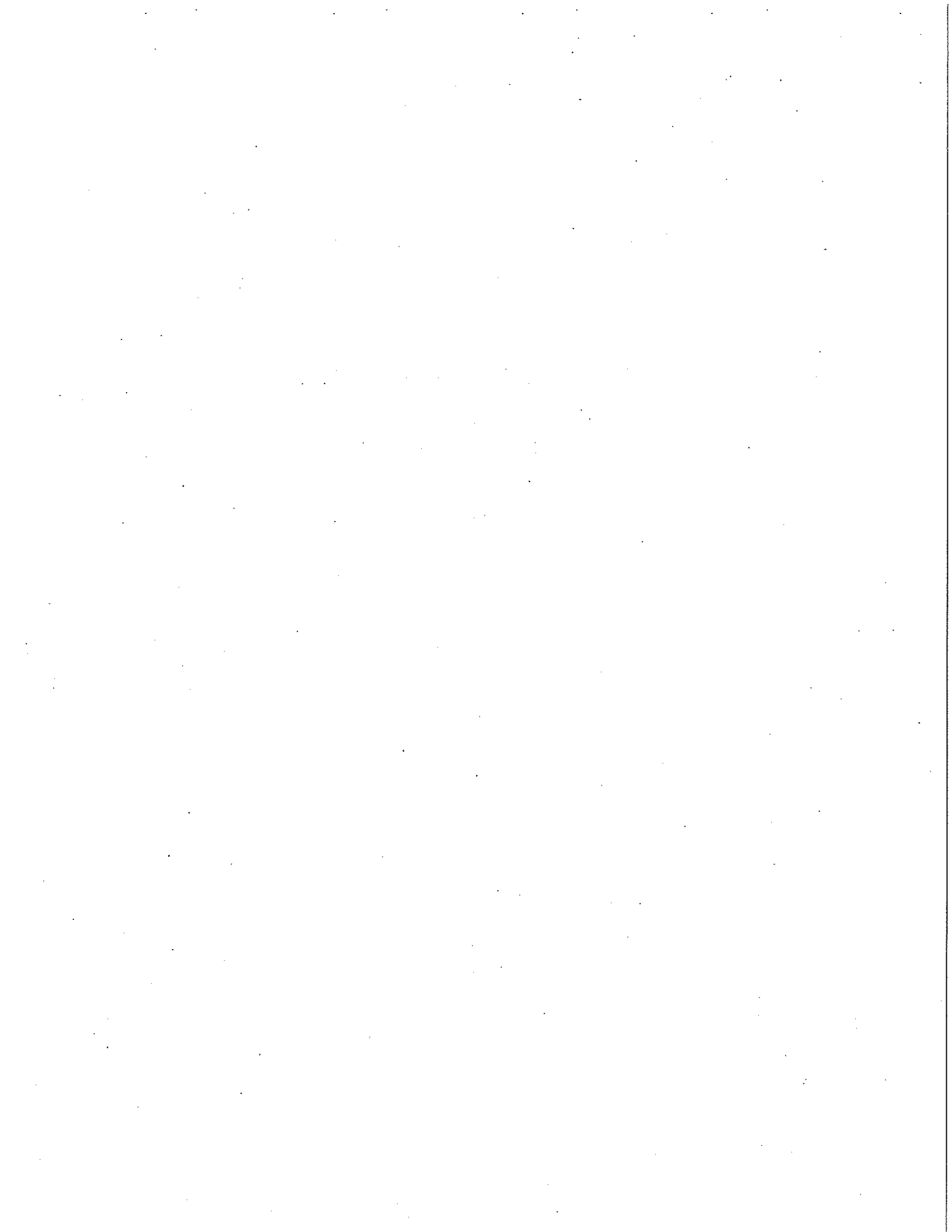
By certified mail: (7012 1010 0003 0195 4642)

cc: Mr. Paul Ecker, ESS Environmental Consulting, Inc.  
Ms. Louise Piacentini and Mr. Gene McIntosh, C/O M & P Properties  
Mr. Bryan DeDoncker, Clark County Health  
Mr. Scott Rose – Ecology  
Mary Shaleen-Hansen – Ecology  
Ms. Dolores Mitchell – Ecology (without enclosures)



## **Enclosure A**

### **Description and Diagrams of the Site**



# Site Description

## Media of Concern: Soil and Groundwater

The Plaid Pantry 23 (Site) is located at 5210 East Fourth Plain Boulevard in Vancouver, Clark County, Washington (see Figure 1). The Site has been zoned for general commercial (CG) purposes. The CG zoning district is designed to allow for a full range of retail, office, and civic uses with a citywide to regional trade area. The parcel on which the facility is located encompasses approximately 0.42 acres and contains one building that is currently vacant retail space. Previous commercial enterprises that have operated on the Site include service station operations, convenience store/refueling operations, and other commercial/retail outlet venues. The Site is bordered on the north by commercial/retail parcels, on the east by Stapleton Road, on the south by East Fourth Plain Boulevard, and on the west by commercial/retail parcels. The Clark County Assessor's (CCA) Office notes the Site as being comprised of one parcel having an assigned tax parcel number of 30243030.

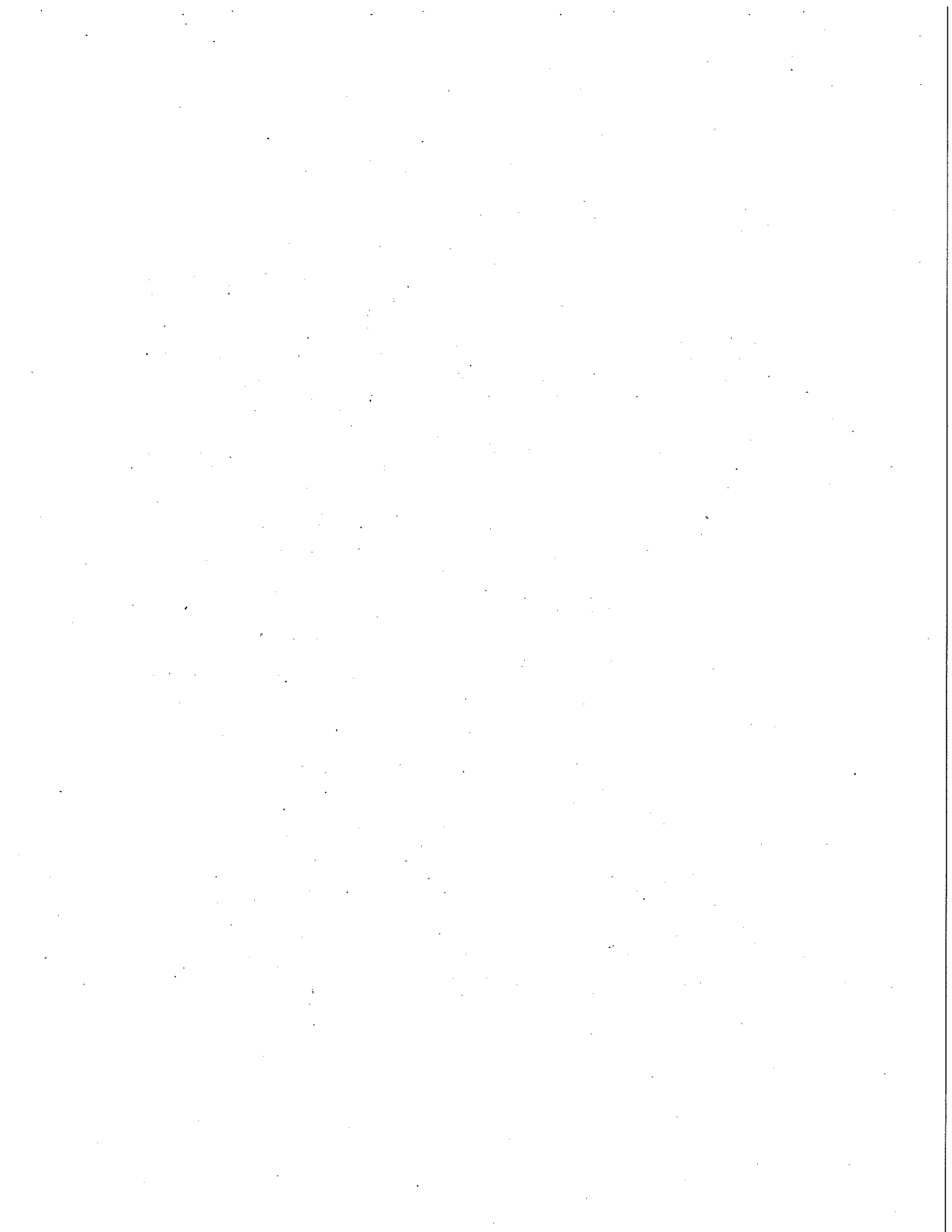
The legal description for the Site is: #4 of TT 3A SUBDIV YOUNG EST . 42A

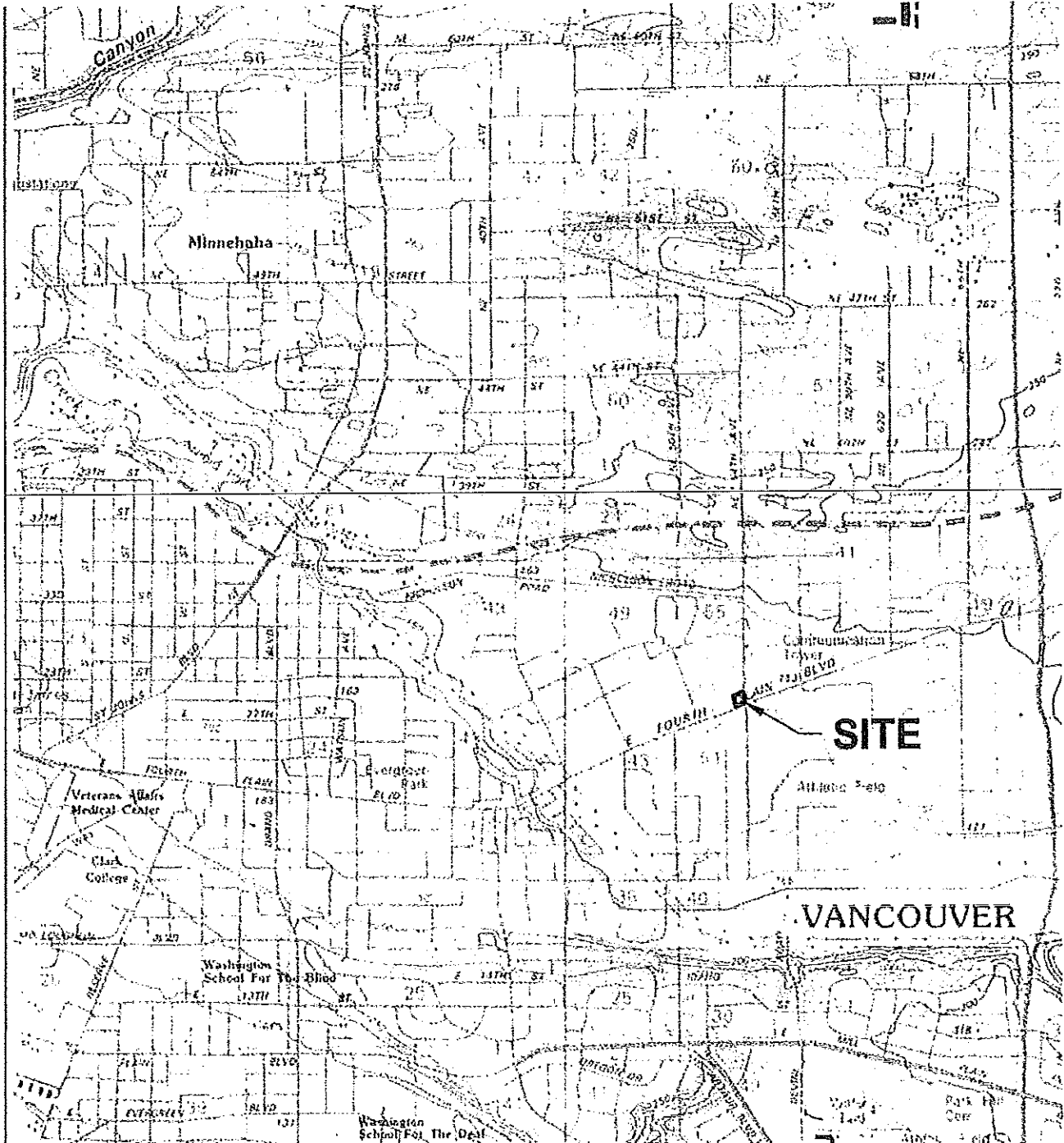
The Clark County Geographic Information System indicates the Site is approximately 180 feet above sea level and is located in south-central Vancouver on a broad, flat plain that slopes slightly to the southwest. The soil in the area is classified as Lauren gravelly loam, a non-hydric soil with 0 to 8 percent slopes. The soil lies on top of unconsolidated sedimentary deposits (Pleistocene catastrophic flood deposits), the Troutdale Gravel Aquifer, and then the Columbia River Basalt Group as the basement complex. Site boring logs indicate the Site is underlain by layers of silt, sand with silt, silt with clay and sand, and silty sand down to 20 feet below ground surface (bgs).

Groundwater is generally 11 to 16 feet bgs at the Site and groundwater predominantly flows to the southwest. Most of the area around the Site is well developed and covered with impervious surface. The Site has two dry wells located in the parking lot.

The Site soil and groundwater has been impacted by a discharge of gasoline into the surrounding soil, available data indicates that the source may be directly related to the UST and dispenser system. In addition, review of the historic former service station operations from the 1960s and 1970s at the Site seems to indicate a possible link to the Site contamination.

The Site lies within the Lower Burnt Bridge Creek Sub Watershed, which is part of the Burnt Bridge Creek Watershed. The parcel is designated as a very low risk for flooding, a low risk during an earthquake, and a low risk for liquefaction; the area is reported to have very dense soil. County records also indicate the southwest corner of the Site is within an area with a high archeological probability buffer.

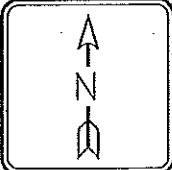




USGS, VANCOUVER WASHINGTON / OREGON  
 7.5 MINUTE QUADRANGLE, 1990  
 BASE MAP PROVIDED BY MAPTECH. APPROXIMATE SCALE IN FEET



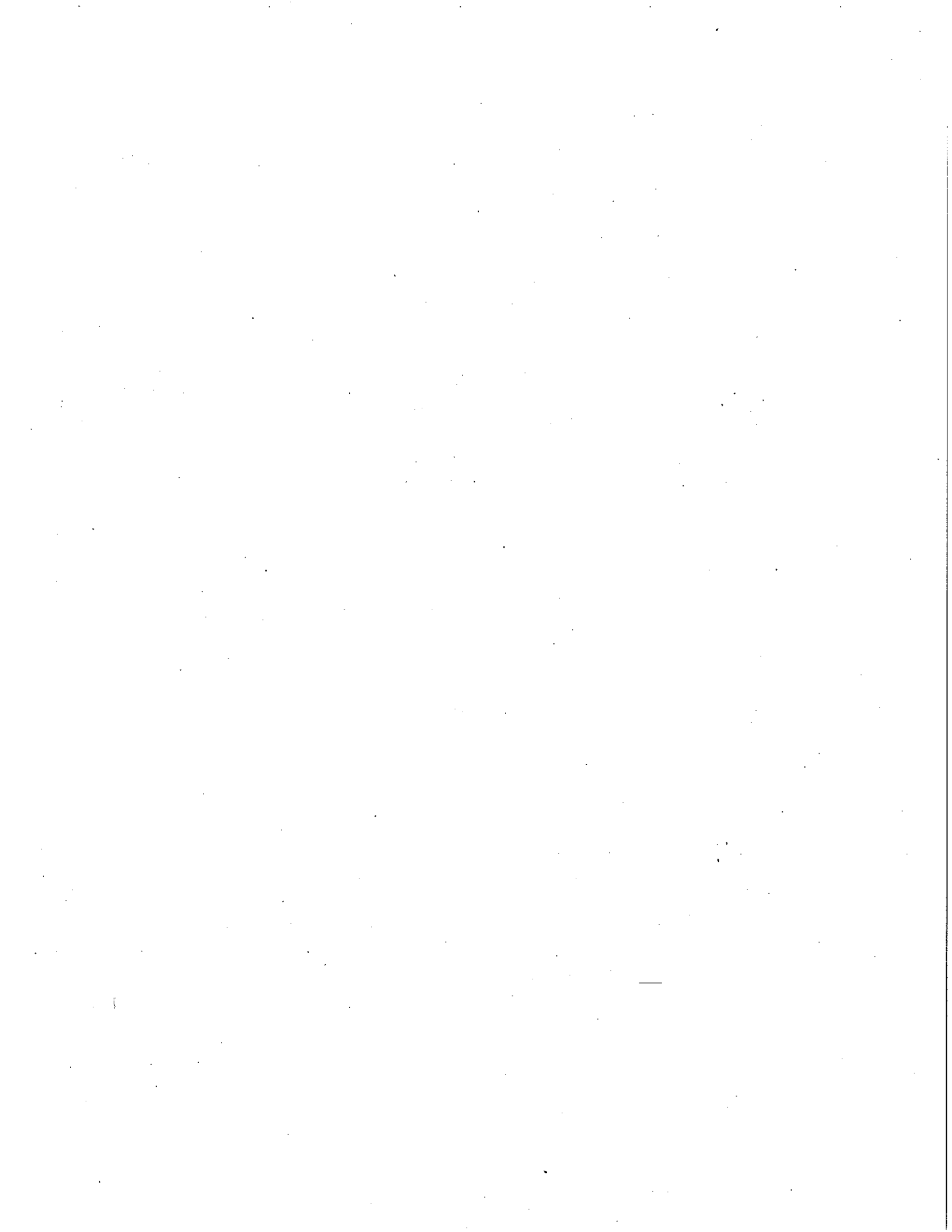
**EES**  
 ENVIRONMENTAL CONSULTING, INC.  
 240 N Broadway #203, Portland, OR  
 (503) 847-2740  
 www.ees-environmental.com

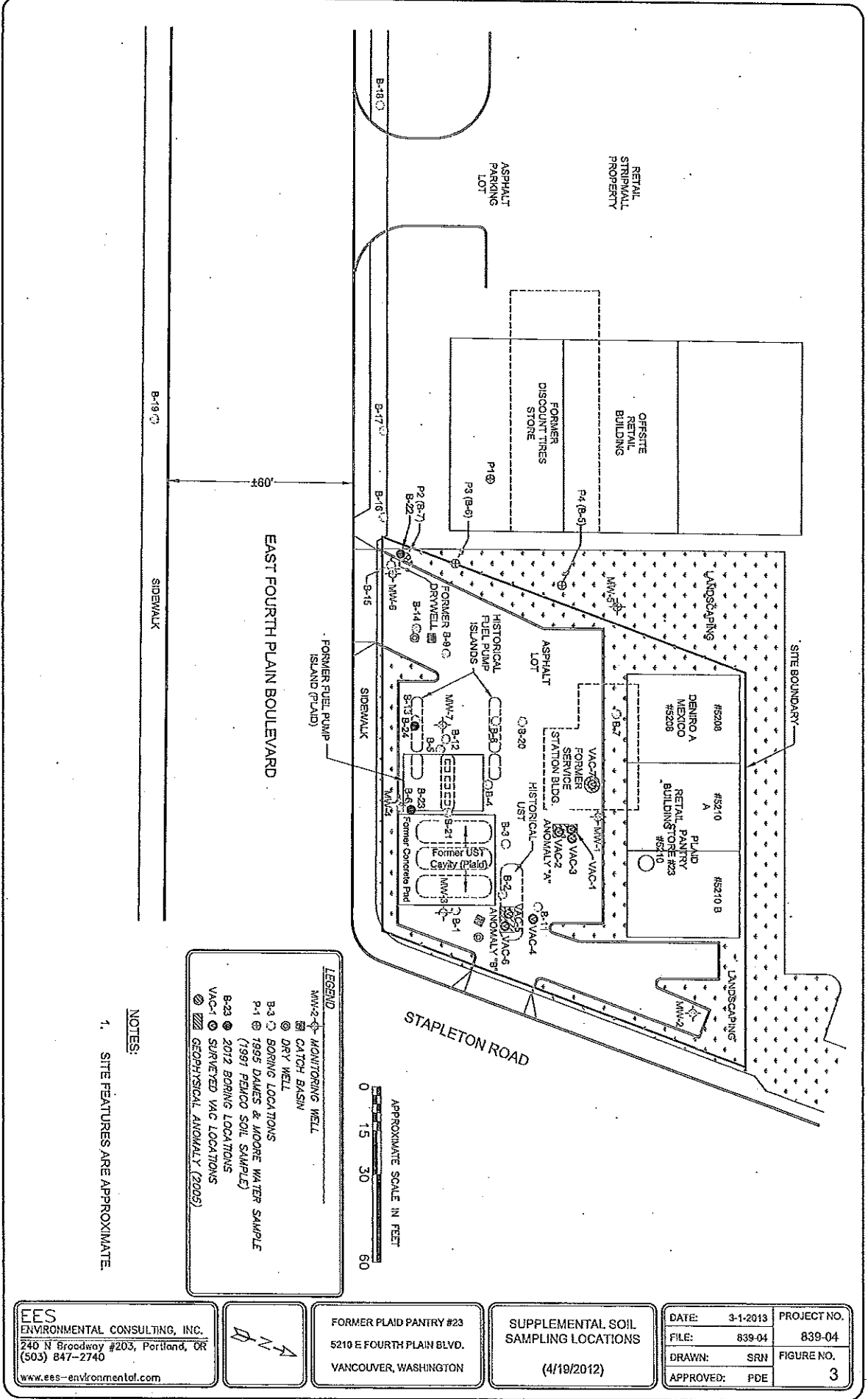


FORMER PLAID PANTRY #23  
 5210 E FOURTH PLAIN BLVD.  
 VANCOUVER, WASHINGTON

SITE VICINITY MAP

|           |          |             |        |
|-----------|----------|-------------|--------|
| DATE:     | 3-1-2013 | PROJECT NO. |        |
| FILE:     | 839-04   |             | 839-04 |
| DRAWN:    | SRN      | FIGURE NO.  |        |
| APPROVED: | PDE      |             | 1      |





**LEGEND**

- MM-2 ◊ MONITORING WELL
- ◻ CATCH BASIN
- ⊙ DRY WELL
- B-3 ◉ BORING LOCATIONS
- P-1 ⊙ 1995 DAKES & MOORE WATER SAMPLE (1997 FEMCO SOIL SAMPLE)
- B-23 ⊙ 2012 BORING LOCATIONS
- VAC-1 ⊙ SURVEYED VAC LOCATIONS
- ◻ GEOPHYSICAL ANOMALY (2005)

**NOTES:**  
1. SITE FEATURES ARE APPROXIMATE.

**EES**  
ENVIRONMENTAL CONSULTING, INC.  
240 N Broadway #203, Portland, OR  
(503) 847-2740  
www.ees-environmental.com



FORMER PLAID PANTRY #23  
5210 E FOURTH PLAIN BLVD.  
VANCOUVER, WASHINGTON

SUPPLEMENTAL SOIL  
SAMPLING LOCATIONS  
(4/10/2012)

|           |          |             |        |
|-----------|----------|-------------|--------|
| DATE:     | 3-1-2013 | PROJECT NO. | 839-04 |
| FILE:     | 839-04   | FIGURE NO.  | 3      |
| DRAWN:    | SRN      |             |        |
| APPROVED: | PDE      |             |        |

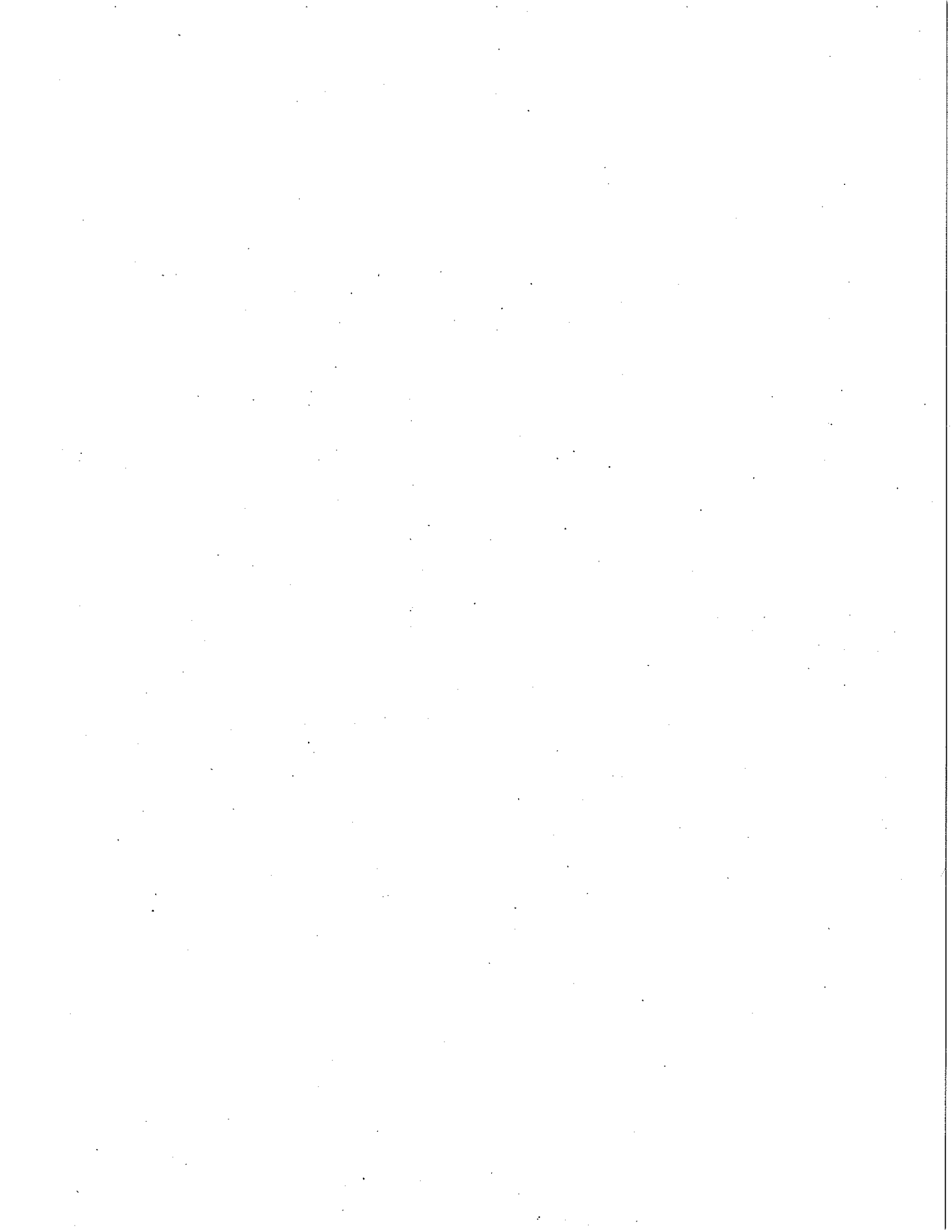




Table 1  
Soil Analytical Results - Gasoline and Related Constituents (mg/kg)  
Former Plaid Pantry #23  
Vancouver, Washington

| Location                                    | Date       | Depth <sup>a</sup> | Field Headspace <sup>b</sup> | Gasoline          | Benzene | Toluene | Ethylbenzene | Xylenes | PCB     | MTBE   | Naphthalene | EDB    | EDC    | 1,2,4-TMB | 1,3,5-TMB | Lead |
|---|------------|--------------------|------------------------------|-------------------|---------|---------|--------------|---------|---------|--------|-------------|--------|--------|-----------|-----------|------|
| <b>Temporary Borings</b>                    |            |                    |                              |                   |         |         |              |         |         |        |             |        |        |           |           |      |
| <b>EES Additional Site Characterization</b> |            |                    |                              |                   |         |         |              |         |         |        |             |        |        |           |           |      |
| B22-15/16                                   | 04/19/2012 | 15-16              | NA                           | 2 U               | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | 0.025 U | 0.05 U | 0.05 U      | 0.05 U | 0.05 U | 0.05 U    | 0.05 U    | 4.8  |
| B23-15                                      | 04/19/2012 | 15.0               | NA                           | 2 U               | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | 0.025 U | 0.05 U | 0.05 U      | 0.05 U | 0.05 U | 0.05 U    | 0.05 U    | 6.9  |
| B24-10                                      | 04/19/2012 | 10.0               | NA                           | 2 U               | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | 0.025 U | 0.05 U | 0.05 U      | 0.05 U | 0.05 U | 0.05 U    | 0.05 U    | 4.8  |
| <b>PEMCO Offsite Investigation</b>          |            |                    |                              |                   |         |         |              |         |         |        |             |        |        |           |           |      |
| B-5/P4 (PEMCO)                              | 1992       | 10-11              | NA                           | -                 | ND      | 0.003   | ND           | 0.002   | -       | -      | -           | -      | -      | -         | -         | -    |
| B-5/P4 (PEMCO)                              | 1992       | 15-16              | NA                           | -                 | ND      | 0.003   | ND           | ND      | -       | -      | -           | -      | -      | -         | -         | -    |
| B-6/P3 (PEMCO)                              | 1992       | 10-11              | NA                           | -                 | ND      | 0.006   | 0.002        | 0.011   | -       | -      | -           | -      | -      | -         | -         | -    |
| B-6/P3 (PEMCO)                              | 1992       | 15-16              | NA                           | -                 | ND      | ND      | ND           | ND      | -       | -      | -           | -      | -      | -         | -         | -    |
| B-7/P2 (PEMCO)                              | 1992       | 10-11              | NA                           | -                 | ND      | 0.005   | ND           | 0.006   | -       | -      | -           | -      | -      | -         | -         | -    |
| B-7/P2 (PEMCO)                              | 1992       | 15-16              | NA                           | -                 | 1.9     | 2.8     | 0.17         | 1.0     | -       | -      | -           | -      | -      | -         | -         | -    |
| <b>PNG Site Check</b>                       |            |                    |                              |                   |         |         |              |         |         |        |             |        |        |           |           |      |
| B-1   | 02/19/1998 | 12.0               | NA                           | 20 U <sup>h</sup> | -       | -       | -            | -       | -       | -      | -           | -      | -      | -         | -         | -    |
| B-2   | 02/19/1998 | 12.0               | NA                           | 20 U <sup>h</sup> | -       | -       | -            | -       | -       | -      | -           | -      | -      | -         | -         | -    |
| B-3   | 02/19/1998 | 12.0               | NA                           | 20 U <sup>h</sup> | -       | -       | -            | -       | -       | -      | -           | -      | -      | -         | -         | -    |
| B-4   | 02/19/1998 | 13.0               | NA                           | 20 U <sup>h</sup> | -       | -       | -            | -       | -       | -      | -           | -      | -      | -         | -         | -    |
| B-5   | 02/19/1998 | 13.0               | NA                           | 20 U <sup>h</sup> | -       | -       | -            | -       | -       | -      | -           | -      | -      | -         | -         | -    |
| B-6   | 02/19/1998 | 10.0               | NA                           | 4,400             | 3.0     | 170     | 75           | 430     | -       | -      | -           | -      | -      | -         | -         | 20 U |
| Stockpile                                   | 02/19/1998 | Composite          | NA                           | 20 U              | -       | -       | -            | -       | -       | -      | -           | -      | -      | -         | -         | -    |
| <b>PNG Well Installation</b>                |            |                    |                              |                   |         |         |              |         |         |        |             |        |        |           |           |      |
| MW-1  | 01/29/2002 | 15.0               | NA                           | 236               | 0.20 U  | 0.20 U  | 0.20 U       | 0.30    | 0.10 U  | 0.10 U | 0.21        | 0.10 U | 0.10 U | -         | -         | -    |
| MW-2  | 01/29/2002 | 13.0               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | -       | -      | -           | -      | -      | -         | -         | -    |
| MW-3  | 01/29/2002 | 13.5               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | -       | -      | -           | -      | -      | -         | -         | -    |
| MW-4  | 01/29/2002 | 13.0               | NA                           | 2.6               | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | 0.10 U  | 0.10 U | 0.20 U      | 0.10 U | 0.40 U | -         | -         | -    |
| MW-5  | 01/29/2002 | 13.0               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | -       | -      | -           | -      | -      | -         | -         | -    |
| MW-6  | 01/29/2002 | 12.0               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | -       | -      | -           | -      | -      | -         | -         | -    |
| <b>PNG Site Investigation</b>               |            |                    |                              |                   |         |         |              |         |         |        |             |        |        |           |           |      |
| B-7   | 01/21/2002 | 14.0               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | -       | -      | -           | -      | -      | -         | -         | -    |
| B-8   | 01/21/2002 | 14.0               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | -       | -      | -           | -      | -      | -         | -         | -    |
| B-9   | 01/21/2002 | 14.0               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | -       | -      | -           | -      | -      | -         | -         | -    |
| B-11  | 01/21/2002 | 14.0               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | -       | -      | -           | -      | -      | -         | -         | -    |
| B-12  | 01/21/2002 | 14.0               | NA                           | 2.0 U             | 0.05 U  | 0.05 U  | 0.05 U       | 0.05 U  | 0.10 U  | 0.10 U | 0.20 U      | 0.10 U | 0.10 U | -         | -         | -    |
| <b>PNG Monitoring Well Installation</b>     |            |                    |                              |                   |         |         |              |         |         |        |             |        |        |           |           |      |
| MW7/5                                       | 03/09/2005 | 5.0                | NA                           | 1.0 U             | -       | -       | -            | -       | -       | -      | -           | -      | -      | -         | -         | -    |
| MW7/10                                      | 03/09/2005 | 10.0               | NA                           | 1.0 U             | -       | -       | -            | -       | -       | -      | -           | -      | -      | -         | -         | -    |
| MW7/12.5                                    | 03/09/2005 | 12.5               | NA                           | 1.0 U             | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U  | 0.05 U | 0.05 U      | 0.05 U | 0.05 U | 0.05 U    | 0.05 U    | -    |
| DB (IDW soil)                               | 03/09/2005 | Composite          | NA                           | 20 U <sup>h</sup> | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U  | 0.05 U | 0.05 U      | 0.05 U | 0.05 U | 0.05 U    | 0.05 U    | -    |

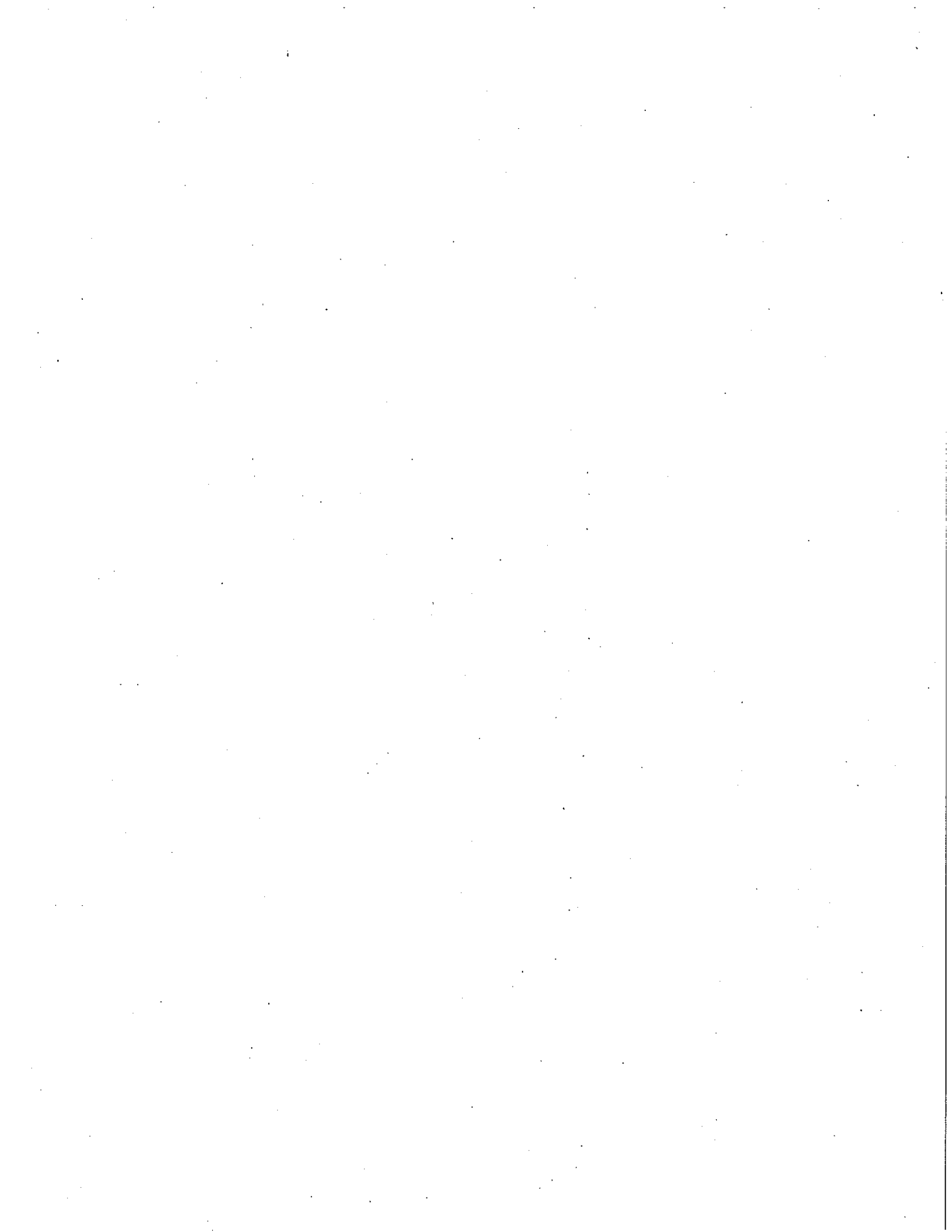
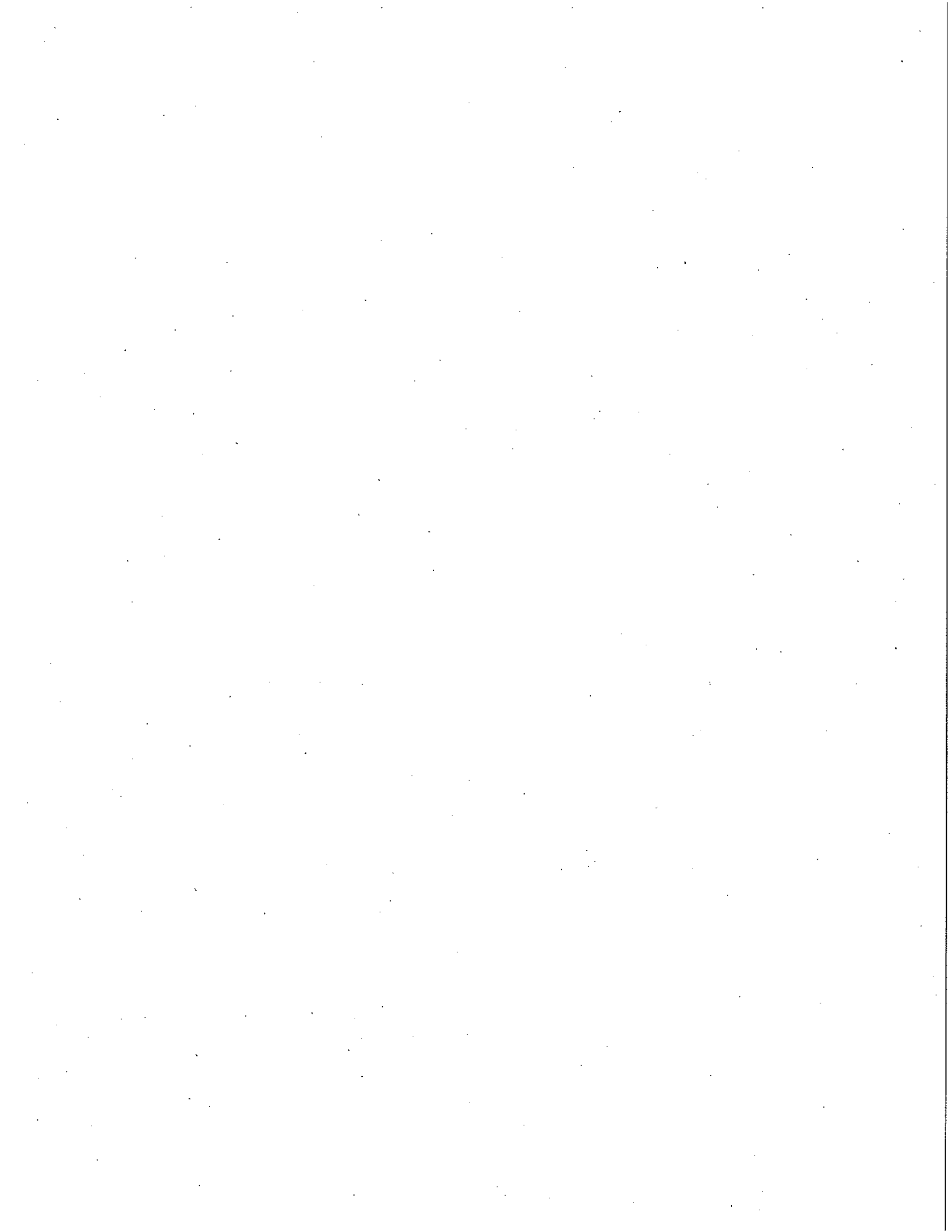


Table 1

Soil Analytical Results - Gasoline and Related Constituents (mg/kg)

Former Plaid Pantry #23  
Vancouver, Washington

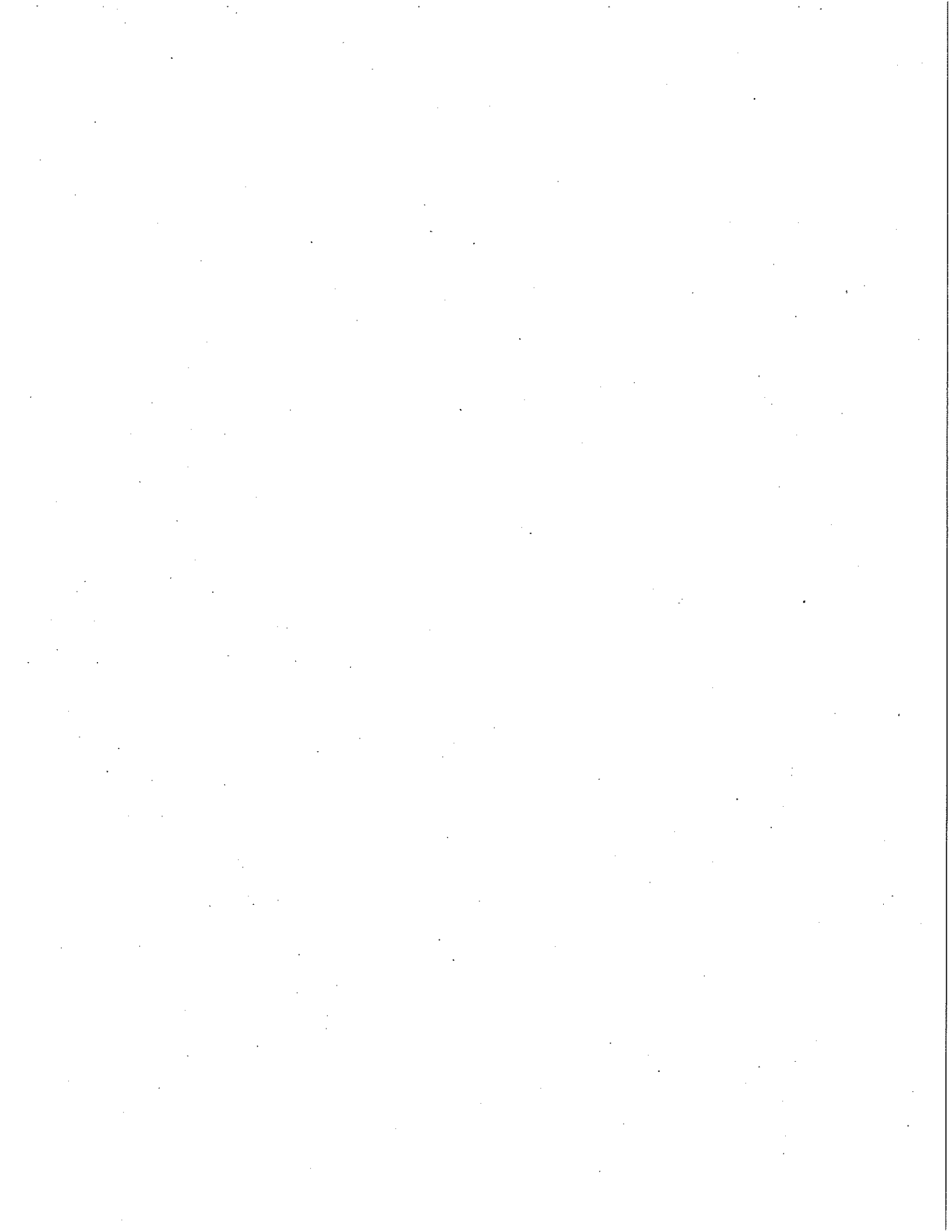
| Location   | Date       | Depth <sup>a</sup> | Field Headspace <sup>b</sup> | Gasoline            | Benzene | Toluene | Ethylbenzene | Xylenes | PCE    | MTBE   | Napthalene | EDB                | EDC    | 1,2,4-TMB | 1,3,5-TMB | Lead |
|--|------------|--------------------|------------------------------|---------------------|---------|---------|--------------|---------|--------|--------|------------|--------------------|--------|-----------|-----------|------|
| <b>PNG Site Investigation</b>                      |            |                    |                              |                     |         |         |              |         |        |        |            |                    |        |           |           |      |
| B13/5  | 03/09/2005 | 5.0                | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B13/12.5   | 03/09/2005 | 12.5               | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B13/15   | 03/09/2005 | 15.0               | NA                           | 1,700               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B14/12.5   | 03/09/2005 | 12.5               | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B14/15   | 03/09/2005 | 15.0               | NA                           | 2.0                 | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B15/5  | 03/09/2005 | 5.0                | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B15/12.5   | 03/09/2005 | 12.5               | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B15/18   | 03/09/2005 | 18.0               | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B16/12.5   | 03/09/2005 | 12.5               | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B16/18   | 03/09/2005 | 18.0               | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B20/5  | 03/09/2005 | 5.0                | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B20/13.5   | 03/09/2005 | 13.5               | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B21/5  | 03/09/2005 | 5.0                | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| B21/13.5   | 03/09/2005 | 13.5               | NA                           | 1.0 U               | 0.03 U  | 0.05 U  | 0.05 U       | 1.5 U   | 0.05 U | 0.05 U | 0.05 U     | 0.05 U             | 0.05 U | 0.05 U    | 0.05 U    | -    |
| <b>UST Decommissioning Confirmatory Samples</b>    |            |                    |                              |                     |         |         |              |         |        |        |            |                    |        |           |           |      |
| <b>Final Sidewalk Samples</b>                      |            |                    |                              |                     |         |         |              |         |        |        |            |                    |        |           |           |      |
| North Wall/11                                      | 10/05/2006 | 11.0               | 5.6 <sup>c</sup>             | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | 0.05 U*            | 0.05 U | 0.05 U    | 0.05 U    | -    |
| North Wall/12                                      | 10/05/2006 | 12.0               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| South Wall/12                                      | 10/04/2006 | 12.0               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| East Wall/12                                       | 10/04/2006 | 12.0               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| West Wall/12.5                                     | 10/04/2006 | 12.5               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| West Wall/13                                       | 10/06/2006 | 13.0               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| West Wall/14                                       | 10/06/2006 | 14.0               | 1 U <sup>c</sup>             | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| NE Corner/8  | 10/05/2006 | 8.0                | 12.3 <sup>c</sup>            | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| NE Corner/12                                       | 10/05/2006 | 12.0               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| SW Corner/12                                       | 10/06/2006 | 12.0               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| NW Corner/14                                       | 10/06/2006 | 14.0               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| <b>Final Floor Samples</b>                         |            |                    |                              |                     |         |         |              |         |        |        |            |                    |        |           |           |      |
| Floor-T1/13.5                                      | 10/05/2006 | 13.5               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| Floor-T2/13.5                                      | 10/05/2006 | 13.5               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| Floor-T3/14  | 10/06/2006 | 14.0               | 1 U <sup>c</sup>             | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| <b>Final Pump Island Samples</b>                   |            |                    |                              |                     |         |         |              |         |        |        |            |                    |        |           |           |      |
| Pipe/1.5   | 10/04/2006 | 1.5                | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| PI East/3  | 10/04/2006 | 3.0                | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| PI West/3  | 10/04/2006 | 3.0                | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| <b>Excavated PCS Samples</b>                       |            |                    |                              |                     |         |         |              |         |        |        |            |                    |        |           |           |      |
| T2-T3/10.5   | 10/03/2006 | 10.5               | 576 <sup>c</sup>             | 140                 | 0.02 U  | 0.03    | 0.14         | 0.78    | -      | 0.05 U | 1.3        | 0.05 U*            | 0.05 U | 4.0       | 0.3       | 5.42 |
| North Wall/11                                      | 10/04/2006 | 11.0               | 131 <sup>c</sup>             | 4                   | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.1 U  | -          | -                  | -      | -         | -         | -    |
| North Wall/12.5                                    | 10/04/2006 | 12.5               | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| Clean Stockpile Sample (1 cubic yard re-used fill) |            |                    |                              |                     |         |         |              |         |        |        |            |                    |        |           |           |      |
| Overburden Pile                                    |            |                    | 1 U                          | 2 U                 | 0.02 U  | 0.02 U  | 0.02 U       | 0.06 U  | -      | 0.05 U | 0.05 U     | -                  | -      | -         | -         | -    |
| <b>MTCA Method A<sup>d</sup></b>                   |            |                    |                              |                     |         |         |              |         |        |        |            |                    |        |           |           |      |
|  |            |                    | NA                           | 30/100 <sup>e</sup> | 0.03    | 7       | 6            | 9       | 0.05   | 0.1    | 5          | 0.005 <sup>f</sup> | NA     | NA        | NA        | 250  |



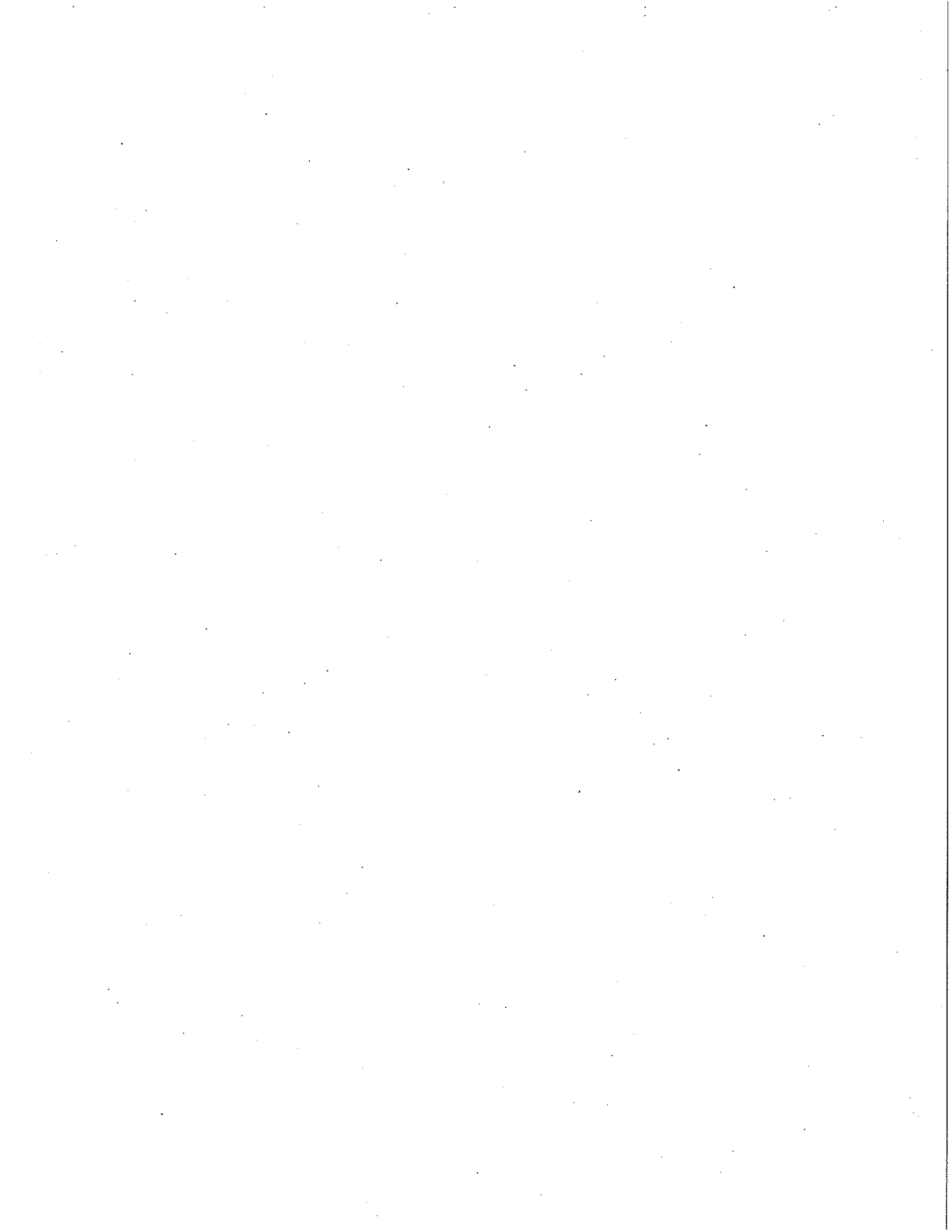
**Table 1**  
**Soil Analytical Results - Gasoline and Related Constituents (mg/kg)**  
 Former Plaid Pantry #23  
 Vancouver, Washington

**Notes:**

- <sup>a</sup> Depth indicates feet below pavement surface
- <sup>b</sup> Field headspace screening for volatile organic compounds using GasTech Explosimeter Model GT303, values in parts per million vapor
- <sup>c</sup> Organic odor and gray discoloration were observed in the field
- <sup>d</sup> Model Toxics Control Act Cleanup Amendments, Method A Soil Cleanup Levels For Unrestricted Land Uses (WDOE, October 12, 2007)
- <sup>e</sup> Per MTCA, cleanup values for gasoline are either (1) a default value of 30 mg/kg where benzene is  $\leq$  0.03 mg/kg, or (2) a value of 100 mg/kg where benzene is not detected and the sum of ethylbenzene + toluene + xylenes is  $<$  1% of the gasoline concentration
- <sup>f</sup> EDB cleanup level for soil is based on groundwater protection where groundwater is used for drinking water
- <sup>g</sup> Compound was not detected but the Method Reporting Limit exceeds the MTCA standard
- <sup>h</sup> Gasoline by Method NWTPH-HCID  
 mg/kg = Milligrams per kilogram  
 Gasoline by Method NWTPH-Gx  
 BTEX Volatile Compounds by EPA Method 8021B; all other Volatile Compounds by EPA Method 8260B  
 PCE = Tetrachloroethene  
 MTBE = Methyl tert-butyl ether  
 EDB = 1,2-Dibromoethane  
 EDC = 1,2-Dichloroethane  
 1,2,4-TMB = 1,2,4-Trimethylbenzene  
 1,3,5-TMB = 1,3,5-Trimethylbenzene  
 U = Undetected at method detection limit shown  
 - = Not analyzed for this parameter  
 NA = Not applicable  
 ND = Not detected above laboratory reporting limit











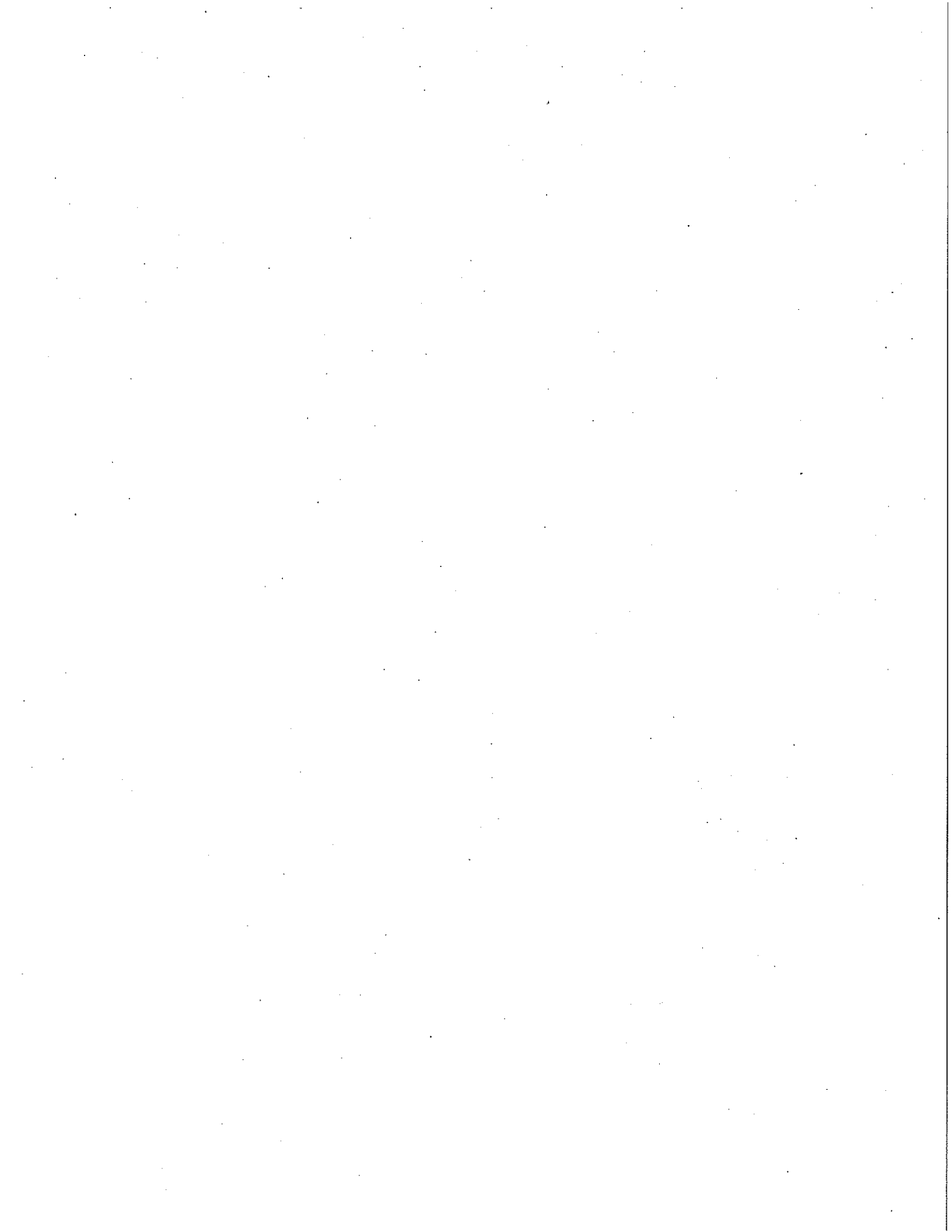


Table 4  
Groundwater Analytical Results Summary - Gasoline and Related Constituents (ug/L)  
Former Plaid Pantry #23  
Vancouver, Washington

| Location    | Date       | Gasoline | Diesel             | Heavy/Lube Oil | Benzene | Toluene | Ethylbenzene | Xylenes          | PCE   | EDS                 | EDC   | MTBE  | 1,2-Di-TMB | 1,3,5-TMB         | Naphthalene       | Hexane | Total Lead | Dissolved Lead |
|-------------|------------|----------|--------------------|----------------|---------|---------|--------------|------------------|-------|---------------------|-------|-------|------------|-------------------|-------------------|--------|------------|----------------|
| MW-5 (cont) | 04/14/2008 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 09/05/2008 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 12/17/2008 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 03/11/2009 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 06/09/2009 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 09/10/2009 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 12/01/2009 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
|             | 08/01/2010 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
|             | 06/07/2010 | 100 U    |                    |                | 0.35 U  | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
|             | 09/13/2010 | 100 U    |                    |                | 0.35 U  | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
|             | 12/01/2010 | 100 U    |                    |                | 0.35 U  | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
| MW-6        | 01/29/2002 | 5,530    | 630 U <sup>a</sup> |                | 523     | 4.6     | 558          | 536              | 5.0 U | 0.01 U <sup>b</sup> | 5.0 U | 376   | 114        | 43.4 <sup>c</sup> | 48.4 <sup>c</sup> |        | 1.6        | 1.0 U          |
|             | 03/14/2005 | 13,000   | 4,700 <sup>a</sup> |                | 880     | 1,900   | 1,900        | 2,370            | 1.0 U | 1.0 U               | 1.0 U | 1,200 | 440        | 189 <sup>c</sup>  | 189 <sup>c</sup>  |        |            |                |
| MW-50 (dup) | 03/14/2005 | 22,000   | 4,800              |                | 1,200   | 1,900   | 1,900        | 3,530            | 1.0 U | 1.0 U               | 1.0 U | 1,500 | 560        | 400               | 400               | 35 L   |            |                |
|             | 01/30/2007 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
| MW-50 (dup) | 01/30/2007 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 04/30/2007 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.1              |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
| MW-50 (dup) | 04/30/2007 | 100 U    |                    |                | 4.4     | 1.0 U   | 3.2          | 3.1              |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 07/23/2007 | 1,800    |                    |                | 63      | 1.0 U   | 17           | 64               |       | 1.0 U               | 1.0 U | 45    | 45         | 33                | 33                |        |            |                |
| MW-50 (dup) | 07/23/2007 | 1,900    |                    |                | 68      | 1.0 U   | 19           | 75               |       | 1.0 U               | 1.0 U | 52    | 52         | 36                | 36                |        |            |                |
|             | 10/29/2007 | 810      |                    |                | 40      | 17      | 11           | 43               |       | 1.0 U               | 1.0 U | 68    | 1.6        | 2.3               | 2.3               |        |            |                |
| MW-50 (dup) | 10/29/2007 | 580      |                    |                | 32      | 24      | 12           | 59               |       | 1.0 U               | 1.0 U | 2.8   | 2.1        | 1.1               | 1.1               |        |            |                |
|             | 01/09/2008 | 940      |                    |                | 58      | 1.0 U   | 72           | 155              |       | 1.0 U               | 1.0 U | 68    | 15         | 11                | 11                |        |            |                |
| MW-50 (dup) | 01/09/2008 | 2,700    |                    |                | 100     | 10 U    | 220          | 457              |       | 1.0 U               | 1.0 U | 180   | 34         | 22                | 22                |        |            |                |
|             | 04/14/2008 | 700      |                    |                | 17      | 150     | 50           | 240              |       | 1.0 U               | 1.0 U | 33    | 8.0        | 5.4               | 5.4               |        |            |                |
| MW-50 (dup) | 04/14/2008 | 1,600    |                    |                | 25      | 270     | 72           | 350              |       | 1.0 U               | 1.0 U | 46    | 3.1        | 1.1               | 1.1               |        |            |                |
|             | 09/05/2008 | 120      |                    |                | 3.5     | 3.8     | 11           | 15               |       | 1.0 U               | 1.0 U | 2.5   | 1.4        | 1.4               | 1.4               |        |            |                |
| MW-50 (dup) | 09/05/2008 | 120      |                    |                | 3.2     | 3.2     | 10           | 13               |       | 1.0 U               | 1.0 U | 1.8   | 1.8        | 1.8               | 1.8               |        |            |                |
|             | 12/17/2008 | 100 U    |                    |                | 1.0 U   | 1.0     | 1.2          | 7.0              |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
| MW-50 (dup) | 12/17/2008 | 100 U    |                    |                | 1.0 U   | 1.0     | 1.2          | 7.1              |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 03/11/2009 | 720      |                    |                | 20      | 20      | 73           | 110              |       | 1.0 U               | 1.0 U | 6.9   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
| MW-50 (dup) | 03/11/2009 | 450      |                    |                | 18      | 22      | 80           | 115              |       | 1.0 U               | 1.0 U | 7.9   | 1.0 U      | 1.0 U             | 1.1               |        |            |                |
|             | 06/09/2009 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
| MW-50 (dup) | 06/09/2009 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 09/10/2009 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.7          | 8.4              |       | 1.0 U               | 1.0 U | 2.6   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
| MW-50 (dup) | 09/10/2009 | 100 U    |                    |                | 1.0 U   | 1.1     | 1.9          | 10               |       | 1.0 U               | 1.0 U | 2.6   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 12/01/2009 | 160      |                    |                | 3.2     | 1.0 U   | 19           | 26               |       | 1.0 U               | 1.0 U | 6.0   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
| MW-50 (dup) | 12/01/2009 | 140      |                    |                | 4.0     | 1.0 U   | 24           | 34               |       | 1.0 U               | 1.0 U | 8.0   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 03/01/2010 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
| MW-50 (dup) | 03/01/2010 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
|             | 06/07/2010 | 100 U    |                    |                | 0.35 U  | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
| MW-50 (dup) | 06/07/2010 | 100 U    |                    |                | 0.35 U  | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             | 1.0 U  |            |                |
|             | 09/13/2010 | 100 U    |                    |                | 0.45    | 1.0 U   | 2.5          | 1.6 <sup>a</sup> |       | 1.0 U               | 1.0 U | 7.4   | 1.5        | 1.2               | 1.2               |        |            |                |
| MW-50 (dup) | 09/13/2010 | 100 U    |                    |                | 0.60    | 1.0 U   | 3.3          | 1.8 <sup>a</sup> |       | 1.0 U               | 1.0 U | 1.1   | 1.1        | 1.1               | 1.1               |        |            |                |
|             | 12/01/2010 | 100 U    |                    |                | 0.35 U  | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
| MW-50 (dup) | 12/01/2010 | 100 U    |                    |                | 0.35 U  | 1.0 U   | 1.0 U        | 3.0 U            |       | 1.0 U               | 1.0 U | 1.0 U | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 10/09/2012 | 100 U    |                    |                | 1.0     | 1.0 U   | 1.0          | 1.5 U            |       | 0.01 U              | 0.5 U | 0.57  | 1.3        | 1.3               | 1.3               |        | 1.0 U      | 1.0 U          |
| MW-7        | 01/29/2002 |          |                    |                | 16 E    | 5,800   | 3,100        | 16,100           |       | 1.0 U               | 1.0 U | 2,400 | 600        | 270 <sup>c</sup>  | 270 <sup>c</sup>  |        |            |                |
|             | 03/14/2005 | 65,000   | 5,500 <sup>a</sup> | 250 U          | 3.4     | 3.4     | 1.5          | 13               |       | 1.0 U               | 1.0 U | 1.9   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 01/30/2007 | 100 U    |                    |                | 1.0 U   | 1.0 U   | 1.5          | 6.6              |       | 1.0 U               | 1.0 U | 2.8   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 04/30/2007 | 100 U    |                    |                | 1.0 U   | 1.3     | 1.5          | 6.6              |       | 1.0 U               | 1.0 U | 3.2   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 07/23/2007 | 610      |                    |                | 4.4     | 36      | 36           | 170              |       | 1.0 U               | 1.0 U | 1,000 | 720        | 120               | 120               |        |            |                |
|             | 10/29/2007 | 20,000   |                    |                | 1,600   | 680     | 2,860        | 2,860            |       | 1.0 U               | 1.0 U | 3.4   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |
|             | 01/09/2008 | 100 U    |                    |                | 3.4     | 1.7     | 1.3          | 13               |       | 1.0 U               | 1.0 U | 3.4   | 1.0 U      | 1.0 U             | 1.0 U             |        |            |                |

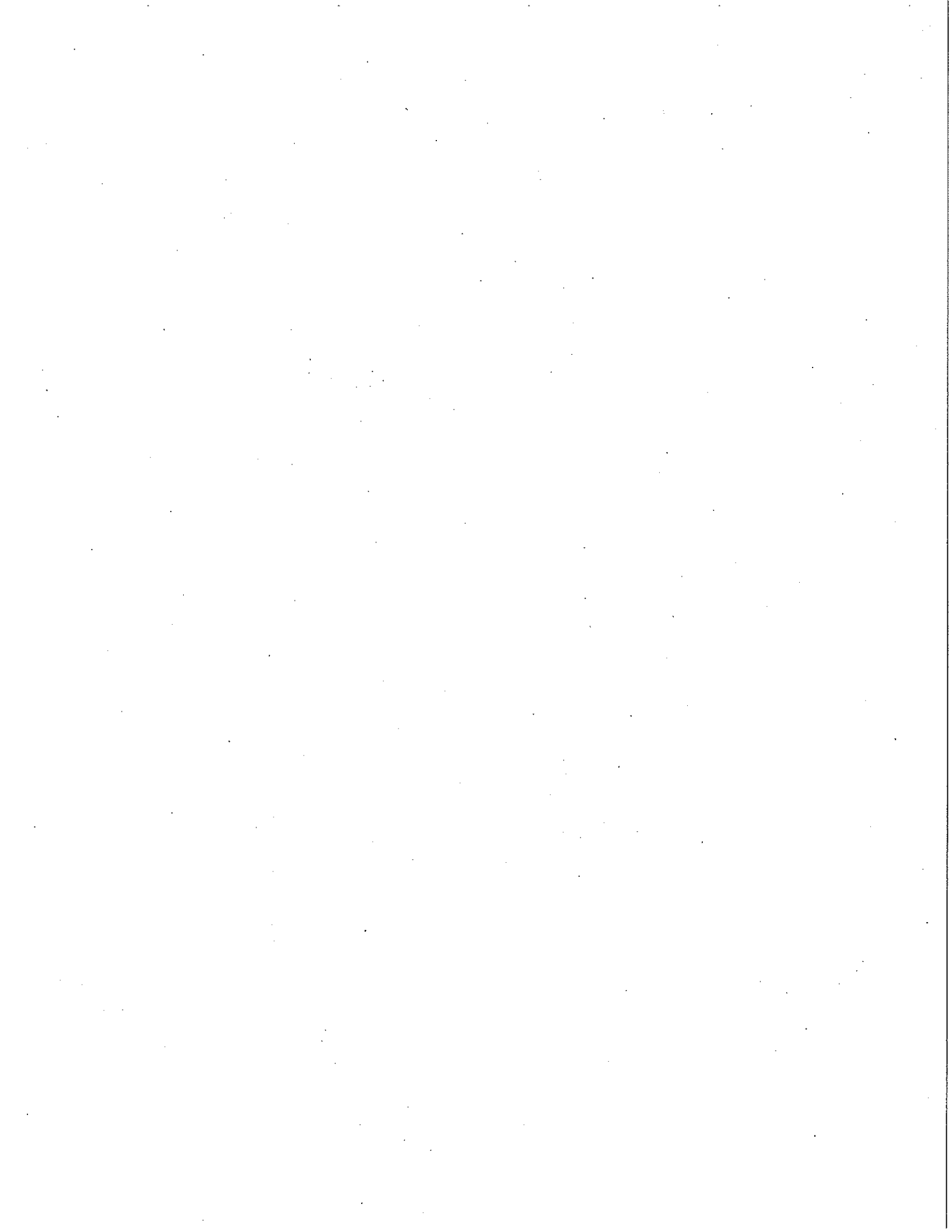


Table 4  
Groundwater Analytical Results Summary - Gasoline and Related Constituents (ug/L)  
Former Plaid Pantry #23  
Vancouver, Washington

| Location                   | Date                   | Gasoline | Diesel | Heavy/Lube Oil | Benzene            | Toluene | Ethylbenzene | Xylenes          | PCE   | EDB                | EDC                | MTHB               | 1,2,4-TMB | 1,3,5-TMB | Naphthalene | Mucrona | Total Lead | Dissolved Lead |
|----------------------------|------------------------|----------|--------|----------------|--------------------|---------|--------------|------------------|-------|--------------------|--------------------|--------------------|-----------|-----------|-------------|---------|------------|----------------|
| MW-7 (cont)                | 04/14/2008             | 100 U    | -      | -              | 1.0 U              | 2.3     | 1.9          | 11               | -     | 1.0 U              | 1.0 U              | 1.0 U              | 1.9       | 1.0 U     | 1.0 U       | -       | -          | -              |
|                            | 09/05/2008             | 16,000   | -      | -              | 3.4                | 1,700   | 750          | 3,900            | -     | 1.0 U              | 1.0 U              | 1.0 U              | 590       | 210       | 160         | -       | -          | -              |
|                            | 12/17/2008             | 3,900    | -      | -              | 1.0 U <sup>a</sup> | 240     | 180          | 1,150            | -     | 1.0 U <sup>b</sup> | 1.0 U <sup>c</sup> | 1.0 U <sup>d</sup> | 170       | 69        | 25          | -       | -          | -              |
|                            | 03/11/2009             | 100 U    | -      | -              | 1.0 U              | 3.0 U   | 1.0 U        | 1.4 <sup>e</sup> | -     | 1.0 U              | 1.0 U              | 1.0 U              | 1.0 U     | 1.0 U     | 1.0 U       | -       | -          | -              |
|                            | 06/09/2009             | 100 U    | -      | -              | 1.0 U              | 1.0 U   | 1.0 U        | 3.0 U            | -     | 1.0 U              | 1.0 U              | 1.0 U              | 1.0 U     | 1.0 U     | 1.0 U       | -       | -          | -              |
|                            | 09/10/2009             | 9,400    | -      | -              | 1.1                | 320     | 360          | 1,660            | -     | 1.0 U              | 1.0 U              | 1.0 U              | 270       | 61        | 53          | -       | -          | -              |
|                            | 12/01/2009             | 8,300    | -      | -              | 1.0 U              | 880     | 560          | 2,900            | -     | 1.0 U              | 1.0 U              | 1.0 U              | 440       | 120       | 46          | -       | -          | -              |
|                            | 03/01/2010             | 100 U    | -      | -              | 1.0 U              | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U              | 1.0 U              | 1.0 U              | 1.0 U     | 1.0 U     | 1.0 U       | 1.0 U   | -          | -              |
|                            | 06/07/2010             | 100 U    | -      | -              | 0.35 U             | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U              | 1.0 U              | 1.0 U              | 1.0 U     | 1.0 U     | 1.0 U       | 1.0 U   | -          | -              |
|                            | 09/13/2010             | 100 U    | -      | -              | 0.35 U             | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U              | 1.0 U              | 1.0 U              | 1.0 U     | 1.0 U     | 1.0 U       | 1.0 U   | -          | -              |
|                            | 12/01/2010             | 100 U    | -      | -              | 0.35 U             | 1.0 U   | 1.0 U        | 3.0 U            | 1.0 U | 1.0 U              | 1.0 U              | 1.0 U              | 1.0 U     | 1.0 U     | 1.0 U       | 1.0 U   | -          | -              |
|                            | 10/09/2012             | 106      | -      | -              | 0.25 U             | 1.0 U   | 6.5          | 17               | -     | 0.01 U             | 0.5 U              | 1.0 U              | 9.3       | 1.3       | 1.8         | -       | 1.0 U      | 1.0 U          |
| MTCA Method A <sup>1</sup> | 800/1,000 <sup>1</sup> | 500      | 500    | 500            | 5.0                | 1,000   | 700          | 1,000            | 5.0   | 0.01               | 5.0                | 20                 | NA        | NA        | 160         | NA      | 15         | 15             |

Notes:  
<sup>1</sup> TPH by Method NWTPH-HCID  
<sup>2</sup> EDB by EPA Method 8011  
<sup>3</sup> Naphthalene by EPA Method 8270C SIM  
<sup>4</sup> BTEX by EPA Method 80213  
<sup>5</sup> Weathered or degraded fuel detected, not indicative of diesel or heavy oil  
<sup>6</sup> Model Toxics Control Act Cleanup (MTC) Amendments (WDOE, October 12, 2007)  
<sup>7</sup> Per MTC values for gasoline are for benzene present (6x < 800 ug/L) versus no benzene present (6x < 1,000 ug/L)  
<sup>8</sup> Results for o-Xylene only. Result for m,p-Xylene was below the reporting limit.  
<sup>9</sup> Results obtained from non-diluted sample; all other data from this sample obtained from a dilution.  
<sup>10</sup> BTEX by EPA Method 8020  
<sup>11</sup> Volatile Compounds by EPA Method 8260B unless otherwise noted  
<sup>12</sup> TPH by Method NWTPH-GX (gasoline) and NWTPH-DX (non-gasoline) unless otherwise noted  
<sup>13</sup> PCE = Tetrachloroethene  
<sup>14</sup> MTBE = Methyl tert-butyl ether  
<sup>15</sup> EDB = 1,2-Dibromoethane  
<sup>16</sup> EDC = 1,2-Dichloroethane  
<sup>17</sup> 1,2,4-TMB = 1,2,4-Trimethylbenzene  
<sup>18</sup> 1,3,5-TMB = 1,3,5-Trimethylbenzene  
<sup>19</sup> ug/L = Micrograms per liter  
<sup>20</sup> Lab qualifier - o-Xylene concentration (1.4 ug/L) may be due to carryover from the previously analyzed sample. Result for m,p-Xylene was below the reporting limit.  
<sup>21</sup> U = Undetected at method reporting limits shown  
<sup>22</sup> E = Some laboratory carryover possible; see laboratory analytical report  
<sup>23</sup> L = The reported concentration was generated from a library search  
<sup>24</sup> - = Not tested  
<sup>25</sup> NA = Not applicable  
<sup>26</sup> ND = Not detected  
<sup>27</sup> Values in bold indicate compound was detected at a concentration exceeding the most stringent MTCA Method A standard

