



September 22, 2011

Ms. Patti Carter
Washington State Department of Ecology
Eastern Regional Office
4601 N. Monroe Street
Spokane, Washington 99205

RE: Remediation Progress Report
5823 West Armstrong Drive
Windsor Crossing
Spokane, Washington
URS Project Number: 36310001

Ms. Carter,

On behalf of Greenstone Management, LLC (Greenstone), URS Corporation (URS) presents the following Remediation Progress Report for the property located at 5823 West Armstrong Drive, Windsor Crossing development (formerly known as Geiger Heights) in Spokane County, Washington. Greenstone entered the Washington State Department of Ecology's (Ecology) Voluntary Cleanup Program (VCP) in February 2009 for the purpose of receiving a no further action (NFA) designation for the development. For the purpose of this report, the property located at 5823 West Armstrong Drive is referred to as the "site". URS has provided environmental services to Greenstone in order to further that goal.

Site Background

The Windsor Crossing development covers approximately 77-acres and is located at the southeast corner of Hallet Road and Grove Road in Spokane County, Washington. The development was constructed in the late 1950s as housing for Fairchild Air Force Base (FAFB) personnel and consists of 131 single family and duplex buildings totaling 226 dwelling units. Each unit was heated with No. 2 heating oil; a 300-gallon, single-walled steel underground storage tank (UST) was associated with each housing unit and was located adjacent to the foundation near the front of the building.

Previous Environmental Work

In 1993, nine USTs at Geiger Heights had been confirmed to have leaked and were replaced. In 1994, all USTs were removed when the heating systems in each dwelling were updated to natural gas. Approximately 600 cubic yards of petroleum-impacted soil was removed from the site at this time. In 2000, Dames and Moore, a legacy company of URS, performed a Preliminary Remedial Investigation to assess soil and groundwater impact resulting from the leaking USTs. In 2004, on behalf of FAFB, URS began additional remediation activities which included additional contaminated soil removal and groundwater monitoring in an effort to obtain an NFA for the development. At that time, Ecology was satisfied with cleanup results at all previously contaminated locations except those at the site, where concentrations of petroleum hydrocarbons in groundwater exceeded applicable cleanup standards. As a result, an NFA for the entire development was withheld.

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Current Environmental Work

As part of the 2009 VCP agreement between Ecology and Greenstone, Ecology has confirmed that a NFA for the site will be granted once groundwater quality requirements beneath the site have been met for four consecutive quarters. To further this goal, a new groundwater monitoring well was installed on site near the location of a former monitoring well that was removed during previous remedial activities. This new well was monitored on a quarterly basis between March 2009 and June 2010. Groundwater samples collected from the monitoring well were analyzed for diesel- and oil-range petroleum hydrocarbons by Northwest Method NWTPH-Dx. Analytical results from samples collected from this well consistently exceeded groundwater cleanup levels. It was determined that previous remediation attempts were not successful because they failed to remove a substantial amount of petroleum-contaminated soil from beneath the structure. This residual contamination was responsible for the continued exceedance of groundwater cleanup levels.

In 2010, Greenstone began implementation of the next phase of site remediation. This included demolition and removal of the building and planning for the excavation and removal of petroleum-contaminated soil from beneath its former footprint. In January 2011, the remedial excavation was conducted. Approximately 500-cubic yards of petroleum-contaminated soil was removed from beneath the footprint of the former building and delivered under permit to Waste Management's Graham Road Landfill facility. The excavation was fenced, contoured, and left open so that groundwater would be exposed to air in order to expedite natural attenuation of any remaining petroleum contamination. Water quality was monitored and when the concentration of diesel-range petroleum hydrocarbons was reduced to non-detect levels and the excavation was backfilled.

Future Environmental Work

A replacement monitoring well will be installed and quarterly groundwater monitoring will resume in late September 2011. Upon completion of four consecutive quarters of groundwater monitoring with contaminant concentrations below MTCA Method A groundwater cleanup levels, URS will provide a letter report to Ecology documenting the results of the groundwater monitoring and request a no further action designation for the development.

Sincerely,
URS Corporation



Gary D. Panther, LG
Project Geologist

GDP/tr

Cc: Ben Scandalis, Greenstone Management, LLC