WASHINGTON STATE DEPARTMENT OF ECOLOGY

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

TRANSMITTAL MEMO

Date: October 20, 2008

TO: Mr. Ron Skov
Evergreen Landing Development, LLC

RE: Evergreen Airport SW0915

Subject: Explanation of Timeline

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

Ecology Determination date: October 20, 2008

Payment received date: 11/26/08

EIM Data successfully uploaded: July 31, 2008

Ecology Determination letter mailed/sent: 12/01/08

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

CERTIFIED MAIL
7007 2560 0000 6214 0723

October 20, 2008

Mr. Ron Skov
Evergreen Landing Development, LLC
1230 SW First Avenue, Penthouse
Portland, OR 97204

Re: No Further Action at the following Site:

- Name: Evergreen Airport (also includes Robertson's Paint Shop and Northwest Aircraft Supply)
- Address: 13800 – 14114 Mill Plain Boulevard, Vancouver, WA
- Facility/Site No.: 7056386 (Evergreen Airport), 1033 (Robertson's Paint Shop), and 2344585 (Northwest Aircraft Supply)
- UST No.: 5312 (Northwest Aircraft Supply)
- VCP No.: SW0915

Dear Mr. Skov:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Evergreen Airport 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

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

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:

- Petroleum Hydrocarbons in Soil
- Metals in Soil
- Volatile Organic Compounds (VOCs) in Soil
- Semi-Volatile Organic Compounds (SVOCs) in Soil
- Organochlorine Pesticides in Soil
- Polychlorinated Biphenyls in Soil

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

Please note that 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

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

1. April 23, 1986, Washington State Department of Ecology. Inspection Report, Max Robertson Paint Shop, 14114 Mill Plain Boulevard, Vancouver, Washington.

2. June 29, 1988, Ecology and Environment, Inc. Memorandum, HRS Score for Robertson Paint Shop, Vancouver, Washington.

3. June 1988, Ecology and Environment, Inc. Preliminary Assessment Report, Robertson Paint Shop, Vancouver, Washington.

4. July 5, 2005, GeoDesign. Phase I Environmental Site Assessment, The Landing at Evergreen, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

5. November 2, 2005, GeoDesign. Phase II Environmental Site Assessment, The Landing at Evergreen, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

6. December 2, 2005, GeoDesign. Proposed Cleanup Action Work Plan, The Landing at Evergreen, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

7. March 9, 2006, GeoDesign. Supplemental Characterization Work Plan, The Landing at Evergreen, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

8. July 19, 2006, URS. Groundwater Sampling Report, First Quarter 2006, The Landing at Evergreen, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

9. July 20, 2006, URS. Supplemental Characterization Report, The Landing at Evergreen, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

10. August 31, 2006, URS. Groundwater Monitoring and Sampling Report, Third Quarter 2006, The Landing at Evergreen, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

11. September 14, 2006, URS. Final Proposed Cleanup Action Plan, The Landing at Evergreen, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

12. December 18, 2007, GeoDesign. Revised Cleanup Action Plan and Supplemental Characterization, Evergreen Landing Development, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

13. March 6, 2008, GeoDesign. Supplemental Characterization, Proposed Evergreen Landing Development, 13800 – 14114 SE Mill Plain Boulevard, Vancouver, Washington.

14. May 1, 2008, GeoDesign. The Village at Evergreen – SW0915, PCE results at Robertson's Paint Shop, e-mail from Kyle Sattler to Steve Teel, Ecology.

15. May 2, 2008, GeoDesign. Request for "Contained-Out" Designation, The Village at Evergreen, 13800 to 14114 SE Mill Plain Boulevard, Vancouver, Washington.

16. June 13, 2008, GeoDesign. Cleanup Action Report, The Village at Evergreen, 13800 to 14114 SE Mill Plain Boulevard, Vancouver, Washington.

17. July 7, 2008, GeoDesign. Supplemental Cleanup Action Results, The Village at Evergreen, 13800 to 14114 SE Mill Plain Boulevard, Vancouver, Washington.

18. July 9, 2008, GeoDesign. Addendum I, Cleanup Action Report, The Village at Evergreen, 13800 to 14114 SE Mill Plain Boulevard, Vancouver, Washington.

19. September 9, 2008, GeoDesign. SW0915 - The Village at Evergreen, e-mail from Kyle Sattler to Steve Teel, Ecology.

20. September 26, 2008, GeoDesign. SW0915 - The Village at Evergreen, Ecological Evaluation, e-mail from Kyle Sattler to Steve Teel, Ecology.

21. October 7, 2008, GeoDesign. SW0915 - The Village at Evergreen, e-mail from Kyle Sattler to Steve Teel, Ecology.

22. October 8, 2008, GeoDesign. SW0915 - The Village at Evergreen, e-mail from Kyle Sattler to Steve Teel, Ecology.

The report listed above will be kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Appointments can be made by calling the SWRO resource contact at (360) 407-6365.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

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 briefly described below and is described in more detail in **Enclosure A.**

Previous site characterization work resulted in the division of the site into the soil Cleanup Action Areas listed below:

- Cleanup Action Area (CAA) 1A, 1B, 1C, and 1D, Former Hanger Buildings
- CAA 2, Robertson's Paint Shop
- CAA 3, Former Fueling Area and Drywell
- CAA 4, Evergreen Flight Service
- CAA 5, Vancouver Chainsaw and Service
- CAA 6, Willamette Soaring Club
- CAA 7, Drainage Feature near Hanger Building No. 2

- CAA 8, Paint Spill Area
- CAA 9, Aurora Avionics and Lights Building Drywell
- CAA 10, Northwest Antique Aircraft Building Drywell

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.

a. Cleanup levels. Soil confirmation samples collected from the excavations after contaminated soil was removed were analyzed for the constituents shown in Attached Table 1 (Sampling and Analysis Plan). Most of the analytical constituents were compared to MTCA Method A Cleanup Levels for Unrestricted Land Uses (WAC 173-340-900, Table 740-1). However, some of the detected constituents at the Site do not have established Method A Cleanup Levels. These include semi-volatile organic compounds (SVOCs), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), pesticides, copper, and zinc. Compounds that do not have established Method A Cleanup Levels were compared to MTCA Method B Formula Values. The laboratory method reporting limits (MRLs) were generally less than the MTCA Method A Cleanup Levels or the Method B Formula Values. For cases where the MRL was not less than the cleanup level or the Formula Value, the laboratory method detection limit (MDL) was used.

Instances where concentrations of final confirmation samples exceeded either MTCA Method A Cleanup Levels or the Method B Formula Values are listed below:

- Cleanup Action Area (CAA) 1A, 1B, 1C, and 1D, Former Hanger Buildings. **None**

- CAA 2, Robertson's Paint Shop. Results from one or more final confirmation samples exceeded the Method B Formula Value for the following SVOCs: benzidine, benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, chrysene, dibenzo(a,h) anthracene, indeno(1,2,3-cd)pyrene, n-nitrosodimethylamine, and n-nitrosodi-n-propylamine. For each of these EPA Method 8270 compounds, the exceedance was caused by an elevated MRL and/or MDL. However, each sample was also analyzed by EPA Method 8270C-

SIM. The results of this analysis was below the MTCA Method A Cleanup Level for benzo(a)pyrene toxicity equivalency concentration (TEC). Therefore, the only remaining compounds not included in the Method 8270C-SIM results are benzidine, n-nitrosodimethylamine, and n-nitrosodi-n-propylamine. Site-specific Method B cleanup levels were developed for each of these compounds using Ecology's online worksheets for calculating soil cleanup levels (summarized in the attached Tables 1A and 2A). The cleanup levels for these three compounds are 400 micrograms per kilogram (µg/kg), 420 µg/kg, and 420 µg/kg, respectively. None of the final confirmation sample results from this cleanup area exceeded these values.

- CAA 3, Former Fueling Area and Drywell. Less than MRL results from one or more final confirmation samples exceeded the Method B Formula Value for selected SVOCs. However, the MDLs for these constituents were all below the MTCA Method B Formula values, MTCA Method A Cleanup Level for benzo(a) pyrene TEC, and the site-specific cleanup levels discussed above.

- CAA 4, Evergreen Flight Service. Less than MRL results from one or more final confirmation samples exceeded the Method B Formula Value for selected SVOCs and one VOC (methylene chloride). However, the MDLs for these constituents were all below the MTCA Method B Formula values, MTCA Method A Cleanup Level for benzo(a)pyrene TEC, and the site-specific cleanup levels discussed above.

- CAA 5, Vancouver Chainsaw and Service. Less than MRL results from one or more final confirmation samples exceeded the Method B Formula Value for selected SVOCs and one VOC (methylene chloride). However, the MDLs for these constituents were all below the MTCA Method B Formula values, MTCA Method A Cleanup Level for benzo(a)pyrene TEC, and the site-specific cleanup levels discussed above.

- CAA 6, Willamette Soaring Club. Less than MRL results from one or more final confirmation samples exceeded the Method B Formula Value for selected SVOCs. However, the MDLs for these constituents were all below the MTCA Method B Formula values, MTCA Method A Cleanup Level for benzo(a)pyrene TEC, and the site-specific cleanup levels discussed above.

- CAA 7, Drainage Feature near Hanger Building No. 2. Less than MRL results from one or more final confirmation samples exceeded the Method B Formula Value for selected SVOCs. However, the MDLs for these constituents were all below the MTCA Method B Formula values, MTCA Method A Cleanup Level for benzo(a)pyrene TEC, and the site-specific cleanup levels discussed above.

- CAA 8, Paint Spill Area. Less than MRL results from one or more final confirmation samples exceeded the Method B Formula Value for selected SVOCs. However, the MDLs for these constituents were all below the MTCA Method B Formula values, MTCA Method A Cleanup Level for benzo(a)pyrene TEC, and the site-specific cleanup levels discussed above.

- CAA 9, Aurora Avionics and Lights Building Drywell. Less than MRL results from one or more final confirmation samples exceeded the Method B Formula Value for selected SVOCs. However, the MDLs for these constituents were all below the MTCA Method B Formula values, MTCA Method A Cleanup Level for benzo(a)pyrene TEC, and the site-specific cleanup levels discussed above.

- CAA 10, Northwest Antique Aircraft Building Drywell. Less than MRL results from one or more final confirmation samples exceeded the Method B Formula Value for selected SVOCs. However, the MDLs for these constituents were all below the MTCA Method B Formula values, MTCA Method A Cleanup Level for benzo(a)pyrene TEC, and the site-specific cleanup levels discussed above.

Groundwater. Results from one or more samples exceeded the MTCA Method A Cleanup Levels for the following VOCs: ethylene dibromide (EDB) and vinyl chloride. For each of these EPA Method 8260 compounds, the exceedance was caused by an elevated MRL and/or MDL. Results from one or more samples exceeded the Method B Formula Value for the following VOCs: chloromethane, 1,2-dibromo-3-chloropropane, 1,1,2,2-tetrachloroethane, and 1,2,3-trichloropropane.

Results from one or more samples exceeded the MTCA Method A Cleanup Levels for the following SVOCs: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, chrysene, dibenzo(a,h) anthracene, indeno(1,2,3-cd)pyrene, bis(2-chloroethyl)ether, 1,2-diphenylhydrazine, 1,4-

dichlorobenzene, 3,3-dichlorobenzidine, hexachlorobenzene, hexachlorobutadiene, hexachloroethane, nitrobenzene, pentachlorophenol, and carbazole. For each of these EPA Method 8270 compounds, the exceedance was caused by an elevated MRL and/or MDL. However, seven of these compounds were also analyzed by EPA Method 8270C-SIM. The results of this analysis was below the MTCA Method A Cleanup Level for benzo(a)pyrene toxicity equivalency concentration (TEC). Therefore, the only remaining compounds not included in the Method 8270C-SIM results are bis(2-chloroethyl)ether, 1,2-diphenylhydrazine, 1,4-dichlorobenzene, 3,3-dichlorobenzidine, hexachlorobenzene, hexachlorobutadiene, hexachloroethane, nitrobenzene, pentachlorophenol, and carbazole.

Site-specific Method B cleanup levels were developed for each of these VOCs and SVOCs using Ecology's online worksheets for calculating cleanup levels (summarized in Tables 1B and 2B). Table 2B summarizes the risk these contaminants would represent if they were present at the MDL concentrations. As presented on Table 2B, even if the contaminants were present in the groundwater samples collected in May 2008 at concentrations equivalent to the MDLs, the cumulative risk does not exceed 1 in 100,000 for carcinogenic risk or a hazard quotient of 1 for non-carcinogenic risk (with the exception of Aroclor 1254).

In the consultant's opinion, Aroclor 1254 does not pose unacceptable non-carcinogenic risk to human health or the environment because:

- Aroclor 1254 was not detected above the MRLs of 0.0980, 0.0990, and 0.100 ug/l (each less than the MTCA Method B non-carcinogenic protective value of 0.320 ug/l) in monitoring wells MW-1, MW-2 and MW-3, respectively, during the February 2006 groundwater monitoring event.

- No PCBs have ever been detected in any of the groundwater samples collected from any of the monitoring wells at the project site.

- Only a limited volume of soil impacted with PCBs was present at the project site, at concentrations less than the corresponding MTCA Method A Cleanup Levels. Nonetheless, the limited PCB-impacted soil was removed during over-excavation activities. New confirmation soil samples collected from the limits of the over-excavated soil did not indicate the presence of PCBs.

Therefore, the existing groundwater conditions at the project site do not pose unacceptable risk to human health or the environment.

b. Points of compliance.

The point of compliance is the point or points where the soil cleanup levels that have been established shall be attained. For soil cleanup levels based on the protection of ground water, the point of compliance shall be 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 is established in the soils throughout the site from the ground surface to 15 feet below the ground surface (ft bgs).

For ground water, the standard point of compliance is 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 cleanup action consisted of the excavation and removal of contaminated soil. Approximately 1,340 tons of contaminated soil was generated from CAAs 1A through 1D, portions of 2, 3 through 7, 9, and 10. This soil was disposed of by permit at the Hillsboro Landfill. About 200 tons of contaminated soil was removed from CAA 8 and a portion of CAA 2. This soil was disposed of under a separate permit as non-dangerous waste under Ecology's Contained-In Policy also at the Hillsboro Landfill. During the soil excavation activities, the 8,000-gallon dual compartment aviation fuel underground storage tank in CAA 3 was decommissioned by removal.

4. Cleanup.

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

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

Limitations of the Opinion

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

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#SW0915).

For more information about the VCP and the cleanup process, please visit our web site: www. ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me at (360) 407-6247 or via e-mail at stee461@ecy.wa.gov.

Sincerely,

SSTeel

Steve Teel, LHG
Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office

ST/ksc:Evergreen Air NFA

Enclosure A – Description and Diagram of the Site

cc: Mr. Kyle Sattler , GeoDesign
Ms. Michelle Limón, Senior Project Manager, ATC Associates Inc.
Richard Hoiland, City of Vancouver – Marine Park Engineering
Bryan DeDoncker, Clark County Health Department
139 Mill Plain Partners, LLC
Scott Rose – Ecology
Meg Bommarito – Ecology
Delores Mitchell – Ecology (without enclosures)

Enclosure A

Description and Diagrams of the Site

Site Description
The Evergreen Airport Site includes approximately 51.5 acres north of SE Mill Plain Boulevard between SE 136th Avenue and SE Heartwood Boulevard in Vancouver, Washington. Recent site use included a small private airport with a runway, four hangar buildings, a small office building, and eight privately leased buildings. An 8,000-gallon, dual compartment, aviation fuel underground storage tank (UST) and associated dispenser were also previously present; this UST was reportedly installed in 1995 and was removed as part of the site cleanup. At least two other unleaded gasoline USTs (installed in 1972 and 1978) were formerly present at the site. The property was originally developed as an airfield in 1945. An overall site plan is shown in Figure 2 and detailed views are shown in Figures 3 through 17.

Environmental Concerns
Previous site characterization work resulted in the division of the site into 10 Soil Cleanup Action Areas (CAAs). These areas are briefly described below:

Soil Contamination:

Hangar Buildings (CAAs 1A through 1D): Based on surficial staining observed during the Phase I Environmental Site Assessment (ESA), selected soil samples were collected and analyzed for Total Petroleum Hydrocarbons – gasoline range (TPH-G), Total Petroleum Hydrocarbons – diesel range (TPH-D), Total Petroleum Hydrocarbons – heavy oil range (TPH-O), volatile organic compounds (VOCs; one sample only), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals. Selected results for TPH-O, cadmium, total chromium, and lead exceeded the MTCA Method A Cleanup Level for Unrestricted Uses. Arochlor-1254 was detected in one sample, Hangar-29-05 (365 micrograms per kilogram [µg/kg]). (See Figures 3 through 6)

Robertson's Paint Shop (CAA 2): Chemicals previously used at the facility include paint, lacquers, lacquer thinners, and paint stripper (including methylene chloride). In 1984, a citizen complaint stated that the shop was disposing of used paint stripper and solvent directly to the ground. Potential areas of concern associated with this facility include the following:

- Underground concrete sump.
- Wastewater settlement cells and a gutter in the floor of the building (these were used to carry wastewater to the underground sump).
- Above-ground concrete cistern located near the southeastern corner of the

building.

- Heating oil above-ground storage tank (AST) located along the western wall of the building.

Selected soil sampling results from beneath the sump during supplemental characterization activities had results for cadmium and/or chromium that exceeded the MTCA Method A Cleanup Level. Analysis of the liquid contained within the sump showed detectable concentrations of tetrachloroethene (PCE) (62.6 micrograms per liter [µg/L]), toluene (2.58 µg/L), bis(2-ethylhexyl) phthalate (57.4 µg/L), diethyl phthalate (1.27 µg/L), phenol (18 µg/L), and aroclor 1260 (0.149 µg/L). During demolition of the paint shop building, 14 buried 55-gallon drums were discovered south of the underground sump, buried underneath the former concrete floor slab. These drums were apparently used to discharge liquids to the ground. Five of the drums contained soil. Soil samples collected from within or below the drums exceeded the MTCA Method A Cleanup Levels for TPH-O, cadmium, and PCE. The following organochlorine pesticides were also detected: 4,4-DDT, dieldrin, endosulfan II, endrin, and methoxychlor. None of these pesticides exceeded the MTCA Method B Formula Values. (See Figures 7 and 8)

Former Fueling Area and Drywell (CAA 3): Soil samples were collected during the installation of a groundwater monitoring well, and 16 direct-push borings. Selected samples were analyzed for TPH hydrocarbon identification method (HCID), TPH-D (one sample), TPH-O (one sample), VOCs, PAHs (one sample), PCBs (one sample), and lead (two samples). All results were below the MTCA Method A Cleanup Level for Unrestricted Uses except for TPH-G (MW-1-14', 747 milligrams per kilogram [mg/kg]). (See Figures 9 and 10)

Southern Portion of Former Evergreen Flight Service (CAA 4): This area included a former paint booth, one septic tank, two dry wells, and associated piping. (See Figure 11)

Vancouver Chainsaw and Service (CAA 5): This area included one French drain feature, one septic tank and distribution box, and associated piping. (See Figure 12)

Willamette Soaring Club (CAA 6): Concentrations of cPAHs and chromium exceeded the MTCA Method A Cleanup Levels in a soil sample beneath a septic tank drain line located near the southwest corner of the Willamette Soaring Club. (See Figure 13)

Drainage Feature near Hanger Building No. 2 (CAA 7): This area included a previously unidentified surface drainage feature that was constructed of two partially buried upside down 55-gallon plastic containers and one partially buried upside down 55-gallon metal drum. The containers were buried flush with the ground surface and two of them had small openings cut in the bottom. (See Figure 14)

CAA 8, Paint Spill Area (CAA 8): This area included an isolated surface spill of red paint , three ASTs, and a 55-gallon drum of red paint. (See Figure 15)

CAA 9, Aurora Avionics and Lights Building Drywell (CAA 9): This area included a septic tank, dry well, and associated piping. (See Figure 16)

Northwest Antique Aircraft Building Drywell (CAA 10): This area included a septic tank, dry well, and associated piping. (See Figure 17)

Groundwater: Three groundwater monitoring wells have been installed at the site (MW-1, -2, and -3). Well MW-1 is located in the vicinity of the UST, MW-2 is located near Robertson's Paint Shop, and MW-3 is located in the northern portion of the site. Depth to water in these wells was 168, 171, and 171 feet below ground surface (bgs), respectively. Perched groundwater was also observed in MW-2 at 86 feet bgs. The inferred direction of groundwater flow is south-southwest. Groundwater samples were collected from all three wells in July 2005, February and August 2006, and May 2008. Samples were analyzed from the wells for petroleum hydrocarbons (by the NWTPH-HCID Method, gasoline, diesel, and heavy oil range), VOCs, semi-volatile organic compounds (SVOCs; February and August 2006, May 2008), PAHs (February and August 2006, May 2008), total and dissolved metals (February and August 2006, and May 2008), PCBs (February and August 2006, and May 2008), and organochlorine pesticides (May 2008 only). A sample of the perched zone in MW-2 was also analyzed in June 2005 for petroleum hydrocarbons (by the NWTPH-HCID Method, gasoline, diesel, and heavy oil range), VOCs, PCBs, and PAHs (metals were not analyzed).

The only constituents that exceeded the MTCA Method A Cleanup Level were chromium and lead in MW-2 (February 2006). In a September 2006 Opinion Letter, Ecology requested an additional sample for total lead and chromium be collected from MW-2. This sample was collected in November 2006 and the analytical results were below the Cleanup Level. However, laboratory method reporting limits (MRLs) exceeded the MTCA Groundwater Method A Cleanup Level for PCBs.

Groundwater samples were collected with a bailer during the July 2005 and February 2006 sampling events. The low-flow method was used for the August and November 2006 and May 2008 sampling events.

In a June 2008 Opinion Letter, Ecology commented that according to Joe Ellingson, Clark County Health Department, a domestic well is located directly downgradient from the site, at 13919 SE Mill Plain Boulevard (see attached e-mail and photographs). It was recommended that this well be sampled to determine if groundwater is impacted. This well is constructed of 6-inch diameter steel casing. Currently the upper portion of the steel casing is bent and is filled-in with dirt. However, it was considered likely that the damaged section of well casing could be

replaced and the well cleaned-out to yield water samples. According to the Clark County assessor's database, the owner of the property where the well is located is 139 Mill Plain Partners, LLC, 1230 SW 1st Avenue, Portland, Oregon 97204. In this Opinion Letter, Ecology also requested that the additional round of groundwater samples include organochlorine herbicides.

In a July 9, 2008, GeoDesign responded to the Opinion Letter in a July 2008 Addendum to the Cleanup Action Report. In this addendum they stated that although a driller may be able to restore the well, groundwater quality may already have been compromised due to the damage and/or unknown "housekeeping" and that potential contaminants detected in future groundwater samples from this well may not represent contaminants from the Evergreen Airport Site. Also, the location of the well is not directly downgradient of the principal area of concern (CAA 2) but instead is south-southeast of CAA 3. Therefore, GeoDesign concludes that it is more appropriate to evaluate groundwater conditions from groundwater samples collected from monitoring well MW-2 rather than the damaged domestic well. GeoDesign also argued that since organochorine herbicides were not detected in any of the soil samples, then it is not necessary to analyze for them in groundwater. Ecology agrees with this conclusion.

In summary, there is no indication that groundwater has been impacted by the releases to soil at the site. Therefore, no additional groundwater monitoring is necessary.

Site Cleanup

The cleanup action began on March 15, 2008 and was completed on June 4, 2008. It consisted of the excavation and removal of contaminated soil. Soil confirmation samples collected from the excavations after contaminated soil was removed were analyzed for the constituents shown in Attached Table 1 (Sampling and Analysis Plan). Most of the analytical constituents were compared to MTCA Method A Cleanup Levels for Unrestricted Land Uses (WAC 173-340-900, Table 740-1). However, some of the detected constituents at the Site do not have established Method A Cleanup Levels. These include semi-volatile organic compounds (SVOCs), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), pesticides, copper, and zinc. Compounds that do not have established Method A Cleanup Levels were compared to MTCA Method B Formula Values. The MRLs were generally less than the MTCA Method A Cleanup Levels or the Method B Formula Values. For cases where the MRL was not less than the cleanup level or the Formula Value, the laboratory method detection limit (MDL) was used.

Approximately 1,340 tons of contaminated soil was generated from CAAs 1A through 1D, portions of 2, 3 through 7, 9, and 10. This soil was disposed of by permit at the Hillsboro Landfill. About 200 tons of contaminated soil was removed from CAA 8 and a portion of CAA 2. This soil was disposed of under a separate permit as non-dangerous waste under Ecology's Contained-In Policy also at the Hillsboro Landfill. During the soil excavation activities, the

8,000-gallon dual compartment aviation fuel underground storage tank in CAA 3 was decommissioned by removal.

Conclusion

All known contaminated soil was removed from the site. Results from groundwater monitoring do not suggest site groundwater was impacted by the releases to soil. Therefore, no additional groundwater monitoring is necessary.

ATTACHMENTS

Table 1 (Sampling and Analysis Plan)
Table 1A (MRL and MDL Summary - Soil)
Table 2A (Summary Risk Table - Soil)
Table 1B (MRL and MDL Summary – Groundwater)
Table 2B (Summary Risk Table – Groundwater)
Figures 2 through 17

TABLE 1A
MRL and MDL Summary
Select SVOCs and VOCs
EPA Method 8270C/8270C-SIM and 8260B (µg/Kg)
The Village at Evergreen
Vancouver, WA

SVOC Compound	Standard MRL (EPA Methods 8270C/8260B)	Elevated MRL/MDL due to required dilution[2] (EPA Methods 8270C/8260B)		Standard MRL/MDL (EPA Method 8270C-SIM)	Established MTCA Cleanup Criteria			Revised Cleanup Level Based on Method B Work Sheet		Does MRL/MDL Exceed Established or Revised Cleanup Criteria?	
		MRL	MDL		MTCA Method A Cleanup Level	MTCA Method B Non-Carcinogenic Protective Value	MTCA Method B Carcinogenic Protective Value				
Benzidine	350 - 420	3,500 - 3,900	420	--	NE	240,000	4.3	350 - 420	See Method B Work Sheet	Yes[3]	See Table 2
Benzo(a)anthracene	35 - 400	--	--	8.04 - 39.4	100	--	--	--		No	
Benzo(b)flouranthene	35 - 400	--	--	12.9 - 57.8	100	--	--	--		No	
Benzo(k)flouranthene	35 - 400	--	--	8.0 - 41.8	100	--	--	--		No	
Benzo(a)pyrene	35 - 400	--	--	6.40 - 41.8	100	--	--	--		No	
Bis(2-Chloroethyl)ether	350 - 390	3,500 - 3,900	280	--	NE	NE	910	--		Yes[4]	See Table 2
Chrysene	35 - 400	--	--	8.0 - 41.8	100	--	--	--		No	
Dibenz(a,h)anthracene	35 - 400	--	--	12.6 - 41.8	100	--	--	--		No	
3,3-Dichlorobenzidine	350 - 390	3,500 - 3,900	310	--	NE	--	2,200	--		Yes[4]	See Table 2
Hexachlorobenzene	350 - 400	3,500 - 3,900	250	--	NE	64,000	630	--		Yes[4]	See Table 2
Indeno(1,2,3-cd)pyrene	35 - 400	--	--	11.0 - 49.3	100	--	--	--		No	
n-Nitrosodimethylamine	350 - 400	--	--	--	NE	NE	20	350 - 400	See Method B Work Sheet	No	
n-Nitrosodi-n-propylamine	350 - 400	--	--	--	NE	NE	140	350 - 400	See Method B Work Sheet	No	
Methylene Chloride	5.3 - 6.4	28	3.0	--	20	--	--	--		Yes[5]	See Table 2

Note:

NA: Not Applicable
NE: Not Established
MRL: Method Reporting Limit. The MRL is equivalent to the Practical Quantitation Limit (PQL).
MDL: Method Detection Limit.
2. The laboratory elevated the reporting limits to reflect necessary dilutions due to matrix interferences.
3. Only the elevated MRL and MDL due to required dilution exceeds the established MTCA Method B Carcinogenic Protective Value and the revised cleanup level. See Table 2 for risk evaluation.
4. Only the elevated MRL due to required dilution exceeds the established MTCA Method B Protective Value. See Table 2 for risk evaluation.
5. Only the elevated MRL due to required dilution exceeds the established MTCA Method A Cleanup Level due to dilution required for analysis. See Table 2.

TABLE 2A
Summary Risk Table
The Village at Evergreen
Vancouver, Washington

Compound	Highest MDL Concentration (assumed to be maximum detected concentration) (ug/Kg)	MTCA Method A Cleanup Level (ug/Kg)	MTCA Method B Non-Carcinogenic Protective Value (ug/Kg)	MTCA Method B Carcinogenic Protective Value (ug/Kg)	Calculated Risk	
					Excess Lifetime Cancer Risk	Hazard Quotient
Benzidine	420	--	240,000	390	0.11×10^{-5}	0.0018
Bis(2-Chloroethyl)ether	280	--	Note 2	910	0.03×10^{-5}	NA
3,3-Dichlorobenzidine	310	--	Note 2	2,200	0.01×10^{-5}	NA
Hexachlorobenzene	250	--	64,000	630	0.04×10^{-5}	0.0039
Methylene Chloride	3	20	--	-	0.015×10^{-5}	NA
Cumulative Risk					0.21×10^{-5}	0.0057

TABLE 1B
MRL and MDL Summary
Select VOCs, SVOCs, Organochlorine Pesticides and PCBs
The Village at Evergreen
Vancouver, WA

Compound	Standard MRL (ug/l)	Standard MRL (EPA Method 8270M-SIM) (ug/l)	Standard MDL (ug/l)	Established MTCA Cleanup Criteria			Revised Carcinogenic Cleanup Level Based on WAC 173-340-700 (6) and 707	Does MRL/MDL Exceed Established or Revised Cleanup Criteria?	
				MTCA Method A Cleanup Level	MTCA Method B Non-Carcinogenic Protective Value	MTCA Method B Carcinogenic Protective Value			
VOCs (EPA Method 8260B)									
Carbon Tetrachloride	5.000	--	0.182	NE	5.600	0.340	NA	No	
Chloromethane	5.000	--	5.000	NE	NE	3.400	5.000	No[1]	See Table 2
1,2-Dibromo-3-chloropropane	2.000	--	0.377	NE	NE	0.031	2.000	No[1]	See Table 2
1,2-Dibromoethane (EDB)	0.500	--	0.205	0.010	NE	NE	0.500	No[1]	See Table 2
cis-1,3-Dichloropropene	0.500	--	0.120	NE	240.000	0.240	NA	No	
trans-1,3-Dichloropropene	0.500	--	0.142	NE	240.000	0.240	NA	No	
Hexachlorobutadine	2.000	--	0.435	NE	1.600	0.560	NA	No	
1,1,2,2-Tetrachloroethane	0.500	--	0.240	NE	NE	0.220	0.500	No[1]	See Table 2
1,2,3-Trichloropropane	1.000	--	0.342	NE	48.000	0.0063	1.0000	No[1]	See Table 2
Vinyl Chloride	0.500	--	0.316	NE	24.000	0.029	0.500	No[1]	See Table 2
SVOCs (EPA Method 8270C)									
Benzo(a)anthracene	5.000	0.0377 - 0.0381	--	0.1[2]	--	--	NA	No	
Benzo(b)flouranthene	5.000	0.0377 - 0.0381	--	0.1[2]	--	--	NA	No	
Benzo(k)flouranthene	5.000	0.0377 - 0.0381	--	0.1[2]	--	--	NA	No	
Benzo(a)pyrene	5.000	0.0377 - 0.0381	--	0.1[2]	--	--	NA	No	
Bis(2-Chloroethyl)ether	5.000	--	1.800	NE	NE	0.04	5.00	No[1]	See Table 2
Chrysene	5.000	0.0377 - 0.0381	--	0.1[2]	--	--	NA	No	
Dibenz(a,h)anthracene	5.000	0.0377 - 0.0381	--	0.1[2]	--	--	NA	No	
1,2-Diphenylhydrazine	10.000	--	2.90	NE	NE	0.11	10.00	No[1]	See Table 2
1,4-Dichlorobenzene	5.000	--	1.60	NE	NE	1.80	NA	No	
3,3-Dichlorobenzidine	10.000	--	2.500	NE	NE	0.19	10.00	No[1]	See Table 2
Hexachlorobenzene	5.000	--	1.800	NE	13	0.055	5.000	No[1]	See Table 2
Hexachlorobutadiene[3]	2.000	--	0.435	NE	1.600	0.560	NA	No	
Hexachloroethane	5.000	--	1.500	NE	8.00	3.10	NA	No	
Indeno(1,2,3-cd)pyrene	5.000	0.0377 - 0.0381	--	0.1[2]	--	--	NA	No	
Nitrobenzene	5.00	--	1.600	NE	4.00	NE	NA	No	
Pentachlorophenol	5.000	--	1.100	NE	480.00	0.73	5.00	No[1]	See Table 2
Carbazole	5.000	--	1.800	NE	NE	4.40	NA	No	
Organochlorine Pesticides (EPA Method 8081A)									
Dieldrin	0.050	--	0.0059	NE	0.8000	0.0055	0.0500	No[1]	See Table 2
Heptachlor	0.050	--	0.0097	NE	8.0000	0.0190	NA	No	
Heptachlor Epoxide	0.050	--	0.0059	NE	0.1000	0.0048	0.0500	No[1]	See Table 2

TABLE 1B
MRL and MDL Summary
Select VOCs, SVOCs, Organochlorine Pesticides and PCBs
The Village at Evergreen
Vancouver, WA

Compound	Standard MRL (ug/l)	Standard MRL (EPA Method 8270M-SIM) (ug/l)	Standard MDL (ug/l)	Established MTCA Cleanup Criteria			Revised Carcinogenic Cleanup Level Based on WAC 173-340-700 (6) and 707	Does MRL/MDL Exceed Established or Revised Cleanup Criteria?	
				MTCA Method A Cleanup Level	MTCA Method B Non-Carcinogenic Protective Value	MTCA Method B Carcinogenic Protective Value			
Toxaphene	1.000	--	0.2300	NE	NE	0.0800	1.0000	No[1]	See Table 2
PCBs (EPA Method 8082)									
Arochlor 1016	1.000	--	0.290	0.1[4]	1.100	NE	1.0	No[1]	See Table 2
Arochlor 1221	1.000	--	0.330	0.1[4]	NE	NE	1.0	No[1]	See Table 2
Arochlor 1232	1.000	--	0.240	0.1[4]	NE	NE	1.0	No[1]	See Table 2
Arochlor 1242	1.000	--	0.280	0.1[4]	NE	NE	1.0	No[1]	See Table 2
Arochlor 1248	1.000	--	0.270	0.1[4]	NE	NE	1.0	No[1]	See Table 2
Arochlor 1254	1.000	--	0.350	0.1[4]	0.320	NE	1.0	No[1]	See Table 2
Arochlor 1260	1.000	--	0.160	0.1[4]	NE	NE	1.0	No[1]	See Table 2

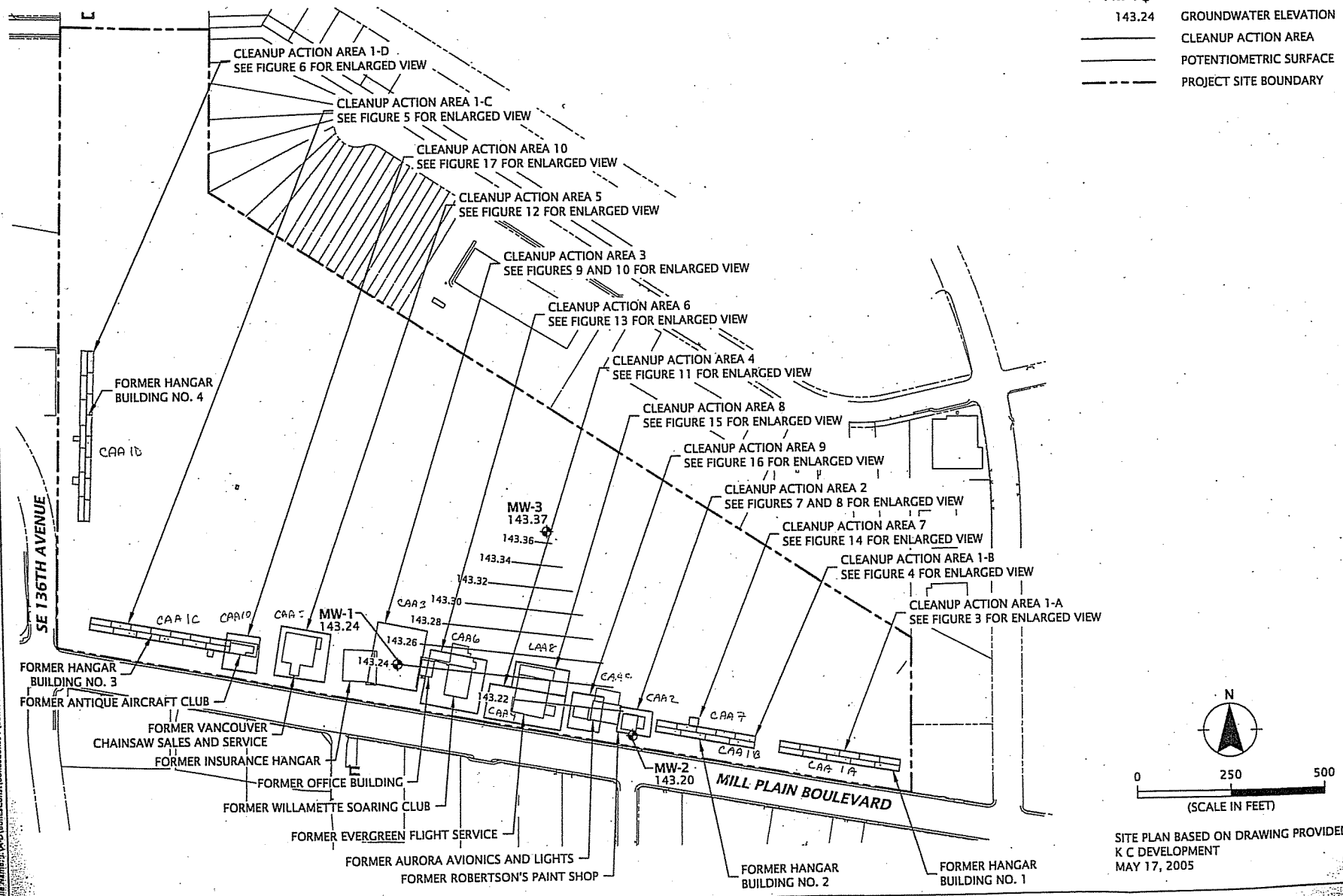
Notes:

NA: Not Applicable
NE: Not Established
MRL: Method Reporting Limit. The MRL is equivalent to the Practical Quantitation Limit (PQL).
MDL: Method Detection Limit.
1. The standard MRL is equivalent to the revised cleanup level based on WAC 173-340-707(2). See Table 2 for risk evaluation.
2. The sum of all carcinogenic PAHs must meet this cleanup level using the toxicity equivalency methodology in WAC 173-340-708(8).
3. Hexachlorobutadiene was also analyzed by EPA Method 8260B. The MRL/MDL for hexachlorobutadiene under EPA Method 8260B are lower than the MRL/MDL under EPA Method 8270C. Therefore, the MRL/MDL for hexachlorobutadiene under EPA Method 8260B are reported.
4. The sum of all PCBs must meet this cleanup level.

TABLE 2 B
Summary Risk Table
The Village at Evergreen
Vancouver, Washington

Compound	Standard MDL Concentration (assumed to be maximum detected concentration) (ug/l)	MTCA Method A Cleanup Level (ug/l)	MTCA Method B Non-Carcinogenic Protective Value (ug/l)	MTCA Method B Carcinogenic Protective Value (ug/l)	Revised Cleanup Level Based on WAC 173-340-707(2) (ug/l)	Calculated Risk	
						Excess Lifetime Cancer Risk	Hazard Quotient
VOCs							
Chloromethane	5.000	NE	NE	3.400	5.000	0.10×10^{-5}	NA
1,2-Dibromo-3-chloropropane	0.377	NE	NE	0.031	2.000	0.018×10^{-5}	NA
1,2-Dibromoethane (EDB)	0.205	0.010	NE	NE	0.500	0.041×10^{-5}	NA
1,1,2,2-Tetrachloroethane	0.240	NE	NE	0.220	0.500	0.048×10^{-5}	NA
1,2,3-Trichloropropane	0.342	NE	48.000	0.0063	1.0000	0.034×10^{-5}	0.007
Vinyl Chloride	0.316	NE	24.000	0.029	0.500	0.063×10^{-5}	0.013
SVOCs							
Bis(2-Chloroethyl)ether	1.800	NE	NE	0.04	5.00	0.036×10^{-5}	NA
1,2-Diphenylhydrazine	2.900	NE	NE	0.11	10.00	0.029×10^{-5}	NA
3,3-Dichlorobenzidine	2.500	NE	NE	0.19	10.00	0.025×10^{-5}	NA
Hexachlorobenzene	1.800	NE	13	0.055	5.000	0.036×10^{-5}	0.138
Pentachlorophenol	1.100	NE	480.00	0.73	5.00	0.022×10^{-5}	0.002
Organochlorine Pesticides							
Dieldrin	0.0059	NE	0.8000	0.0055	0.0500	0.012×10^{-5}	0.007
Heptachlor Epoxide	0.0059	NE	0.1000	0.0048	0.0500	0.012×10^{-5}	0.059
Toxaphene	0.2300	NE	NE	0.0800	1.0000	0.023×10^{-5}	NA
PCBs							
Arochlor 1016	0.290	0.1[2]	1.100	NE	1.0	0.029×10^{-5}	0.264
Arochlor 1221	0.330	0.1[2]	NE	NE	1.0	0.033×10^{-5}	NA
Arochlor 1232	0.240	0.1[2]	NE	NE	1.0	0.024×10^{-5}	NA
Arochlor 1242	0.280	0.1[2]	NE	NE	1.0	0.028×10^{-5}	NA
Arochlor 1248	0.270	0.1[2]	NE	NE	1.0	0.027×10^{-5}	NA
Arochlor 1254	0.350	0.1[2]	0.320	NE	1.0	0.035×10^{-5}	1.09[1]
Arochlor 1260	0.160	0.1[2]	NE	NE	1.0	0.016×10^{-5}	NA
Cumulative Risk						0.727×10^{-5}	1.58[2]

Notes:
1. Substituting the highest MRL of 0.1 ug/l utlized during the February 2006 groundwater monitoring events indicates a hazard quotient of 0.313 for aroclor 1254.
2. Summing the hazard quotients utilizing the MRL of 0.1 and hazard quotient of 0.313 for aroclor 1254 results in a total hazard quotient of 0.49 (less than 1).



SITE PLAN

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 2

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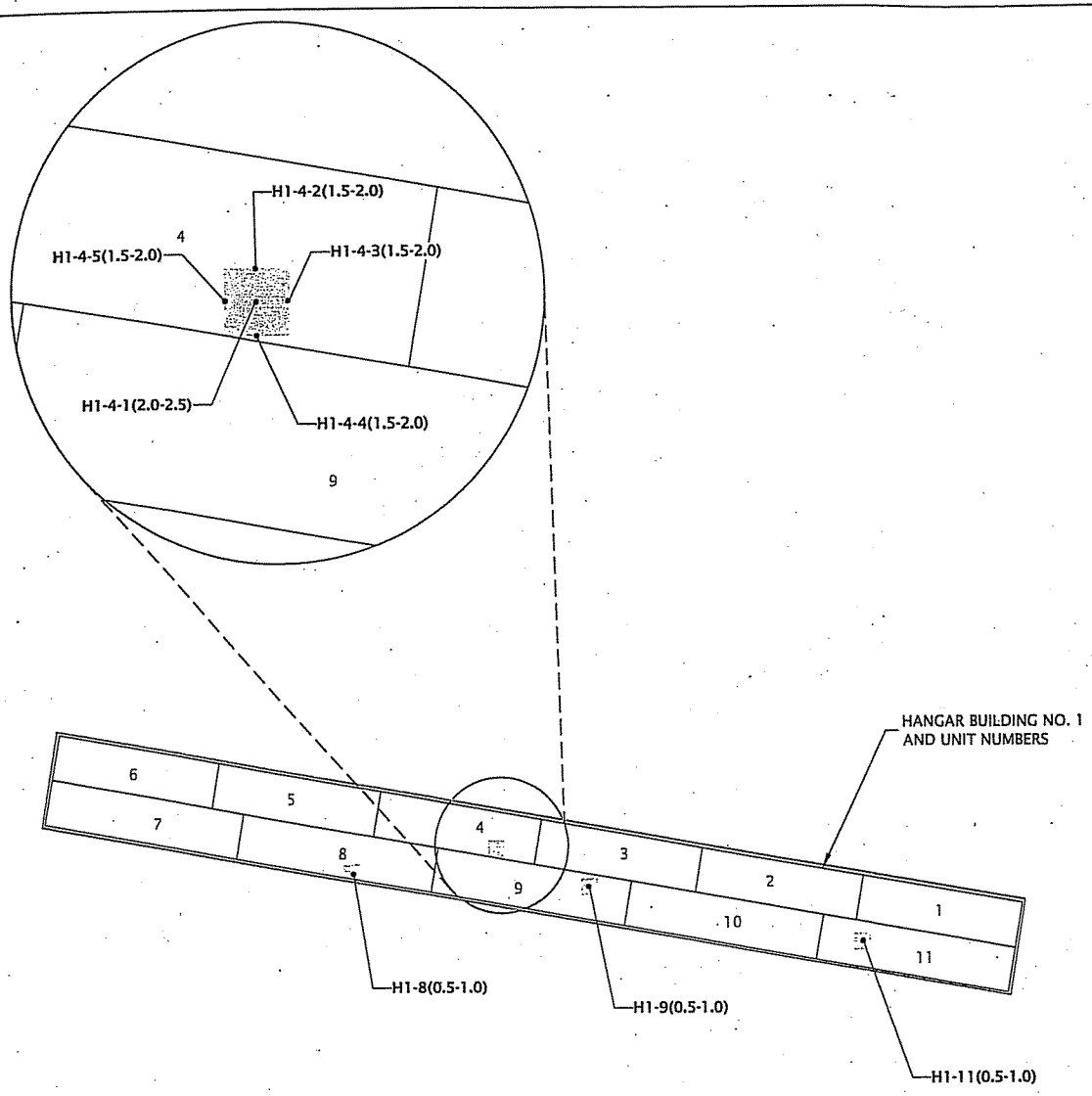

LEGEND:

H1-8(0.5-1.0) • SOIL SAMPLE

REMOVED SURFACE STAINING

CLEANUP ACTION AREA

N

0 40 80

(SCALE IN FEET)

SITE PLAN BASED ON DRAWING PROVIDED BY
K C DEVELOPMENT
MAY 17, 2005

ENLARGED VIEW - CLEANUP ACTION AREA 1A

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 3

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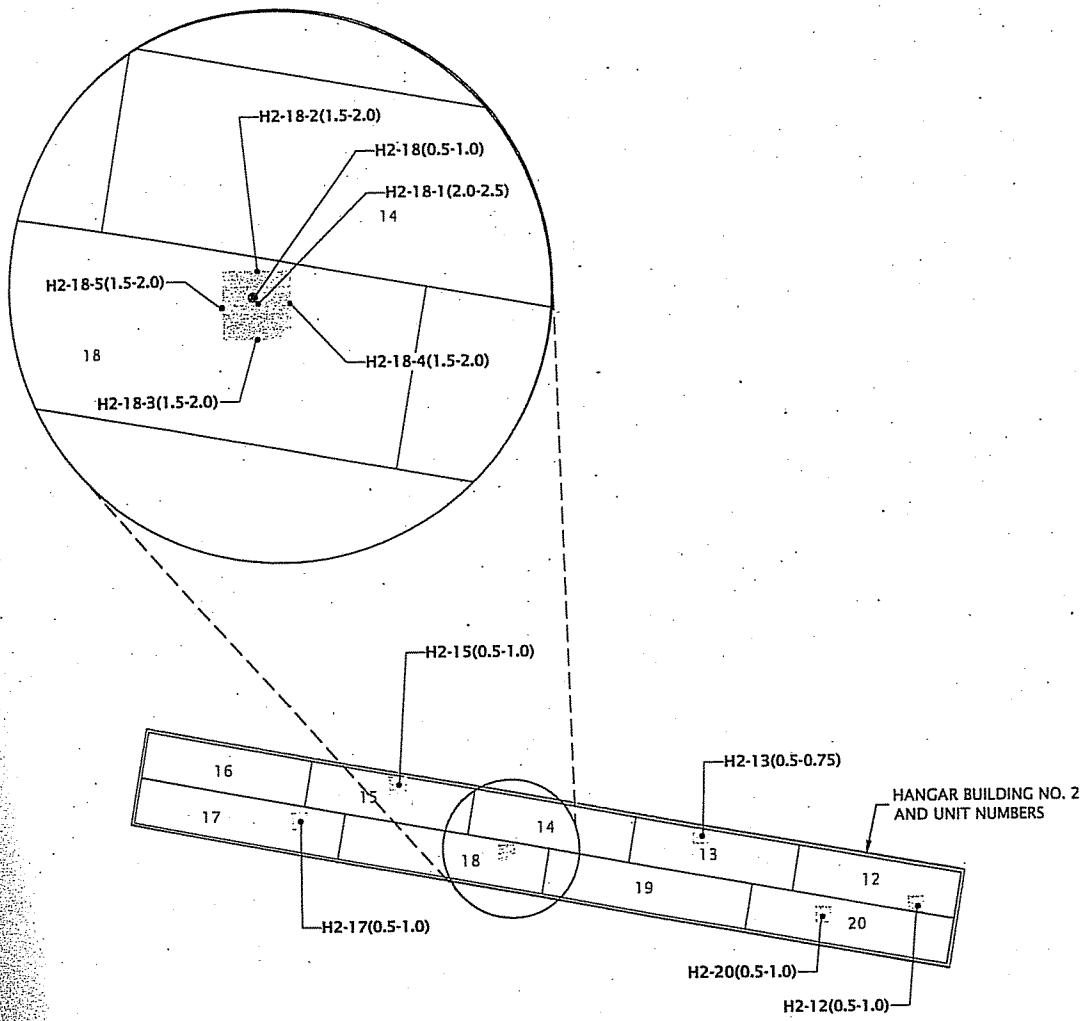

LEGEND:

H2-13(0.5-0.75) •	SOIL SAMPLE
H2-18(0.5-1.0) ●	OVEREXCAVATED SOIL SAMPLE
	REMOVED SURFACE STAINING
———	CLEANUP ACTION AREA

N

0 40 80

(SCALE IN FEET)

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ENLARGED VIEW - CLEANUP ACTION AREA 1B

FIGURE 4

THE VILLAGE AT EVERGREEN
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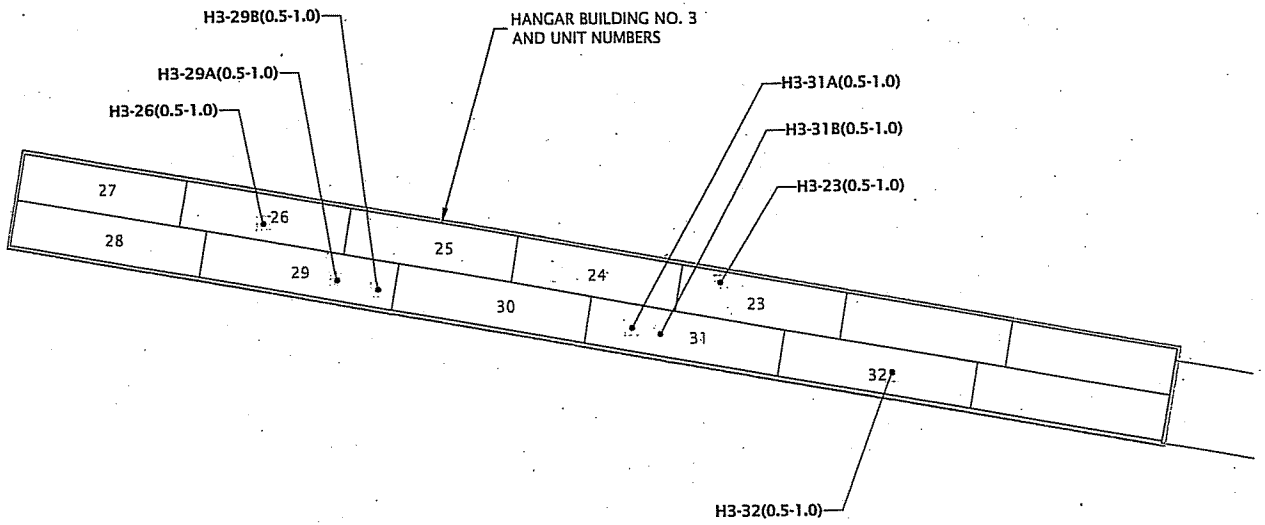
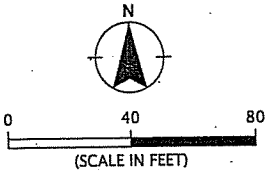
LEGEND:

H3-23(0.5 - 1.0) • SOIL SAMPLE
REMOVED SURFACE STAINING
——— CLEANUP ACTION AREA





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THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 5

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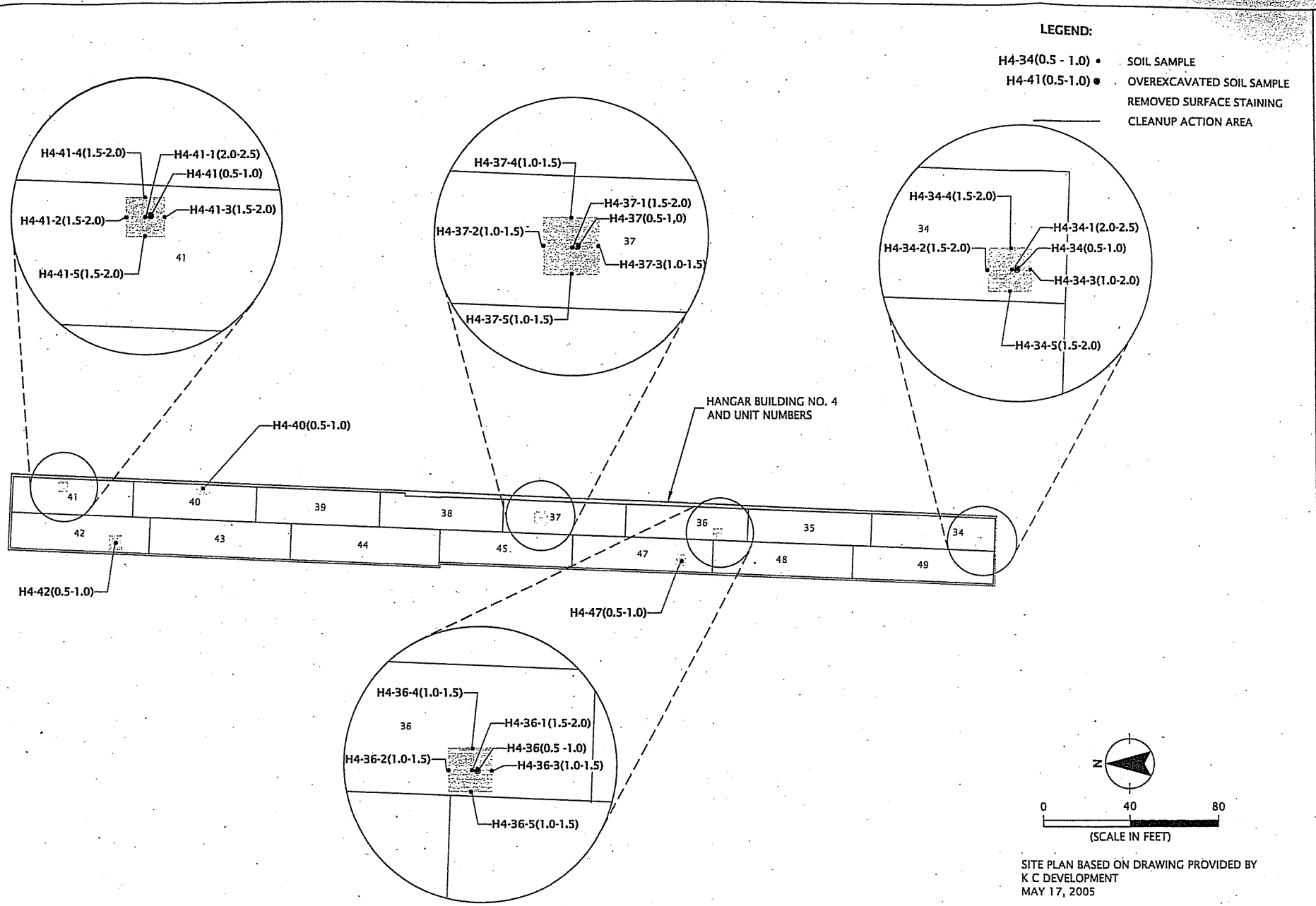

ENLARGED VIEW - CLEANUP ACTION AREA 1D

FIGURE 6

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

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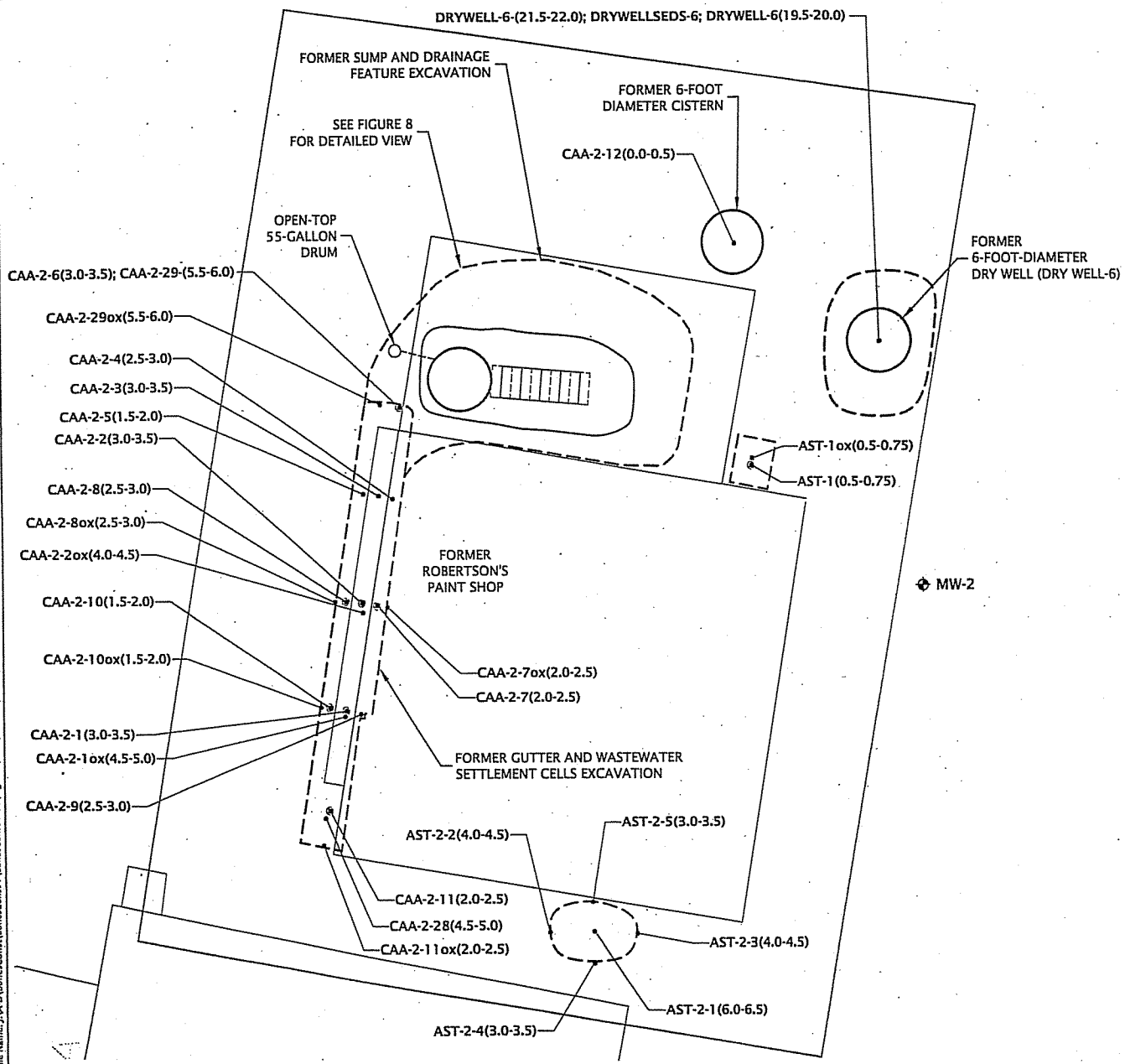

LEGEND:

- CAA-2-1(3-3.5)• SOIL SAMPLE
- CAA-2-7ox(2.0-2.5)● OVEREXCAVATED SOIL SAMPLE
- MW-2 ⊕ MONITORING WELL
- EXCAVATION AREA
- CLEANUP ACTION AREA

N

0 10 20

(SCALE IN FEET)

SITE PLAN BASED ON DRAWING PROVIDED BY K C DEVELOPMENT MAY 17, 2005

ENLARGED VIEW - CLEANUP ACTION AREA 2

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 7

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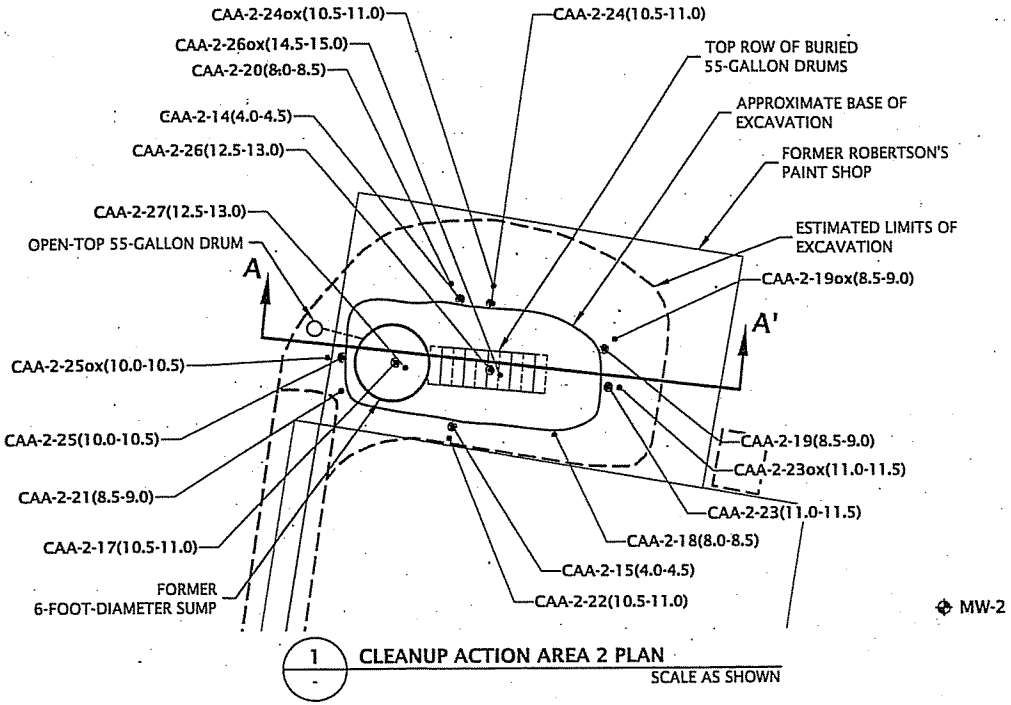
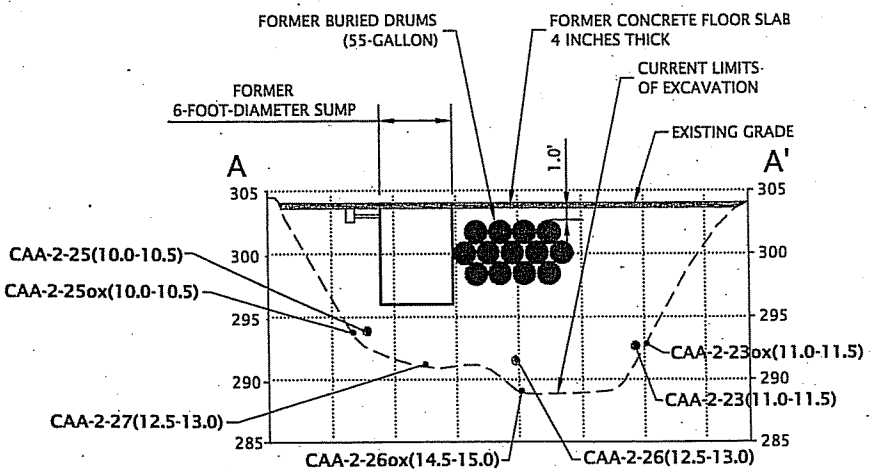


1 CLEANUP ACTION AREA 2 PLAN
SCALE AS SHOWN



2 CROSS SECTION A-A'
SCALE AS SHOWN
ELEVATION IS APPROXIMATE

LEGEND:

CAA-2-13(8.0-8.5) •	SOIL SAMPLE
CAA-2-14ox(0.5-1.0) •	OVEREXCAVATED SOIL SAMPLE
MW-2 ⊕	MONITORING WELL
A A'	EXCAVATION AREA
	CROSS SECTION LINE

N

0 10 20
(SCALE IN FEET)

SITE PLAN BASED ON DRAWING PROVIDED BY
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MAY 17, 2005

HORIZONTAL 0 10 20
(SCALE IN FEET)

VERTICAL 0 10 20
(SCALE IN FEET)

CLEANUP ACTION AREA 2 DETAIL VIEWS

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 8

BONESCONST-7-01

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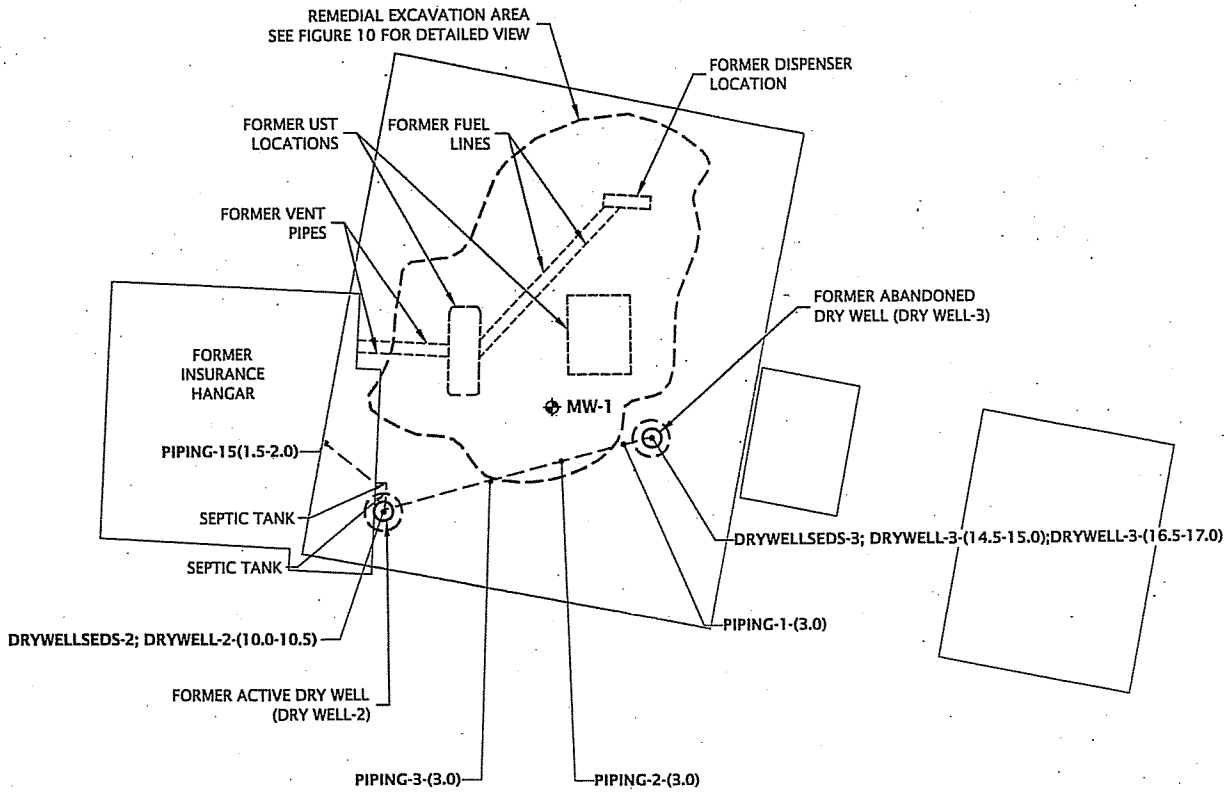

LEGEND:

- PIPING-1-(3) • SOIL SAMPLE
- MW-1 ⊕ MONITORING WELL
- EXCAVATION AREA
- SEPTIC SYSTEM PIPING
- CLEANUP ACTION AREA

N

0 40 80

(SCALE IN FEET)

SITE PLAN BASED ON DRAWING PROVIDED BY
K C DEVELOPMENT
MAY 17, 2005

ENLARGED VIEW - CLEANUP ACTION AREA 3 SEPTIC AND PIPING

FIGURE 9

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

BONESCONST-7-01

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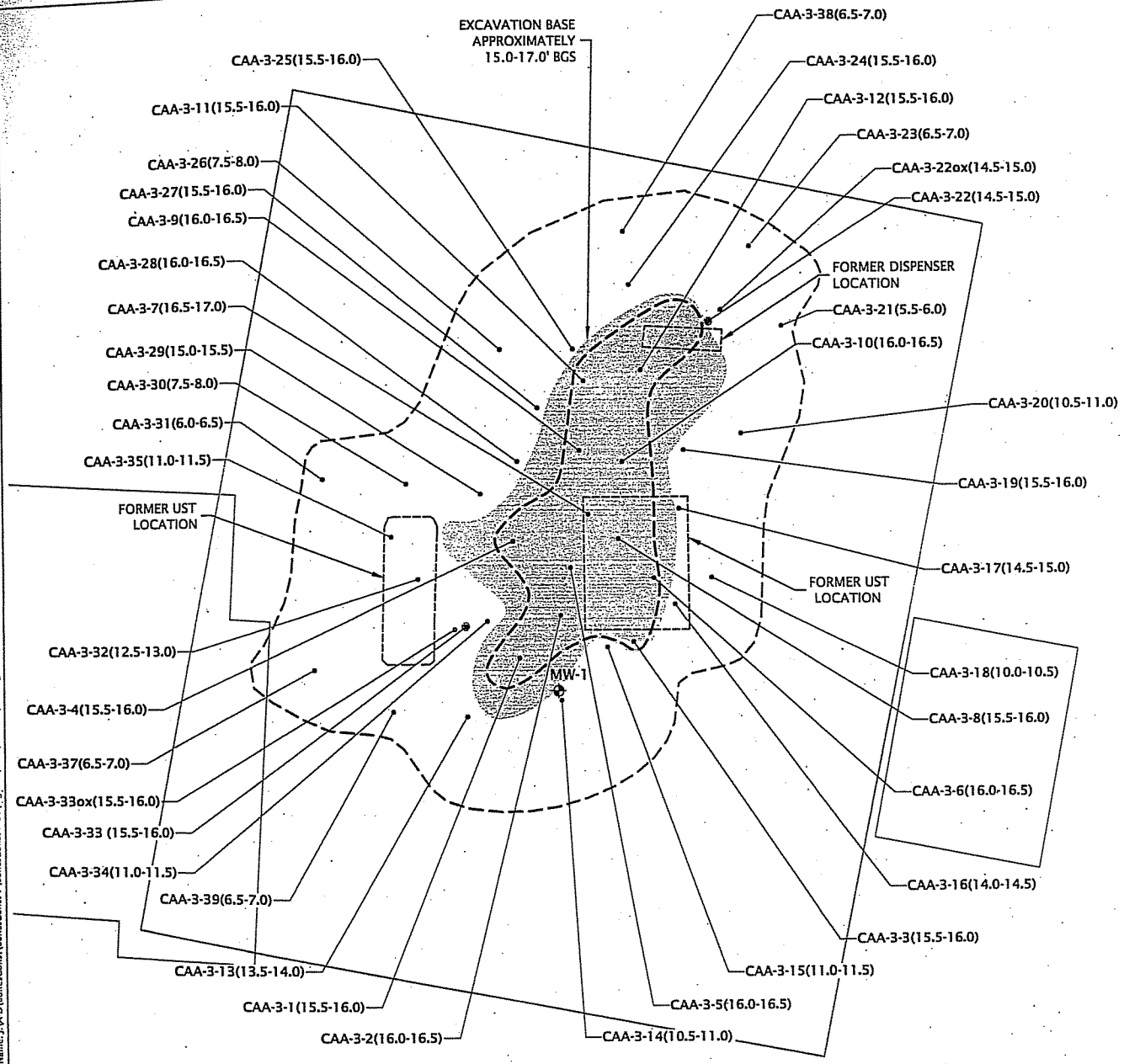

LEGEND:

- CAA-3-1(15.5-16.0) • SOIL SAMPLE
- CAA-3-22ox(14.5-15.0) ● OVEREXCAVATED SOIL SAMPLE
- MW-1 ⊕ MONITORING WELL
- EXCAVATION AREA
- EXTENT OF PETROLEUM CONTAMINATED SOIL
- CLEANUP ACTION AREA

N

0 20 40

(SCALE IN FEET)

SITE PLAN BASED ON DRAWING PROVIDED BY
K C DEVELOPMENT
MAY 17, 2005

ENLARGED VIEW - CLEANUP ACTION AREA 3
UST REMOVAL

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

BONESCONST-7-01

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FIGURE 10

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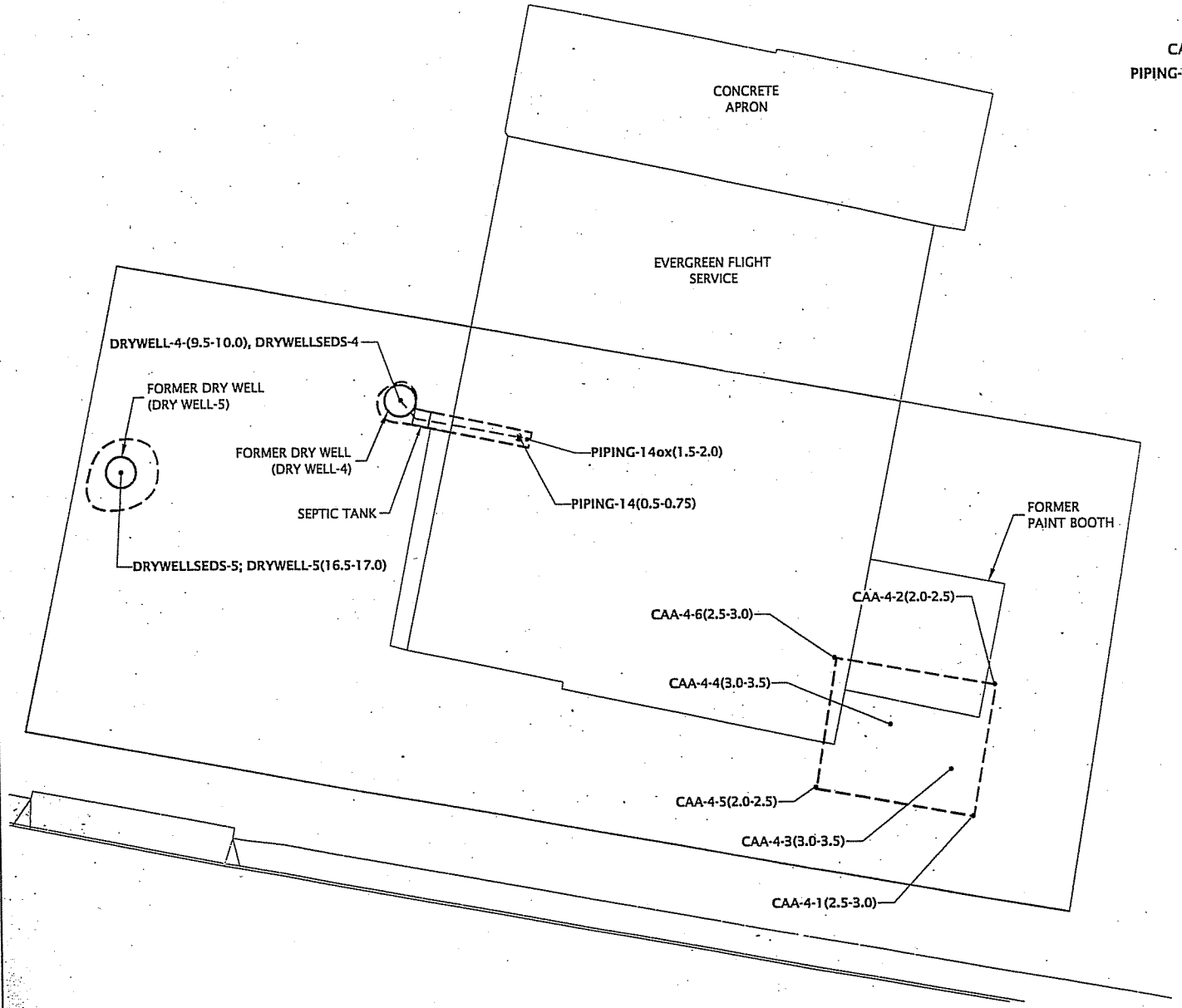

LEGEND:

CAA-4-1(2.5-3.0)•	SOIL SAMPLE
PIPING-14ox(1.5-2.0) ●	OVEREXCAVATED SOIL SAMPLE
	EXCAVATION AREA
	SEPTIC SYSTEM PIPING
	CLEANUP ACTION AREA

N

0 20 40

(SCALE IN FEET)

SITE PLAN BASED ON DRAWING PROVIDED BY
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ENLARGED VIEW - CLEANUP ACTION AREA 4

FIGURE 11

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

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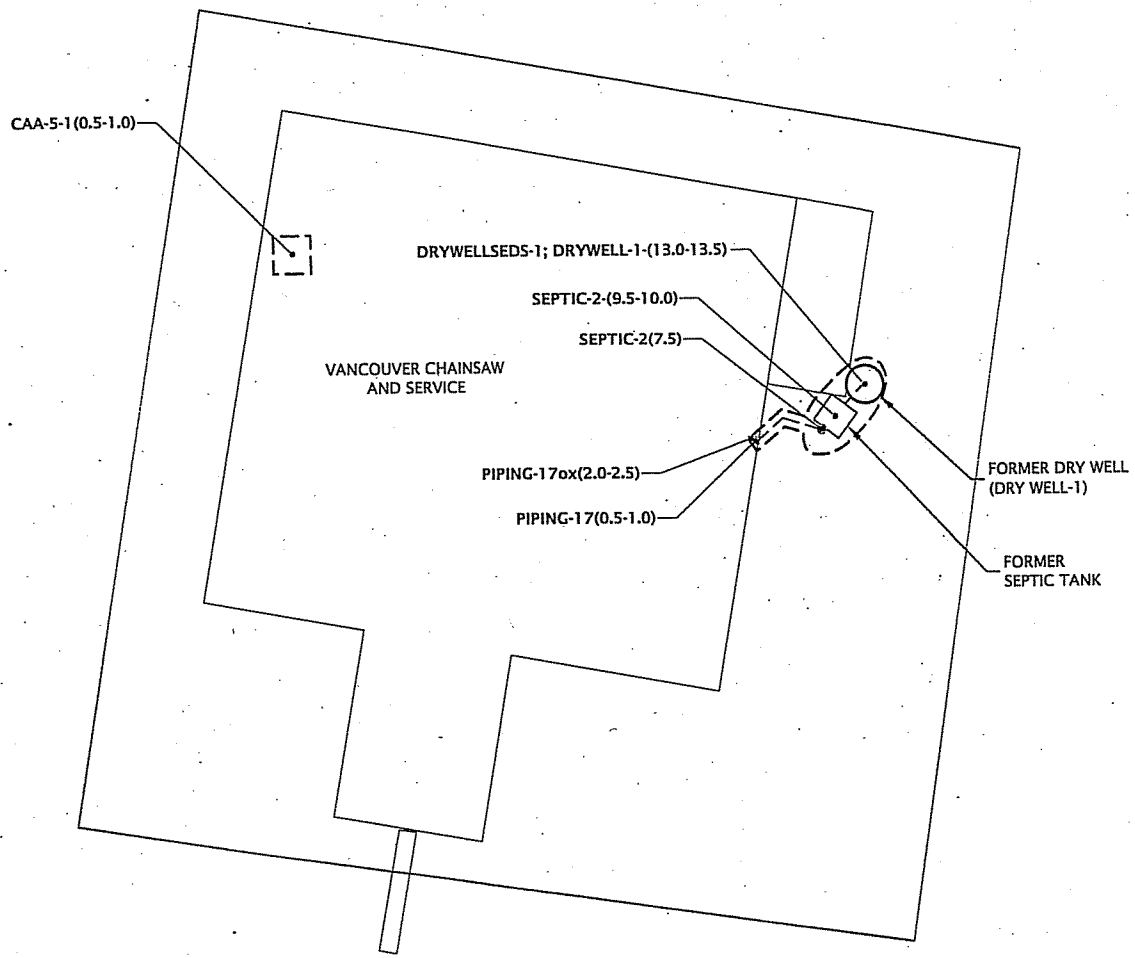
LEGEND:

- CAA-5-1 (0.5-1.0) • SOIL SAMPLE
- PIPING-17(0.5-1.0) ● OVEREXCAVATED SOIL SAMPLE
- EXCAVATION AREA
- SEPTIC SYSTEM PIPING
- CLEANUP ACTION AREA



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0 20 40

(SCALE IN FEET)

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ENLARGED VIEW - CLEANUP ACTION AREA 5

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 12

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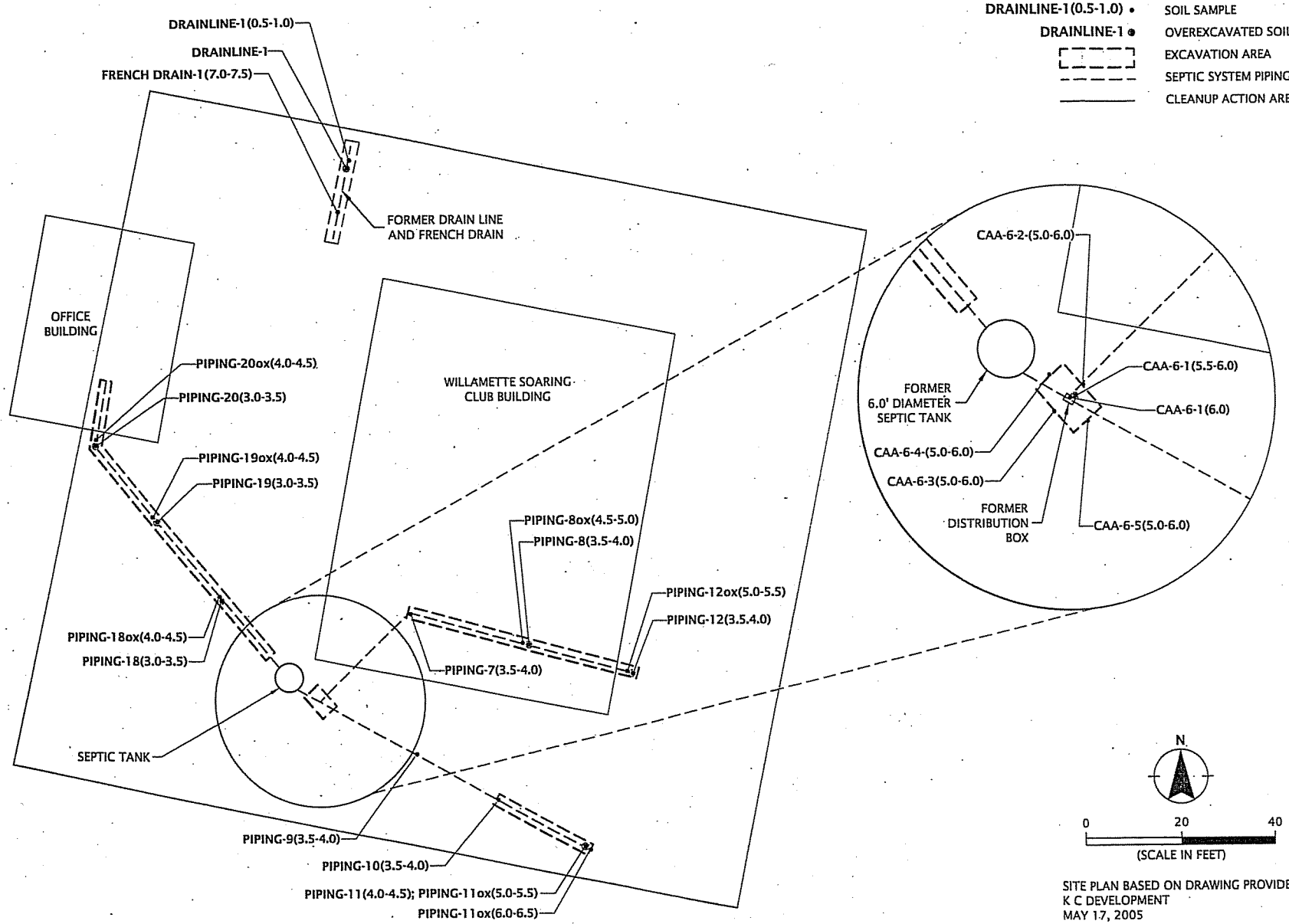

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ENLARGED VIEW - CLEANUP ACTION AREA 6
SEPTIC AND PIPING

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 13

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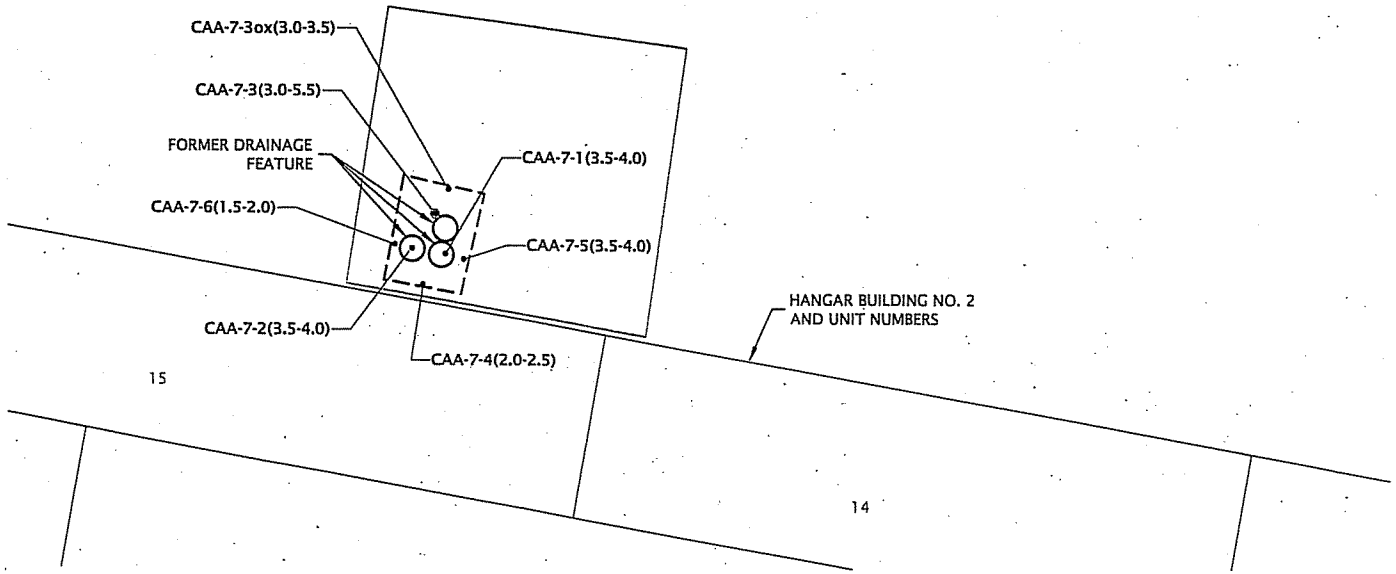
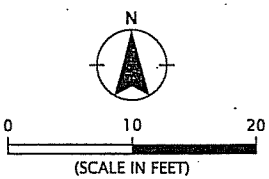
LEGEND:

- CAA7-1-(3.5-4.0)• SOIL SAMPLE
- CAA-7-6(1.5-2.0)● OVEREXCAVATED SOIL SAMPLE
- EXCAVATION AREA
- CLEANUP ACTION AREA





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ENLARGED VIEW - CLEANUP ACTION AREA 7

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 14

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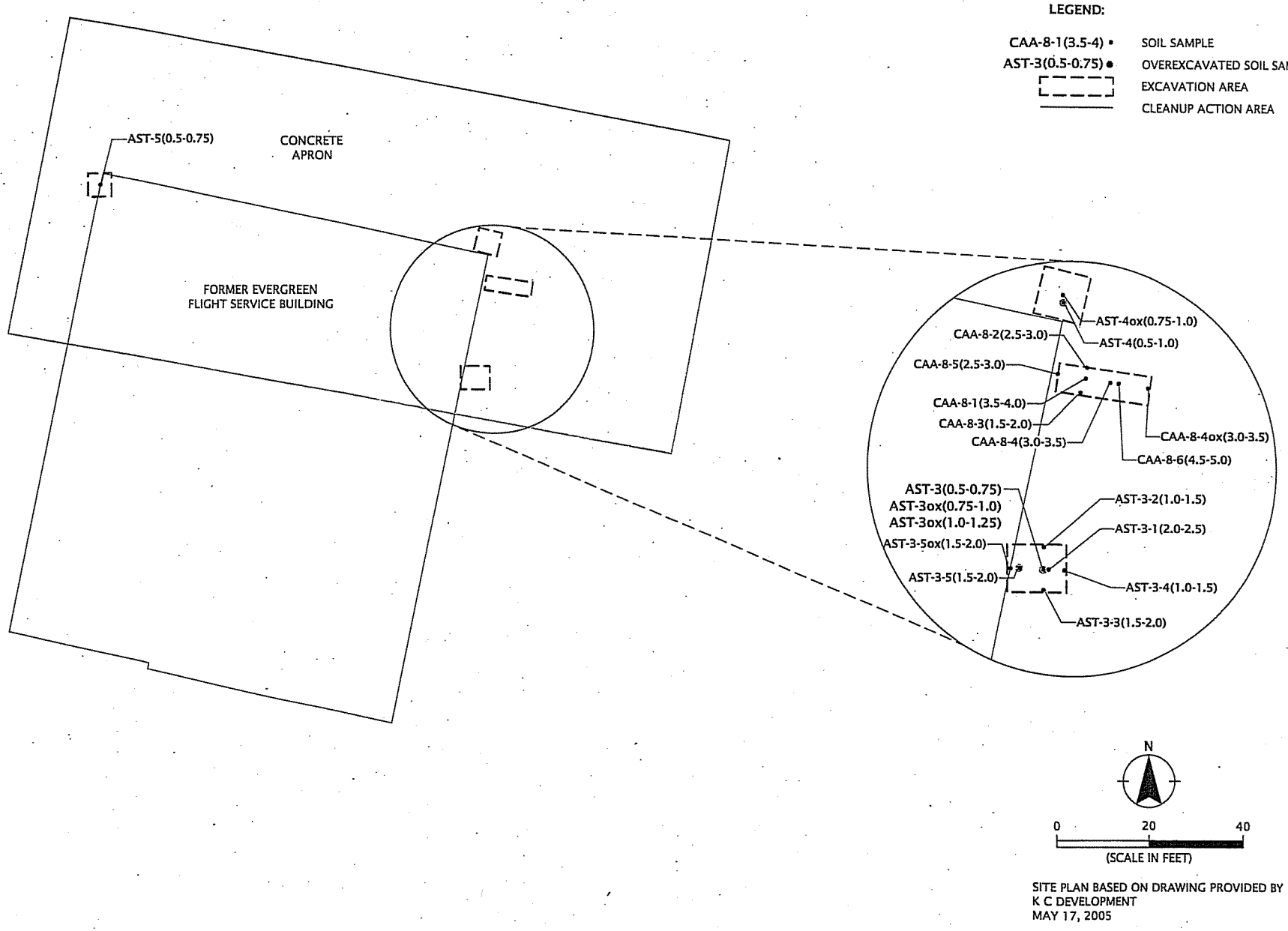

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ENLARGED VIEW - CLEANUP ACTION AREA 8

THE VILLAGE AT EVERGREEN
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FIGURE 15

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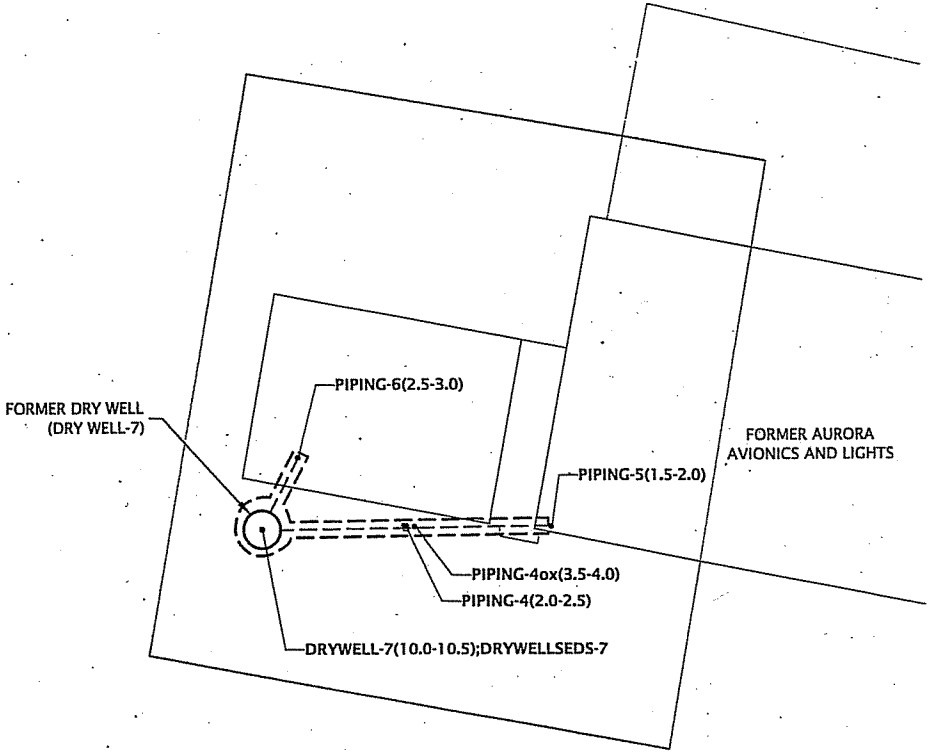

LEGEND:

PIPING-4ox (3.5-4.0)• SOIL SAMPLE

PIPING-4(2.0-2.5)● OVEREXCAVATED SOIL SAMPLE

EXCAVATION AREA

SEPTIC SYSTEM PIPING

CLEANUP ACTION AREA

N

0 20 40

(SCALE IN FEET)

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ENLARGED VIEW - CLEANUP ACTION AREA 9

THE VILLAGE AT EVERGREEN
VANCOUVER, WA

FIGURE 16

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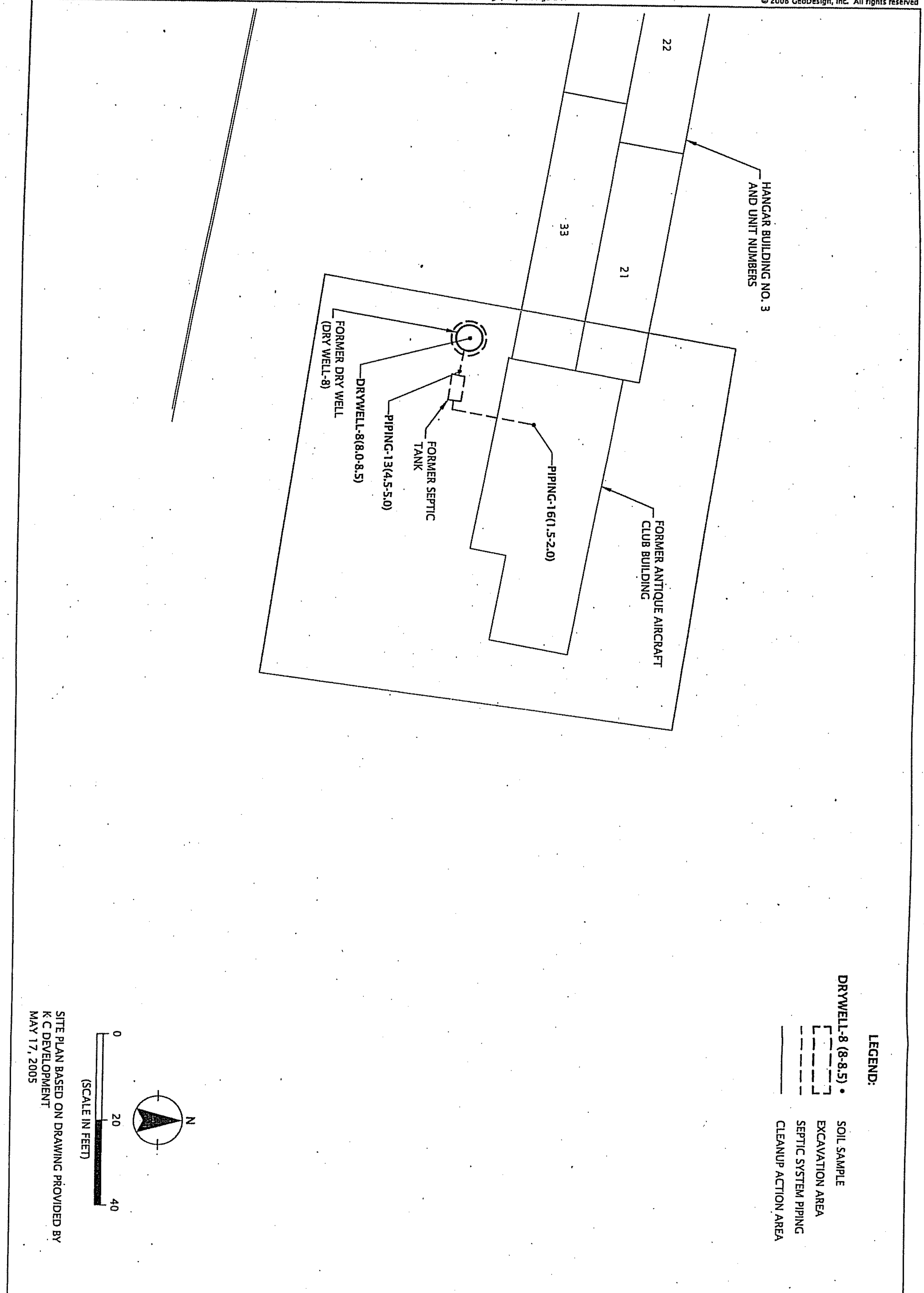

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BONESCONST-7-01	ENLARGED VIEW - CLEANUP ACTION AREA 10	
JUNE 2008	THE VILLAGE AT EVERGREEN VANCOUVER, WA	FIGURE 17