



PERIODIC REVIEW

**Old Inland Pit
FS ID#: 632**

**3808 North Sullivan Road
Spokane, Washington 99220**

Eastern Region Office

TOXICS CLEANUP PROGRAM

August 2009

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1.0 INTRODUCTION

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

Cleanup activities at this Site were completed under Agreed Order No. DE 95TC-E101 entered into with Ecology in 1995 and amended in 1999. MTCA Method C cleanup levels were used for the Site, which requires the implementation of institutional controls. The MTCA Method C cleanup levels for soil are established under WAC 173-340-745(5). 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;
- (d) 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 or 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 SITE SUMMARY

2.1 Site History

The Old Inland Pit is located in the City of Spokane in Spokane County, Washington (Vicinity Map - Appendix 6.1). The property owner entered into an Agreed Order with Ecology in 1995. Following a remedial investigation conducted under the Agreed Order, it was determined that the no remedial action would be required at the Site if institutional controls were implemented for the property. A restrictive covenant was recorded for the property in 1999, and the provisions of the Agreed Order were deemed satisfied. No additional remedial actions were required for the Site. The Site remains unoccupied and is located in a predominantly industrial area.

The Site overlies the Spokane Valley-Rathdrum Prairie Aquifer, the sole source of water for the greater Spokane area. Groundwater at the site is about 65 to 70 feet below ground surface, and flows from the northeast to the southwest towards the Spokane River. Materials at depth and near the surface are comprised of native sands and gravels. The surficial soils are a mixture of native deposits and backfilled material, including foundry sands and baghouse dust.

The ten-acre Old Inland Pit Site was operated by Inland Asphalt as a sand and gravel source from 1969 to 1978. Materials were excavated to a depth of 35 to 50 feet below ground surface (bgs). Spokane Steel Foundry Company (SSFC), located just east of the pit, disposed of waste foundry sands and baghouse dust from May 1978 to May 1983. The sands were from metal molding operations, and the baghouse dust was generated from sand sieving, sandblasting operations, and the residue of electric arc furnaces.

Approximately 200 tons of baghouse dust was thought to have been disposed of in the pit. Foundry sand disposal continued until 1986. In addition to the foundry dusts, permission was also given to Inland Asphalt and Central Premix to dispose of construction debris, and to Quarry Tile Company for disposal of broken decorative clay tiles. Combined dumping from all sources raised the bottom level of the pit to a uniform 35 feet below ground surface.

2.2 Site Investigations

Concerns that the baghouse dust was potentially a hazardous waste first arose in 1981. In May 1983, Ecology collected four baghouse dust samples from the SSFC plant baghouses for waste classification. Two samples were from the sandblasting/sand sieving operations, and two were from electric arc furnaces. The furnace dusts failed the Static Basic Acute Fish Toxicity test (fish bioassay) and were classified as state-only dangerous waste under the authority of WAC 173-303. The foundry sands from the sieving operations were not classified as dangerous waste.

In August, 1984, Ecology & Environment (E&E) conducted a Preliminary Site Assessment (PSA) for the Environmental Protection Agency (EPA), which consisted of interviews with SSFC personnel, a Site visit, and soil sampling. Samples were analyzed for inorganics, pesticides, and volatile and semi-volatile organics; elevated concentrations of copper, zinc,

nickel, and chromium were detected. The results of the PSA were used to complete a Hazard Ranking System (HRS) scoring. The Site scored 29.45, high enough to be nominated to the National Priorities List (NPL) in 1986. The nomination was formalized in February of 1990.

In July, 1986, Reed Corporation was contracted to assess the data gathered during the PSA, collect data to confirm those samples, and provide additional site characterization. E&E collected additional soil and dust samples for the EPA in late 1988 to assess the distribution and concentration of potential contaminants on the Site. Both sample sets were analyzed for inorganics, organics, and pesticides.

E&E, under contract to Ecology, collected additional soil samples and installed four groundwater monitoring wells in May of 1991. Groundwater samples were collected from these wells in May 1991 and April 1993. Those groundwater samples and the splitspoon soil samples collected during well installation were analyzed for the same groups-of analytes as previous samples.

On April 20, 1995, the PLPs entered into an Agreed Order with Ecology after public notice and opportunity to comment. Dames & Moore began site investigations on behalf of the PLPs. Further soil sampling was performed. Groundwater samples were taken in January 1995, March 1996, June 1996, and September 1996. Additional dust samples were also collected from the pit floor in September 1995 for a second fish bioassay test. Those test results indicated the material would no longer be characterized as a state dangerous waste, likely due to the difference in sampling location. The complete history of site investigations and sampling results is presented in the Final Phase I Remedial Investigation (RI).

The RI was completed by Dames & Moore, contractor to CH&E Investments, in August of 1998. The conclusions reached by the studies are summarized below:

- The site is located in an historically industrial area, with current and future use expected to continue as such;
- Approximately 200 tons of furnace baghouse dust was disposed of during-a five year period, mainly in the northeast and south-central sections of the pit;
- Fish bioassay testing initially designated the furnace dust as a state-only dangerous waste, but repeat testing has shown that the waste no longer classifies as such;
- Contaminants of potential concern in soils were inorganics, especially arsenic, chromium, zinc, and aluminum. These were all detected at levels below applicable cleanup standards;
- Groundwater has not been affected by waste disposal practices at the Site.

MTCA Method C Industrial Soil Cleanup Levels were used since the site and the surrounding properties will remain industrial. The highest possible use of groundwater is drinking water, so Method B Groundwater cleanup levels were applied. The concentrations of inorganics in both groundwater and soil are below their respective risk-based cleanup levels. Details of cleanup level development are presented in the Cleanup Action Plan issued by Ecology on January 20, 1999.

2.3 Remedial activities

Since there were no contaminants exceeding cleanup levels, no contamination of groundwater, and minimal risks from hazardous materials remaining on site, the Cleanup Action Plan did not require remedial activities. MTCA requires that where Method C Industrial Soil Cleanup Levels are used, a restrictive covenant must be placed with the deed. A restrictive covenant was placed with this property for that purpose.

Following the remedial investigation, the property owner obtained approval from Ecology to import fill to the Site. Significant quantities of soil were tested for contamination and imported to the Site for fill. The former pit area was filled in lifts until the majority of the Site was above the surrounding grade. A small ravine remains inside the eastern edge of the fenceline.

2.4 Groundwater Monitoring

As described above, four groundwater monitoring wells were installed at the Site in 1991. Samples were collected sporadically throughout investigation and remediation activities. Between 1995 and 2000, only barium, chromium and lead were detected above laboratory detection limits. The only dissolved metals detected above laboratory detection limits were barium and chromium. No contaminants were detected above MTCA Method A or B groundwater cleanup levels.

Groundwater analytical results are available as Appendix 6.3.

2.5 Restrictive Covenant

A Restrictive Covenant was recorded for the property in 1999. The Restrictive Covenant imposes the following limitations:

1. The owner of the premises must give written notice to Ecology of the owner's intent to convey any interest in the property at least 30 days prior to such conveyance.
2. In the event that the owner or any persons who later own the property proposes to use the property in a manner which is inconsistent with the Restrictive Covenant, they must obtain written approval from Ecology.
3. No drilling for groundwater may occur on any portion of the property.
4. No excavation of any kind deeper than 15 feet below ground surface may occur on any portion of the property.
5. Ecology shall have the right to enter the property at reasonable times for the purpose of inspecting records and evaluating compliance with the Restrictive Covenant. Any activity on the property that may be in violation of the Restrictive Covenant is prohibited.

The Restrictive Covenant was amended in 2002, and again in 2006. Both amendments were to reduce the area impacted by the Restrictive Covenant. The limitations of the Restrictive Covenant were not changed substantively.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

Based upon the site visit conducted on July 28, 2009, access restrictions at the Site appear in excellent condition and continues to eliminate exposure pathways (ingestion, contact) to contaminated soils. The security fencing around the Site is in excellent condition and there are no signs of attempted access by the public. The Site remains undeveloped. A photo log is available as Appendix 6.4.

The Restrictive Covenant and subsequent amendments remain active. The Restrictive Covenant prohibits excavation, drilling, groundwater use, and any use of the property that is inconsistent with the Covenant. The Restrictive Covenant for the property continues to prevent the exposure of hazardous materials contained during remedial activities at the Site. The integrity of the cap will be protected by the limitations provided in the Restrictive Covenant.

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

There is no new pertinent scientific information for the 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.”

MTCA Method C cleanup levels continue to be used at the Site. Though MTCA Method C cleanup levels have changed since the CAP was created in 1999, the cleanup action remains protective of human health and the environment.

3.4 Current and projected site use

The Site remains vacant. The perimeter fencing at the Site remains in excellent condition and prevents public access to the former pit area. 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 containment of hazardous substances 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 below MTCA Method C 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 appear to be protective of human health and the environment.
- Concentrations of contaminants of concern at the Site remain below MTCA Method C cleanup levels. The use of MTCA Method C cleanup levels requires the implementation of institutional controls at the Site, which is being met by the use of a Restrictive Covenant to limit property use.
- 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 periodic review, the Department of Ecology has determined that the requirements of the Restrictive Covenant are being satisfactorily met. No additional remedial 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

Ecology. *Agreed Order No. 95TC-E101*. February 23, 1995.

Dames and Moore. *Final Report – Phase I Remedial Investigation*. February 27, 1998.

Ecology. *Amendment to Agreed Order No. 95TC-E101*. February 23, 1995.

United States Environmental Protection Agency. *Final Closeout Report for Old Inland Pit*.
January 29, 1999.

Ecology. *Restrictive Covenant*. 1999.

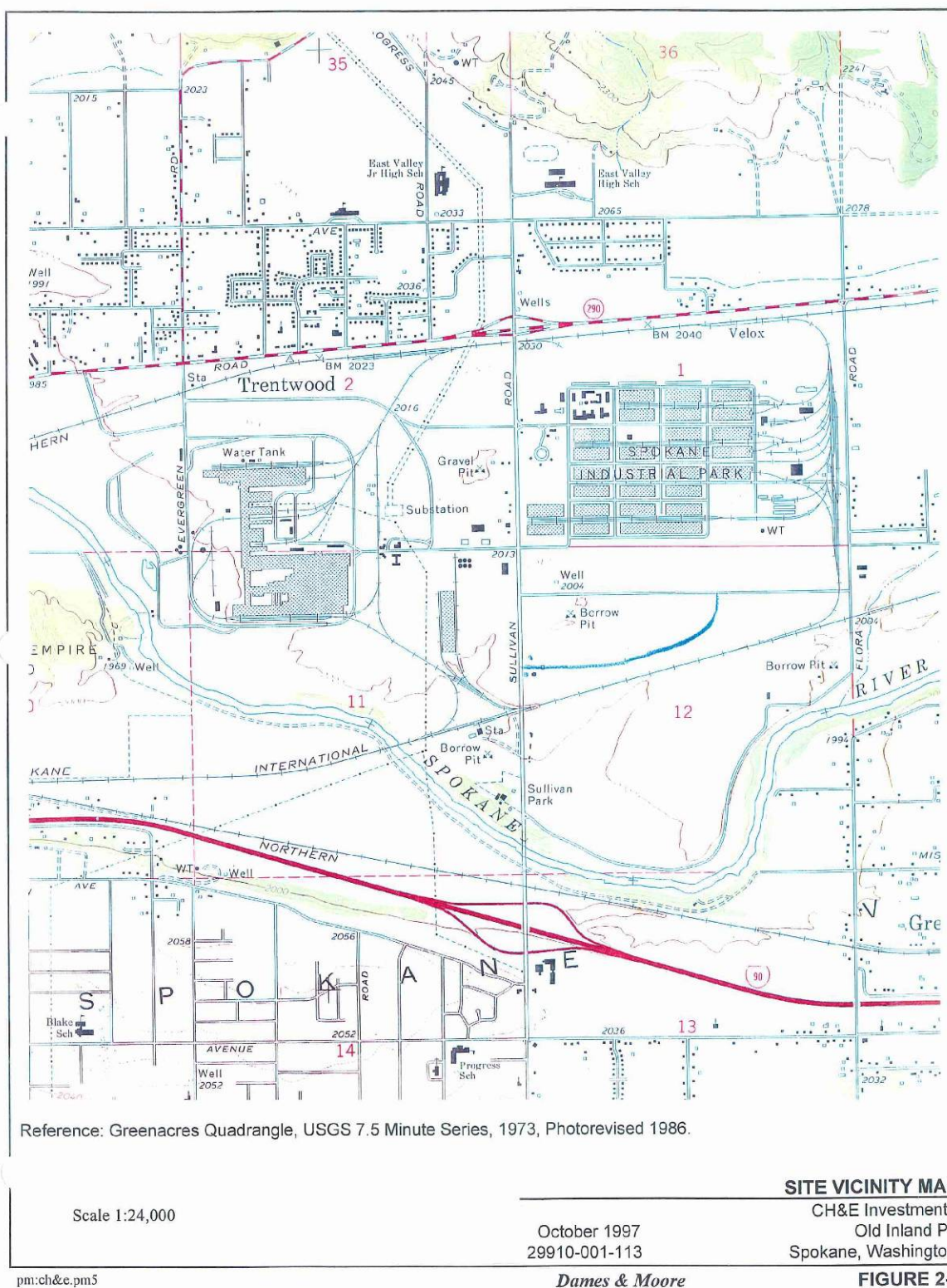
Ecology. *Amended Restrictive Covenant*. 2002.

Ecology. *Amended Restrictive Covenant*. 2006.

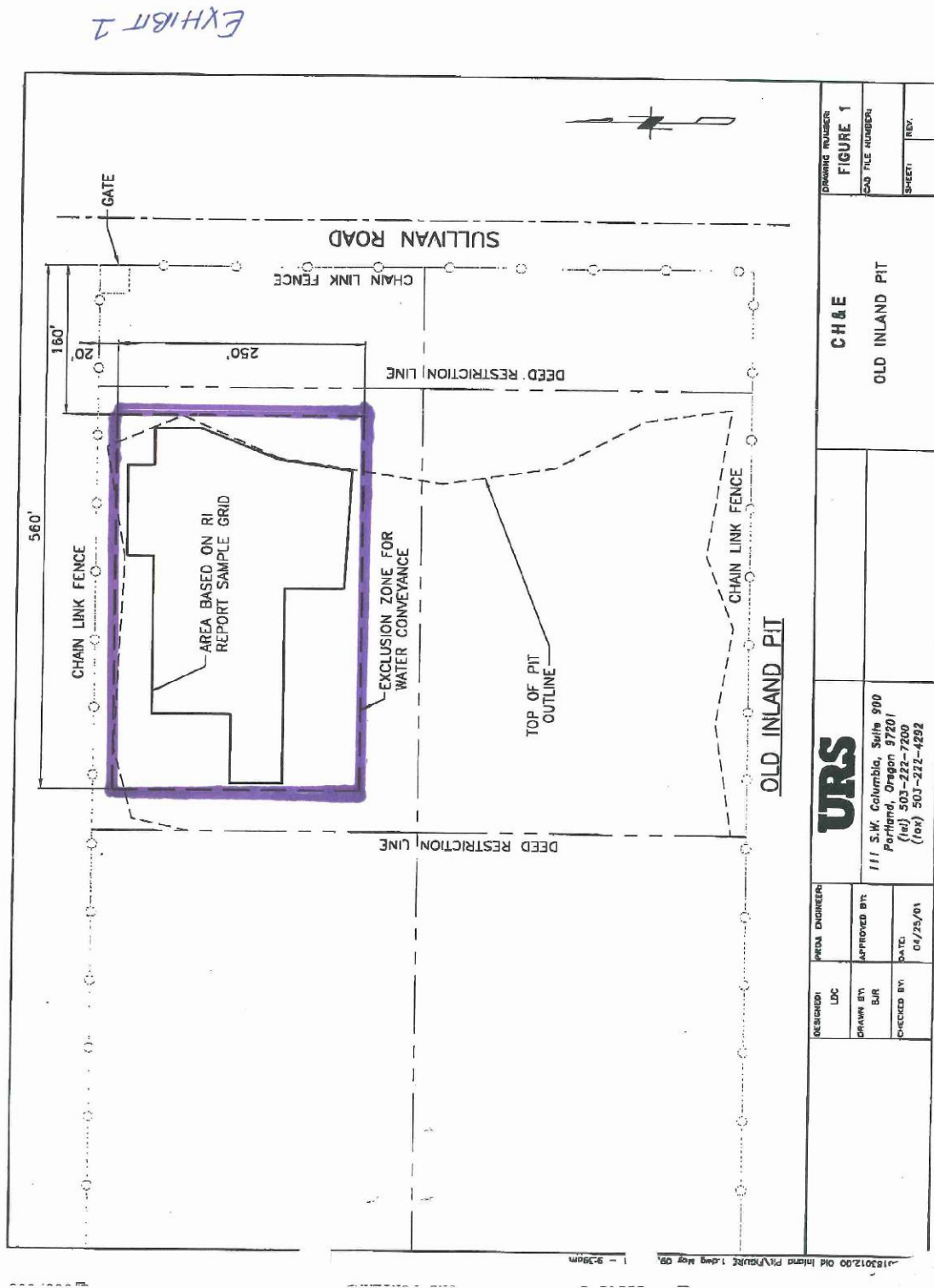
Ecology. Site Visit. July 28, 2009.

6.0 APPENDICIES

6.1 Vicinity Map



6.2 Site Plan



6.3 Groundwater Monitoring Data

Table 1
Summary of Analytical Data
Groundwater Sampling
1995-2000 Dames & Moore

	Total Metals (ug/L)					Dissolved Metals (ug/L)										
	12/18/95	3/21/96	6/18/96	9/26/96	8/6/99	12/17/99	4/6/00	9/18/00	12/18/95	3/21/96	6/18/96	9/26/96	8/6/99	12/17/99	4/6/00	9/18/00
Arsenic																
MW-1	4.1	6.7	15.7	47.6	10.0	NS	NS	NS	<4.0	<4.0	<4.0	<4.0	NS	<4.0	<4.0	<5.0
MW-2	<4.0	4.1	16.3	75.3	NS	NS	NS	NS	<4.0	<4.0	<4.0	<4.0	NS	NS	NS	NS
MW-3	4.6	4.2	16.3	66.1	NS	NS	NS	NS	<4.0	<4.0	<4.0	<4.0	NS	NS	NS	NS
MW-4	6.4	4.9	10.0	88.7	12.0	NS	NS	NS	<4.0	<4.0	<4.0	<4.0	NS	<4.0	<4.0	<5.0
MW-4DUP	5.6	5.2	9.3	81.3	N/A	N/A	N/A	N/A	<4.0	4.1	<4.0	<4.0	N/A	N/A	N/A	N/A
Barium																
MW-1	NS	NS	NS	NS	<313	NS	NS	NS	NS	NS	NS	NS	NS	23.7	21.9	35.5
MW-2	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW-3	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW-4	NS	NS	NS	NS	<313	NS	NS	NS	NS	NS	NS	NS	NS	20.1	21.3	28.2
MW-4DUP	NS	NS	NS	NS	N/A	N/A	N/A	N/A	NS	NS	NS	NS	N/A	N/A	N/A	N/A
Cadmium																
MW-1	<5.0	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	<5.0	<5.0	<5.0	<5.0	NS	<8.54	<8.54	<8.54
MW-2	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	NS	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	NS
MW-3	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	NS	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	NS
MW-4	<5.0	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	<5.0	<5.0	<5.0	<5.0	NS	<8.54	<8.54	<8.54
MW-4DUP	<5.0	<5.0	<5.0	<5.0	N/A	N/A	N/A	N/A	<5.0	<5.0	<5.0	<5.0	N/A	N/A	N/A	N/A
Chromium																
MW-1	100	46	14.8	29.3	<5.0	NS	NS	NS	130	46	<10	<10	NS	7.98	<5.0	<5.0
MW-2	20	<10	15.8	62.9	NS	NS	NS	NS	15	<10	<10	<10	NS	NS	NS	NS
MW-3	<10	<10	<10	31.2	NS	NS	NS	NS	ND	<10	<10	<10	NS	NS	NS	NS
MW-4	24	<10	<10	83.1	<5.0	NS	NS	NS	11	<10	<10	<10	NS	<7.81	<5.0	<5.0
MW-4DUP	24	<10	12.9	97.9	N/A	N/A	N/A	N/A	ND	<10	<10	<10	N/A	N/A	N/A	N/A

NS = Not Sampled
N/A = Not Analyzable

NS = Not Sampled N/A = Not Applicable

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Table J
Summary of Analytical Data
Groundwater Sampling
1995-2000 Dames & Moore

	Total Metals (ug/L)					Dissolved Metals (ug/L)				
	12/18/95	3/21/96	6/18/96	9/26/96	8/6/99	12/17/99	4/6/00	9/18/00	12/17/99	4/6/00
Lead										
MW-1	19	12	19.8	48.4	3.6	NS	NS	NS	NS	NS
MW-2	10	5.4	22.5	94.5	NS	NS	NS	NS	NS	NS
MW-3	10	2.2	19.4	85.8	NS	NS	NS	NS	NS	NS
MW-4	60	9.8	13.8	131	5.7	NS	NS	NS	NS	NS
MW-4DUP	59	15	15.8	130	N/A	N/A	N/A	N/A	N/A	N/A
Mercury										
MW-1	<1.0	<1.0	<1.0	<1.0	<0.2	NS	NS	NS	NS	<0.2
MW-2	<1.0	<1.0	<1.0	<1.0	NS	NS	NS	NS	NS	NS
MW-3	<1.0	<1.0	<1.0	<1.0	NS	NS	NS	NS	NS	NS
MW-4	<1.0	<1.0	<1.0	<1.0	<0.2	NS	NS	NS	NS	<0.2
MW-4DUP	<1.0	<1.0	<1.0	<1.0	N/A	N/A	N/A	N/A	N/A	N/A
Selenium										
MW-1	<5.0	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	NS	<5.0
MW-2	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	NS	NS	NS
MW-3	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	NS	NS	NS
MW-4	<5.0	<5.0	<5.0	<5.0	<5.0	NS	NS	NS	NS	<5.0
MW-4DUP	<5.0	<5.0	<5.0	<5.0	N/A	N/A	N/A	N/A	N/A	N/A
Silver										
MW-1	<20	<20	<20	<20	<9.03	NS	NS	NS	<9.03	<9.03
MW-2	<20	<20	<20	<20	NS	NS	NS	NS	NS	NS
MW-3	<20	<20	<20	<20	NS	NS	NS	NS	NS	NS
MW-4	<20	<20	<20	<20	<9.03	NS	NS	NS	<9.03	<9.03
MW-4DUP	<20	<20	<20	<20	N/A	N/A	N/A	N/A	N/A	N/A

NS = Not Sampled N/A = Not Applicable

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6.4 Restrictive Covenant

AFTER RECORDING, PLEASE
RETURN DOCUMENT TO:

Jerry R. Neal
Preston Gates & Ellis LLP
601 West Riverside Avenue #1400
Spokane, WA 99201
Tel. No. 509-624-2100



AMENDED DECLARATION OF RESTRICTIVE COVENANTS RUNNING WITH THE LAND

This Amended Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030 and WAC 173-340-440 by James F. and Billie A. Etter, (hereinafter referred to as "Owner"). This Amended Declaration of Restrictive Covenants Running with the Land is required by the Washington State Department of Ecology ("Ecology") and supersedes all prior restrictive covenants.

As the Owner in fee simple of that certain real property situated in the County of Spokane, and the State of Washington, bounded as described as follows:

That portion of the East half of the South half of the Northeast quarter of the Southeast quarter of Section 2, Township 25 North, Range 44 East, Willamette Meridian, Spokane County, Washington, lying westerly of the following described line:

COMMENCING at the Northeast corner of the Southeast quarter of the Southeast quarter of said Section 2; thence N89°52'55"W 274.00 feet along the north line of said SE ¼ SE ¼, to the POINT OF BEGINNING;

Thence N00°35'56"W 163.00, parallel with the East line of said Section 2; thence N25°27'02"E 152.66 feet; thence N00°35'56"W 29.00 feet, more or less, to the North line of the South half of the South half of the Northeast quarter of the Southeast quarter of said Section 2, and the Point of Terminus.

(hereinafter referred to as the "Property")

AMENDED DECLARATION OF RESTRICTIVE
COVENANTS RUNNING WITH THE LAND - 1
K125163100001XRHXRH_021DY

The Owner hereby declares and establishes the following amended restrictive covenants on the Property. These covenants are to run with the land and shall be binding upon the Owner and all persons who may later become the Owner or Owners of the Property or any part thereof and all parties claiming under them in perpetuity.

The amended restrictive covenants hereby declared and established are as follows:

1. The Owner of the Premises must give written notice to Ecology, or to a successor agency, of the Owner's intent to convey any interest in the Premises at least thirty (30) days prior to such conveyance.
2. In the event that the Owner, any person or persons who may later own the Premises or any interest therein or any person claiming by, through or under them, proposes to use the Premises in a manner which is inconsistent in any way with these restrictive covenants, such person must give prior written notice to Ecology of its proposal and may use the Premises as proposed only after such proposal is approved in writing by Ecology.
3. No drilling for groundwater may occur on any portion of the hereinbefore described property.
4. No excavation of any kind including drilling or digging deeper than 15 feet below ground surface may occur on any portion of the property described above.
5. Ecology and its designated representatives, shall have the right to enter the premises at reasonable times for the purpose of inspecting records and evaluating compliance with these restrictive covenants. Any activity on the property that may be in violation of these restrictive covenants is prohibited.

IN WITNESS WHEREOF, Owner has caused this instrument to be signed and sealed on its behalf by its officers thereunder duly authorized this ____ day of _____, 2001.

James F. and Billie A. Etter

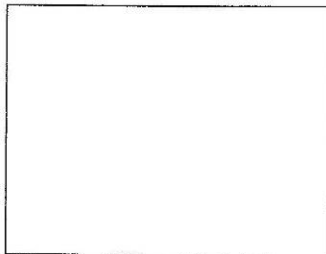
By _____
James F. Etter

AMENDED DECLARATION OF RESTRICTIVE
COVENANTS RUNNING WITH THE LAND - 2
K:\26163\00001\XRHXRH_Q21DY

STATE OF WASHINGTON)
) ss:
COUNTY OF Spokane)

I certify that I know or have satisfactory evidence that James F. Etter is the person who appeared before me, and said person acknowledged that he signed this instrument, and acknowledged it to be his free and voluntary act for the uses and purposes mentioned in the instrument.

Dated: _____.



(Use this space for notarial stamp/seal)

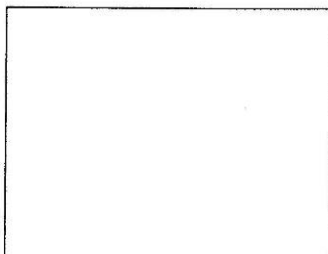
Notary Public _____
Print Name _____
My commission expires _____

By _____
Billie A. Etter

STATE OF WASHINGTON)
) ss:
COUNTY OF Spokane)

I certify that I know or have satisfactory evidence that Billie A. Etter is the person who appeared before me, and said person acknowledged that she signed this instrument, and acknowledged it to be her free and voluntary act for the uses and purposes mentioned in the instrument.

Dated: _____.



(Use this space for notarial stamp/seal)

Notary Public _____
Print Name _____
My commission expires _____

AMENDED DECLARATION OF RESTRICTIVE
COVENANTS RUNNING WITH THE LAND - 3
K:\28163\00001\XRHXRH_Q21DY

6.5 Photo log

Photo 1: East Side of Property – from the south

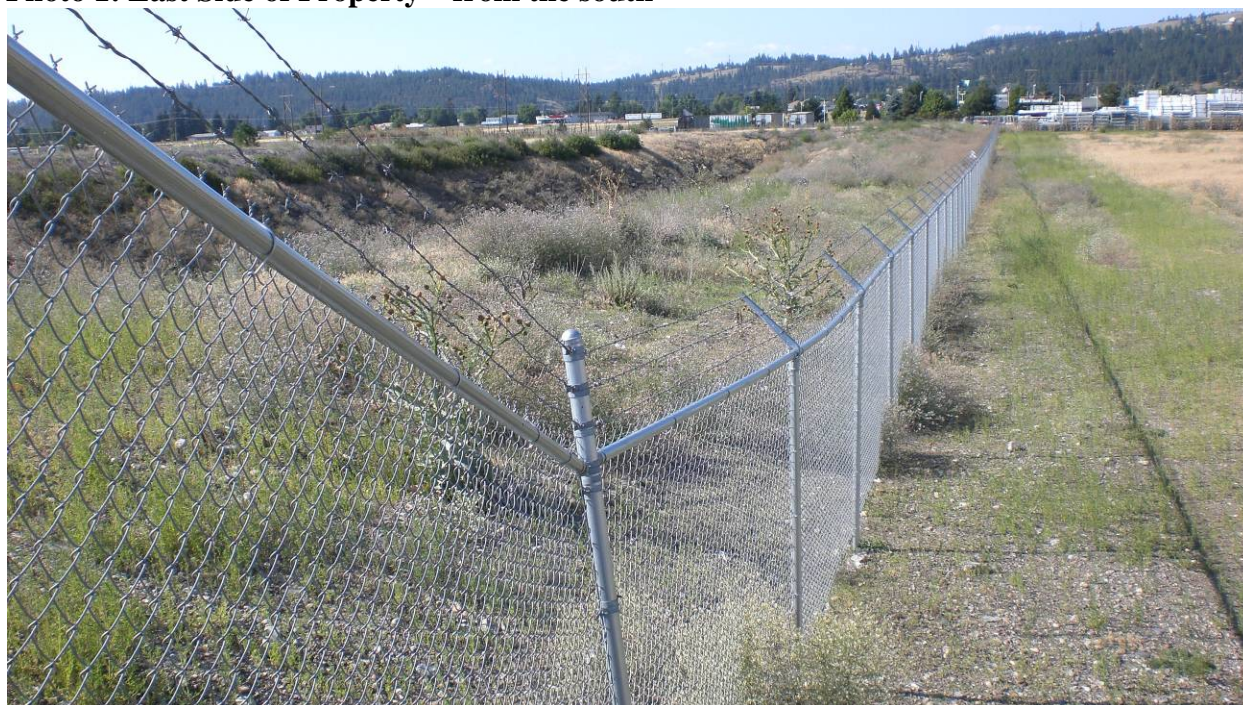


Photo 2: Ravine at South Pit Edge – from the south



Photo 3: Well at North End of Property - from the southwest



Photo 4: Looking South from the Property – from the north

