PERIODIC REVIEW

Pacific Propeller
Facility Site ID#: 75316173

5802 South 228th Street,
Kent, Washington

Northwest Region Office

TOXICS CLEANUP PROGRAM

October 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 Pacific Propeller (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 Independent Remedial Action Program (IRAP). The cleanup actions resulted in concentrations of metals (chromium and cadmium) remaining at the Site which exceed MTCA cleanup levels for unrestricted use. The MTCA cleanup levels for soil are established under WAC 173-340-740. The MTCA cleanup levels for groundwater are established under WAC 173-340-720. 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, 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; or
    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 Description and History

Pacific Propeller, Inc., is located at 5802 South 228th Street, Kent, Washington 98032. Northwest of downtown Kent and east of the Green River, Pacific Propeller is in an industrial zoned area of the Kent Valley. It is approximately one mile south of the Boeing Aerospace Facility. The owner changed its name to PPI (NMB) Inc. from Pacific Propeller, Inc., on April 4, 1996. The property has been owned by the PPI (NMB) Inc., since the early 1970's. PPI (NMB) Inc. is a subsidiary of NMB (USA) Inc.

Pacific Propeller has operated as an aviation repair facility since the end of World War II, moving to its current location in the early 1970's. Prior to construction and eventual building expansion the land was used for agricultural purposes. Since an initial 15,000 sq. ft construction in 1968 the building has seen two major additions, resulting in a current size of 60,000 sq. ft., as a single story building with limited second story space. Operating within this structure are various machine tools, air compressors, paint booths, grinding machine, assembly/disassembly tools, hydraulic test stands and a plating department, in addition to basic office arrangements.

The facility is situated on approximately 5.2 acres, of which approximately 3 acres is covered by the building, asphalt parking lots, access drives and landscaping, the remaining two acres being undeveloped. Topography is primarily flat, with negligible change in grade throughout the Site. Topography in the Site vicinity slopes gradually down to the west-northwest toward the meandering Green River. South 228th Street runs along the southern boundary of the property.

2.2 Site Investigations and Sample Results

Chemical plating capabilities were instituted since the earliest use of the building. After the first part of the building was constructed two deep pits were installed into an originally flat floor. The pits were used to hold plating tanks deep enough to contain propeller blades inserted vertically. As part of an expansion program started in August 1994, construction on an additional but shallower plating pit located near one of the original deep pits was started. Excavation was halted when discolored dirt was discovered adjacent to the existing pit. Analysis of the discolored dirt showed the soil to be contaminated with chromium and cadmium. This finding was consistent with the use of the existing pit.

Halting all construction efforts, a full Phase I/II Environmental Site Assessment was performed to characterize the extent of any soil contamination on the property. That investigation showed no other environmental contaminants in excess of regulatory standards in the soil. Only chromium and cadmium were found in the ground near two plating department pits. The results of the Environmental Site Assessment are summarized in the Subsurface Soil and Groundwater Assessment submitted by AGRA Earth & Environmental, Inc.

The AGRA Report indicated the migration of cadmium and chromium through the soil was slow and limited and groundwater analysis showed no indication of dissolved or water-born metals. Groundwater contamination was not found to exist at any location within the property or near the boundary.

There has been one known spill onto the ground surface. On 28 March, 1994 chromium contaminated water estimated between 20 and 100 gallons was released onto the ground near the plating department. An overflow of the wash water in the chromium scrubber was caused by a malfunctioning valve. The fluid was recaptured into waste disposal containers and the area examined by an environmental cleanup company. A sampling pattern determined the extent of contamination into the ground after placing a grid extending beyond the spill area. Based on these results, soil was removed to a depth of at least two feet beyond measured contamination and sent off-Site for disposal. Clean fill dirt and gravel replaced the contaminated soil. Department of Ecology was notified on the day of the spill and advised when all tests showed that the effects of the spill had been completely removed. Because this was a surface spill it did not impact the contamination found deeper in the ground around the plating department pits and had been completely removed prior to the subsurface remediation effort.

Chemical analysis of soil samples identified only chromium and cadmium in excess of background levels and cleanup standards in the ground around the bottom of the plating department pits. A complete Phase I/II Environmental Site Assessment of the entire property of both soil and groundwater revealed that no other contamination exists on the property.

All contamination is associated with the plating pits and at a level that is consistent with the seam at the bottom of the Zinc Pit and seepage from the Anodize Pit. Note that lateral migration is the primary mechanism of metal movement; contamination did not travel significantly above or below the depth at which it was released from a pit.

There is no known potential threat to public health according to the consultant. All contamination was found deep under the ground surface and was not at risk for human contact, i.e., there is no exposure pathway for human contact. During the initial investigations and subsequent remediation, soil sampling demonstrated that migration through the soil is limited. Therefore, future exposure of the minor amount of remaining contamination is very unlikely.

Groundwater is not affected. Groundwater quality was characterized by the consultant: “No contaminants were detected in concentrations of concern from groundwater samples obtained from eight monitoring wells installed across the property including one hydrologically upgradient and seven cross- or downgradient wells. This fact suggests that chromium and cadmium concentrations noted surrounding the zinc and anodize pits are relatively immobile and not currently affecting groundwater quality. Based upon the apparent water quality data it appears the current elevated concentrations of chromium and cadmium observed in Site soils are probably ‘protective’ (per Ecology) of groundwater quality”. Additionally, groundwater samples taken after remediation from wells immediately adjacent to the excavation areas showed no signs of cadmium or chromium contamination.

Prior to the purchase in 1991 of approximately 2 acres north of the plant a Level II Environmental Site Assessment dated August, 1990 was performed on the purchased property. No identifiable environmental concerns were discovered as a result of this assessment. Additionally, a full Phase II Environmental Site Assessment and Limited Asbestos Assessment was performed.

2.3 Cleanup Actions

A plan for removal of the contaminated soil underneath the Plating Department was initiated after a Phase I/II Site Assessment revealed no contamination elsewhere on the property, even though removal was possibly not required. Removal was selected by the owners because it was the most complete solution to any possibility of future risk. Over a period of approximately one year, both pits were removed and contaminated soil transported to an off-Site remediation facility. An estimated 584 cubic yards of contaminated soil and overburden was removed from the property. Clean soil has replaced all removed soil. In reconstructing the plating facilities deep pits were eliminated and no part of the new construction is located below ground level. Post remediation analysis has determined that the contaminated soils have been completely removed except for the possibility of small quantities immediately below building footings. Tests performed after the completion of soil removal confirm no impact to groundwater due to gradual migration or disturbance by the removal process. Because the source of contamination has been removed, groundwater and adjacent soil is not likely to be impacted at any future time, according to the environmental consultant.

Integrity of the plating operations had to be continued. Deep pits have been replaced by plating areas contained in shallow but broader pits, essentially enclosing the entire plating processes within ground level containment. The ability to seal, access, and maintain such a design appears to have been accomplished. Substantial construction was required for this change.

AGRA established the expected limits of contamination from the pits. Boring through the wall of the Zinc Pit found that metals concentration diminished rapidly with distance from the pit. Contamination from the Anodize Pit was localized. Plating operations had to be maintained during the cleanup process. This lead to a plan which provided for 1) temporary chromium plating tank locations in other areas of the building, 2) offloading selected plating processes to local plating companies and 3) a two-stage process of cleanup whereby the Zinc Pit area (Stage I) would be remediated while continuing operations in the Anodize Pit area (Stage II). Once the Zinc Pit area was back in operation, the Anodize Pit plating processes were removed or relocated and that area remediated. As a further step in the investigation and before the Zinc Pit was removed, a sampling through the wall of the pit was taken to determine how far from the pit contamination would be encountered. At locations along the walls of the pit several borings were taken that were either near the bottom of the pit (within one foot of the bottom) or taken approximately 3 to 4 feet above the floor of the pit. The lower samples were captured within approximately one foot outside the pit wall while the upper samples were obtained farther away from the wall, at approximately three feet.

Soil removal plans were dependent on the findings of a grid sampling test. Soil contamination laterally around the bottom of the pit was found to be the consistent contamination mechanism as each grid was independently measured. Soil to the farthest limits of each grid was removed except at the eastern area of the grid. Grids A5, B5 and C5 were all found to be clean per the standards set for remediation. Soil removal to a level at least three feet below the bottom of the pit proceeded in grids Al through A4, B4, and Cl through C4. Because of soil stability and foundation concerns each grid had to be evacuated separately and backfilled with clean dirt before proceeding to the next cell. Before being refilled with clean dirt a sample was taken from the bottom of the excavation at each grid section for confirmation of remediation. If the sample result showed contamination in excess of limits, the hole was re-excavated to a greater depth and another sample was taken to confirm remediation. Complete backfilling was not accomplished until a clean sample from the bottom of the excavation was obtained. A total calculated soil removal of 277 cubic yards was accomplished in the Stage I area. The initial remediation to a depth consistent with the bottom of the Zinc Pit was not sufficient at all grid locations. Grids Cl through C4 were cleaned in one excavation. Some of the other grid locations needed further work, particularly in the northeast corner of the Zinc Pit at grids A3, A4 and B4. The seam had deteriorated considerably at this end of the Zinc Pit. The seam existed all around the bottom of the Zinc Pit, but was most significantly eroded at the northeast corner. For this reason grids A3, A4 and B4 had to be excavated several times before sufficient material was removed to ensure complete remediation.

With completion of excavation around the Zinc Pit plans to leave the concrete pit floor at grids B1 through B3 were re-evaluated. Because of the expense of removing the concrete at a later time, if necessary, it was decided to remove during cleanup. After floor removal the underlying soil was sampled for possible contamination and was found to be within limits except for a slight elevation of cadmium in grid B2. Because of this result all three grids were excavated to a depth of at least a further 3 feet at which level testing by AGRA had shown the soil to be within limits. After excavation at grids B1 through B3, the remediation efforts for Stage I were complete. All grids except A5, B5 and C5 had been excavated to the depth of three feet or greater below the Zinc Pit floor.

Contamination directly from the Anodize Pit was minimal. However, the soil under the northernmost portion of the pit and at the boundary of the Stage I - Stage II areas was impacted. It was subsequently found that contamination extended underground slightly beyond the building walls. In all cases, the concentration of chromium and cadmium found was substantially less than that found adjacent to the Zinc Pit. For those grids found to be contaminated, samples were taken prior to excavation, defining the depth at which contamination ended and clean soil was found. Each grid had to be excavated individually so that soil stability could be maintained; if a grid was next to a foundation then sheet piling was used for soil stabilization. Each grid with elevated metal content was excavated in a single lift to a point 2 to 3 feet below the depth where clean soil was encountered. As in Stage I, complete backfilling was not accomplished until a clean sample from the bottom of the excavation was obtained. A total calculated soil removal of 307 cubic yards was accomplished in the Stage II area. In the initial phase of testing only grids in the rectangle defined by Al through C5 were tested. These grids define the Stage II area within the building walls. After completion of grids Al, B1 and Cl, possible migration beyond the building

walls was considered. Subsequently, testing at AA0 through C0 and AA1 revealed three more grids requiring soil removal. Testing at the sides of the final excavation and at additional grids AAA00 through AAA1, and AA00 showed that all contamination under the Plating Department had been properly removed.

None of the original soil located under the building or from the outside areas of excavation was used as replacement fill dirt. Soil removed during the remediation process, 584 cubic yards total, whether measured to be contaminated or clean, was sent off-Site for disposal at a qualified disposal Site.

It was not possible to fully excavate under the wall footings in all areas. However, by using sheet piling driven into the ground immediately adjacent to the footings, soil was removed right up to the footing itself. The small amount of contaminated soil remaining under the foundation is estimated to be 4.4 cubic yards. At the Stage I - Stage II boundary wall residual soil is 16 inches (the width of the footing) by 16 feet (the length of the footing) by 18 inches (estimated band width of contaminated soil). At this location the volume of possibly contaminated soil is approximately 1.2 cubic yards. Under grid C3 in Stage II and grid Cl in Stage I, a major foundation footing covers approximately 4 feet by 11 feet of the grids. If the band width of contamination is 18 inches the volume of possibly contaminated soil is approximately 2.4 cubic yards. Finally, a concrete pad located in grid AA1 in Stage II covers an area of approximately 2 feet by 7 feet. At a band width of 18 inches the approximate volume of possibly contaminated soil is .8 cubic yards. This volume of potentially contaminated soil is calculated to not pose a health risk for industrial property now or in the future. There is no human contact exposure mechanism. Groundwater has been shown both before and after remediation to be clean of cadmium or chromium above reportable levels. Based on these circumstances the Site can be considered appropriately remediated with no additional monitoring.

Ecology issued a ‘No Further Action’ (NFA) letter September 26, 1996, and a slightly corrected NFA letter November 5, 1996 after a restrictive covenant (because industrial standards were used) was filed with the county. An amended covenant was recorded later apparently to correct the property’s legal description.

2.4 Cleanup Levels

The independent environmental consultant, AGRA Earth & Environmental, Inc., found only chromium and cadmium have been in excess of regulatory limits. Groundwater has not been found to contain any contamination. Groundwater tests were performed before and after soil removal.

Cleanup standards for soil are established under Washington State regulations. The State’s Model Toxics Control Act (MTCA) establishes three cleanup levels: Method A, Method B and Method C. Method A was chosen because it applies to routine cleanup actions. Cleanup levels for Method A, Industrial Sites have been established by the Department of Ecology. Although Method B is a standard approach for cleanup Sites it is based on risk equations which assume human exposure to the soil. Testing established that the contaminated soil was limited to

locations deep in the ground which could not result in human contact. Equations determining the risk to humans if the soil was left in situ allowed concentration limits that the owners considered unacceptably high. Similar to Method B, Method C is a risk-based calculation and not useful for this Site. Therefore the Industrial Site standards listed under MTCA Method A were selected (the property is zoned Ml Industrial): Cadmium at 10 parts per million (ppm) and Chromium at 500 ppm.

2.5 Restrictive Covenant

Based on the Site use, surface cover and cleanup levels, it was determined that the Site was eligible for a 'No Further Action' determination if a Restrictive Covenant was recorded for the property. A Restrictive Covenant was recorded for the Site in 1996 which imposed the following limitations:

Section 1. The Site may be used only for industrial purposes as defined in and allowed under the city of Kent's Zoning Regulations codified in the Kent City Code as of the date of this Restrictive Covenant. The Site shall not be used as a Day Care Center without the owner following the public notice procedures set out in Section 4.

Section 2. Any activity on the Site that may interfere with monitoring is prohibited without prior notification to Ecology. No groundwater may be taken for domestic purposes from any well at the Site.

Section 3. The owner of the property must give written notice to Ecology or to a successor agency of the owner's intent to convey any interest in the Site.

Section 4. The owner must notify Ecology or its successor agency prior to any use of the Site that is inconsistent with the terms of this Restrictive Covenant. Ecology or its successor agency may seek public notice and comment on the change in use of the Site.

Section 5. The owner shall allow authorized representatives of Ecology or its successor agency the right to enter the Site at a reasonable time for the purpose of evaluating the Cleanup Action: to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Cleanup Action.

Section 6. The owner of the Site and the owner's assigns and successors in interest reserve the right under WAC 173-340-440 to record an instrument which 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 with the consent of Ecology, or its successor agency. Ecology or its successor agency may consent to the recording of such an instrument only after public notice and comment.

The Restrictive Covenant is available as Appendix 6.4.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

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 at the Site without Ecology's approval, and prohibits any use of the property that is inconsistent with the Covenant. This Restrictive Covenant serves to ensure the long term integrity of the remedy.

Based upon the Site visit conducted on June 30, 2016, the remedy at the Site continues to eliminate exposure to contaminated soils by ingestion and contact. The barriers to direct contact appear to be in satisfactory condition and no repair, maintenance, or contingency actions have been required. The Site is still operating as a propeller manufacturer. A photo log is available as Appendix 6.5.

Soils with metals concentrations higher than MTCA unrestricted use cleanup levels are still present at the Site. However, the remedy based on industrial use prevents human exposure to this contamination by ingestion and direct contact with soils. The Restrictive Covenant for the property will ensure that the contamination remaining is contained and controlled.

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

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

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

The cleanup at the Site was governed by Chapter 173-340 WAC. 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 petroleum hydrocarbon compounds as a result of modifications to MTCA in 2001, petroleum contamination was not an issue at the Site. Even so, the cleanup action is still protective of human health and the environment. A table comparing MTCA cleanup levels from 1991 to 2001 is available below.

Analyte	1991 MTCA Method A 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)
Cadmium	2	2	5	5
Lead	250	250	5	15
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

NL = None listed

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 it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

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

The analytical methods used at the time of the remedial action were capable of detection below selected Site cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

4.0 CONCLUSIONS

The following conclusions have been made as a result of this periodic review:

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

- Soils cleanup levels for unrestricted use have not been met at the standard point of compliance for the Site; however, the cleanup action has been determined to comply with industrial cleanup standards.

- 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.

Based on this periodic review, the Department of Ecology has determined that the requirements of the Restrictive Covenant continue to be met. No additional cleanup actions are required by the property owner. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the remedy is maintained.

4.1 Next Review

The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

1. Rittenhouse Zeman and Associates (now AGRA Earth and Environmental), August 1990, *Level II Environmental Site Assessment*;

2. AGRA Earth and Environmental, January 31, 1995, *Subsurface Soil and Groundwater Assessment*;

3. Pacific Propeller, Inc., June 1996, *Independent Remedial Action Report, Volumes One and Two*;

4. Miscellaneous documents in Ecology's Central Files;

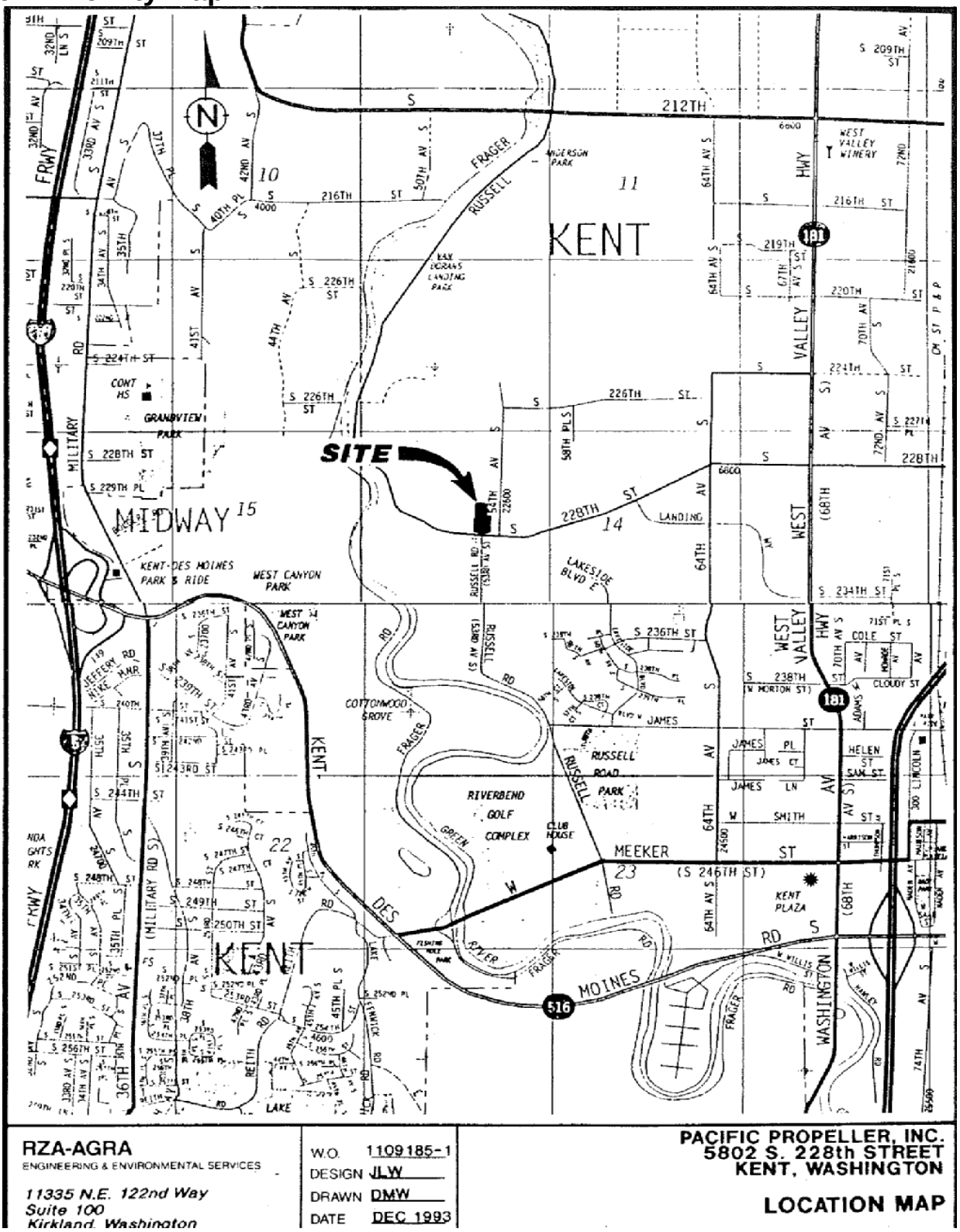
5. Pacific Propeller Inc. (NMB), 1996, *Restrictive Covenant*;

6. Ecology, 2010, *Site Visit*.

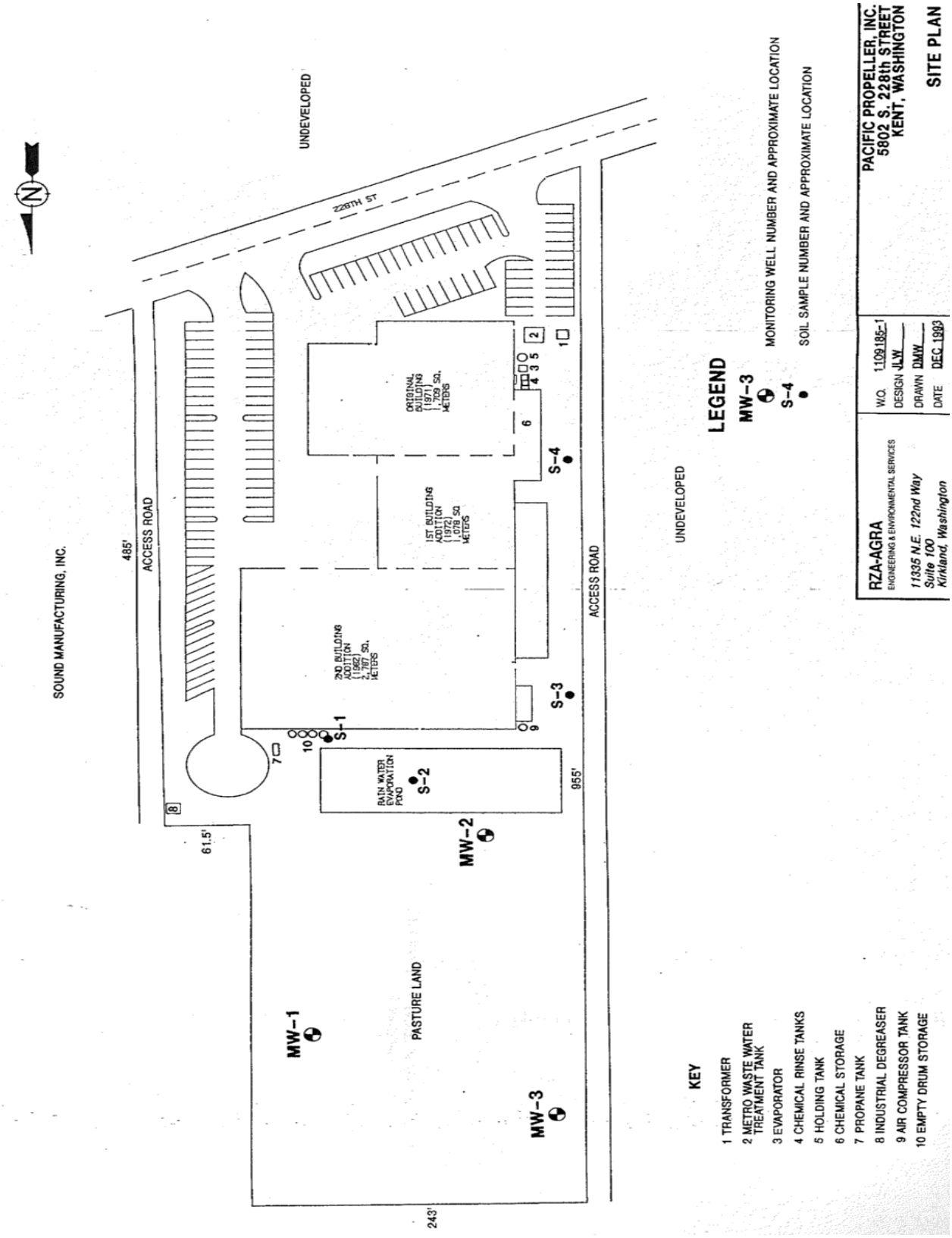
7. Ecology, 2016, *Site Visit*.

6.0 APPENDICES

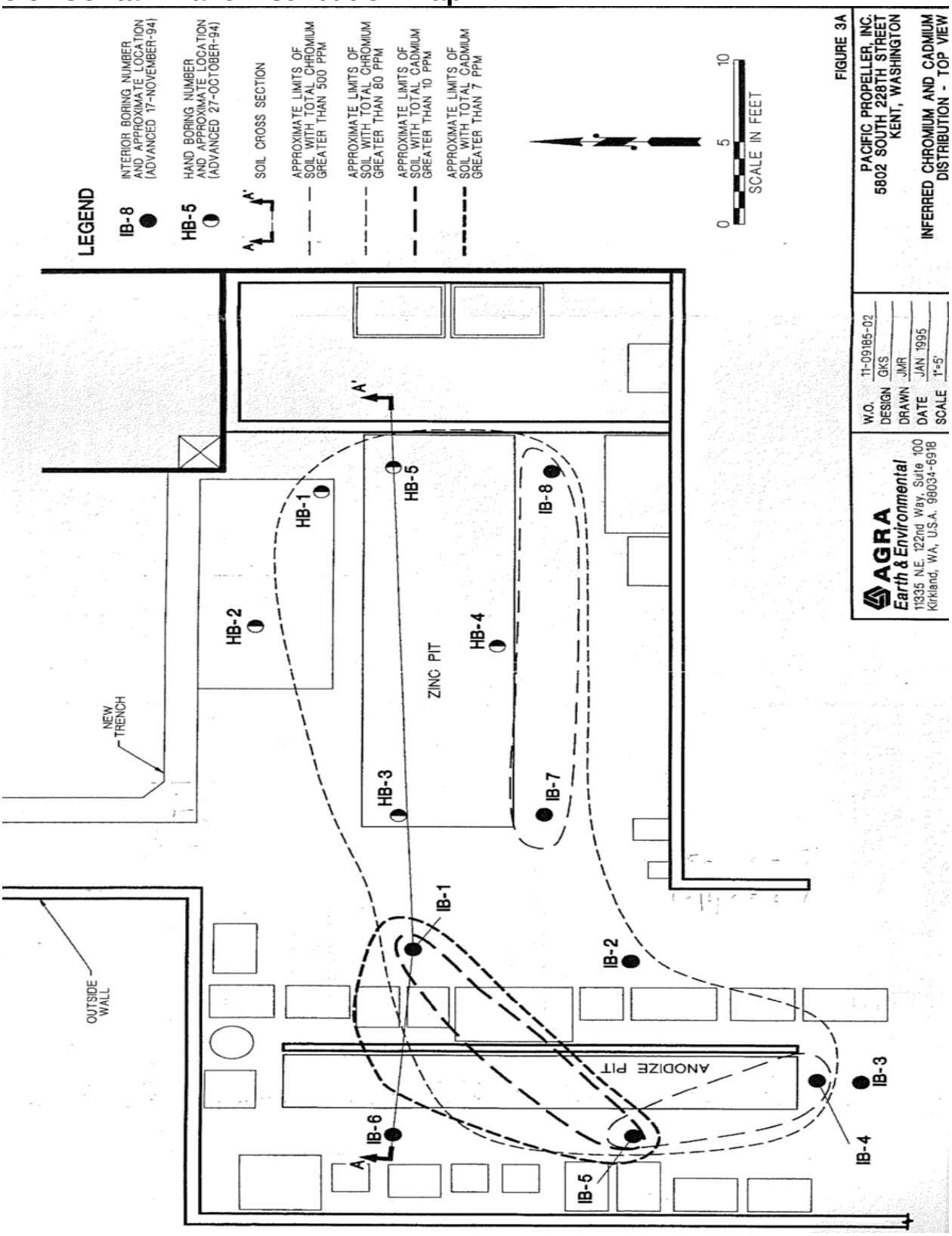
6.1 Vicinity Map



6.2 Site Plan


SOUND MANUFACTURING, INC.
485'
ACCESS ROAD
UNDEVELOPED
228TH ST
ORIGINAL BUILDING (1971) 1,709 SQ. METERS
1ST BUILDING ADDITION (1972) 1,078 SQ. METERS
2ND BUILDING ADDITION (1982) 2,787 SQ. METERS
RAIN WATER EVAPORATION POND
S-1
S-2
S-3
S-4
MW-1
MW-2
MW-3
PASTURE LAND
61.5'
955'
243'
ACCESS ROAD
UNDEVELOPED
LEGEND
MW-3 MONITORING WELL NUMBER AND APPROXIMATE LOCATION
S-4 SOIL SAMPLE NUMBER AND APPROXIMATE LOCATION
KEY
1 TRANSFORMER
2 METRO WASTE WATER TREATMENT TANK
3 EVAPORATOR
4 CHEMICAL RINSE TANKS
5 HOLDING TANK
6 CHEMICAL STORAGE
7 PROPANE TANK
8 INDUSTRIAL DEGREASER
9 AIR COMPRESSOR TANK
10 EMPTY DRUM STORAGE
RZA-AGRA
ENGINEERING & ENVIRONMENTAL SERVICES
11335 N.E. 122nd Way
Suite 100
Kirkland, Washington
W.O. 1109185-1
DESIGN JLW
DRAWN DMW
DATE DEC 1993
PACIFIC PROPELLER, INC.
5802 S. 228th STREET
KENT, WASHINGTON
SITE PLAN

6.3 Contaminant Distribution Map



6.4 Environmental Covenant

RESTRICTIVE COVENANT
PPI (NMB) INC.

The property that is the subject of this Restrictive Covenant has been the subject of an independent remedial action under Chapter 70.105D RCW. The remedial action undertaken to clean up the property (hereafter the "Cleanup Action") is described in the report, "Independent Remedial Action Report, Pacific Propeller, Inc., Kent, Washington", and the letter from Dennis J. Patrick, P.E. to Elaine P. Atkinson dated June 19, 1996. These documents are on file at the State of Washington Department of Ecology ("Ecology") Northwest Regional Office. This Restrictive Covenant is required by Ecology as defined in WAC 173-340-440 to provide for Ecology review of any proposed change in use of the property.

The undersigned, PPI (NMB) INC., is the fee owner of the real property in the County of King, State of Washington, which is more fully identified in the legal description of the property attached hereto and made a part hereof by reference (hereafter referred to as the "Site.") The Site includes the soil remediation area described in the above referenced report. PPI (NMB) INC. makes the following declaration as to limitations, restrictions, and uses to which the Site 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 Site.

Section 1. The Site may be used only for industrial purposes as defined in and allowed under the City of Kent's Zoning Regulations codified in the Kent City Code as of the date of this Restrictive Covenant. The Site shall not be used as a Day Care Center without the owner following the public notice procedures set out in Section 4.

Section 2. Any activity on the Site that may interfere with monitoring is prohibited without prior notification to Ecology. No groundwater may be taken for domestic purposes from any well at the Site.

Section 3. The owner of the property must give written notice to Ecology, or to a successor agency, of the owner's intent to convey any interest in the Site.

Section 4. The owner must notify Ecology, or its successor agency, prior to any use of the Site that is inconsistent with the terms of this Restrictive Covenant. Ecology or its successor agency may seek public notice and comment on the change in use of the Site.

Section 5. The owner shall allow authorized representatives of Ecology, or its successor agency, the right to enter the Site at a reasonable time for the purpose of evaluating the Cleanup Action; to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Cleanup Action.

9610310318

9608180504

10.00 KING COUNTY RECORDS 003 JB 09:21:00 AM 961031-0318

Section 6. The owner of the Site and the owner's assigns and successors in interest reserve the right under WAC 173-340-440 to record an instrument which 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 with the consent of Ecology, or its successor agency. Ecology or its successor agency may consent to the recording of such an instrument only after public notice and comment.

PPI (NMB) INC.

By: _____
Reina M. MacDonald
Its: Secretary

Date: September 17, 1996

96103103 18

* LEGAL DESCRIPTION

of the "Site", otherwise known as 5802 S. 228th Street, Kent, Washington 98032, and filed in accordance with RESTRICTIVE COVENANT dated September 17, 1996:

PARCEL A:

Beginning at the southwest corner of Lot 4 of the City of Kent Short Plat No. 76-17 recorded under Recording No. 7806120758, located in a portion of Government Lot 5, Section 14, Township 22 North, Range 4 East, W.M., in King County, Washington. This point of beginning is on the northerly right-of-way line of South 228th Street; thence along said right-of-way line south 70° 39' 00" west, 334.86 feet to the west line of said Government Lot 5; thence along west line of said Government Lot 5, north 02° 06' 40" east, 954.84 feet to the northwest corner of said Government Lot 5; thence along the north line of said Government Lot 5, south 88° 47' 19" east, 243.00 feet; thence south 02° 06' 40" west, 354.64 feet; thence south 88° 47' 19" east, 61.38 feet; thence south 01° 14' 38" west, 482.52 feet to the point of beginning;

(also know as Parcel A of City of Kent Lot Line Adjustment Number 80-34 as recorded under King County Recording No. 9010221144).

PARCEL B:

An easement for ingress and egress as described in Short Plat No. SPC-76-17; except any portion thereof lying within Parcel A above.

Both situated in the County of King, State of Washington.

96103103 18

* LEGAL DESCRIPTION REVISED, PREVIOUS LEGAL DESCRIPTION FILED UNDER 9610240930 IS DELETED

DJ Patrick
10754 Marine View Dr. SW
Seattle 98146

6.5 Photo log

Photo 1: Building view from 228th Street direction, entrance just around left side

Photo 2: Small parts plating area was excavated

Photo 3: Raised platform in plating area, over containment

Photo 4: Assembly area adjacent to excavated area to the left, off-picture.