PERIODIC REVIEW

Pacific Grinding Wheel
Facility Site ID: 72466721

13120 State Avenue
Marysville, Washington 98271

Northwest Regional Office

TOXICS CLEANUP PROGRAM

January 14, 2014

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1.0 INTRODUCTION

This document is the Department of Ecology's review of post-cleanup site conditions and monitoring data to assure that human health and the environment are being protected at the Pacific Grinding Wheel Company property (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA), Chapter 173-340 WAC.

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP) in 1998. The cleanup actions resulted in residual concentrations of petroleum hydrocarbons exceeding MTCA Method A cleanup levels for soil established under WAC 173-340-740(2). The MTCA Method A cleanup levels for groundwater are established under WAC 173-340-720(3). WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

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

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

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

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

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

The Pacific Grinding Wheel Site is located in the City of Marysville, Snohomish County, Washington (Site Plan - Appendix 6.1). Following remedial activities beginning in 1992, a restrictive covenant (Appendix 6.2) was recorded for the property and the Site received a 'No Further Action' determination.

Remedial activities began at the site in 1992 when, during the decommissioning of a concrete underground storage tank (UST), petroleum hydrocarbon contaminated soils (PCS) were encountered. Following the removal of the UST, confirmation samples from the tank pit indicated the presence of diesel fuel and heavy oil, toluene, ethylbenzene, xylenes and stoddard solvents. The UST was reportedly used to store used solvents and waste hydraulic oil.

Approximately 65 cubic yards of PCS were removed from the excavation, though excavation on the southern sidewall was limited due to the presence of Site structures. Groundwater was encountered in the excavation, and was pumped into a Baker tank to allow for excavation of soils below the groundwater table. All confirmation samples collected from the bottom of the excavation exceeded MTCA Method A cleanup levels in soil. Three monitoring wells were installed in the vicinity of the former UST. Samples collected from these wells in April 1992 were non-detect for petroleum hydrocarbons and volatile organic compounds (VOCs). Resampling of these wells in September 1994 did not detect contamination exceeding MTCA Method A Cleanup levels.

Applied Hydrogeologic Research (AHR) conducted additional subsurface investigations at the Site in 1997. Three additional monitoring wells were installed at the site, and soil samples were collected during their installation. A direct push tracked sampling vehicle was used to sample soil and groundwater at 17 additional locations. Sample results indicated that approximately 300 cubic yards of contaminated soils remained at the site, and groundwater contamination was present at levels exceeding MTCA Method A cleanup levels. Soil samples indicated diesel and heavy oil-range petroleum contamination (TPH-Dx) in excess of 50,000 ppm. Groundwater samples indicated TPH-Dx concentrations above 1 ppm.

One additional well was installed in 1998 to ensure groundwater in all potential down-gradient flow directions could be sampled. Following the construction of this monitoring well, sampling events were conducted on all wells quarterly for two years. No groundwater samples collected during that period contained contamination exceeding MTCA Method A cleanup levels. It was determined contaminated soils at the site did not pose a threat to human health or the environment since they were contained under permanent structures and impermeable asphalt. Groundwater monitoring has indicated that contaminants no longer impact groundwater at the site. A restrictive covenant was recorded for the Site in March 1998, and a 'No Further Action' letter was sent to the property owner. The site status was changed to reflect a 'No Further Action' determination.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

The structure on the site continues to eliminate human exposure to contaminated soils from ingestion and direct contact. Based upon the site visit conducted on January 23, 2014, no repair, maintenance or contingency actions have been required. A photo log is available as Appendix 6.3.

The Restrictive Covenant for the Site was recorded and is in place. This Restrictive Covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup without Ecology's approval, and prohibits any use of the property that is inconsistent with the Covenant. This Restrictive Covenant serves to assure the long term integrity of the structure covering the contaminated soils.

Soils with TPH-Dx concentrations higher than MTCA Method A cleanup levels are still present at the Site. However, the Site structure prevents human exposure to this contamination by ingestion and direct contact with soils. The Restrictive Covenant for the property will ensure that the structural cover will be protected through maintaining the current use of the Site.

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

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

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

The cleanup at the site was governed by Chapter 173-340 WAC (1996 ed.). WAC 173-340-702(12)(c) [2001 ed.] provides that,

"A release cleaned up under the cleanup levels determined in (a) or (b) of this subsection shall not be subject to further cleanup action due solely to subsequent amendments to the provision in this chapter on cleanup levels, unless the department determines, on a case-by-case basis, that the previous cleanup action is no longer sufficiently protective of human health and the environment."

Although cleanup levels changed for gasoline, diesel, and volatile organic compounds as a result of modifications to MTCA in 2001, contamination remains at the site above MTCA Method A cleanup levels; however, the cleanup action is still protective of human health and the environment.

3.4 Current and projected site use

The site is currently used for industrial purposes. There have been no changes in current or projected future site or resource uses.

3.5 Availability and practicability of higher preference technologies

The remedy implemented included removal/recycling of hazardous substances as well as containment, and it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

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

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

4.0 CONCLUSIONS

- The cleanup actions completed at the Site is protective of human health and the environment.

- Soil cleanup levels have not been met at the Site; however, under WAC 173-340-740(6)(d), the cleanup action is determined to comply with cleanup standards, since the long-term integrity of the containment system is ensured and the requirements for containment technologies in WAC 173-340-360(8) are being met. Please note the citations are from the MTCA regulations in effect at the time the remedy was implemented, and are incorrect if applied to the current version of the regulations.

- All six groundwater monitoring wells have been decommissioned and abandoned.

- The tenant, Pacific Grinding Wheel Company, has changed their name to Radiac Abrasives. Property ownership has not changed.

- The Restrictive Covenant for the property is in place and will be effective in protecting public health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this five-year review, the Department of Ecology has determined that the requirements of the Restrictive Covenant continue to be met. No additional cleanup actions are required by the property owner. It is the property owner's responsibility to continue to inspect the site to assure that the integrity of the cap is maintained.

4.1 Next Review

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

5.0 REFERENCES

Hart Crowser, June 1992, Site Characterization and Final Cleanup Report.

Applied Hydrogeologic Research, Inc., September 1994, Groundwater Sampling and Analysis.

Applied Hydrogeologic Research, Inc., September 1997, Subsurface Contamination Investigation Report.

Applied Hydrogeologic Research, Inc., May 1998, 1st Quarterly Groundwater Sampling.

Applied Hydrogeologic Research, Inc., May 1998, Monitoring Well and Sampling Equipment Installation.

Applied Hydrogeologic Research, Inc., July 1998, 2nd Quarterly Groundwater Sampling.

Applied Hydrogeologic Research, Inc., November 1998, 3rd Quarterly Groundwater Sampling.

Applied Hydrogeologic Research, Inc., January 1999, 4th Quarterly Groundwater Sampling.

Applied Hydrogeologic Research, Inc., May 1999, 5th Quarterly Groundwater Sampling.

Applied Hydrogeologic Research, Inc., July 1999, 6th Quarterly Groundwater Sampling.

Applied Hydrogeologic Research, Inc., November 1999, 7th Quarterly Groundwater Sampling.

Applied Hydrogeologic Research, Inc., February 2000, 8th Quarterly Groundwater Sampling.

Ecology, 1998, No Further Action Letter

Ecology, 1998, Restrictive Covenant

Ecology, 2008, Site Visit

Ecology, 2014, Site Visit

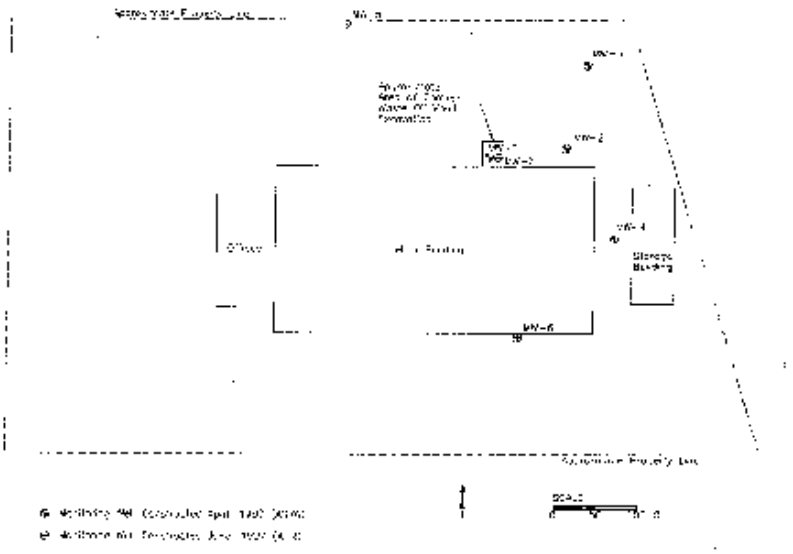
6.0 APPENDICES

6.1 Site Plan

AHR

Subsurface Contamination Investigation Report
Pacific Grinding Wheel Property, Marysville, WA

AHR 1035
09/19/97



Subsurface Contamination Investigation
Pacific Grinding Wheel Property

AHR
Applied Hydrogeologic Research, Inc.

Facility Layout and Monitoring Well Locations
Figure 2

J1035 9/97

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6.2 Environmental Covenant

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Return Address
Bruce R Bell
P.O. Box 1769
Everett, WA 98206

9803190476
03/19/98 14:24
p.0009 Recorded
Snohomish County

Please print or type information

Document Title(s)(or transaction contained therein):

1. RESTRICTIVE COVENANT
2.
3.
4.

Grantor(s)(Last name first, then first name and initials)

1. BANK OF AMERICA NT & SA, dba Seafirst Bank, et al.
2.
3.
4.
☐ Additional names on page ___ of document.

Grantee(s) (Last name first, then first name and initials)

1. DEPARTMENT OF ECOLOGY
2.
3.
4.
☐ Additional names on page ___ of document.

Legal description (abbreviated: i.e. lot, block, plat or section, township, range, qtr./qtr.)

Portion of NW 1/4 of SW 1/4 of Section 4, Township 30 North, Range 5 EWM lying West of BNR right of way, except south 30 feet. . .
☐ Additional legal is on page ___ of document

Reference Number(s) of Documents assigned or released:

☐ Additional numbers on page ___ of document.

Assessor's Property Tax Parcel/Account Number

043005-3-003-0006
☐ Property Tax Parcel ID is not yet assigned
☐ Additional parcel numbers on page ___ of document

The Auditor/Recorder will rely on the information provided on the form. The staff will not read the document to verify the accuracy or completeness of the indexing information.

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RESTRICTIVE COVENANT

Pacific Grinding Wheel Property
13120 Smokey Point Boulevard
Marysville, Washington 98271

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by BANK OF AMERICA NT & SA, doing business as Seafirst Bank, in its representative capacity as Trustee under the Testamentary Trust of Knut Kravik, deceased, and in its representative capacity as Corporate Trustee under the Living Trust of Gerald E. Kravik, deceased; and Stanley Minor and Mary Lou Kravik in their capacities as individual trustees under the Living Trust of Gerald E. Kravik, deceased, its successors and assigns, and the STATE OF WASHINGTON DEPARTMENT OF ECOLOGY, its successors and assigns (hereinafter "Ecology").

An independent remedial action (hereinafter "Remedial Action") occurred at the property that is the subject of this Restrictive Covenant. The Remedial Action conducted at the property is described in the following document(s):

(1) Site Characterization and Final Cleanup Report, UST Removal and Closure, Pacific Grinding Wheel Company, Marysville, Washington, for Seafirst National Bank Trustee and Knut Kravik Trust and Gerald Kravik. By Hart Crowser, J-3046-10, June 1992.

(2) Subsurface Contamination Investigation Report, Pacific Grinding Wheel Property, Marysville, Washington. For Seafirst Bank, as Trustee. By Applied Hydrogeologic Research, Inc. (AHR), September 1997.

These documents are on file at Ecology's NWRO.

This restrictive Covenant is required because the Remedial Action resulted in remnant concentrations of unspecified heavy hydrocarbon mixtures that may contain a combination of products such as gear oil, brake fluid, transmission fluid, transmission oil, mineral oil and hydraulic oil present in unaccessible location beneath the building foundations of the northeast corner of the Weld Room, northeast corner of the Machine Shop, and the northwest corner of the Storage Room (see enclosed Ma, Fig. 6, Extent of Contamination). This remnant and unaccessible contaminated soil is estimated to be about 300 cubic yards in volume based on soil investigation.

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The undersigned Trustees of the Pacific Grinding Wheel Property, BANK OF AMERICA NT & SA, doing business as Seafirst Bank, in its representative capacity as Trustee under the Testamentary Trust of Knut Kravik, deceased, and in its representative capacity as Corporate Trustee under the Living Trust of Gerald E. Kravik, deceased; and Stanley Minor and Mary Lou Kravik in their capacities as individual trustees under the Living Trust of Gerald E. Kravik, deceased, its successors and assigns, are the fee owner of real property (hereinafter "Property") in the County of Snohomish, State of Washington, that is subject to this Restrictive Covenant. The Property is legally described in Exhibit "A" of this Restrictive Covenant and made a part hereof by reference.

BANK OF AMERICA NT & SA, doing business as Seafirst Bank, in its representative capacity as Trustee under the Testamentary Trust of Knut Kravik, deceased, and in its representative capacity as Corporate Trustee under the Living Trust of Gerald E. Kravik, deceased; and Stanley Minor and Mary Lou Kravik in their capacities as individual trustees under the Living Trust of Gerald E. Kravik, deceased, its successors and assigns, makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declaration shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereinafter "Owner").

Section 1. The Property shall be used only for traditional industrial uses, as described in RCW 70.105D.020(23) and defined in and allowed under the City of Marysville's zoning regulations codified in MMC § 19 as of the date of this Restrictive Covenant or as hereinafter amended.

2. No groundwater may be taken for any use from the Property without meeting all relevant substantive requirements applicable to the State and County laws.

3. A portion of the Property contains unspecified heavy hydrocarbon mixtures that may contain a combination of products such as gear oil, brake fluid, transmission fluid, transmission oil, mineral oil and hydraulic oil present in unaccessible location beneath the building foundations of the northeast corner of the Weld Room, northeast corner of the Machine Shop, and the northwest corner of the Storage Room. The Owner shall not alter, modify or remove the existing structure(s) in any manner that may result in the release or exposure to the environment of that contaminated soil, groundwater, vapors or create a new exposure pathway without prior written approval from Ecology.

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B. Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil, groundwater or vapors that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped areas include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load-bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

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

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

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

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

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

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

3 - RESTRICTIVE COVENANT
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DATED this 16 day of MARCH, 1998.

PROPERTY OWNER:

BANK OF AMERICA NT & SA, doing business as Seafirst Bank, in its representative capacity as Trustee under the Testamentary Trust of Knut Kravik, deceased, and in its representative capacity as Corporate Trustee under the Living Trust of Gerald E. Kravik, deceased; and Stanley Minor and Mary Lou Kravik in their capacities as individual trustees under the Living Trust of Gerald E. Kravik, deceased, its successors and assigns

James E. Strock
JAMES E. STROCK, Vice President

John T. Margeson
John T. Margeson, Asst. Vice President

Stanley N. Minor
Stanley N. Minor, Co-Trustee

Mary Lou Kravik
Mary Lou Kravik, Co-Trustee

Address: Seafirst Bank, REIS
Attn: John Margeson
P.O. Box 34029
Seattle, WA 98124-1029

4 - RESTRICTIVE COVENANT
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STATE OF WASHINGTON)
) ss.
COUNTY OF SNOHOMISH)
John

On this 17TH day of MARCH, 1998, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared JAMES E. STROCK and T. MARGESON, to me known to be the Vice President and Assistant Vice President, respectively, of BANK OF AMERICA NT & SA, doing business as Seafirst Bank, in its representative capacity as Trustee under the Testamentary Trust of Knut Kravik, deceased, and in its representative capacity as Corporate Trustee under the Living Trust of Gerald E. Kravik, deceased, its successors and assigns, the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that they were authorized to execute the said instrument and that the seal affixed thereon is the corporate seal of said corporation.

Witness my hand and official seal hereto affixed the day and year first above written.

DOUGLAS MARSHALL

NOTARY PUBLIC
STATE OF WASHINGTON
DOUGLAS MARSHALL
My Appointment Expires Nov. 20, 2001

Douglas Marshall
Signature of Notary Public
Title:
Appt. Exp.: 11/20/2001

STATE OF WASHINGTON)
Ktarp)ss.
COUNTY OF ~~SNOHOMISH~~

On this day personally appeared before me STANLEY N. MINOR, in his capacity as Co-Trustee under the Living Trust of Gerald E. Kravik, deceased, to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged to me that he signed the same as his free and voluntary act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and official seal this 9th day of March, 1998.

BROOKE FANTA
Commission Expires
NOTARY PUBLIC
NOV. 24, 1999
STATE OF WASHINGTON

Brooke Fanta
Signature of Notary Public
Title:
Appt. Expires: 11-24-98

5 - RESTRICTIVE COVENANT
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STATE OF ~~WASHINGTON~~ California)
COUNTY OF ~~SNOHOMISH~~ Riverside) ss.

On this day personally appeared before me MARY LOU KRAVIK, in her capacity as Co-Trustee under the Living Trust of Gerald E. Kravik, deceased, to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged to me that she signed the same as her free and voluntary act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and official seal this 16th day of March, 1998.

BARBARA J. VALDIVIA
COMM. # 1061376
Notary Public — California
RIVERSIDE COUNTY
My Comm. Expires JUN 13, 1999

Barbara Valdivia
Signature of Notary Public

Appt. Expires: 6-13-99

6 - RESTRICTIVE COVENANT
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All that portion of the Northwest quarter of the Southwest quarter of Section 4, Township 30 North, Range 5 East, W.M., lying West of the Burlington Northern Railroad right-of-way (formerly the Seattle and Montana Railroad right-of-way);

EXCEPT the South 30 feet thereof; and

AND ALSO EXCEPT that portion thereof described as follows:

Beginning at a point on the West line of said Northwest quarter of the Southwest quarter South 2°07'02" East a distance of 529.35 feet from the Northwest corner of said Northwest quarter of the Southwest quarter; thence South 2°07'02" East along said West line for 816.68 feet to a point 30.0 feet North, as measured at right angles from the South line of said Northwest quarter of the Southwest quarter; thence North 88°21'33" East, parallel with said South line for 1066.51 feet to the Westerly margin of the Burlington Northern Railroad right-of-way; thence North 15°56'31" West along said margin for 862.59 feet; thence South 87°04'46" West, parallel with the North line of said Northwest quarter of the Southwest quarter for 860.42 feet to the true point of beginning.

Situate in the County of Snohomish, State of Washington.

EXHIBIT A

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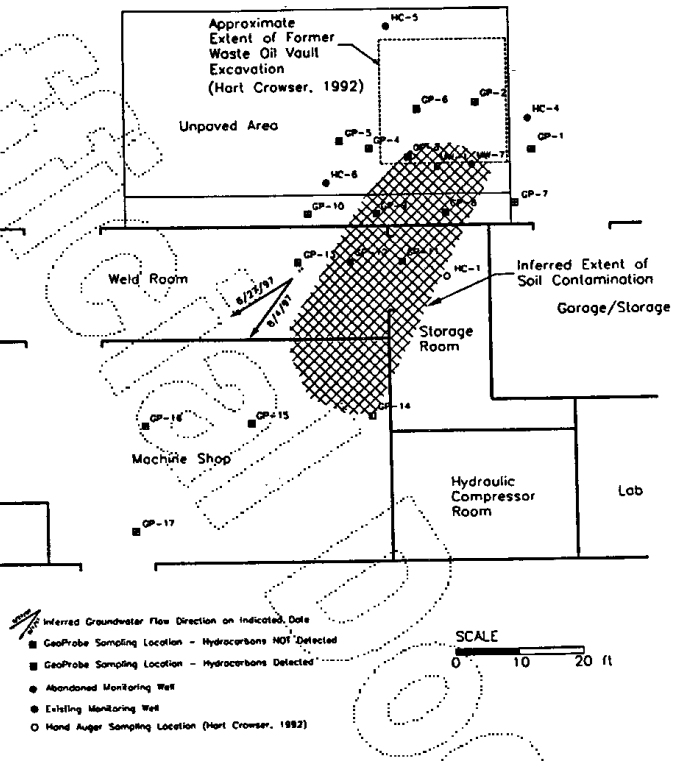
Subsurface Contamination Investigation Report
Pacific Grinding Wheel Property, Marysville, WA

AHR 1035
09/19/97



Subsurface Contamination Investigation
Pacific Grinding Wheel Property

AHR
Applied Hydrogeologic Research, Inc.

Sampling Locations and Extent of Contamination
Figure 6

J1035 9/97

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6.3 Photo log

Photo 1: Facility from entrance gate looking southwest (1/23/14)

Photo 2: Facility looking southeast (1/23/14)

Photo 3: Area of former UST (1/23/14)

Photo 4: Northeast corner looking west (1/23/14)