PERIODIC REVIEW REPORT
FINAL

GROAT BROTHERS INC.
Facility Site ID#: 36354352

618 and 608 West Scott Avenue
Woodland, WA 98674

Southwest Region Office

TOXICS CLEANUP PROGRAM

April 2015

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1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup conditions and monitoring data to ensure that human health and the environment are being protected at the Groat Brothers, Inc. site (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 the Voluntary Cleanup Program (VCP). The cleanup actions resulted in concentrations of oil-range total petroleum hydrocarbons (TPH-O) in groundwater that exceeds MTCA Method A cleanup level. The MTCA Method A cleanup level for groundwater are established under WAC 173-340-720(3). WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

- Whenever the department conducts a cleanup action.
- Whenever the department approves a cleanup action under an order, agreed order or consent decree.
- Or, as resources permit, whenever the department issues a no further action (NFA) opinion.
- And one of the following conditions exists:

    (a) Institutional controls or financial assurance are required as part of the cleanup.
    (b) Where the cleanup level is based on a practical quantitation limit.
    (c) Where, in the department's judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

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

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

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

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

The Groat Brothers, Inc. Site is located at 618 and 608 West Scott Avenue Woodland, Washington. The Site is located within the City of Woodland in Cowlitz County. The Property consists of a total of approximately 6.91-acres on two parcels. The parcel at 608 West Scott Avenue (southern portion of the Site) was a former Service Station. The Service Station was reportedly used as a gasoline retail station and automobile repair shop by Humble Oil and Refining Company from approximately 1966 until approximately 1990. In 2002, the Service Station was reportedly used as a consignment shop and for repair of used farm and lawn tractors and associated equipments. In 1978, Lowell and Netta Groat, Donald Groat, and Elvira Groat purchased the parcel that included the Service Station. Shortly thereafter, the Groats began leasing both the Service Station and rest of the Site. Currently the Site is owned by Woodridge LLC. The Service Station is leased by Groat Brothers, Inc. (GBI). A Site vicinity map and a Site Plan are available as Appendix 6.1 and Appendix 6.2 respectively.

The Site is currently being used for industrial purposes. The property is zoned for highway commercial use. The surrounding properties currently are being used for light and heavy industry, highway commercial purposes. The surrounding properties are currently zoned for light and heavy industrial, and highway commercial purposes.

GBI has been operating heavy hauling and trucking company on the Site from 1978 to the present. The Site includes truck parking and equipment storage areas, a former vehicle washing area, a former fueling area, and a truck-maintenance shop. GBI conducted fueling operations using two 10,000-gallons diesel above ground storage tanks (ASTs) and one 500-gallon gasoline underground storage tank (UST). Truck parking, equipment storage, spills during filling of former diesel ASTs and suspected plumbing leaks from a former gasoline UST have resulted in localized petroleum hydrocarbon releases to shallow soil and in the area of the former ASTs and UST localized groundwater impacts. The ASTs and UST were removed in 1996. The truck maintenance shop was used for the repair of vehicles and equipment. Waste oil generated form repairs were placed in a UST adjacent to the building. The waste-oil UST was removed in 1990.

2.2 Cleanup Levels

WAC 173-340-704 states that MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for this Site. The cleanup actions conducted at the Site were determined to be “routine”, few

hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A Table for each hazardous substances. However, for soil samples collected at the drainage swale area MTCA Method B cleanup levels were calculated for total petroleum hydrocarbons.

2.3 Site Investigations

The Site investigations were conducted in three Phases during May 2002 through October 2002. Phase 1 was conducted on the property leased by GBI, Phase 2 was conducted on the northern portion of the property owned by GBI, and Phase 3 was conducted on the whole property to better characterize the Site including the drainage swale.

2.3.1 Phase 1 Investigation

The Phase 1 investigation was conducted to evaluate potential environmental impacts to soil and groundwater that may have been associated with GBI's historical operations at the Site. Under Phase 1 the following five areas of concern (AOCs) were investigated:

- Truck Parking Area
- Former Vehicle Wash Pad Area
- Maintenance Shop Area
- Former AST/UST Area
- Drainage Swale

2.3.1.1 Truck Parking Area

Three geoprobe borings (GP-1 through GP-3) were drilled in the northern truck parking area, and one Geoprobe boring (GP-4) was advanced in the southern truck parking area during this investigation. Shallow soil samples were collected at each boring from depth of 0.5 feet to 2.0 feet below ground surface (bgs). Also two Geoprobe borings (GP-14 and GP-15) were performed in the northern truck parking area. Soil samples from each boring were performed at 0.5 feet to 5.0 feet bgs. Specific soil samples were analyzed for gasoline, diesel, and/or oil-range petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O). Soil samples collected at borings GP-14 and GP-15 were also analyzed for total lead. All the contaminant concentrations were below their respective method reporting limits (MRLs).

Reconnaissance groundwater samples were collected from all borings just below the top of the water table. Groundwater samples were analyzed for TPH-D, TPH-O, polycyclic aromatic hydrocarbons (PAHs), and/or lead. Contaminant concentrations were either nondetects or below MTCA Method A cleanup levels except for water samples from GP-2 and GP-14, whose TPH-O and lead concentrations were 740 micrograms per liter (µg/L) and 25.6 µg/L respectively. These concentrations exceeded their MTCA Method A cleanup levels of 500 µg/L and 15 µg/L for TPH-O and lead, respectively. The soil and groundwater sampling locations and results are included as Appendix 6.3.

2.3.1.2 Former Vehicle Wash Pad Areas

Two Geoprobe borings (GP-5 and GP-6) were drilled in the vicinity of the former vehicle wash pad area. Soil and groundwater samples were collected from depths of 0.5 feet to 2 feet bgs for soil and from just below the top of the water table for groundwater. These samples were analyzed for TPH-G, TPH-D, and TPH-O. All of the results were below the laboratory detection limits. The boring locations and soil and groundwater sample results are included in Appendix 6.4.

2.3.1.3 Maintenance Shop Area

Three Geoprobe borings (GP-7, GP-8 and GP-13) were advanced in the vicinity of the maintenance shop area. Soil and groundwater samples were collected from depths of 0.5 feet to 2 feet bgs for soil and from just below the top of the water table for groundwater. These samples were analyzed for TPH-G, TPH-D, and TPH-O. All of the results were below the laboratory detection limits. The sampling locations and results are included in Appendix 6.4.

2.3.1.4 Former AST/UST Area

A total of twenty five exploratory borings (GP-9 through GP-12, GP-16 through GP-34, and GP-37 through GP-39) were drilled in the former AST/UST area to characterize the nature and extent of soil and groundwater contamination. Soil samples were collected from depths of 0.5 feet to 2.0 feet bgs for soil from borings GP-9 through GP-12 and from depths of 0.5 feet to 6.5 feet bgs for soil from the rest of the other borings. Select soil samples were analyzed for TPH-G, TPH-D, TPH-O, PAHs, total metals and volatile organic compounds (VOCs). Only TPH-G [2,880 milligrams per kilograms (mg/Kg)], and carcinogenic PAHs [142.7 micrograms per kilogram (µg/Kg)] concentrations exceeded their MTCA Method A cleanup levels of 100 mg/Kg and 100 µg/Kg respectively from boring GP-9. A soil sample collected from boring GP-9 was also analyzed for volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH) for calculating the Method B TPH cleanup level. VPHs and EPHs concentrations of 3,300 mg/Kg and 5,200 mg/Kg, respectively were detected in the soil sample collected from GP-9. A Method B TPH cleanup level (unrestricted land use) using VPH and EPH concentrations for direct contact was calculated to be 2,840 mg/Kg using the MTCA TPH worksheet. This concentration also exceeds the calculated Method B cleanup level (unrestricted land use) for the protection of groundwater (310 mg/Kg). All other samples collected were either non-detect or had contaminant concentrations below the MTCA Method A or B cleanup levels. Soil sample locations and results are presented in Appendix 6.4.

A total of nine groundwater samples were collected and analyzed for same parameters as soils. The TPH-G (160,000 µg/L), TPH-D (11,000 µg/L), benzene (310 µg/L), ethylbenzene (5,200 µg/L), total xylenes (24, 400 µg/L) toluene (2,800 µg/L), and naphthalene (3,300 µg/L) concentrations exceed their MTCA Method A cleanup levels of 5 µg/L, 700 µg/L, 1000 µg/L, and 160 µg/L respectively in the groundwater sample collected in boring GP-9. In addition, TPH-G, and lead concentrations of 7,900 µg/L, and 87.2 µg/L also exceed their Method A cleanup levels of 800 µg/L, 500 µg/L, and 15 µg/L in groundwater samples from borings GP-

10b, and GP-21, respectively. Figure 3-7 in Appendix 6.4 shows the sampling locations, results and approximate extent of TPH-G, and TPH-D contamination in groundwater.

2.3.1.5 Drainage Swale

Five surface-soil samples (SED-1 through SED-5) were collected for TPH-G, TPH-D, TPH-O, PAHs, and metals analysis. TPH-D (3,500 mg/Kg), and TPH-O (2,600 mg/Kg to 25,000 mg/Kg) concentrations exceeded the MTCA Method A cleanup level of 2,000 mg/Kg for TPH-D or TPH-O. In addition, VPH and EPH analysis was conducted on these samples. Surface-soil sampling locations are shown on Figures 3-8 in Appendix 6.5.

2.3.2 Phase 2 Investigations

As a part of Phase 2, a supplemental investigation was conducted for collecting soil and groundwater samples around the former AST and gasoline UST area to delineate the extent of TPH contamination. Additional sampling was conducted on the northern portion of the Site, owned by GBI to evaluate potential impacts from historical Site operations in the areas used for truck parking. Soil samples were also collected from the drainage swale adjoining the Site.

Results of soil sample collected at Sed-4 showed TPH-D, and TPH-O concentrations of 2,600 mg/Kg and 20,000 mg/Kg, respectively. Also a TPH-O concentration of 7,500 mg/Kg was detected from a soil sample collected from the Sed-5 location. These concentrations exceed the MTCA Method A cleanup level of 2,000 mg/Kg for TPH-D or TPH-O.

The TPH-D (7,000 µg/L), and TPH-O (4,300 µg/L) concentrations in the groundwater sample collected from boring GP-19 exceeded the MTCA Method A cleanup level of 500 µg/L for TPH-D or TPH-O. Also the groundwater sample collected from boring GP-35 showed a TPH-O concentration of 670 µg/L which exceed the MTCA cleanup level of 500 µg/L. Total lead was detected in groundwater samples collected from GP-14 (25.6 µg/L) and GP-21 (87.2 µg/L). These concentrations also exceed the MTCA Method A cleanup level of 15 µg/L for lead in groundwater. The supplemental investigation sampling locations are shown on Figure 3-2 in Appendix 6.6.

2.3.3 Phase 3 Investigations

The Phase 3 investigations included additional characterization of some of the previously investigated areas and new areas of concern to better define the extent of soil and groundwater contamination. The following activities were performed under Phase 3:

- Supplemental soil and/or groundwater characterization of truck parking, vehicle wash pad, and maintenance shop areas.
- Stormwater and septic drain fields and bermed area.
- Supplemental characterization of drainage swale area.
- Simplified Terrestrial Ecological Evaluation for the drainage swale area, pursuant to WAC 173-340-7492(2)(a)(ii).

- Installation of six groundwater monitoring wells in the shallow zone to evaluate the nature and extent of potential groundwater impacts.
- Conduct two rounds of groundwater monitoring.

A total of 25 Geoprobe borings (GP-51 through GP-63, and GP-64 through GP-75) were advanced in truck parking, vehicle wash pad, and maintenance shop areas for collecting soil and groundwater samples to further characterize the extent of contamination. Soil samples were collected from depths of 0.5 feet to 2 feet bgs in each boring and groundwater was sampled in select borings. All of the samples were analyzed for TP-G, TPH-D, TPH-O, PAHs, and metals. Results of the samples collected indicated that contaminant concentrations were either not detected or were below MTCA Method A cleanup levels. Geoprobe boring locations are shown on Figure 3-3 in Appendix 6.7.

Borings GP-76 and GP-77 were advanced in the stormwater drain field (SWF), and septic drain field (SDF), respectively. Soil samples were collected at approximately 3 feet bgs in the SWF and SDF areas. Also, discrete soil samples were collected from depths of 0 to 0.5 feet bgs from the bermed soil area using a hand auger. All of these samples were analyzed for the same parameters as stated above. The results showed that all the contaminant concentrations were either below the laboratory detection limits or below MTCA cleanup levels. Results of a reconnaissance groundwater sample collected from boring GP-76 revealed TPH-D and TPH-O concentrations of 920 µg/L and 1,200 µg/L respectively. These concentrations exceed the MTCA Method A cleanup level of 500 µg/L for TPH-D or TPH-O in groundwater.

Soil samples DD2 through DD5 were collected in the drainage swale to further assess potential threats to human health from the petroleum hydrocarbon-related impacts. These samples were collected at the same locations as previous investigation locations (SED2 through SED5). These samples were analyzed for VPH and EPH. The EPH concentrations ranged from 1,220 mg/Kg to 3,580 mg/Kg. VPH concentrations were not detected at or above their method reporting limits. The TPH worksheet calculated the total TPH concentrations of all fractions as 3,577 mg/Kg. Using the most impacted soil sample results (DD4/SED4), and TPH Worksheet, a MTCA Method B direct contact TPH cleanup level of 7,762 mg/Kg was calculated. Consequently, it was concluded that the TPH fractions detected in the drainage swale do not pose a threat to human health for the direct contact pathway.

A simplified Terrestrial Ecological Evaluation (TEE) was performed pursuant to MTCA WAC 173-340-7492. The TEE was performed using conservative assumptions. Based on the evaluation score and pursuant to WAC 173-340-7492(a)(ii), it was concluded that there was no substantial threat to terrestrial ecological receptors.

A total of six groundwater monitoring wells (MW-1 through MW-6) were installed in October of 2002. All these wells were sampled in October 2002 and January 2003. Groundwater samples were analyzed for TPH-G, TPH-D, TPH-O, benzene, toluene, ethylbenzene, and xylenes (BTEX), PAHs, and total metals (cadmium, chromium and lead). Results of the samples collected indicated contaminant concentrations were either not detected or below MTCA Method A cleanup levels.

2.4 Decommissioning of Above Ground and Underground Storage Tanks and Underground Injection Control Well

Beginning in 1978, GBI conducted fueling operations using two 10,000-gallon diesel ASTs and one 500-gallon gasoline UST. Accidental releases during the filling of diesel ASTs and fueling operations impacted the soils in this area. In 1996, the diesel ASTs and gasoline UST were removed. Approximately 300 cubic yards of petroleum impacted soils were excavated and disposed of in a permitted landfill. In August 2002, approximately 3,085 cubic yards of petroleum impacted soil in the former AST area was excavated. Results of confirmational soil samples collected from the limits of excavation were all non-detects for petroleum contaminants. The contaminated soils removed were stockpiled in a 100-foot by 300-foot soil-containment-and-treatment cell lined with a 12-millimimeter reinforce polyethylene liner in the bottom. This material was treated with biological method. Also, a 1,000-gallon used oil storage UST was decommissioned on the Site. Confirmational soil sample results did not detect contaminants above MTCA Method A cleanup levels. The approximate extent of the excavations, confirmational soil sample locations and the soil containment and treatment cell are shown on Figure 4-1in Appendix 6.8.

In 2003, a 10-inch diameter cement underground injection control (UIC) well which extended approximately 5 feet bgs at the Site was decommissioned. The UIC well with an open bottom was connected by a 4-inch cast iron drain line to a former double-chambered waste oil sump located within the bay area of the former service station. The bottom of the UIC well/pipe was open to allow for drainage into the silty sandy soil. The results of soil and groundwater samples collected within the UIC well revealed the presence of TPH-G, TPH-D, TPH-O, benzene, tetrachloroethylene, and total metals (cadmium, chromium and lead) concentrations above MTCA Method A cleanup levels. Approximately 72 tons of contaminated soils were excavated from the UIC well area to a depth of approximately 10 feet bgs. Results of the confirmational soil samples did not detect contaminants above MTCA Method A cleanup levels. Location of UIC well and approximate extent of the excavation are shown on Figure 4 in Appendix 6.9.

2.5 Groundwater Monitoring

Since October 2002 through July 2010, a total of 12 rounds of groundwater monitoring was conducted at the Site. Groundwater samples were analyzed for TPH-G, TPH-D, TPH-O, PAHs, VOCs, and lead. Results of the groundwater samples collected indicated that contaminant concentrations were not detected except for TPH-O. TPH-O concentrations of 790 µg/L, 630 µg/L, and 639 µg/L were detected in groundwater samples collected from MW-4, MW-5, and MW-7, respectively. These concentrations exceed the MTCA Method A cleanup level of 500 µg/L for TPH-O in groundwater. As a result of these exceedences, the NFA letter required the monitoring to be continued on an 18 month frequency until the concentrations reduce to below cleanup levels. However, the groundwater monitoring was discontinued in July 2010. After Ecology's meeting with the property owner on December 10, 2014, the property owner has agreed to restart the groundwater monitoring and is in the process of hiring an environmental

consultant for conducting the groundwater monitoring. The groundwater monitoring well locations, groundwater elevations and approximate groundwater flow direction are shown on Figure 4 in Appendix 6.10.

2.6 Restrictive Covenant

The required RC (now referred to as an environmental covenant) was recorded for the Site on March 31, 2004 and an NFA determination for the Site was issued on October 4, 2010. The Covenant was required because the Remedial Action resulted in residual concentrations of total petroleum hydrocarbons ("TPH") and related constituents concentrations exceeded the MTCA Method A cleanup levels in groundwater at the Site. The Environmental Covenant (EC) imposes the following limitations:

> **Section 1.** Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.
>
> **Section 2:** Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.
>
> **Section 3:** The owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.
>
> **Section 4:** NO GROUNDWATER MAY BE TAKEN FROM THE PROPERTY FOR ANY USE. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant (RC) and notify all lessees of the restrictions on the use of the Property.
>
> **Section 5:** The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this EC. Ecology may approve any inconsistent use only after public notice and comment.
>
> **Section 6:** The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, to determine compliance with this Covenant, and to inspect records that are related to the Remedial Action.
>
> **Section 7:** The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this EC shall no longer limit use of the Property or

be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

The EC is available in Appendix 6.11.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

Based upon the Site visit conducted on December 10, 2014, the compacted clean soil surface cover appears in excellent condition at the Site and continues to eliminate direct exposure pathways (ingestion, contact) to contaminated groundwater. During the Site visit, there was no evidence of new routes of exposure to contaminated groundwater. All groundwater monitoring wells are in good condition, no repair, maintenance, contingency actions are required. However, clearing of bushes is required around some of the monitoring wells to access the well for the collection of groundwater samples. A photo log is available in Appendix 6.12.

All of the contaminated soils (approximately 3,400 cubic yards) were excavated either to below MTCA Method A cleanup levels or to below detection limits as part of the remedial action. However, results of groundwater samples indicated that TPH-O concentrations exceeded MTCA Method A cleanup levels in wells MW-4, MW-5, and MW-7. Nonetheless, these concentrations continue to decrease and the current concentrations may be much lower. The area is served by the City Drinking Water Supply System and the groundwater is not being used by the public at this time.

Institutional controls have been implemented at the Site in the form of a RC. This RC prohibits groundwater use at the Site, restricts activities that will result in the release of contaminants contained as part of the cleanup without Ecology's approval, and prohibits any use of the property that is inconsistent with the RC. This RC serves to assure the long-term property use and integrity of the remedial action and effectively prevents human exposure to any TPH-O that may remain in the groundwater at the Site.

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

There is no new relevant scientific information for hazardous substances remaining at the Site.

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

MTCA Method A cleanup levels for contaminants of concern at the Site have not changed since the NFA determination was issued on October 10, 2004.

3.4 Current and projected Site use

The Site is currently occupied by an office and storage building and a truck maintenance shop, and rest of the Site is being used as a truck parking area. This use is not likely to have a negative

impact on the risk posed by hazardous substances contained at the Site. There are no changes projected in the Site use.

3.5 Availability and practicability of higher preference technologies

The remedy implemented included the excavation and disposal of all the contaminated soils. However, some residual TPH-O groundwater contamination was left on the Site. Results of groundwater monitoring indicate that TPH-O concentrations are decreasing. Since the Site is covered with clean soil, there is no indication of any exposure to the contaminated groundwater remaining at the Site. Hence the implemented remedy 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 actions were capable of detection below Site cleanup levels. The presence of improved analytical techniques would not affect 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. Based on the results of the July 2010 groundwater monitoring, TPH-O remains in groundwater at the Site at concentrations that exceed MTCA Method A cleanup levels. However, the overall concentration trend was decreasing and the current concentrations may be lower.

- Ongoing groundwater monitoring on an 18 month frequency was required at the Site as a condition to maintain the NFA determination. Currently the groundwater monitoring is not being conducted per this requirement. However, after a meeting with Ecology on December 10, 2014, the property owner is in the process of hiring an environmental consultant for conducting the required groundwater monitoring to come into compliance and also to ensure that the Site remains protective.

- The institutional controls implemented in the EC for the property is in place and will be effective in protecting public health from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this review, Ecology has determined that the remedial actions conducted at the Site continue to be protective of human health and the environment. To meet the requirements of NFA determination, the property owner is restarting the groundwater monitoring and no additional remedial actions are required at this time. It is the property owner's responsibility to monitor the groundwater on an 18 month frequency and to continue to inspect the Site to assure that the integrity of the surface cover is maintained and no groundwater exposure pathways are created.

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

KHM Environmental Management, Inc., Phase II Limited Investigation Report, Former Gasoline Station Site, 608 West Scott Avenue, Woodland, WA, September 23, 2002.

Maul Foster & Alongi, Inc., Characterization of Soil and Groundwater from an Underground Injection Well; Former Service Station, 608 West Scott Avenue, Woodland, Washington, March 26, 2003.

Maul Foster & Alongi, Inc., Final Remedial Investigation Report, Groat Brothers, Inc., 618 West Scott Avenue, Woodland, Washington, March 27, 2003.

Maul Foster & Alongi, Inc., Underground Injection Control Well and Underground Storage Tank Decommissioning Report, Former Service Station, 608 West Scott Avenue, Woodland, Washington, November 7, 2003.

Maul Foster & Alongi, Inc., Supplemental Investigation of Groundwater at Former Underground Injection Control Well, 608 West Scott Avenue, Woodland, Washington, April 6, 2006.

Maul Foster & Alongi, Inc., Groundwater and Soil Characterization at Groat Brothers, Inc., Former Service Station, 608 West Scott Avenue, Woodland, Washington, June 14, 2007.

State of Washington, Department of Ecology, Partial Sufficiency and Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site: Groat Brothers/Former Service Station, 608 West Scott Avenue, Woodland, WA, Facility/Site Number: 5365021, VCP Number: SW0519, September 7, 2007.

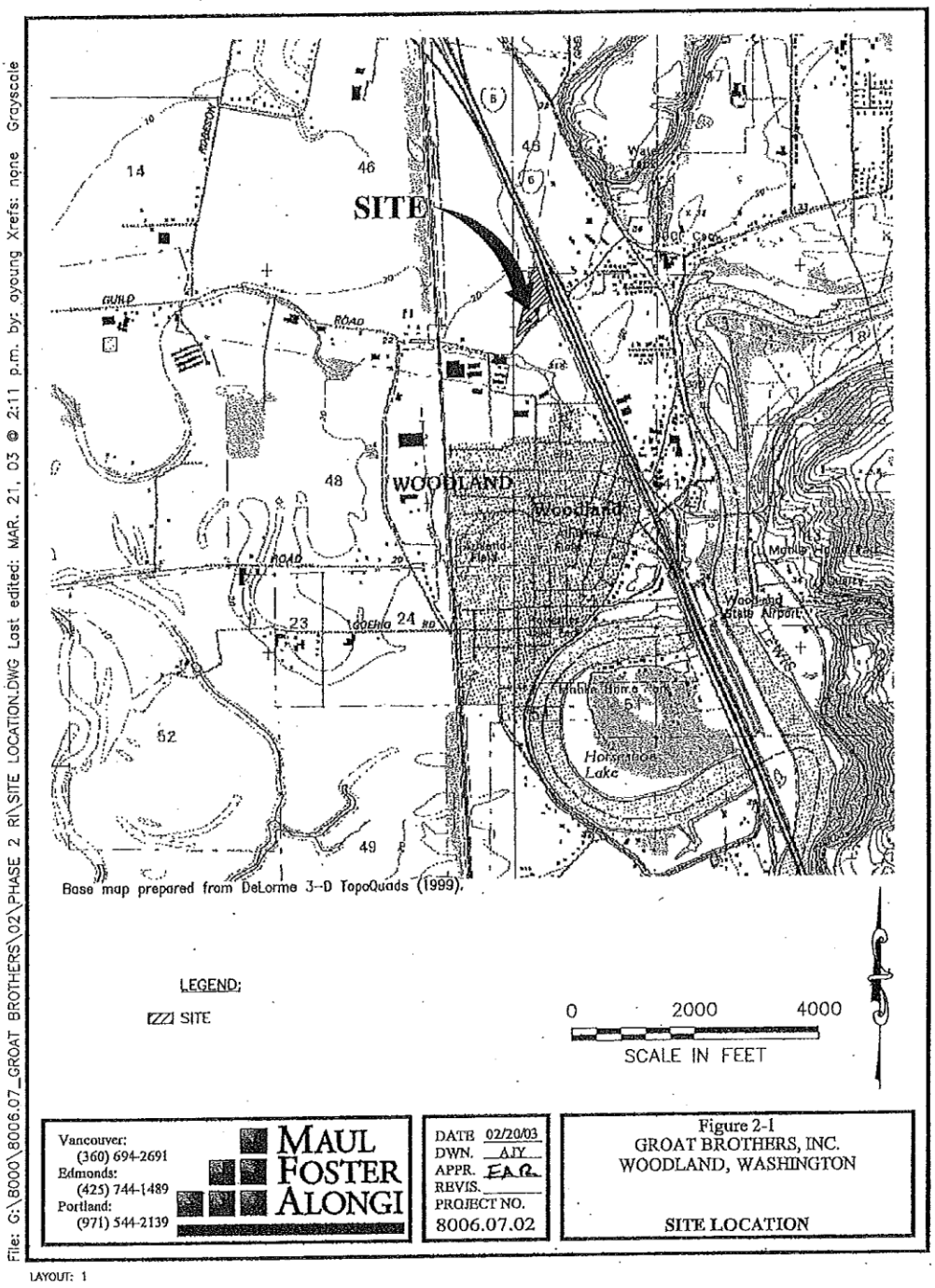
Maul Foster & Alongi, Inc., Feasibility Study Report, Former Service Station Property, Woodland, Washington, July 2, 2009.

Maul Foster & Alongi, Inc., Groundwater Monitoring, July 2010, Groat Brothers, Inc., Woodland, Washington, September 29, 2010.

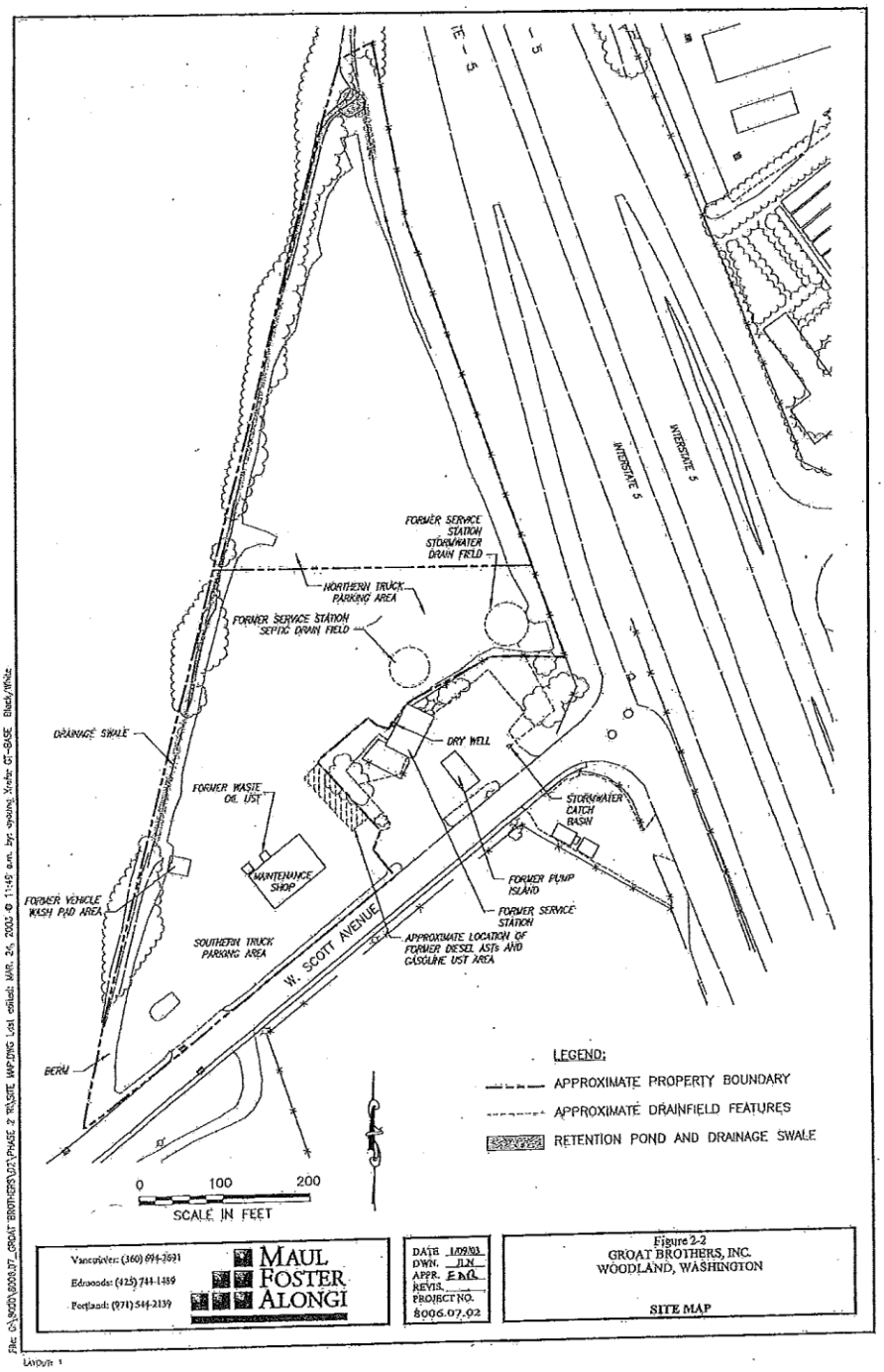
Department of Ecology, Site Visit, December 10, 2014.

6.0 APPENDICES

6.1 Vicinity Map



6.2 Site Plan


INTERSTATE 5
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DRAINAGE SWALE
DRY WELL
FORMER WASTE OIL UST
STORMWATER CATCH BASIN
MAINTENANCE SHOP
FORMER VEHICLE WASH PAD AREA
FORMER PUMP ISLAND
FORMER SERVICE STATION
SOUTHERN TRUCK PARKING AREA
APPROXIMATE LOCATION OF FORMER DIESEL ASTs AND GASOLINE UST AREA
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APPROXIMATE DRAINFIELD FEATURES
RETENTION POND AND DRAINAGE SWALE
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SCALE IN FEET
Vancouver: (360) 694-2691
Edmonds: (425) 744-1489
Portland: (971) 544-2139
MAUL FOSTER ALONGI
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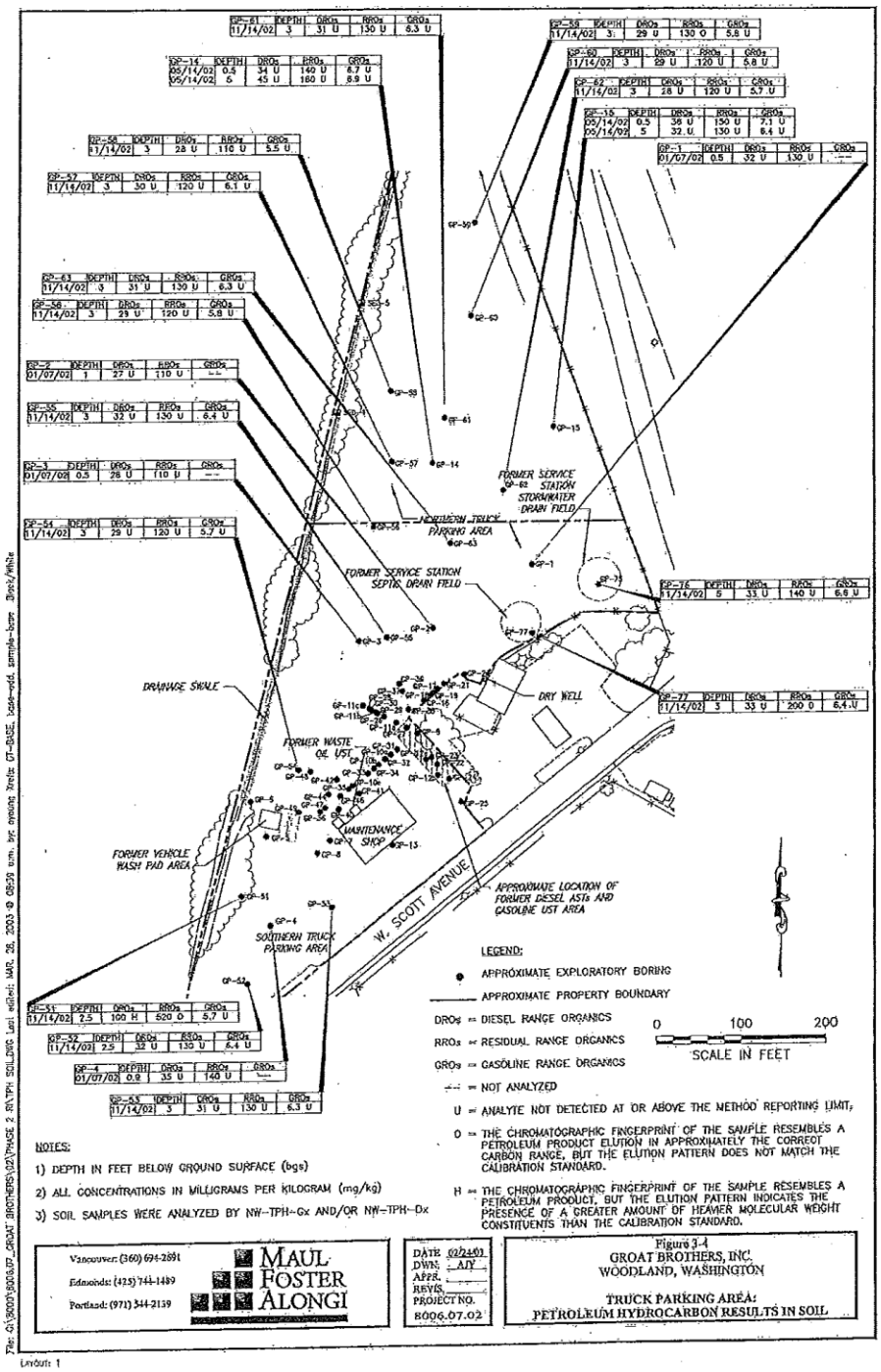
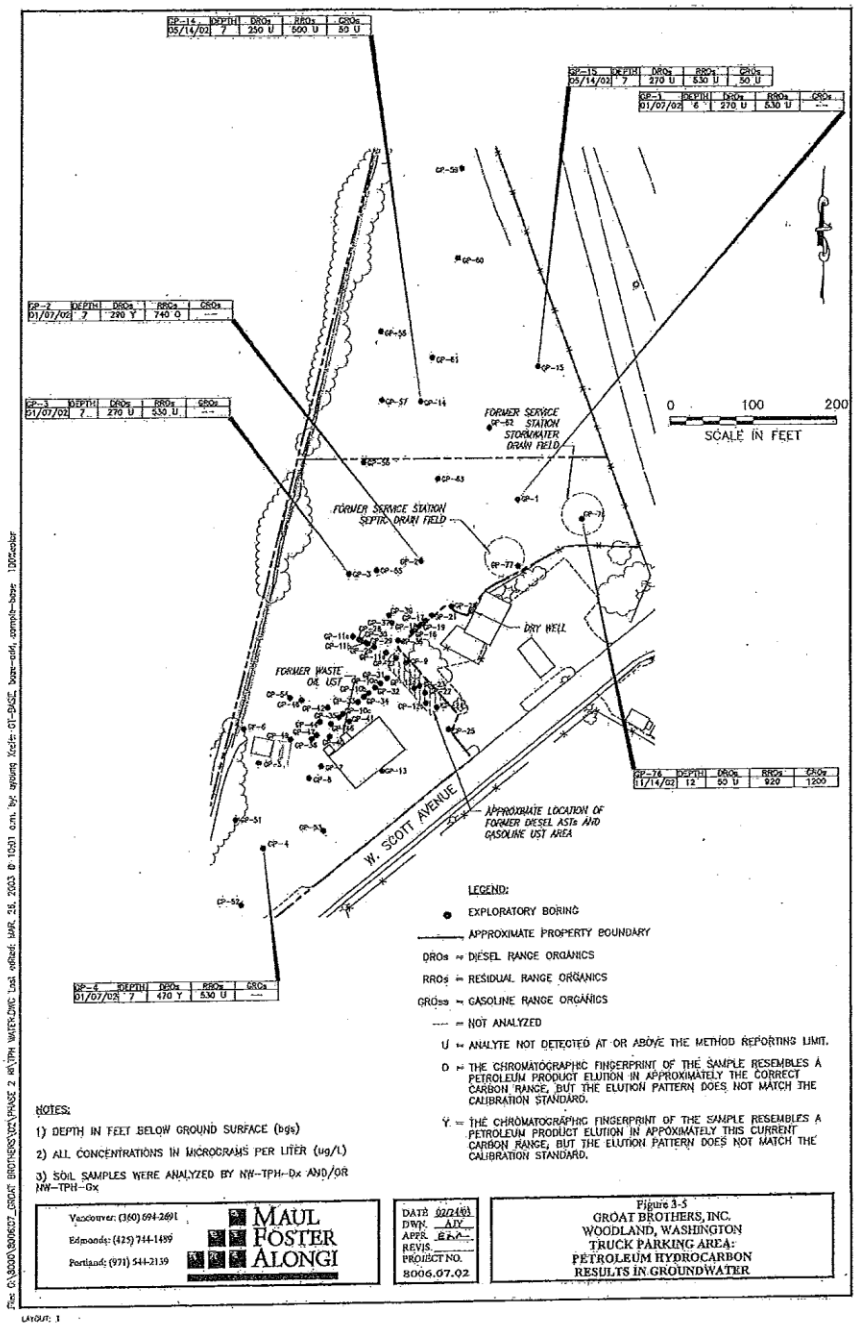
PROJECT NO. 8006.07.02
Figure 2-2
GROAT BROTHERS, INC.
WOODLAND, WASHINGTON
SITE MAP

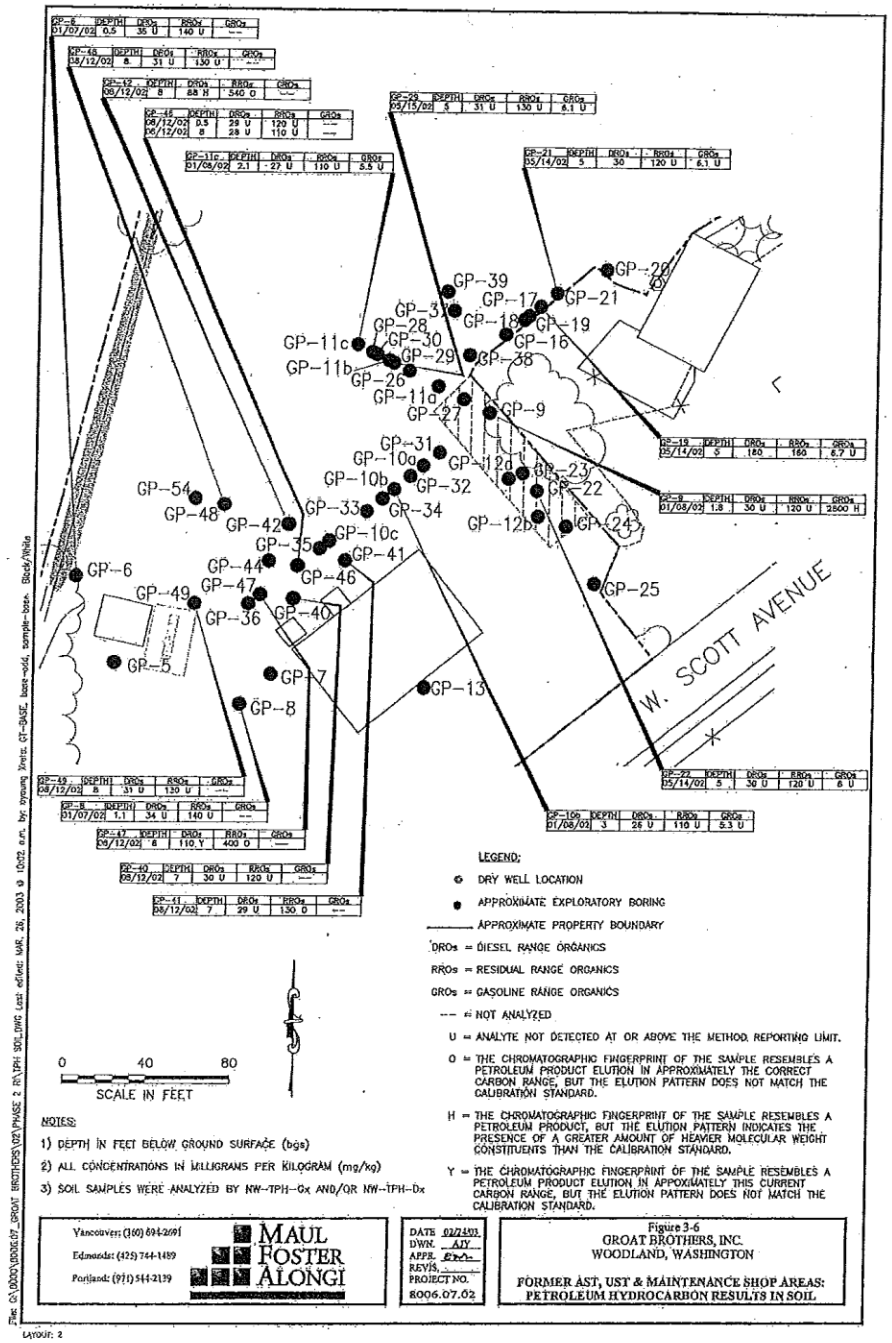
6.3 Truck Parking Area Sampling Locations and Results (Soil and Groundwater



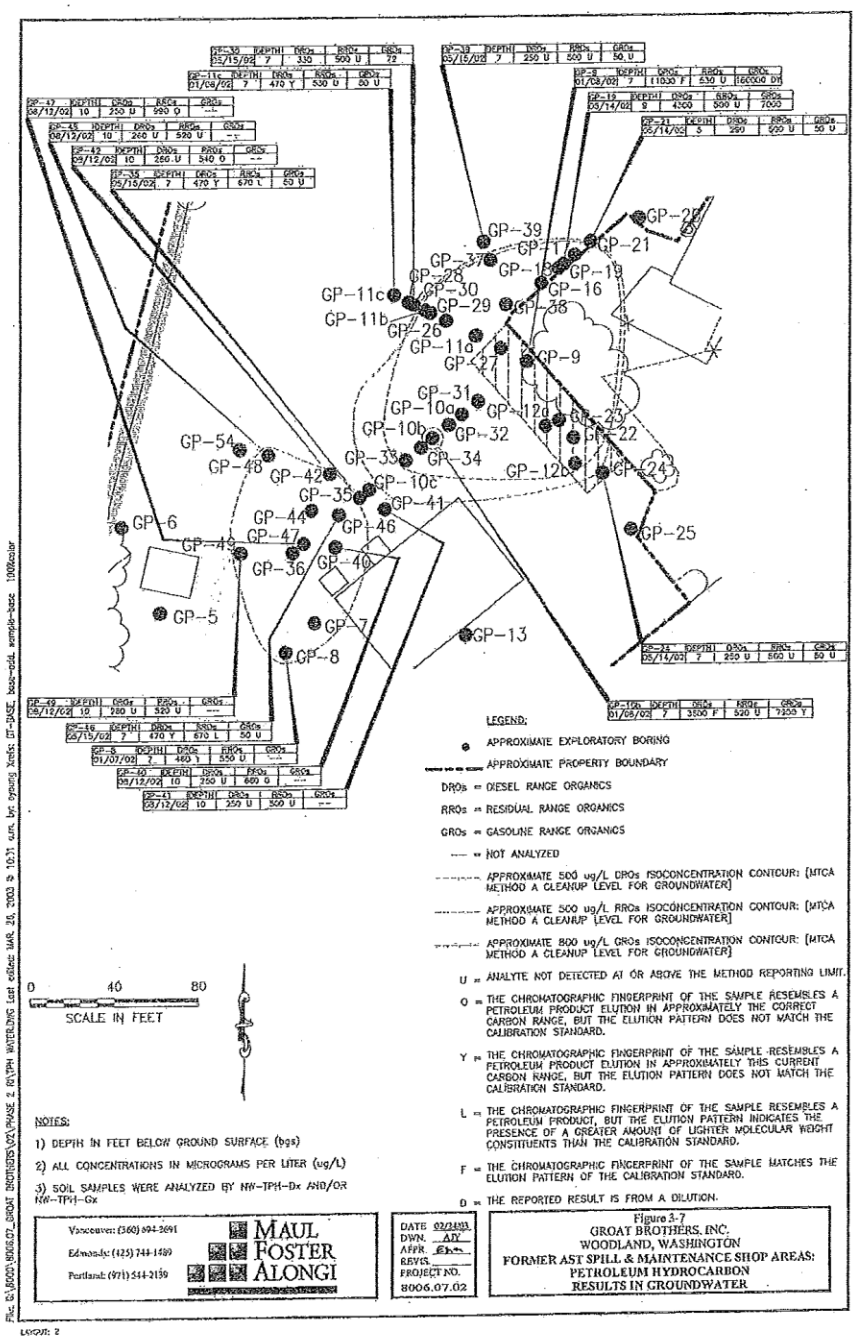
Truck Parking Area Groundwater Sampling Locations and Results



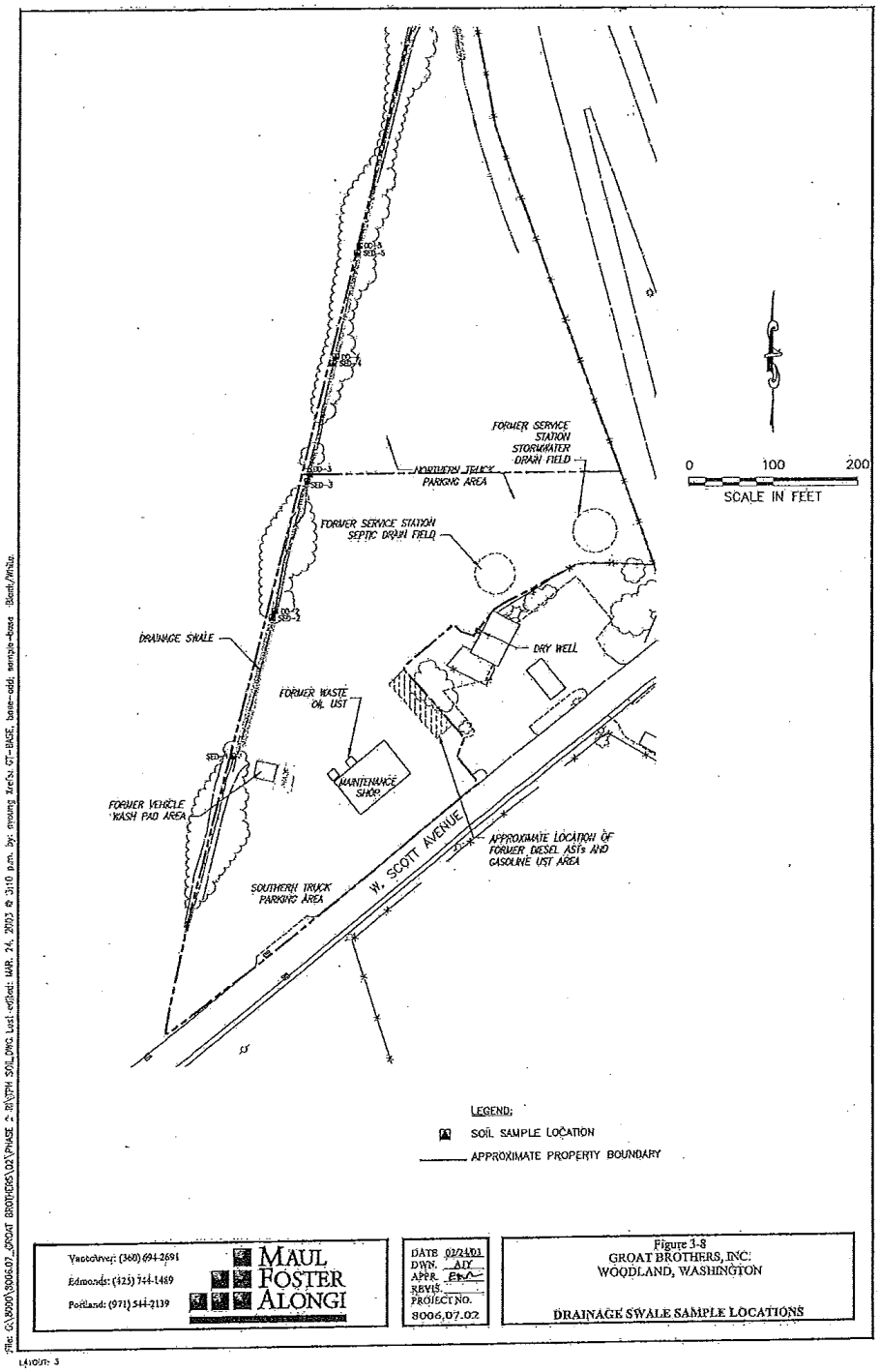
6.4 Former Vehicle Wash Pad Areas, Maintenance Shop Area and Former AST/UST Area Sampling Locations and Results



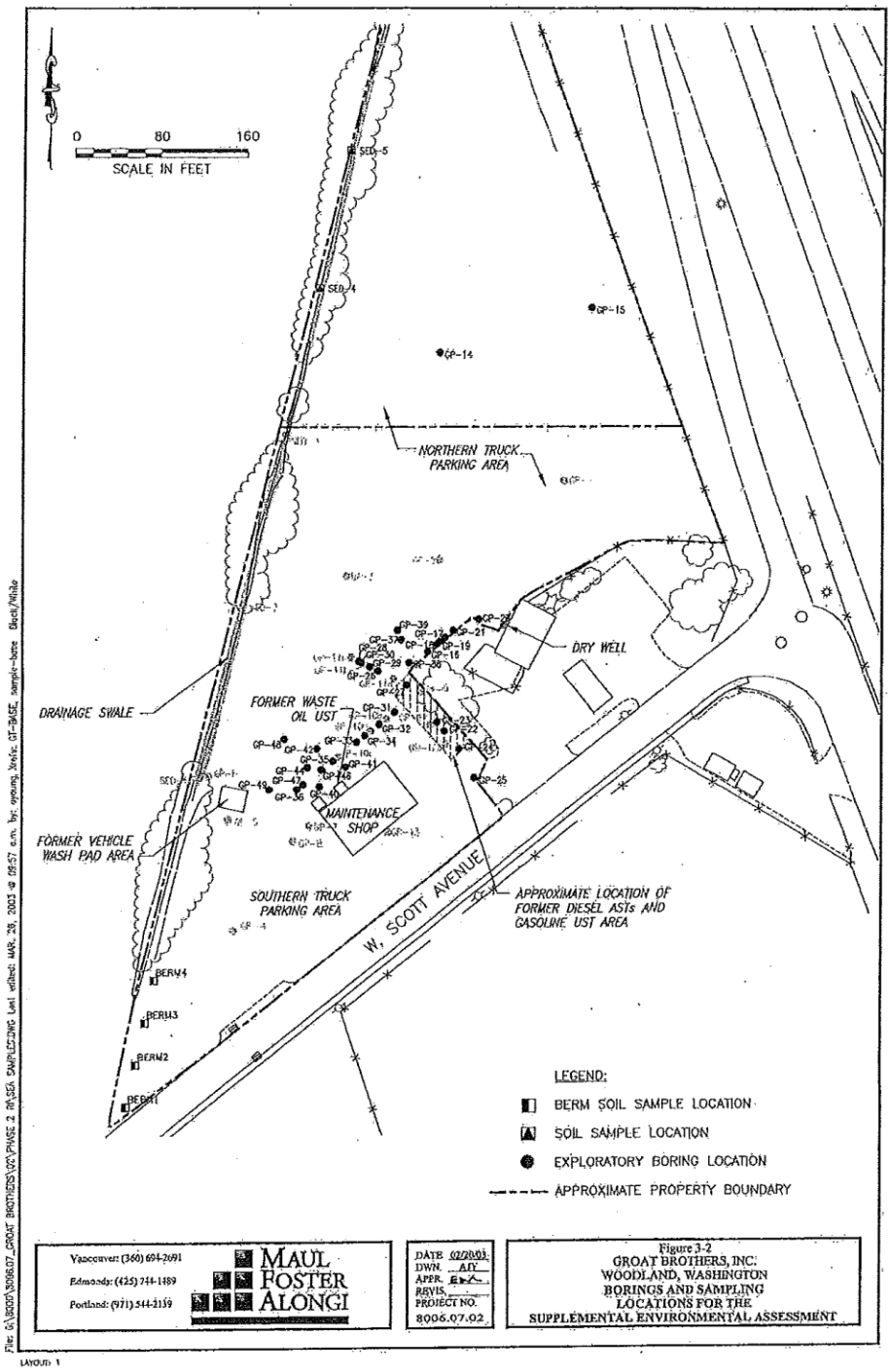
Maintenance Areas and Former AST/UST Area Groundwater Results



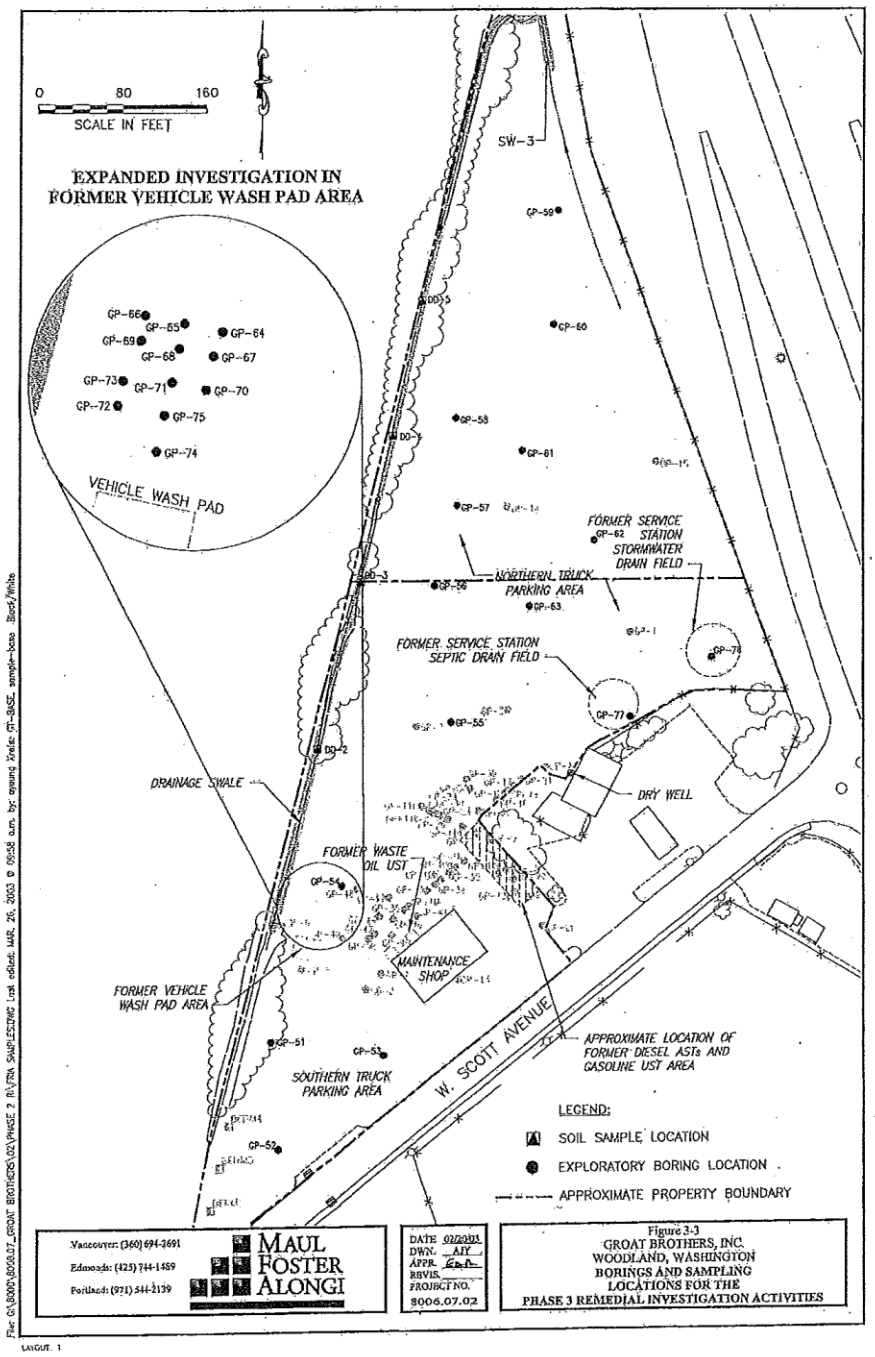
6.5 Drainage Swale Sampling Locations



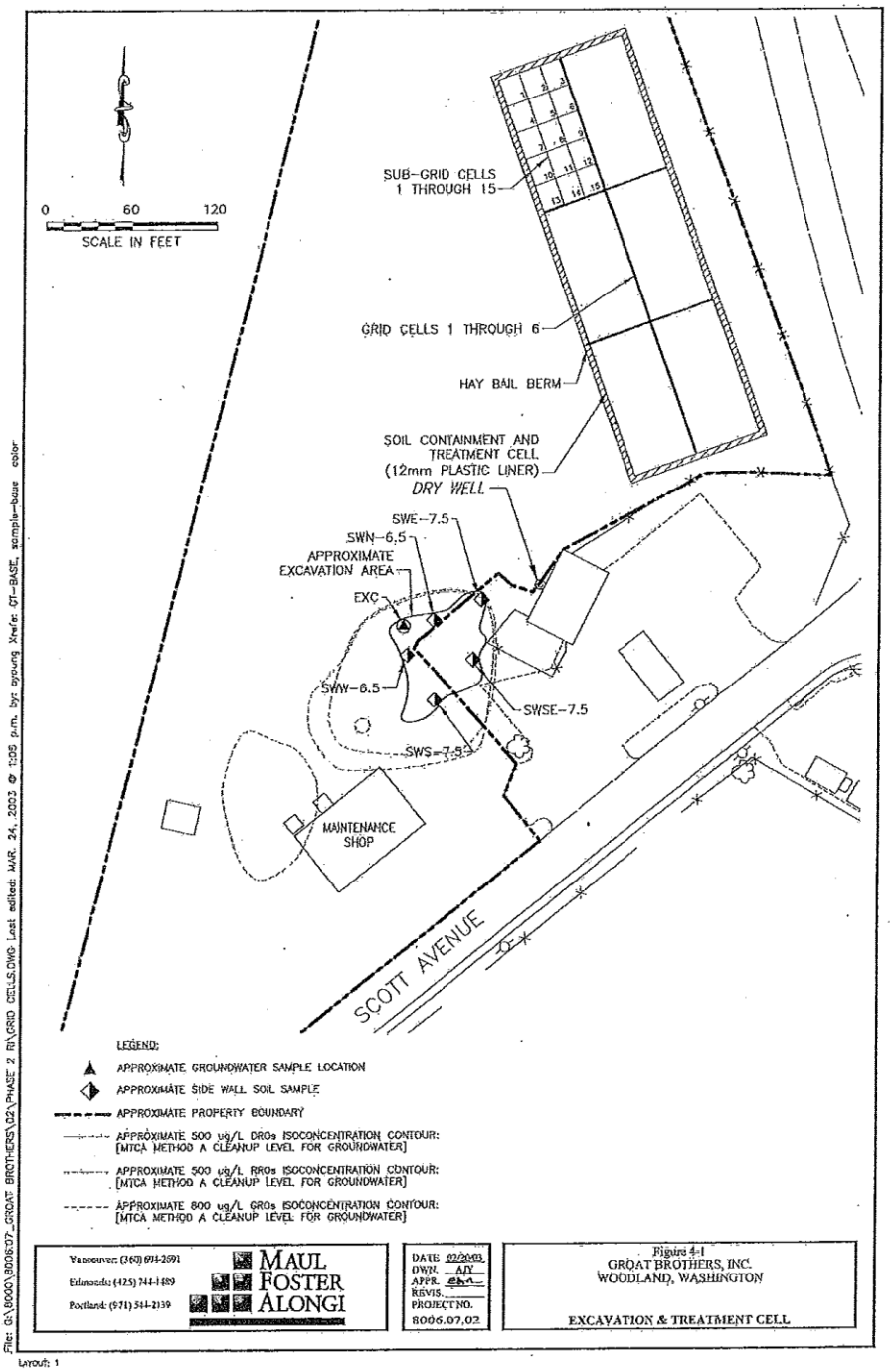
6.6 Phase 2 Investigations



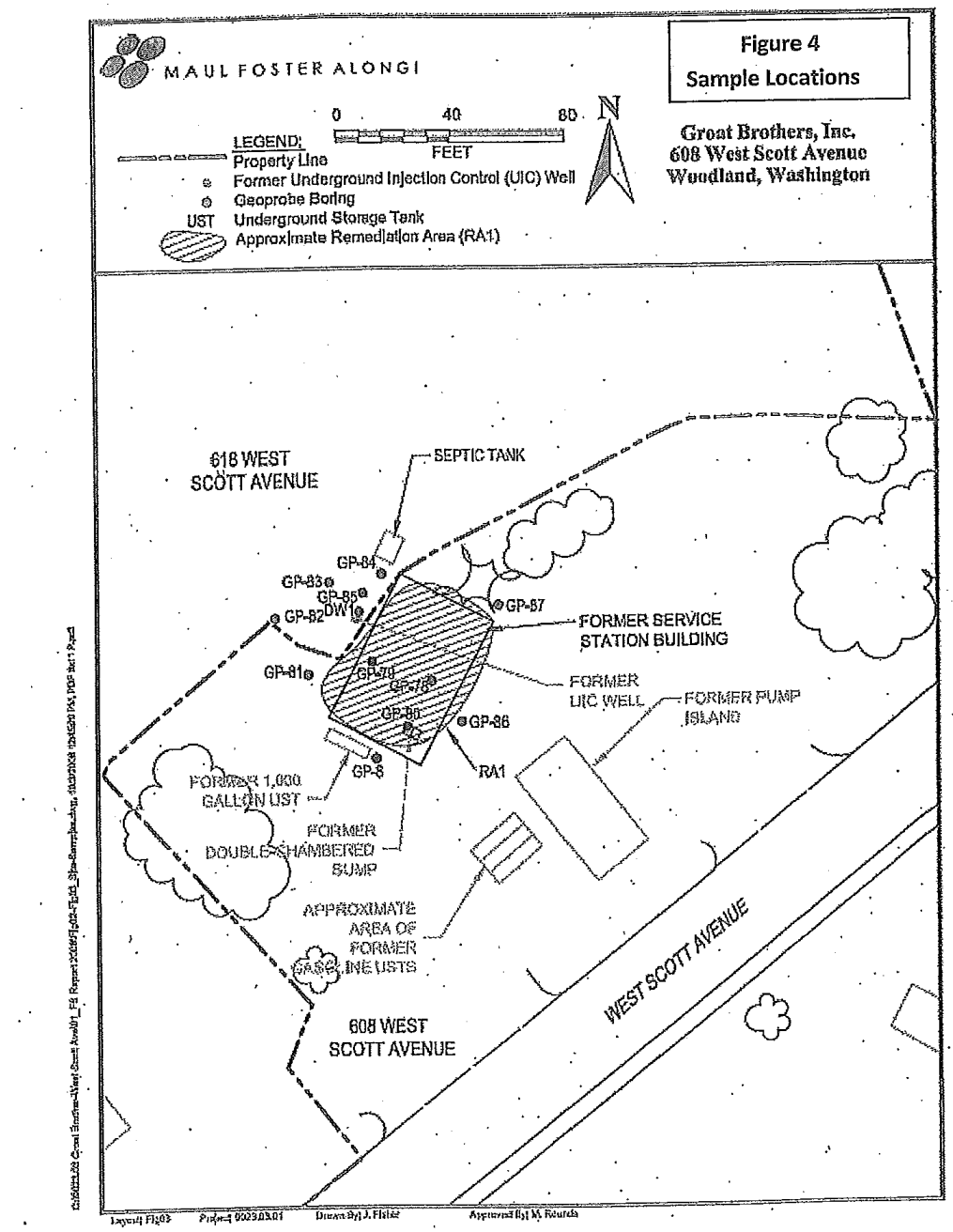
6.7 Phase 3 Investigations Sampling Locations



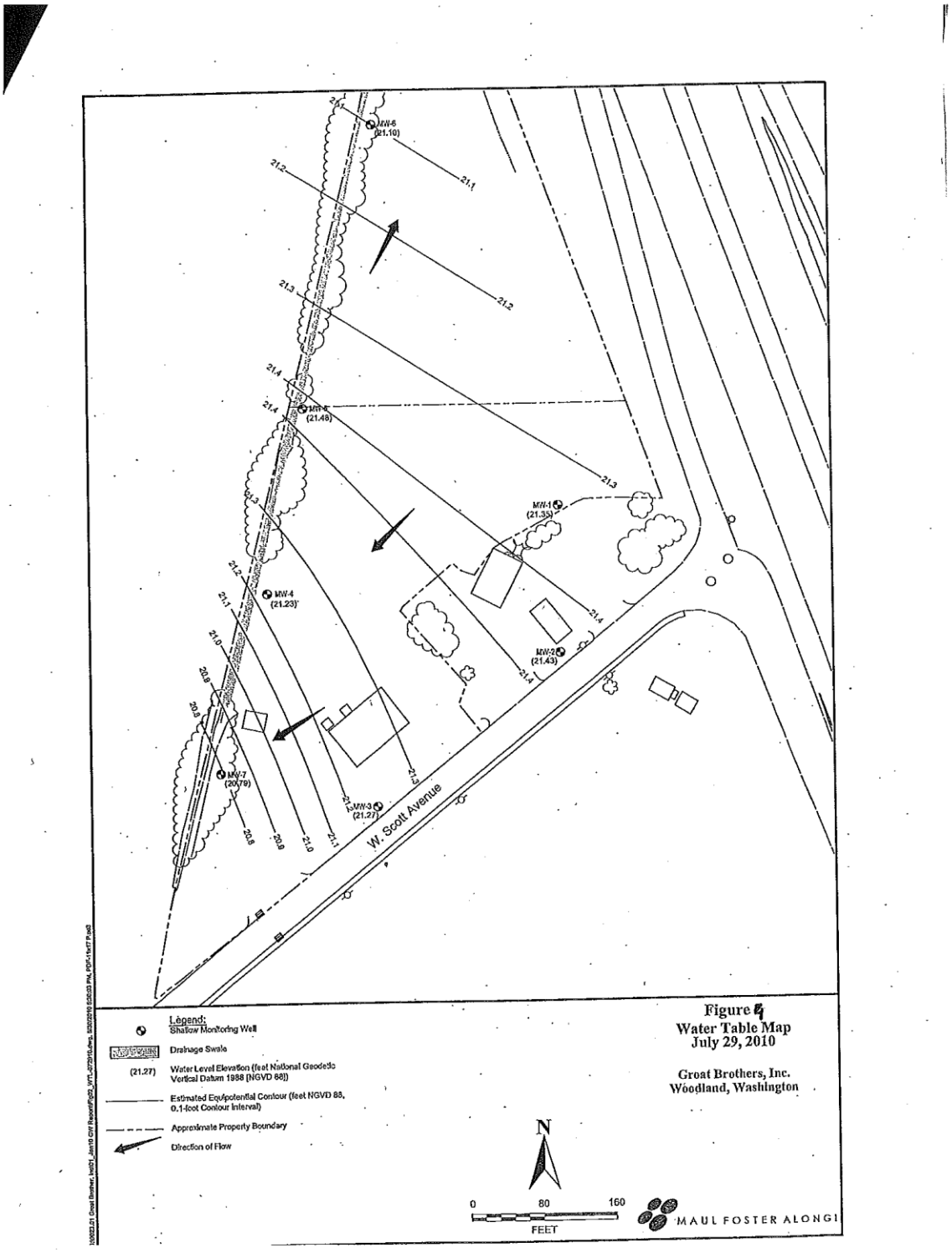
6.8 Approximate Extent of Contaminated Soils Excavation



6.9 UIC Decommissioning and Extent of Contaminated Soils Excavation



6.10 Groundwater Monitoring Well Locations and Groundwater Flow Direction



6.11 Environmental Covenant

3219641
Page: 1 of 2
03/31/2004 03:42P
COWLITZ COUNTY TITLE DEED 20.00 Cowlitz County

AFTER RECORDING MAIL TO:

Name WOODRIDGE LLC
Address 4809 NW 199th St.
City, State, Zip Ridgefield, WA 98642

Received $2,008.00 excise tax levied pursuant to Gen. Laws Ex. 1951
041133
AFF. NO.
COWLITZ COUNTY TREAS.
Date MAR 31 2004 By Deputy

Escrow No. 00137399-BGL

#1

Statutory Warranty Deed

THE GRANTOR DONALD L. GROAT SR., TRUSTEE OF THE GROAT LIVING TRUST DATED NOVEMBER 25, 1997 for and in consideration of Ten Dollars and other valuable consideration in hand paid, conveys and warrants to WOODRIDGE LLC, a Washington Limited Liability Company the following described real estate, situated in the County of COWLITZ, State of Washington:

See Exhibit A attached hereto and made a part hereof.

WDOL 125 IN S/M BOZARTH DLC

SUBJECT TO covenants, conditions, restrictions, reservations, easements and agreements of record, if any.

Assessor's Property Tax Parcel Account Number(s): 5-0603

Dated this 26TH day of MARCH, 2004.

THE GROAT LIVING TRUST DATED NOVEMBER 25, 1997

Donald L Groat Sr. Trustee

DONALD L. GROAT, SR., TRUSTEE

STATE OF WASHINGTON
COUNTY OF COWLITZ } ss:

I certify that I know or have satisfactory evidence that DONALD L. GROAT, SR. IS the person who appeared before me, and said person acknowledged that HE signed this instrument, on oath stated that HE IS authorized to execute the instrument and acknowledged it as the TRUSTEE of THE GROAT LIVING TRUST DATED NOVEMBER 25, 1997, to be the free and voluntary act of such party for the uses and purposes mentioned in this instrument.

Dated: MARCH 31, 2004

Bianca Lemmons

~~Gwendolyn D. Reid~~ Bianca Lemmons
Notary Public in and for the State of Washington
Residing at ~~Woodland~~ Kelso
My appointment expires: ~~7-29-07~~ 2-19-07

LPB-10

9/98 Vision Form SD002WA Rev. 10/29/98

2/20

3219641
Page: 2 of 2
03/31/2004 03:42P
COWLITZ COUNTY TITLE DEED 20.00 Cowlitz County

Exhibit A

THAT PORTION OF THE SQUIRE AND MILLY BOZARTH DONATION LAND CLAIM IN SECTION 13, TOWNSHIP 5 NORTH, RANGE 1 WEST OF THE W.M., IN THE COUNTY OF COWLITZ, STATE OF WASHINGTON, DESCRIBED AS FOLLOWS:

BEGINNING A T THE S OUTHWEST C ORNER O F A 15 ACRE TRACT CONVEYED BY S.J. BOZARTH TO STANFORD L. GATES, AS DESCRIBED IN VOLUME 26 OF DEED, PAGE 318, RECORDS OF COWLITZ COUNTY;
THENCE SOUTH 87° 33' 30" EAST ALONG SAID SOUTH LINE 417.36 FEET TO AN IRON ROD AT THE INTERSECTION OF SAID SOUTH LINE WITH THE WESTERLY RIGHT OF WAY LINE OF STATE HIGHWAY NO. 1;
THENCE S OUTH 1 9° 4 9' 1 0" E AST A LONG S AID R IGHT O F WAY A DISTANCE OF 41.94 FEET TO AN IRON ROD AT STATION 905+94.65;
THENCE SOUTH 30° 51' 30" WEST ALONG SAID RIGHT OF WAY 87.97 FEET TO AN IRON ROD AT THE INTERSECTION OF THE NORTHWESTERLY LINE OF SCOTT AVENUE;
THENCE ALONG SAID NORTHWESTERLY LINE THE FOLLOWING COURSES: SOUTH 51° 13' 50" WEST 468.44 FEET;
THENCE ON THE ARC OF A 477.46 FOOT RADIUS CURVE 156.28 FEET;
THENCE SOUTH 33° 13' 50" WEST 116.28 FEET;
THENCE ON THE ARC OF A 218.73 FOOT RADIUS CURVE 27.17 FEET TO AN INTERSECTION WITH THE WEST LINE OF THE SQUIRE AND MILLY BOZARTH DONATION LAND CLAIM;
THENCE NORTH 11° EAST ALONG SAID WEST LINE 680.5 FEET, MORE OR LESS, TO THE POINT OF BEGINNING.

EXCEPTING THEREFROM THAT PORTION CONVEYED TO THE CITY OF WOODLAND BY QUIT CLAIM DEED RECORDED IN AUDITOR'S FILE NO. 901210041.

ALSO EXCEPTING THAT PORTION DEEDED TO THE STATE OF WASHINGTON AS DESCRIBED UNDER AUDITOR'S FILE NO. 425741.

ALSO EXCEPTING THAT PORTION DECREED TO THE STATE OF WASHINGTON ENTERED IN COWLITZ COUNTY SUPERIOR COURT CAUSE NO. 26164.

SITUATE IN THE COUNTY OF COWLITZ, STATE OF WASHINGTON

FEB.23.2004 11:45AM JOEL RIVES LLP NO.321 P.2/7

RESTRICTIVE COVENANT

Lloyd L. Groat and Netta E. Groat and Donald L. Groat

608-618 West Scott Avenue, Woodland, Washington

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by Lloyd L. Groat and Netta E. Groat and The Groat Living Trust dated November 25, 1997 (the "Owners"), their successors and assigns, and the State of Washington Department of Ecology, its successors and assigns (hereafter "Ecology").

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

Focused Site Assessment Report, May 22, 2002, Maul Foster Alongi

Phase 2 Supplemental Environmental Assessment, August 6, 2002, Maul Foster Alongi

Final Remedial Investigation Report, March 30, 2003, Maul Foster Alongi

This Restrictive Covenant is required because the Remedial Action resulted in residual concentrations of total petroleum hydrocarbons ("TPH") and related constituents which exceed the Model Toxics Control Act Method A Residential Cleanup Levels for groundwater established under WAC 173-340-720. The groundwater contaminations were specifically found in the former above-ground and underground storage tanks area, the truck parking area, the maintenance shop area and the area of the former service station stormwater drain field. These groundwater contaminations are documented in Final Remedial Investigation Report, March 30, 2003, Maul Foster Alongi.

FEB.23.2004 11:45AM J.OEL RIVES LLP NO.321 P.3/7

Page 2

Lloyd L. Groat and Netta B. Groat and The Groat Living Trust are the fee owners of real property (hereafter "Property") in the County of Cowlitz, State of Washington that is subject to this Restrictive Covenant. The Property is legally described as follows:

> That portion of the Squire and Milly Bozarth Donation Land Claim in Section 13m Township 5 North, Range 1 West of the W.M., in the County of Cowlitz, State of Washington, described as follows:
>
> Beginning at the Southwest corner of a 15-acre tract conveyed by S. J. Bozarth to Stanford L. Gates, as described in Volume 26 of Deeds, page 318, records of Cowlitz County; thence South 87° 33' 00" East along said South line 417.36 feet to an iron rod at the intersection of said South line with the Westerly right of way line of State Highway No. 1; then South 19° 49' 10" East along said right of way a distance of 41.94 feet to an iron rod at station 905+94.65; thence South 30° 51' 30" West along said right of way 87.97 feet to an iron rod at the intersection of the Northwesterly line of Scott Avenue; thence along said Northwesterly line the following courses: South 51° 13' 50" West 468.44 feet; thence on the arc of a 477.46 foot radius curve 156.28 feet; thence South 33° 13' 50" West 116.28 feet; thence on the arc of a 218.73 foot radius curve 27.17 feet to an intersection with the West line of the Squire and Milly Bozarth Donation Land Claim; thence North 11° East along said West line 680.5 feet, more or less, to the point of beginning.

Lloyd L. Groat, Netta Groat and The Groat Living Trust make the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter "Owner").

RESTRICTIVE COVENANT 08/14/03

Section 1. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 2. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 3. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 4. NO GROUNDWATER MAY BE TAKEN FROM THE PROPERTY FOR ANY USE. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 5. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 6. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Remedial Action.

FEB.23.2004 11:46AM STOEL RIVES LLP NO.321 P.5/7

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Section 7. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

Lloyd L. Groat

8-27-03
Date

STATE OF WASHINGTON)
Cowlitz) ss.
County of ~~Clark~~)

On this day personally appeared before me **LLOYD L. GROAT**, to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged that she signed the same as free and voluntary act for the uses and purposes therein mentioned.

Given under my hand and official seal this 27th ~~July~~ August, 2003.

ELIZABETH CAROL ROUNDS NOTARY PUBLIC STATE OF WASHINGTON 7-1-07

Signature: Elizabeth Carol Rounds
Name (Print) Elizabeth Carol Rounds
NOTARY PUBLIC in and for the State of Washington,
residing at Woodland
My appointment expires: 7-1-07

RESTRICTIVE COVENANT 08/14/03

FEB.23.2004 11:46AM STOEL RIVES LLP NO.321 P.6/7

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Netta E. Groat

Netta E. Groat

August 27, 2003
Date

STATE OF WASHINGTON)
Cowlitz)
County of ~~Clark~~) ss.

On this day personally appeared before me **NETTA E. GROAT**, to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged that she signed the same as free and voluntary act for the uses and purposes therein mentioned.

Given under my hand and official seal this 27th August, 2003.

Signature: Elizabeth Carol Rounds
Name (Print): Elizabeth Carol Rounds
NOTARY PUBLIC in and for the State of Washington,
residing at Woodland
My appointment expires: 11-1-07

ELIZABETH CAROL ROUNDS
NOTARY PUBLIC
STATE OF WASHINGTON
AUREIL
11-1-07

RESTRICTIVE COVENANT 08/14/03

FEB.23.2004 11:46AM JEL RIVES LLP NO.321 P.7/7

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Donald L. Groat
Living Trust dated November 25, 1997

August 18, 2003
Date

STATE OF WASHINGTON)
) ss.
County of Clark)

On this day personally appeared before me **DONALD L. GROAT, Trustee of The Groat Living Trust**, to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged that she signed the same as free and voluntary act for the uses and purposes therein mentioned.

Given under my hand and official seal this 18 ~~July~~ August, 2003.

Signature: Pat L Pabst
Name (Print): PAT L. PABST
NOTARY PUBLIC in and for the State of Washington,
residing at Camas, WA
My appointment expires: 4-15-2004

STATE OF WASHINGTON NOTARY PUBLIC PAT L. PABST MY APPOINTMENT EXPIRES APR 15, 2004

RESTRICTIVE COVENANT 08/14/03

6.12 Photo Log

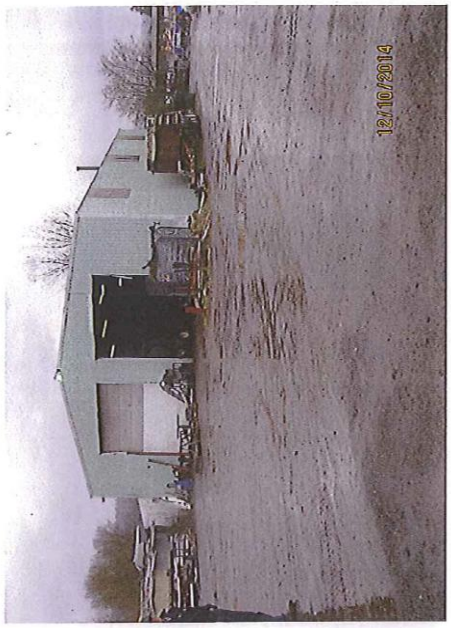

Photo 2: Truck Maintenance Building – Looking East

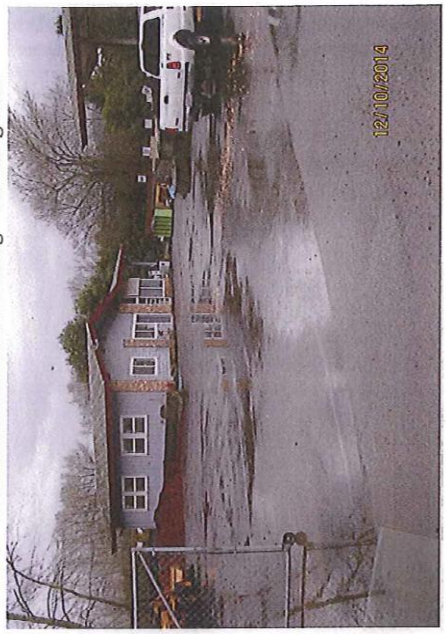

Photo 4: Office Building – Looking Southeast

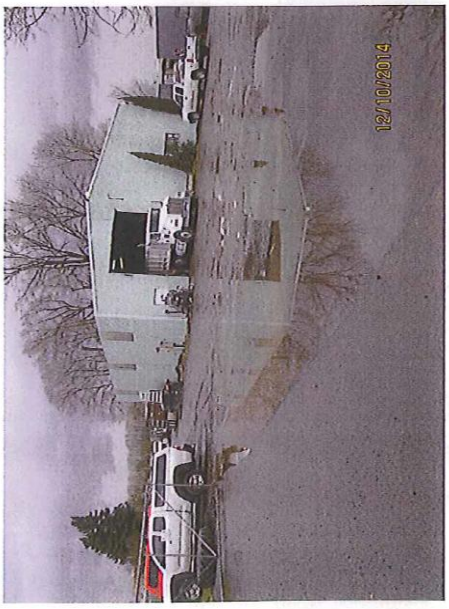

Photo 1: Truck Maintenance Building – Looking West

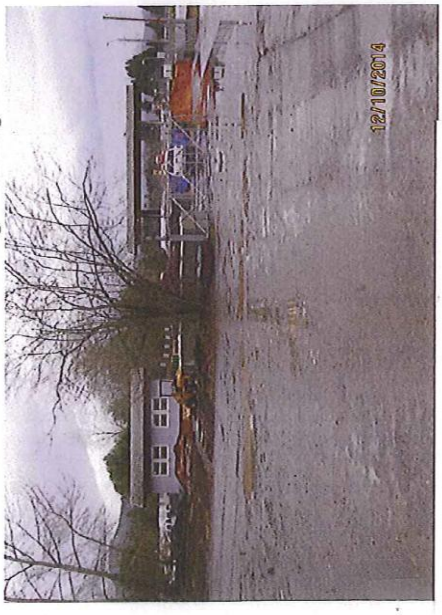

Photo 3: Office Building – Looking East

6.6

Photo 6: Groundwater Monitoring Well – MW - 5

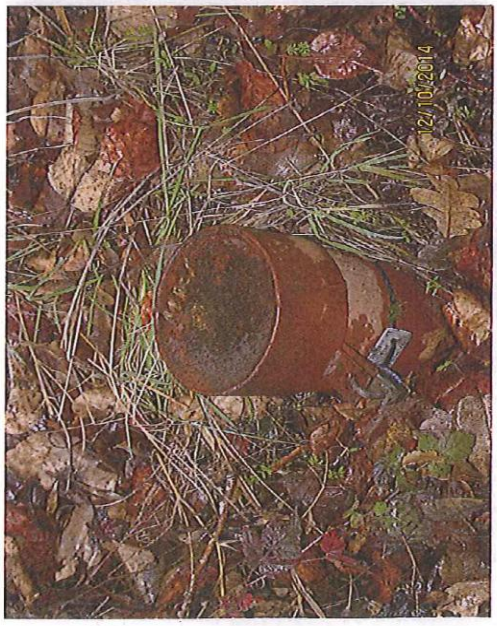

Photo 5: Groundwater Monitoring Well – MW - 4

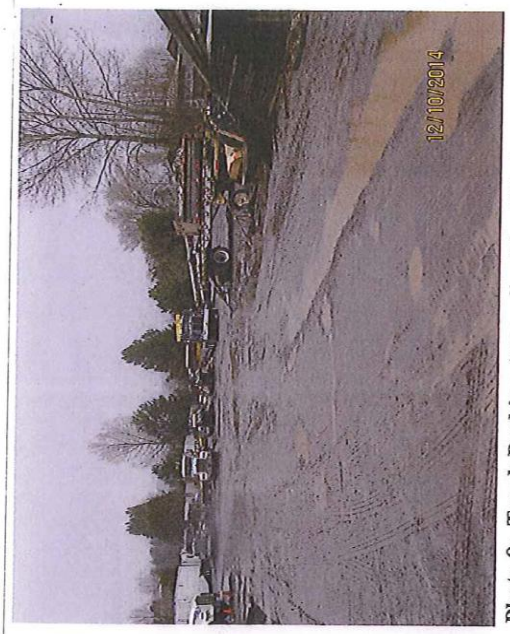

Photo 8: Truck Parking Area – Looking West

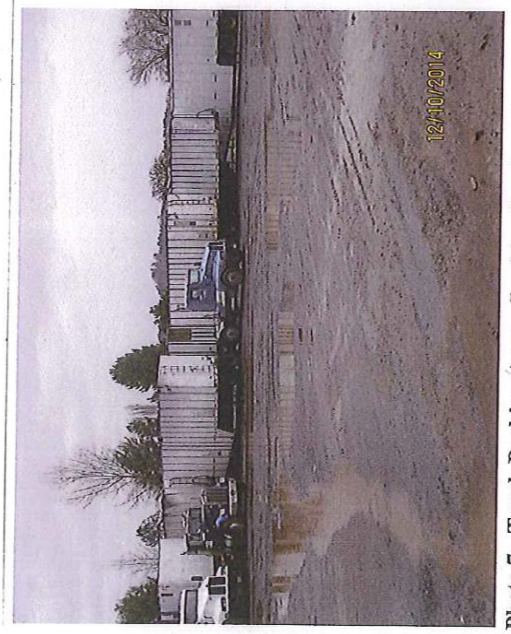

Photo 7: Truck Parking Area – Looking Southwest