PERIODIC REVIEW

Gaco Western
FS ID#: 2402

18700 Southcenter Parkway
Tukwila, Washington 98138

Northwest Region Office

TOXICS CLEANUP PROGRAM

February 2016

1.0 INTRODUCTION

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

Cleanup activities at this Site were completed under Agreed Order No. DE 92 HS-N28S. The cleanup actions resulted in residual concentrations of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), benzene, toluene, ethylbenzene, xylenes and methyl isobutyl ketone (MIBK) exceeding MTCA Method A cleanup levels for soil and groundwater. The cleanup levels for soil were established under WAC 173-340-740(2). The MTCA Method A cleanup levels for groundwater are established under WAC 173-340-720(3). WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

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

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

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

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

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

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

The Gaco Western Facility is located in an industrial area of south Seattle in King County, Washington (Vicinity Map - Appendix 6.1). Following remedial activities, a Restrictive Covenant was recorded for the property in 1996. The Site received a 'No Further Action' (NFA) determination in 1996 by Ecology's Hazardous Waste and Toxics Reduction Program. A NFA has not been issued by Ecology's Toxics Cleanup Program. The Site continues to be used for industrial purposes.

The Gaco Western facility has been in commercial operation in Tukwila, Washington since 1968. Gaco Western's dangerous waste identification number is: WAD 009241027, and Gaco Western is an active Medium Quantity Generator of dangerous wastes (less than 2,200 pounds per year and greater than 220 pounds per year). The company manufactures liquid rubber coatings used for industrial tank liners, roof coatings, and general waterproofing. There is approximately 33,000 square feet of manufacturing area and approximately 13,000 square feet of office space at the facility. The Site occupies an area of approximately three acres. North of the Site is the Segale Asphalt Plant and south of the Site is the Mitchell Moving/storage Warehouse. A residential property is located west of the Site; however, none of the surrounding area is zoned residential for a radius of approximately one-half mile. The Green River is approximately 70 feet east of the Gaco facility and 150 feet from any production areas of the plant. The Gaco Western property eastern boundary is the high-water mark of the Green River.

Until September 1991, Gaco Western operated 14 underground storage tanks (USTs), located on the west side of the Site. These USTs were organized in two groups: three USTs were clustered on the southwest side of the facility and 11 USTs were clustered on the northwest side of the facility. The two UST groups were approximately 50 feet apart. These USTs contained xylenes, toluene, methyl-ethyl ketone, and ethylbenzene, chlorinated paraffins, cyclolube, trimethyl benzene, propanol, and naphtha. These products were pumped through an underground piping system into the facility building for manufacturing processes.

A site plan is available as Appendix 6.2.

2.2 Site Investigations and Cleanup

Gaco Western decided to have the 14 USTs removed and convert to a "just-in-time" system of production materials delivery in mid-1991. Northwest EnviroService, as a subcontractor to Envirocon, Inc., removed and disposed of the 14 USTs in September 1991. Two pits were opened to remove the 14 USTs and associated piping. Solvents were detected under some of the tanks upon removal. Approximately seven yards of soil were removed from the excavated pits

during UST removal and stockpiled near the excavation. Confirmation samples were collected from the limits of the excavation.

Envirocon installed four resource protection wells in 1991, located on the west side of the Gaco Western facility. According to Gaco Western records, these resource protection wells were screened across a clay-silt layer separating two water-bearing zones. Ground water samples taken from the four resource protection wells confirmed the presence of benzene, ethyl benzene, xylenes, and toluene in the ground water. Gaco Western personnel detected approximately 3/8"-1/2" of free product on top of the ground water table in February 1992, while making water level measurements in the four resource protection wells, in resource protection well MW-3. Subsequent laboratory analysis identified this product as gasoline or a gasoline-like substance.

Gaco Western recommended and was given permission by Ecology on February 19, 1992 to abandon the four existing resource protection wells to eliminate the possible threat of cross-contamination of the lower water-bearing zone. These wells were abandoned and five resource protection wells were installed in the upper water-bearing zone. Two resource protection wells were installed in the lower water-bearing zone in April 1992.

Based on the chemical analyses of soil samples taken at the bottom of the two UST excavations and from soil borings, data indicated the following hazardous substances are present in the soils at the site:

- Methyl-Ethyl Ketone
- Ethylbenzene
- Xylenes
- Toluene

Data from these samples is available in Appendix 6.3.

Groundwater monitoring data indicated the following hazardous substances present in groundwater:

- Benzene
- Ethyl Benzene
- MIBK
- Methylene Chloride
- Toluene
- Xylene
- Chloroform
- 1-1-2-2-Tetrachloroethane
- Tetrachloroethene
- Trichloroethene
- 1-2 Dichloroethene
- 1-1-1 Trichloroethane

2.3 Cleanup Levels

MTCA Method A and Method B cleanup levels were used for the Site. Some of the key contaminants of concern (COC) and their cleanup levels before and after MTCA changes in 2001 are listed in the table below:

Analyte	1991 MTCA Soil Cleanup Level (ppm)	2001 MTCA Method A Soil Cleanup Level (ppm)	1991 MTCA Method A Groundwater Cleanup level (ppb)	2001 MTCA Method A Groundwater Cleanup Level (ppb)
Arsenic	20	20	5	5
Benzene	0.5	0.03	5	5
Ethylbenzene	20	6	30	NL
Lead	250	250	5	15
Methyl Ethyl Ketone	NL	48000*	NL	4800*
Tetrachloroethylene	0.5	0.03	5	5
Toluene	40	7	40	1000
Total Xylenes	20	9	20	1000
TPH	NL	NL	1000	NL
TPH-Gas	100	100/30	NL	1000/800
TPH-Diesel	200	2000	NL	500
TPH-Oil	200	2000	NL	500
1,1,1 Trichloroethane	20	2	200	200

NL = None listed
ND = Not detected
*** = Method B level**

2.4 Groundwater Monitoring

Groundwater monitoring conducted at the Site between 1992 and 1996. At the time of the final groundwater monitoring event in 1996, groundwater samples collected from HC-1D and HC-2D exceeded MTCA Method A cleanup standards for benzene, ethylbenzene and total xylenes. It is not known why groundwater monitoring was ceased after the 1996 event. A letter from Ecology's Hazardous Waste and Toxics Reduction division in 1995 indicated that the need for additional groundwater monitoring would be evaluated following the 1996 sampling event. There is no evidence that this evaluation took place, though no additional groundwater monitoring has been conducted at the Site. Groundwater monitoring data is available in Appendix 6.4.

2.5 Restrictive Covenant

The Restrictive Covenant was recorded in 1996 and is available as Appendix 6.5. The following limitations are found in the current Restrictive Covenant:

1. The site may only be used for industrial purposes.
2. Any activity that will interfere with groundwater monitoring at the Site is prohibited.
3. No groundwater may be taken for domestic purposes from the Site.
4. The owner or successor owner of the Site must give written notice of intent to convey any interest in the Site.
5. The owner or successor owner must notify and obtain approval from Ecology prior to any use of the Site that is inconsistent with the terms of the Covenant.
6. The owner or successor owner shall grant Ecology the right to enter the site at reasonable times.
7. The owner or successor owner reserves the right to remove this Covenant with Ecology's approval.

A 'No Further Action' determination was issued by Ecology's Hazardous Waste and Toxics Reduction division in 1996. This determination stated that groundwater monitoring should continue for an additional quarter, after which the need for further monitoring would be evaluated. There is no indication that this evaluation took place.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

Based upon the site visit conducted on February 18, 2016, the building and asphalt cover at the Site continue to eliminate exposure to contaminated soils by ingestion and direct contact. The asphalt appears cracked and degraded, but it still serves to prevent direct human contact to contaminated soils. The Site continues to operate as a commercial facility. A photo log is available as Appendix 6.6.

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

Soils with VOC concentrations higher than MTCA Method A cleanup levels are still present at the Site. However, the structures and asphalt surface prevent human exposure to this contamination by ingestion and direct contact with soils and the Restrictive Covenant will prevent future exposure of these soils to the environment. Groundwater with benzene, ethylbenzene and total xylene concentrations exceeding MTCA Method A cleanup levels are also still be present at the Site, though groundwater use restrictions likely prevent human exposure to contaminated groundwater. Additional groundwater monitoring should be conducted to assure that groundwater contamination remains contained at the Site.

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

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

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

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

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

Although cleanup levels changed for some COCs at the Site as a result of modifications to MTCA in 2001, contamination remains at the site above MTCA Method A cleanup levels; however, the cleanup action is still likely protective of human health and the environment.

3.4 Current and projected site use

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

3.5 Availability and practicability of higher preference technologies

The remedy implemented included containment of hazardous substances and is likely to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

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

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

4.0 CONCLUSIONS

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

- The cleanup actions completed at the Site appear to be protective of human health and the environment.

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

- Groundwater monitoring has not been conducted the Site since 1996. Ecology recommends that a groundwater monitoring event be conducted at the Site to evaluate the current status of residual groundwater contamination.

Based on this periodic review, the Department of Ecology has determined that the requirements of the Restrictive Covenant continue to be satisfactorily met. It is the property owner's responsibility to continue to inspect the site to assure that the integrity of the site surfaces is maintained. Remedial actions at the Site fail to be protective of human health and the environment due to the unknown status of groundwater contamination that was still present during the last groundwater monitoring event in 1996.

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

EnviroCon, Inc. 1991. Findings from UST Assessment.

Gaco Western, Inc. 1995. Third Quarter Ground Water Monitoring Report and Long Term Groundwater Monitoring Proposal.

Gaco Western, Inc. 1996. September 1996 Groundwater Monitoring Report.

Ecology. Restrictive Covenant, 1996.

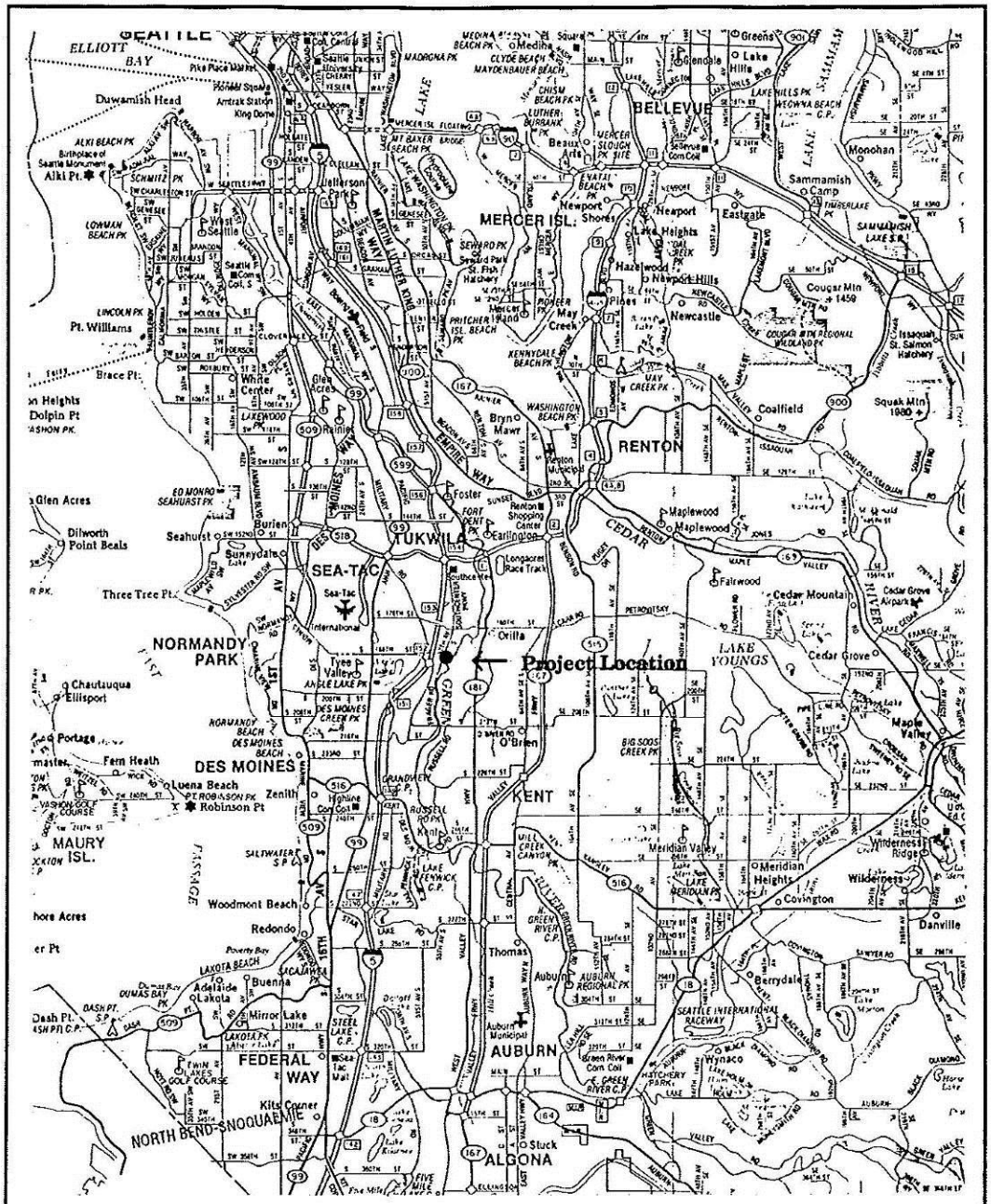
Ecology HW/TR. No Further Action letter. 1996.

Ecology, 2009, Site Visit.

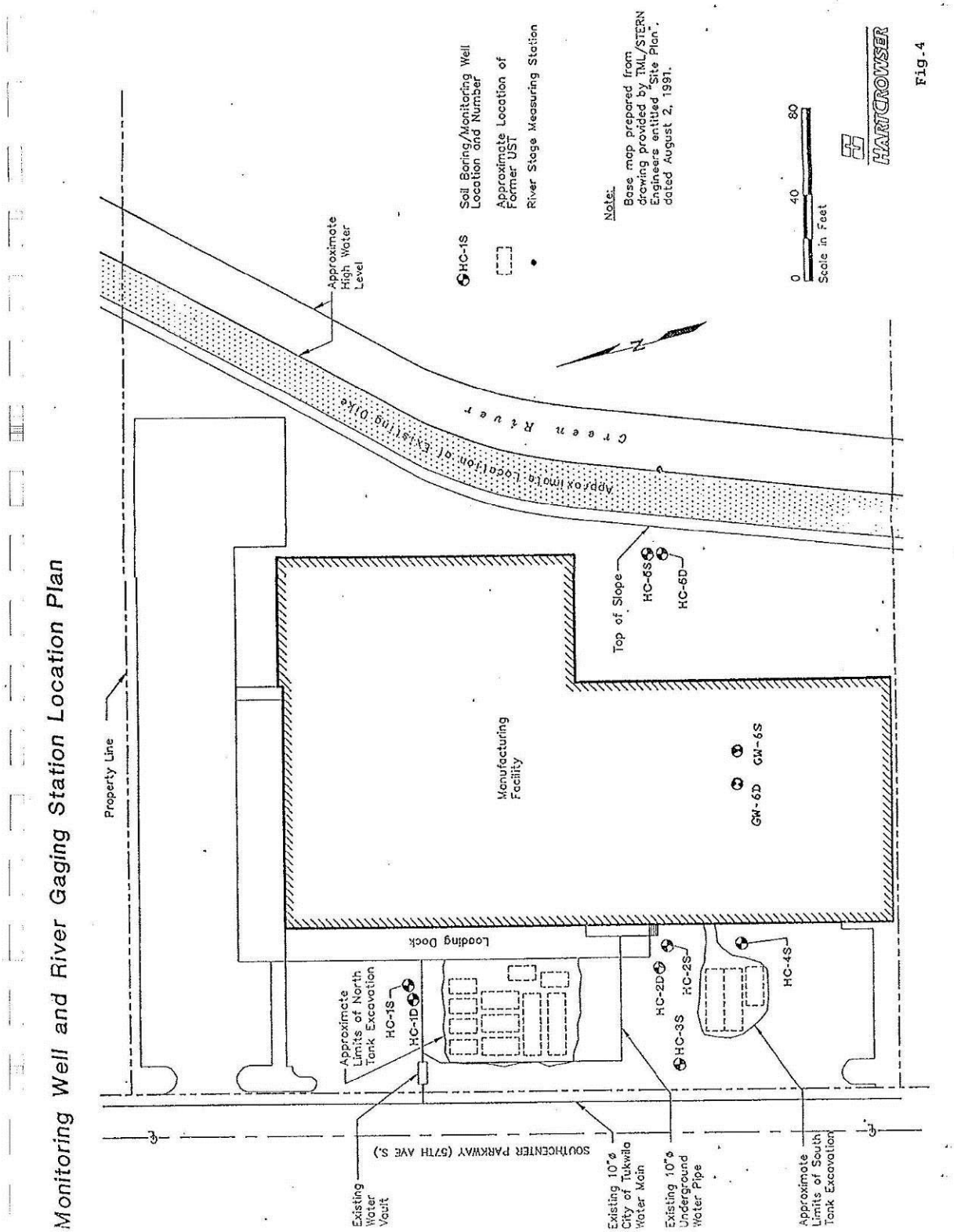
Ecology, 2016, Site Visit.

6.0 APPENDICES

6.1 Vicinity Map



6.2 Site Plan


Monitoring Well and River Gaging Station Location Plan
Soil Boring/Monitoring Well Location and Number
Approximate Location of Former UST
River Stage Measuring Station
Note:
Base map prepared from drawing provided by TML/STERN Engineers entitled "Site Plan", dated August 2, 1991.
Scale in Feet
HARTCROWSER
Fig.4
Approximate High Water Level
Approximate Location of Existing Dike
Green River
Property Line
Top of Slope
HC-6S
HC-6D
Manufacturing Facility
GW-6S
GW-6D
Loading Dock
Approximate Limits of North Tank Excavation
HC-1S
HC-1D
HC-2D
HC-2S
HC-3S
HC-4S
SOUTHCENTER PARKWAY (57TH AVE S.)
Existing Water Vault
Existing 10"ø City of Tukwila Water Main
Existing 10"ø Underground Water Pipe
Approximate Limits of South Tank Excavation

6.3 Soil Sampling Data

Table 1. A Summary of Results for Volatile Organics in Soils - EPA Test Method 8240

Sample Number	Sample Depth in Feet	MICRO TIP* (ppm)	TCA (ppm)	PCE (ppm)	MEK (ppm)	Toluene (ppm)	Ethyl benzene (ppm)	Total Xylene (ppm)
A-1B	12 to 13		-	-	-	19	160	1,600
A-2SE	7 to 8		-	0.120	-	-	-	0.092
A-3W	7 to 8		-	-	-	-	22	310
B-1B	12 to 13	1,023	-	-	-	4	26	260
B-2E	7		-	-	-	-	0.350	7.4
D-1B[1]	NA		-	-	-	-	16	120
D-1[2]	NA		-	-	-	12	97	900
E-1	2	11	0.06	-	-	-	0.130	0.870
4-1B	12 to 13	1,476	-	-	1,300	38	-	300
9-1B	12 to 13	8,013	-	-	-	6,500	870	870
10-1B	13	3,317	-	-	-	640	97	74
11-1B	12 to 13		-	-	-	400	71	130
11-2E	7 to 8		-	-	-	1.9	1.2	4.7
12-1B[3]	NA		-	-	-	15,000	1,700	1,700
MTCA			NA	0.5	NA	40	20	20

1 = Field Duplicate of B-1B
2 = Stockpile Soil Sample (composite)
3 = Field Duplicate of 9-1B
* = Field Screening Gas Analyzer - Photoionization Detector
Photovac MICROTIP
TCA = Tetrachloroethane
PCE = Tetrachloroethene
MEK = Methyl Ethyl Ketone (2-Butanone)
ppm = parts per million (mg/Kg)
- = below detection limit
MTCA = WA. State Models Toxics Control Act (Method A industrial soils)
NA = Not Applicable

Table 2. - A Summary of Results for Volatile Organics and Total Petroleum Hydrocarbons in Soils - EPA Test Methods 8020 and 418.1

Sample Number	Sample Depth in Feet	MICRO TIP* (ppm)	Toluene (ppm)	Ethyl benzene (ppm)	Total xylenes (ppm)	TPH (ppm)
C-1B	12	-	NA	NA	NA	-
C-2E	5	-	NA	NA	NA	-
D-1[a]						190
1-1B	10 to 12	3,900	12	17	77	330
1-2W	5 to 6	50	-	-	0.55	NA
2-1B	12 to 13		120	230	860	NA
2-2E	2		-	0.050	0.21	NA
3-1BE	12 to 13	4,800	330	120	560	NA
5-1B	12 to 13	2,120	2,500	100	410	NA
6-1B	12 to 13	5,500	840	90	260	NA
7-1B	12 to 13	8,176	NA	NA	NA	1,600
7-2E	4 to 5	6,676	18	84	460	NA
8-1B	13 to 14	1,700	40	-	13	NA
8-2E	12 to 13	76	0.070	-	0.36	NA
MTCA			40	20	20	200

a = See Table 1 for volatile organic results
* = Field Screening Gas Analyzer - Photoionization Detector
ppm = parts per million (mg/Kg)
- = below detection limit
MTCA = WA. State Models Toxics Control Act (Method A industrial soils)
NA = Not Analyzed

6.4 Groundwater Monitoring Data

Table 2 - Summary of Detected Chemical Constituents in Groundwater

Well	Acetone	Benzene	2-Butanone (MEK)	Total 1,2-Dichloro-ethene	Ethyl-benzene	4-Methyl-2-Pentanone (MIBK)	Tetrachloro-ethene	Toluene	Total Xylenes	TPH Quantified as Gasoline	TPH Quantified as Diesel
	Concentration in ug/L									Concentration in mg/L	
HC-1D											
12/9/92	10 U	39	88		670 D4	10 U	1 U	2,800 D4	2,000 D4	8	5 U
3/22/93	50 U	30	50 U		360	50 U	5 U	880	1,400	3	1 U
6/10/93	50 U	22	50 U		220	50 U	5 U	570	970	2	1 U
9/23/93	10 U	8	10 U		180	10 U	1 U	480 D3	920 D3	2	1 U
8/11/94	100 U	50 U	200 U		410 D4	200 U	50 U	3200 D4	900 D4	8.6 D4	NA
3/23/95	NA	36	NA		340	NA	NA	340	2100	NA	NA
6/30/95	NA	13 F	NA		100 E,F	NA	NA	78 E,F	710 E,F	NA	NA
10/3/95	20 U	25	20 U	1 U	460 E	1 U	1 U	1500 E,F	1510 E	NA	NA
9/29/96	400 U	27 D5	400 U	100 U	360 D5	100 U	100 U	980 D5	1400 D5	NA	NA
HC-2D											
12/9/92	140 B	240	100 U		6,400 D7	4,000 D7	10 U	2,200	28,000 D7	62	5 U
3/22/93	100 U	250	100 U		9,000 D7	630	10 U	2,200	36,000 D7	59	1 U
6/10/93	200 U	200	200 U		5,300	800	20 U	1,900	28,000 D7	44	1 U
9/23/93	500 U	250	500 U		6,700	1,100	50 U	1,400	29,000	51	1 U
8/11/94	1000 U	260 D8	1000 U		7,300 D8	1000 U	200 U	710 D8	18,000 D8	20 D4	NA
3/23/95	NA	210	NA		9,500	NA	NA	3,300	40,000	NA	NA
6/30/95	NA	320 D7,F	NA		10,000 D7,E,F	NA	NA	3,000 D7,E,F	42,000 D7,E,F	NA	NA
10/3/95	20 U	220	20 U	3.8	3,500	120 F	1 U	700 F, E	21,000	NA	NA
9/29/96	20 U	290 J	20 U	4.7 J	1,200 J	83 J	5 U	830 J	5,600 J	NA	NA

Notes:
D3 = Value from a five-fold diluted analysis
D4 = Value from a ten-fold diluted analysis
D5 = Value from a 20-fold diluted analysis
D7 = Value from a 100-fold diluted analysis
D8 = Value from a 50-fold diluted analysis
NA = Not Analyzed

J = Estimated value
U = Not detected at the method detection limit indicated
B = Constituent also detected in laboratory reagent blank; Laboratory contamination indicated
E = Constituent also detected in equipment blank
F = Constituent also detected in field blank

Table 2 - Summary of Detected Chemical Constituents in Groundwater (cont.)

Well	Acetone	Benzene	2-Butanone (MEK)	Total 1,2-Dichloro-ethene	Ethyl-benzene	4-Methyl-2-Pentanone (MIBK)	Tetrachloro-ethene	Toluene	Total Xylenes	TPH Quantified as Gasoline	TPH Quantified as Diesel
	Concentration in ug/L									Concentration in mg/L	
HC-5D											
12/9/92	10 U	1 U	10 U		1 U	10 U	1 U	1 U	2	1 U	5 U
3/22/93	10 U	1 U	10 U		2	10 U	1 U	1 U	3	1 U	1 U
6/10/93	10 U	1 U	10 U		1 U	10 U	1 U	1 U	1 U	1 U	1 U
9/23/93	10 U	1 U	10 U		1 U	10 U	1 U	1 U	2	1 U	1 U
8/11/94	20 U	5 U	20 U		5 U	20 U	5 U	5 U	5 U	0.05 U	NA
3/23/95	NA	0.74	NA		0.5 U	NA	NA	0.5 U	5.3	NA	NA
6/30/95	NA	0.5 U	NA		0.5 U	NA	NA	0.5 U	2.3 E,F	NA	NA
10/3/95	72 E,F	1 U	20 U	1 U	1 U	1 U	1 U	1 U	6 E	NA	NA
9/29/96	20 U	5 U	20 U	5 U	5 U	5 U	5 U	5 U	8.8	NA	NA
GW-6D											
8/11/94	20 U	5 U	20 U	7	5 U	20 U	5 U	5 U	5 U	0.05 U	NA
3/23/95	NA	1	NA	NA	0.5 U	NA	NA	0.5 U	0.5 U	NA	NA
6/30/95	NA	0.82 F	NA	NA	0.5 U	NA	NA	8.3 E,F	0.5 U	NA	NA
10/3/95	20 U	1 U	29 E,F	20	1 U	1 U	1 U	1 U	1 U	NA	NA
9/29/96	20 U	5 U	20 U	31	5 U	5 U	5 U	5 U	5 U	NA	NA
FIELD BLANK											
6/30/95	NA	0.5 U	NA		1.7	NA	NA	2.7	8	NA	NA
10/3/95	26	1 U	23	1 U	1 U	1.4	1 U	1.1	1 U	NA	NA

Notes:

D3 = Value from a five-fold diluted analysis
D4 = Value from a ten-fold diluted analysis
D5 = Value from a 20-fold diluted analysis
D7 = Value from a 100-fold diluted analysis
D8 = Value from a 50-fold diluted analysis
NA = Not Analyzed

J = Estimated value
U = Not detected at the method detection limit indicated
B = Constituent also detected in laboratory reagent blank; Laboratory contamination indicated
E = Constituent also detected in equipment blank
F = Constituent also detected in field blank

6.5 Environmental Covenant

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After recording, mail to:

Gaco Western, Inc.
P.O. Box 88698
Seattle, WA 98138-2698

RESTRICTIVE COVENANT

The undersigned, Gaco Western, Inc. ("Gaco"), is the fee owner of the real property described on Exhibit A in King County, Washington, hereafter referred to as the "Site." There are subsurface areas at the Site where there have been detections of petroleum hydrocarbons and volatile organic compounds including toluene, ethylbenzene, xylenes, MIBK and gasoline and oil range hydrocarbons at levels which exceed the Method A or B Cleanup Level Guidelines (depending on the constituent) as published in the Model Toxics Control Act ("MTCA") Regulations. More detailed information on the location and concentration of the detected substances and on the location of groundwater monitoring wells on the Site is available in reports that have been filed by Gaco with the Washington Department of Ecology or a successor agency ("Ecology"). These reports include the;

Final Report, Soil Vapor Extraction Interim Remedial Action Prepared by Hart Crowser, Febuary 9, 1994

Third Quarter Groundwater Monitoring Report And Long Term Monitoring Proposal, Prepared by Gaco Western, Inc., November 14, 1995

Gaco makes the following declarations as to limitations, restrictions and uses to which the Site may be put. It 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 it, including all current and future owners of any portion of or interest in the Site.

1. No redevelopment of the property other than for street or industrial use shall hereafter be undertaken unless thirty days prior notice has been given to Ecology. For purposes of this restriction, "industrial use" means and includes any industrial use described or defined in or allowed under MTCA, MTCA regulations or the City of Tukwila's zoning laws.

2. Gaco will be sampling some if the existing groundwater monitoring wells at the Site pursuant to a program approved by Ecology. Any activity on the site that may interfere with such monitoring is prohibited. Gaco expressly reserves the right of access to the Site for

purposes of performing such monitoring or for any other environmental investigations or remediations that it may desire to undertake.

3. No groundwater may be taken for domestic purposes at the Site. No wells for the extraction of groundwater for domestic purposes shall be installed at the Site without Ecology approval.

4. The owner of the Site must be given written notice to Ecology of the owner's intent to convey any fee interest in the Site. No conveyance or title, easement, lease or other interest in the Site shall be consummated by the owner without adequate and complete provision for the continued operation, maintenance and monitoring of groundwater wells by Gaco.

5. The owner must notify and obtain approval from Ecology prior to any use of the Site that is inconsistent with the terms of this Restrictive Covenant. If required by applicable law, Ecology may have to seek public notice and comment prior to approval of the proposed change.

6. The owner shall allow authorized representatives from Ecology the right to enter the Site at reasonable times for the purpose of evaluating compliance with the monitoring of groundwater wells or any other remedial action undertaken by Gaco.

9601170252

Owner reserves the right to record, with Ecology's prior approval, an instrument terminating this Restrictive Covenant and rendering it null and void and of no further force or effect.

Gaco Western, Inc.,
a WASHINGTON Corporation

By _____

Name: MICHAEL C. O'LEARY
Title: VICE-PRESIDENT, FINANCE

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

On this 15th day of December, 1995, before me, the undersigned, sworn, personally appeared MICHAEL C. O'LEARY to me known to be the person who signed as V.P.-FINANCE of GACO WESTERN, INC., the corporation that executed the within and foregoing instrument, and acknowledged said instrument to be

the free and voluntary act and deed of said corporation for the uses and purposes therein mentioned, and on oath stated that MICHAEL C. O'LEARY was duly elected, qualified and acting as said officer of the corporation, that MICHAEL C. O'LEARY was authorized to execute said instrument and that the seal affixed, if any, is the corporate seal of said corporation.

IN WITNESS WHEREOF I have hereunto set my hand and official seal the day and year first above written.

Yolanda L Sewell
(Signature of Notary)

(Print or stamp name of Notary)

NOTARY PUBLIC in and for the State of Washington, residing at Auburn, WA

My Appointment Expires:

9601170252

DESCRIPTION:

PARCEL A:

THAT PORTION OF GOVERNMENT LOT 6, SECTION 35, TOWNSHIP 23 NORTH, RANGE 4 EAST, W.M., IN KING COUNTY, WASHINGTON, LYING SOUTHEASTERLY OF THE SOUTHEASTERLY MARGIN OF COUNTY ROAD SOUTHCENTER PARKWAY, FORMERLY 57TH AVENUE SOUTH, AND SOUTHWESTERLY OF A LINE DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT FROM WHICH THE SOUTHWEST CORNER OF SAID GOVERNMENT LOT 6 BEARS SOUTH 0°58'10" WEST 313.17 FEET AND NORTH 89°01'50" WEST 505.54 FEET, SAID DISTANCES BEING MEASURED RESPECTIVELY AT RIGHT ANGLES TO AND ALONG THE SOUTH BOUNDARY LINE OF SAID GOVERNMENT LOT, SAID POINT BEING MARKED BY AN IRON PIPE SET BY R.W. JONES AND ASSOCIATES ON OCTOBER 4, 1966; THENCE NORTH 67°36'00" WEST 1.46 FEET, MORE OR LESS, TO THE SOUTHEASTERLY MARGIN OF SAID COUNTY ROAD AND THE TRUE POINT OF BEGINNING OF THE HEREIN DESCRIBED LINE; THENCE SOUTH 67°36'00" EAST 1.46 FEET, MORE OR LESS, TO SAID IRON PIPE; THENCE CONTINUE SOUTH 67°36'00" EAST 248.63 FEET TO A CONCRETE MONUMENT SET BY R.W. JONES AND ASSOCIATES ON OCTOBER 4, 1966; THENCE CONTINUE SOUTH 67°36'00" EAST TO THE BANK OF THE GREEN RIVER AND THE TERMINUS OF THE HEREIN DESCRIBED LINE.

PARCEL B:

THAT PORTION OF GOVERNMENT LOT 7, SECTION 35, TOWNSHIP 23, RANGE 4 EAST, W.M., LYING SOUTHEASTERLY OF COUNTY ROAD (SOUTHCENTER PARKWAY, FORMERLY 57TH AVENUE SOUTH) AND LYING NORTHEASTERLY OF A LINE ESTABLISHED OF STATUTORY WARRANTY DEED RECORDED AUGUST 3, 1973, UNDER RECORDING NO. 7308030425, SAID LINE BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT FROM WHICH THE NORTHWEST CORNER OF SAID GOVERNMENT LOT 7 BEARS SOUTH 0°58'10" WEST 313.17 FEET AND NORTH 89°01'50" WEST 505.54 FEET, SAID DISTANCES BEING MEASURED RESPECTIVELY AT RIGHT ANGLES TO AND ALONG THE NORTH BOUNDARY LINE OF SAID GOVERNMENT LOT, SAID POINT OF BEGINNING IS MARKED BY A CONCRETE MONUMENT WHICH IS INDICATED AS POINT "A" ON SURVEY DRAWING BY R.W. JONES AND ASSOCIATES, ENGINEERS AND SURVEYORS, DATED OCTOBER 6, 1966 AND ENTITLED BOUNDARY AND TOPOGRAPHIC SURVEY OF A PORTION OF GOVERNMENT LOTS 6, 7, SECTION 35, TOWNSHIP 23 NORTH, RANGE 4 EAST, W.M.; THENCE SOUTH 67°36'00" EAST 248.63 FEET TO A CONCRETE MONUMENT SET BY SAID ENGINEERS AND SURVEYORS ON OCTOBER 4, 1966 AND INDICATED AS POINT "B" ON SAID SURVEY DRAWING; THENCE SOUTH 23°57'22" WEST 208.79 FEET TO A CONCRETE MONUMENT ALSO SET BY SAID ENGINEERS AND SURVEYORS, SAID MONUMENT MARKING THE INTERSECTION WITH A LINE AT RIGHT ANGLES, SAID LINE TO BE REFERRED TO HEREINAFTER IN THIS DESCRIPTION AS THE SOUTHWESTERLY LINE OF THE GACO-WESTERN TRACT; THENCE CONTINUING SOUTH 23°57'22" WEST 138.76 FEET; THENCE NORTH 66°02'38" WEST ALONG A LINE PARALLEL TO SAID SOUTHWESTERLY LINE OF THE GACO-WESTERN TRACT 5.39 FEET TO A CONCRETE MONUMENT; THENCE CONTINUING NORTH 66°02'38" WEST 244.61 FEET, MORE OR LESS, TO AN INTERSECTION WITH THE SOUTHEASTERLY LINE OF 57TH AVENUE SOUTH; THENCE SOUTHWESTERLY ALONG SAID ROAD MARGIN 5.14 FEET, MORE OR LESS, TO AN INTERSECTION WITH THE NORTHWESTERLY EXTENSION OF THE NORTHEASTERLY FACE OF THE ALASKA SEAVAN BUILDING AND THE TRUE POINT OF BEGINNING OF THE LINE HEREIN DESCRIBED; THENCE SOUTH 66°02'38" EAST ALONG SAID EXTENSION AND ALONG SAID NORTHEASTERLY FACE OF SAID BUILDING AND ALONG THE SOUTHEASTERLY EXTENSION OF SAID BUILDING LINE 280 FEET, MORE OR LESS, TO THE BANK OF THE GREEN RIVER AND THE TERMINUS OF THE HEREIN DESCRIBED LINE.

SITUATE IN THE COUNTY OF KING, STATE OF WASHINGTON.

9601170252

S.W.C. OF GOVT. LOT 6
SEC. 35,T23N,R4E.

N8

GOV

AUDITOR OR RECORDER'S CERTIFICATE

Filed for record this _____day of _____, 19____at _____ M.

in Book _____of Surveys at page _____ at the request of

SURVEYOR'S CERTIFIC.

This map correctly represents a s
my direction in conformance with

6.6 Photo log

Photo 1: Southwest Side of Building - from the southwest

Photo 2: Northeast Corner of Building – from the Northeast

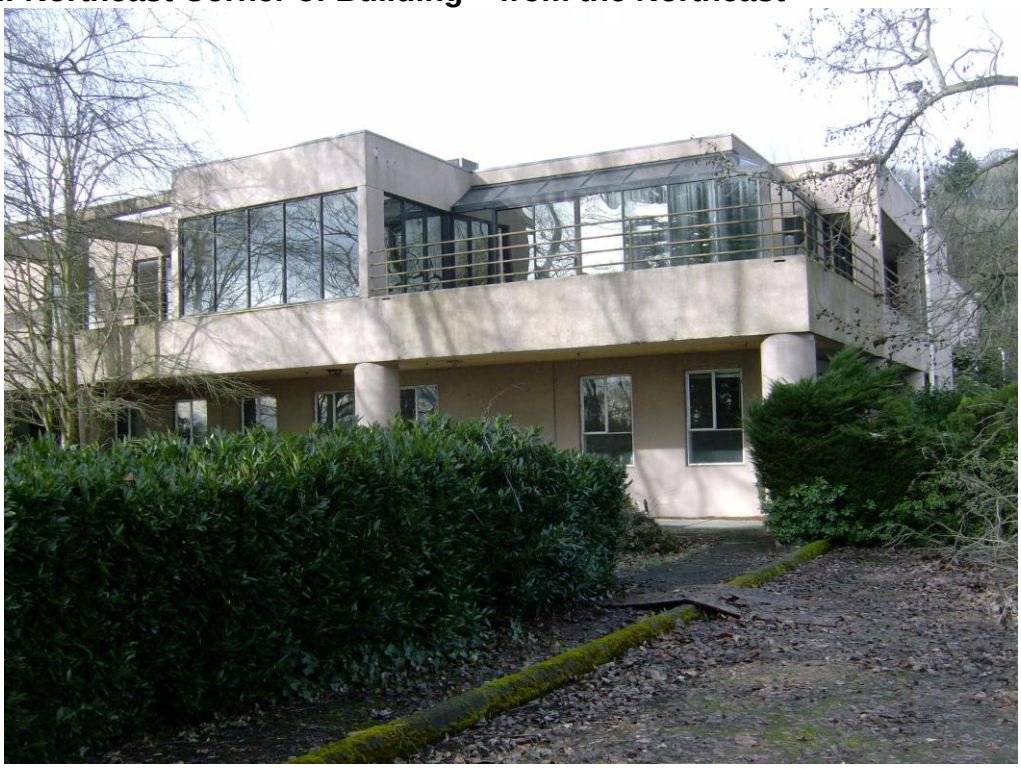

Photo 3: Former Tank Area – from the north.

Photo 4: West Side – from the southwest