

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

In the Matter of Remedial Action by: )  
 )  
South Wilbur Petroleum Contamination Site )  
Area of Intersection of Anne St. and Front Ave )

AGREED ORDER  
NO. 00TCPER-1465

To: Washington State Department of Transportation (WSDOT)  
Lincoln County Public Works Department  
Lincoln Mutual #3  
Joe and Tina Clark  
Jerome Clark

Collectively referred to herein as the Potentially Liable Parties (PLPs).

I

Jurisdiction

This Agreed Order ("Order") is issued pursuant to the authority of RCW  
70.105D.050(1).

II

Findings of Fact

Ecology makes the following Findings of Fact, without admission of such facts by the  
PLPs.

1. The Site is located in Wilbur, Washington, adjacent to and just south of Goose  
Creek. The properties cover an approximately three block area in the vicinity of the  
Anne Street and Front Avenue intersection (Exhibit A).
2. WSDOT is the owner of the property at 103 SE Front Avenue, Wilbur,  
Washington. The facility served to store, maintain, and fuel state-owned highway  
equipment from the 1930s through the early 1970s.
3. Two 1000-gallon underground storage tanks, one diesel and one gasoline, were  
located on the WSDOT property. Diesel-contaminated soil was discovered in 1991  
during the removal of the tanks. Localized undocumented releases of fuel from  
regular vehicle fueling have occurred throughout the history of site operation.

- 4 Lincoln County is the owner of the Lincoln County Maintenance Facility buildings located at 108 and 112 SE Anne Street, Wilbur, Washington. The facility served to store, maintain, and fuel county-owned highway equipment and continues as such through the present.
- 5 Four underground storage tanks, containing diesel, gasoline, and waste oil at various times, were located on the Lincoln County property until 1995. Localized undocumented releases of fuel from regular vehicle fueling have occurred throughout the history of site operation.
- 6 Joe & Tina Clark and Jerome Clark are the current owners of property located at 15 SE Anne Street, Wilbur, Washington. The property was purchased in January of 1993 from Lincoln Mutual #3, which was the owner and operator of the fueling station that occupied the property from 1963 until 1991.
- 7 This fueling station had an unknown number of underground storage tanks on the property which were removed prior to 1991.
- 8 Site investigations by WSDOT in 1997 and 1998 found petroleum contamination in soil and groundwater on and upgradient of the WSDOT and Lincoln County properties.
- 9 Ecology's contractor, SAIC, performed additional site characterization in 1998. Soil contamination below 5' and groundwater contamination was documented on all three aforementioned properties. Although no contamination was detected in the adjacent Goose Creek, the shallow groundwater system feeds the surface water.
- 10 Diesel, gasoline, and BTEX compounds are the contaminants of concern in soil and groundwater.
- 11 The site was evaluated through the Washington Ranking Method (WARM) in August of 1999 and received a ranking of 1.
- 12 In certified correspondence dated August 9, 1999, Ecology notified the PLPs of the preliminary finding of potential liability and requested comment on that finding.
- 13 In certified correspondence dated October 6, 1999, Ecology notified the PLPs of their status as potentially liable persons with regard to the release of hazardous substances at the South Wilbur Petroleum Site.

### III.

#### Ecology Determinations

1. WSDOT, the Lincoln County Public Works Department, Joe and Tina Clark, Jerome Clark, and Lincoln Mutual #3 are "owners or operators" as defined in RCW 70.105D.020(12) of a "facility" as defined in RCW 70.105D.020(4).
2. The facilities that comprise the site are: WSDOT Old Maintenance Facility, 103 SE Front Street; Lincoln County Maintenance Facility, 108 and 112 SE Anne Street; and the Old Lincoln Mutual #3 Station (currently JCT Properties), 15 SE Anne Street, as shown in Exhibit A.
3. The substances found at the facility as described above are "hazardous substances" as defined in RCW 70.105D.020(7)(d).
4. Based on the presence of these hazardous substances at the facility and all factors known to the Department, there is a release or threatened release of hazardous substances from the facility, as defined in RCW 70.105D.020(20).
5. By letter dated October 6, 1999, Ecology notified the PLPs of their status as a "potentially liable person" (PLP) under RCW 70.105D.040 after notice and opportunity for comment.
6. Pursuant to RCW 70.105D.030(1) and 70.105D.050, the Department may require potentially liable persons to investigate or conduct other remedial actions with respect to the release or threatened release of hazardous substances, whenever it believes such action to be in the public interest.
7. Based on the foregoing facts, Ecology believes the remedial action required by this Order is in the public interest.

### IV.

#### Work to be Performed

Based on the foregoing Facts and Determinations, it is hereby ordered that the PLPs take the following remedial actions and that these actions be conducted in accordance with Chapter 173-340 WAC unless otherwise specifically provided for herein.

1. The work to be performed includes the planning, implementation, and reporting on the conduct of a Remedial Investigation and Feasibility Study (RI/FS). Attached hereto as Exhibit B is a Scope of Work for the completion of an RI/FS. Exhibit B is incorporated by reference as an integral and enforceable part of the Order.
2. The PLPs shall submit all necessary work plans to implement the Scope of Work (Exhibit B) to Ecology for review and approval according to the Schedule of Deliverables attached as Exhibit B. Upon approval by Ecology, the PLPs will proceed with field implementation of the Work Plans in accordance with an agreed upon schedule.
3. Work Plans shall consist of a detailed description of site conditions, work to be performed, personnel requirements, and schedules for implementation and deliverables for the following:
  - a. TASK I. Project Plan including RI work Plan, Sampling and Analysis Plan, Health and Safety Plan, and Public Participation Plan.
  - b. TASK II. Conduct RI Field Investigations.
  - c. TASK III. Remedial Investigation/Feasibility Study Report.

These work plans and each element thereof shall be designed, implemented, and completed in accordance with the Model Toxics Control Act (Chapter 70.105D RCW) and its implementing regulation (Chapter 173-340 WAC) as amended, and all applicable federal, state, and local laws and regulations.

2. After receipt of a deliverable plan, technical report, draft or final document, Ecology will provide written notification to the PLPs of approval or disapproval. If not approved, Ecology will specify deficiencies and necessary changes.
3. As provided in the agreed upon schedule, the PLPs shall commence work and thereafter complete all tasks in the time frames indicated in the approved schedule. Upon approval by Ecology, the Project Plan and schedule shall become an integral and enforceable part of this Order.
4. Written progress reports shall be completed every second month and shall be submitted by the tenth day of the month beginning the month following the effective date of this Order. The reports shall address and describe the previous full two

months progress toward completion of the Order including work in progress, problem areas, key activities, deliverables submitted, field work and data generated, subcontracting, analytical services performed, and key staff changes

5. In accordance with WAC 173-340-840(5), ground water sampling data shall be submitted according to Exhibit C: GROUND WATER SAMPLING DATA SUBMITTAL REQUIREMENTS. These submittals shall be provided to Ecology as required under the schedule established in provision 3 above.

## V.

### Terms and Conditions of Order

#### 1. Definitions

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

#### 2. Public Notice

RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that the Order is inadequate or improper in any respect.

#### 3. Remedial Action Costs

The PLPs shall pay to Ecology costs incurred by Ecology pursuant to this Order. These costs shall include work performed by Ecology or its contractors for investigations, remedial actions, and Order preparation, oversight, and administration. Ecology costs shall include costs of direct activities and support costs of direct activities as defined in WAC 173-340-550(2). The PLPs shall pay the required amount within 90 days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved staff, and the amount of time spent by involved staff members on the project. A general description of work performed will be provided upon request. Itemized statements shall be prepared quarterly. Failure to pay Ecology's costs

within 90 days of receipt of the itemized statement of costs will result in interest charges

4 Designated Project Coordinators

The project coordinator for Ecology is:

Sandra L. Treccani  
Department of Ecology  
Eastern Regional Office  
4601 N. Monroe Suite 202  
Spokane, WA 99205-1295

The project coordinator for the PLPs is:

Robert Breshears, Public Works Director/County Engineer  
Lincoln County Public Works Department  
27234 SR 25 N.  
Davenport, WA 99122

The project coordinator(s) shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communications between Ecology and the PLPs, and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order, shall be directed through the project coordinator(s). Should Ecology or the PLPs change project coordinator(s), written notification shall be provided to Ecology or the PLPs at least ten (10) calendar days prior to the change.

5 Performance

All work performed pursuant to this Order shall be under the direction and supervision, as necessary, of a professional engineer or hydrogeologist, or similar expert, with appropriate training, experience, and expertise in hazardous waste site investigation and cleanup. The PLPs shall notify Ecology as to the identity of such engineer(s) or hydrogeologist(s), and of any contractors and subcontractors to be used in carrying out the terms of this Order in advance of their involvement at the Site. The PLPs shall provide a copy of this Order to all agents, contractors, and

subcontractors retained to perform work required by this Order and shall ensure that all work undertaken by such agents, contractors, and subcontractors will be in compliance with the Order.

Except where necessary to abate an emergency situation, the PLPs shall not perform any remedial actions at the South Wilbur Petroleum Contamination Site outside that required by this Order unless Ecology concurs, in writing, with such additional remedial actions.

6. Access

Ecology or any Ecology-authorized representative shall have the authority to enter and freely move about the Site at all reasonable times for the purposes of, inter alia: inspecting records, operation logs, and contracts related to the work being performed pursuant to this Order; reviewing the progress in carrying out the terms of this Order; conducting such tests or collecting samples as Ecology or the project coordinator may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done pursuant to this Order; and verifying the data submitted to Ecology by the PLPs. By signing the Agreed Order, the PLPs agree that this Order constitutes reasonable notice of access, and agrees to allow access to the Site at all reasonable times for purposes of overseeing work performed under this Order. Ecology shall allow split or replicate samples to be taken by the PLPs during an inspection unless doing so interferes with Ecology's sampling. The PLPs shall allow split or replicate samples to be taken by Ecology and shall provide seven (7) days notice before any sampling activity.

7. Public Participation

The PLPs shall prepare and/or update a public participation plan for the site as part of Task I under paragraph IV.4. Ecology shall maintain the responsibility for public participation at the site. The PLPs shall help coordinate and implement public participation for the site.

8. Retention of Records

The PLPs shall preserve in a readily retrievable fashion, during the pendency of this Order and for ten (10) years from the date of completion of the work performed

pursuant to this Order, all records, reports, documents, and underlying data in its possession relevant to this Order. Should any portion of the work performed hereunder by undertaken through contractors or agents of the PLPs, then the PLPs agree to include in their contract with such contractors or agents a record retention requirement meeting the terms of this paragraph.

9. Dispute Resolution

The PLPs may request Ecology to resolve disputes which may arise during the implementation of this Order. Such request shall be in writing and directed to the signatory, or his/her successor(s), to this Order. Ecology resolution of the dispute shall be binding and final. The PLPs are not relieved of any requirement of this Order during the pendency of the dispute and remains responsible for timely compliance with the terms of the Order unless otherwise provided by Ecology in writing.

10. Reservation of Rights/No Settlement

This Agreed Order is not a settlement under Chapter 70 105D RCW. Ecology's signature on this Order in no way constitutes a covenant not to sue or a compromise of any Ecology rights or authority. Ecology will not, however, bring an action against the PLPs to recover remedial action costs paid to and received by Ecology under this Agreed Order.

In addition, Ecology will not take additional enforcement actions against the PLPs to require those remedial actions required by this Agreed Order, provided the PLPs comply with this Agreed Order.

Ecology reserves the right, however, to require additional remedial actions at the Site should it deem such actions necessary.

Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the releases or threatened releases of hazardous substances from the South Wilbur Petroleum Site.

In the event Ecology determines that conditions at the Site are creating or have the potential to create a danger to the health or welfare of the people on the Site or in the surrounding area or to the environment, Ecology may order the PLPs to stop



further implementation of this Order for such period of time as needed to abate the danger.

#### 11. Transference of Property

No voluntary conveyance or relinquishment of title, easement, leasehold, or other interest held by the PLPs in any portion of the Site shall be consummated without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Prior to transfer or involuntary conveyance or relinquishment of any legal or equitable interest in all or any portion of the property, the PLPs shall serve a copy of this Order upon any prospective purchaser, lessee, transferee, assignee, or other successor in such interest. At least thirty (30) days prior to finalization of any transfer, the PLPs shall notify Ecology of the contemplated transfer or conveyance or relinquishment.

#### 12 Compliance with Other Applicable Laws

- a. All actions carried out by the PLPs pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements, including requirements to obtain necessary permits, except as provided in paragraph B of this section.
- b. Pursuant to RCW 70.105D.090(1), the substantive requirements of Chapters 70.94, 70.95, 70.105, 75.20, 90.48, and 90.58 RCW and of any laws requiring or authorizing local government permits or approvals for the remedial action under this Order are binding and enforceable requirements of the Order. The PLPs have a continuing obligation to determine whether additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order. In the event the PLPs determine that additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order, it shall promptly notify Ecology of this determination. Ecology shall determine whether Ecology or the PLPs shall be responsible to contact the appropriate state and/or local

agencies. If Ecology so requires, the PLPs shall promptly consult with the appropriate state and/or local agencies and provide Ecology with written documentation from those agencies of the substantive requirements those agencies believe are applicable to the remedial action. Ecology shall make the final determination on the additional substantive requirements that must be met by the PLPs and on how the PLPs must meet those requirements. Ecology shall inform the PLPs in writing of these requirements. Once established by Ecology, the additional requirements shall be enforceable requirements of this Order. The PLPs shall not begin or continue the remedial action potentially subject to the additional requirements until Ecology makes its final determination.

- c. Pursuant to RCW 70.105D.090(2), in the event Ecology determines that the exemption from complying with the procedural requirements of the laws referenced in RCW 70.105D.090(1) would result in the loss of approval from a federal agency which is necessary for the State to administer any federal law, the exemption shall not apply and the PLPs shall comply with both the procedural and substantive requirements of the laws referenced in RCW 70.105D.090(1), including any requirements to obtain permits.

## VI.

### Satisfaction of this Order

The provisions of this Order shall be deemed satisfied upon the PLP's receipt of written notification from Ecology that the PLPs have completed the remedial activity required by this Order, as amended by any modifications, and that all other provisions of this Agreed Order have been complied with.

## VII.

### Enforcement

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

- a. The Attorney General may bring an action to enforce this Order in a state or federal court.
- b. The Attorney General may seek, by filing an action, if necessary, to recover amounts spent by Ecology for investigative and remedial actions and orders related to the Site.
- c. In the event the PLPs refuse, without sufficient cause, to comply with any term of this Order, the PLPs will be liable for:
  - i. up to three times the amount of any costs incurred by the State of Washington as a result of its refusal to comply; and
  - ii. civil penalties of up to \$25,000 per day for each day it refuses to comply.
- d. This Order is not appealable to the Washington Pollution Control Hearings Board. This Order may be reviewed only as provided under RCW 70.105D.060.

Effective Date of this Order: 8.7.2000

STATE OF WASHINGTON  
DEPARTMENT OF TRANSPORTATION

BY \_\_\_\_\_

DATE \_\_\_\_\_

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

BY Sam J. Gustin

DATE 8.7.2000

LINCOLN COUNTY PUBLIC WORKS DEPARTMENT

BY [Signature]

DATE 8/7/00

LINCOLN MUTUAL #3

BY \_\_\_\_\_

DATE \_\_\_\_\_

JEROME CLARK

BY \_\_\_\_\_

DATE \_\_\_\_\_

JOSEPH CLARK

BY \_\_\_\_\_

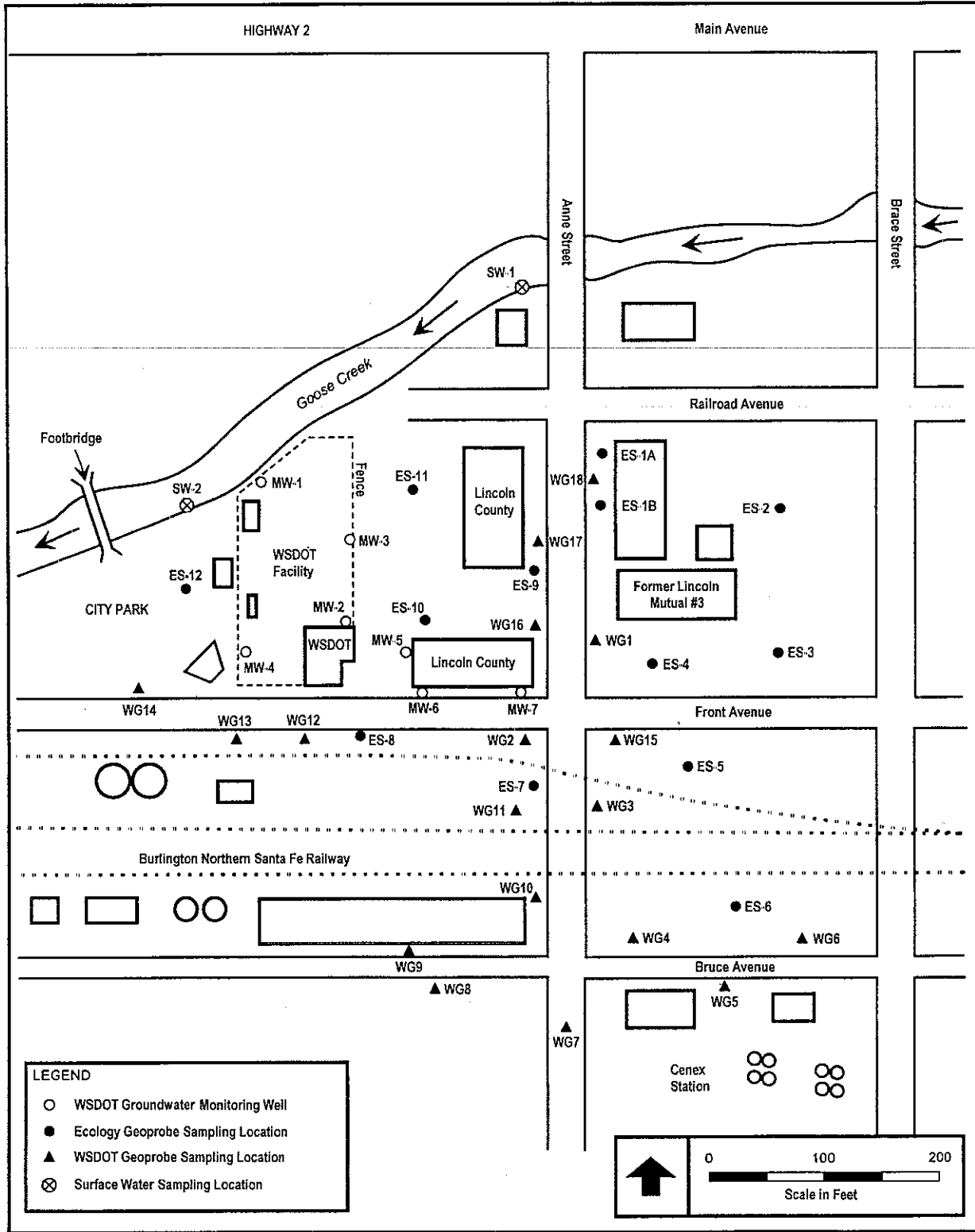
DATE \_\_\_\_\_

TINA CLARK

BY \_\_\_\_\_

DATE \_\_\_\_\_

AGREED ORDER NO.



**Exhibit A**  
**Map of South Wilbur Petroleum Contamination Site**

**EXHIBIT B**  
**South Wilbur Petroleum Contamination Site Scope of Work**  
**Remedial Investigation/Feasibility Study**

This scope of work is to investigate the petroleum contamination at the South Wilbur Petroleum Contamination Site (Site) in Wilbur, Washington. This scope of work prepared by the Department of Ecology is to be used by the potentially liable parties (PLPs) to develop Work Plans in order to complete a Remedial Investigation/Feasibility Study (RI/FS) at the Site.

The RI is to supplement existing data and determine the nature and extent of contamination by hazardous substances at the Site. The FS shall evaluate remedial alternatives that are applicable to the Site. The information and data gathered during the RI/FS shall be used to identify if additional data needs be collected and determine an appropriate remedial action. The PLPs shall furnish all personnel, materials, and services necessary for, or incidental to, performing the Remedial Investigation at the Site.

The RI/FS shall contain the following tasks:

Task I: RI/FS Project Plan

A. RI/FS Work Plan

A work plan outlining procedures for the Remedial Investigation shall be prepared which includes the following information:

1. Background Summary

Any pertinent Site information including, but not limited to:

a. Maps – topographical, property lines, underground tank locations, surface water bodies near the vicinity of the Site, previous Site investigations; all maps shall be consistent with the requirement set forth in WAC 173-340-840(4) and be of sufficient detail and accuracy to locate and report all current and future work performed at the Site;

b. Property histories

2. Evaluation of Existing Data

A brief discussion of activities and data already collected during previous investigations:

a. WSDOT Investigations;

b. Department of Ecology (SAIC) Investigation.

### 3. Task II Work Plans and Schedules

#### B. Sampling and Analysis Plan

The PLPs shall prepare a Sampling and Analysis Plan for use during all Site characterization studies. The Sampling and Analysis Plan shall contain:

1. Field Sampling and Testing Plans – The plan shall describe in detail the sampling, testing, and data gathering methods, locations, frequency and other field study procedures that will be used for obtaining data required to complete the RI/FS. The Sampling and Testing Plan will include the following:
  - a. Specific sampling methods, including number and type of QA/QC samples;
  - b. Sampling locations and designations, including access considerations;
  - c. Types of media to be sampled and the number of samples of each;
  - d. Schedule and task assignments;
  - e. Supplies and equipment;
  - f. Monitoring well construction requirements;
  - g. Analytical procedures, methods, and detection limits;
  - h. Sample custody procedures, including holding times, containers, and preservation;
  - i. Shipping and handling arrangements.
2. Quality Assurance Project Plan (QAPP)
  - a. Field quality assurance/quality control (QA/QC) methods;
  - b. Chain of custody procedures;
  - c. Decontamination procedures;
  - d. Laboratory QA/QC methods.
3. Health and Safety Plan
  - a. Level of protection;
  - b. Hazard evaluation;

- c. Waste characteristics;
- d. Special considerations and emergency information.

C. Public Participation Plan

A Public Participation Plan shall be developed to provide the public with timely information and an opportunity to participate in accordance with WAC 173-340-600. A model Public Participation Plan is available from the Department of Ecology for use as the format for the Public Participation Plan.

Task II: Remedial Investigation

The purpose of the Remedial Investigation is to obtain the information necessary to supplement and verify existing data. That information will be used to characterize the Site and source(s), type(s), and extent of contamination present. The resulting data shall meet the criteria set out in the QAPP and be of sufficient quality to develop an appropriate remedial action for the Site. The investigation shall meet the requirements stated in WAC 173-340-350, and more specifically, shall include the following elements:

A. Site Characterization

Collect analytical data on groundwater, soils, and surface water contamination in the vicinity of the Site. The data shall be sufficient to delineate the depth, areal extent, velocity and direction of contaminant movement, type, and concentration of contaminants.

1. Collect background information from the WSDOT Site characterization work, Ecology's investigation by SAIC International, other Ecology information, and any other historical data.
2. Hydrogeology  
An investigation of the regional and Site specific geologic and hydrogeologic characteristics affecting groundwater flow beneath the Site
  - a. Evaluate and monitor all seven existing monitoring wells;
  - b. Install new groundwater monitoring wells and soil borings where needed;
  - c. Measure water levels in all wells and new borings;
  - d. Characterize regional stratigraphy and lithology based on well logs, maps, and any other information available;
  - e. Estimate hydraulic conductivity and porosity based on well logs, samples, and other general information available;



- f. Prepare maps showing water levels and regional/Site hydrogeology.

### 3. Soils

- a. Install soil borings;
- b. Field test soil from the borings using a photoionization detector (PID) to screen for the presence of petroleum vapors;
- c. Collect soil samples at specified intervals and/or at intervals that have a strong odor, staining, sheen, a detection using the PID, or any other evidence of contamination;
- d. Characterize soil samples using the Unified Soil Classification System (USCS);
- e. Prepare boring logs for each boring.

### 4. Surface Water

- a. Collect surface water samples along the southern bank of Goose Creek adjacent to and downstream of the Site properties that border the creek;
- b. Surface water samples shall be collected at times of low creek flow when the groundwater input is most easily discerned.

### 5. Sediment

- a. Collect sediment samples from the southern bank of Goose Creek;
- b. Sediment samples shall be collected from the same locations as the surface water samples.

## B. Source and Contamination Characterization

- 1. Sampling locations shall be selected to characterize the wastes and areas where wastes were handled, stored, spilled, or disposed;
- 2. Analytical data collected shall help describe the nature, extent, and potential sources of contamination.

## C. Potential Receptor Information

Collect data on the surrounding human and ecological populations that may be in contact with contaminants and potential routes of exposure for those populations.

1. Public Use/Site Access – Potential uses of the affected properties and the presence or absence of controls on Site access;
2. Potential Groundwater/Surface Water Uses – Any consumptive, recreational, or other use of groundwater and surface water in the area, and by which populations;
3. Environmental Receptors – Information on the presence of endangered or threatened species, potential habitats, and ecological environments

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Task III: RI/FS Report

The PLPs shall complete a report documenting the remedial investigation/feasibility study as required by WAC 173-340-350(8). This report shall include the following elements:

A Remedial Investigation

1. Background Information

- a. Site History
- b. Previous Studies

2. Nature and Extent of Contamination

The PLPs shall prepare an assessment and description of the degree and extent of contamination. This should include:

- a. Data Analysis – Analyze all data collected during Task II and prepare supporting maps and tables;
- b. Lab reports, previous investigations, well and boring logs, and any other documentation of characterization activities shall be included.

3. ARARs Analysis

Identify Applicable State and Federal Laws for cleanup of the Site in accordance with WAC 173-340-710.

4. Cleanup Levels/Risk Assessment Analysis

Perform a baseline Model Toxics Cleanup Act (MTCA) cleanup levels analysis/baseline risk assessment characterizing the current and potential threats to public health and the environment that may be posed by hazardous substances at the facility. The assessment will integrate cleanup standards and risk assessment as required by WAC 173-340-350(6)(d) and WAC 173-340-708.

5. Discussion and Recommendations

- a. Interpret and discuss data to determine the nature and extent of the contamination and to support final recommendations for the Site;
- b. A summary of all possible and suspected source areas of contamination based on the data collected shall be included;
- c. Any known or potential risks to the public health, welfare, and the environment should be discussed;
- d. Recommendations should be provided identifying additional data requirements.

B. Feasibility Study

1. Identification of contamination to be remediated;
2. Identification and initial screening of treatment technologies;
3. Proposed remedial alternatives and evaluation with respect to MTCA criteria;
4. Recommended alternative.

### Schedule of Deliverables

<u>Deliverables</u>	<u>Date Due</u>
Effective date of Order	Start
Draft RI/FS Work Plan, Sampling and Analysis Plan, Health and Safety Plan, Public Participation Plan, and Schedule of Work to be Performed	30 days after start
Final RI/FS Work Plan, Sampling and Analysis Plan, Health and Safety Plan, Public Participation Plan, and Schedule of Work to be Performed	30 days after Ecology approval of draft
Begin implementation of RI following Schedule of Work to be Performed	15 days after approval of work plans
Draft RI/FS Report	As approved in RI/FS Work Plan
Final RI/FS Report	30 days after Ecology approval of draft
Progress Reports	Every 2 months