

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF REMEDIAL ACTION BY:)

CAMERON-YAKIMA, INCORPORATED)
1414 SOUTH FIRST STREET)
PO BOX 1554)
YAKIMA, WASHINGTON 98901)

ENFORCEMENT ORDER
No. DE 96HW-C113

TO: Bob Hansen, President
CAMERON-YAKIMA, INCORPORATED

I.

Jurisdiction

This Order ("Order") is issued pursuant to the authority of the Revised Code of Washington (RCW) 70.105D.050(1).

II.

Findings of Fact

The Department of Ecology (Ecology) makes the following Findings of Fact.

- 2.1. The Facility, Cameron-Yakima, Inc., (CYI) is located at 1414 South First Street in Yakima, Washington, on Parcel Number 19133042441 (according to Yakima County Assessors records). CYI has been owned and operated as an activated carbon recycling business since 1944.

CYI is an active facility that regenerates spent carbon from air, water, and industrial process filtration systems. Management areas include, but are not limited to, a multiple hearth furnace, a rotary kiln, and a drum storage area. CYI Facility operations are regulated under a RCRA interim status permit.

- 2.2. On June 28, 1988 the Environmental Protection Agency (EPA), via contractor, completed a preliminary site assessment of CYI. A manifest review showed tetrahydrofurane, xylene, acetate, tetrachloroethene (perchloroethylene, PCE), dichloroethene, trichloroethylene (TCE), and dichlorobromopropane adsorbed on the carbon arriving at the Facility. Based on information gathered during a Facility Assessment (RFA), the EPA assigned a high priority for corrective action.

- 2.3. On March 29, 1988 the EPA issued a 3013 Order to CYI pursuant to RCRA. The Order stated that inspectors "...discovered that the Facility has been storing outdoors approximately 500 55-gallon drums of charcoal contaminated with perchloroethylene."
- 2.4. On August 1 - 3, 1988, CYI consultants, Black and Veatch, Waste Management Incorporated, conducted soil sampling at the CYI Facility as required in the March 29, 1988, 3013 Order. Contamination of soil by perchloroethylene (PCE) was found in concentrations as high as 170 mg/kg (ppm). Additional contaminants found included trichloroethene, methylene chloride, chloroform, toluene, ethylbenzene, xylene, and carbon disulfide.
- 2.5. Delta Environmental, consultants to CYI, conducted a hydrogeologic assessment in August of 1988, as required under the March 29, 1988, 3013 Order. Data from this study showed tetrachlorethene in groundwater as high as 960 ppb in an on-site monitoring well MW-4.
- 2.6. Ecology & Environment, Inc. (E&E), contractors to EPA, conducted a soil-gas study of a 2-1/2 square mile area in the downtown industrial section of Yakima between June 5, 1989 and July 22, 1989. CYI is located within the area of the study known as the Yakima Railroad Area (YRRA). In its report, E&E stated "...it is believed that Cameron-Yakima, Inc., property is a ...potential source of PCE in groundwater contamination."
- 2.7. On October 24, 1991, after notice and opportunity for comment, Ecology issued a final determination of Potentially Liable Person (PLP) status under RCW 70.105D.040 for the YRRA to CYI.
- 2.8. On February 11, 1992, the YRRA PLPs were issued an Order by Ecology (Order No. DE 92TC-C108) which directed them to provide bottled water to those residences in the YRRA on private wells.
- 2.9. On October 8, 1993 Cameron-Yakima, Inc., provided Ecology with a "Preliminary Site Assessment" prepared by Hart Crowser, dated September 28, 1993. Contamination of soil by PCE was found in concentrations as high as 720 mg/kg (ppm). Additional contaminants found at the facility included Trichloroethene, 1,2-Dichloroethane, 1,2-Dichloroethene, 1,1,1-Trichloroethane, Ethylbenzene, Toluene, Xylene, Freon 12, Freon 11, Freon 113, Vinyl Chloride, Methylene Chloride, cis-1,2-Dichloroethene, Benzene, Styrene, 1,2,4-Trimethylbenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene. Additionally, it was found that soil moisture levels appear elevated in various locations at the Facility including the barrel washing area and the surface impoundment unit presently undergoing closure.

III.

Ecology Determinations

- 3.1. CYI is an "owner or operator" as defined in RCW 70.105D.020(6) of a "Facility" as defined in RCW 70.105D.020(3).
- 3.2. The Facility is known as Cameron-Yakima, Incorporated, and is located at 1414 South First Street in Yakima, Washington 98901, Parcel Number 19133042441.
- 3.3. The substances found at the Facility as described above are "hazardous substances" as defined in RCW 70.105D.020(5).
- 3.4. Based on the presence of these hazardous substances at the Facility and all factors known to Ecology, there is a release or threatened release of hazardous substances from the Facility, as defined in RCW 70.105D.020(10).
- 3.5. CYI is one of the facilities from which there is a release or threatened release of PCE within the YRRA.
- 3.6. By letter dated October 24, 1991 Ecology notified CYI of its status as a "potentially liable person" under RCW 70.105D.040 after notice and opportunity for comment.
- 3.7. Pursuant to RCW 70.105D.030(1) and RCW 70.105D.050, Ecology may require PLPs to investigate or conduct other remedial actions with respect to the release or threatened release of hazardous substances, whenever it believes such action to be in the public interest.
- 3.8. Based on the foregoing facts, Ecology believes the remedial action required by the Order is in the public interest.

IV.

Work to be Performed

Based on the foregoing Facts and Determinations, it is hereby ordered that Cameron-Yakima, Incorporated, take the following remedial actions and that these actions be conducted in accordance with Chapter 173-340 of the Washington Administration Code (WAC) unless otherwise specifically provided for herein.

- 4.1. Cameron-Yakima, Inc., shall submit to Ecology for review and approval, a draft work plan (Plan) for completion of a Remedial Investigation/Feasibility Study (RI/FS). This draft Plan shall consist of a detailed RI/FS work plan which, at a minimum, shall address the components outlined in Attachment A. Attachment A is incorporated by this reference and is an integral and enforceable part of this Order. The draft Plan will also include a Schedule of Deliverables as outlined in Attachment B. Attachment B is incorporated by this reference and is an integral and enforceable part of this Order.

After receipt of Ecology's comments on the draft Plan, Cameron-Yakima, Inc., shall submit a final Plan for approval by Ecology.

After receipt of Ecology's written approval of the final Plan, Cameron-Yakima, Inc., shall begin the RI/FS work described in the Plan. The RI/FS work shall be completed according to the time frame and schedules described in the approved Plan.

The RI/FS will collect, develop, and evaluate sufficient information regarding the Facility to enable the selection of a cleanup action under WAC 173-340-360. The RI/FS will be implemented to meet the requirements of WAC 173-340-350.

- 4.2. Samples from the initial round of groundwater and soil sampling conducted for the RI/FS shall be analyzed for all constituents specified in Appendix IX of 40 CFR, Part 264. Parameters for subsequent sampling events shall be selected, subject to Ecology review and approval, based on initial sampling and analysis, and upon the composition of wastes that are, or have been, managed at CYI. The rationale for selection of all parameters shall be provided.
- 4.3. Cameron-Yakima, Inc., will develop and submit to Ecology for approval a Quality Assurance/Quality Control (QA/QC) Plan in accordance with the Ecology Guidelines and Specifications for Preparing Quality Assurance Project Plans (May 1991), Attachment C. Attachment C is incorporated by this

reference and is an integral and enforceable part of this Order. No sampling associated with this Order may be conducted prior to Ecology approval of the QA/QC Plan.

- 4.4. Results from sampling shall be provided to Ecology's project coordinator in hard copy within 14 days of receipt from the laboratory and in electronic form within 45 days from the receipt from the laboratory.
- 4.5. In accordance with WAC 173-340-840(5), sampling data shall be submitted according to Attachment D: DATA SUBMITTAL REQUIREMENTS. Attachment D is incorporated by this reference and is an integral and enforceable part of this Order. Also, all soil sample results shall be given in $\mu\text{g}/\text{kg}$, all water sample results in $\mu\text{g}/\ell$, and soil gas in true ppb.
- 4.6. Written progress reports shall be submitted to Ecology's project coordinator monthly from the date of this Order to completion. CYI shall immediately notify Ecology by telephone of any unexpected delays in the work required as part of this Order.
- 4.7. Deviations from the Scope of Work may only be made with prior Ecology approval.
- 4.8. If and when Ecology deems appropriate, CYI shall conduct an interim action for the purpose of source control.

V.

Terms and Condition of Order

5.1. Definitions

Unless otherwise specified, the definitions set forth in Chapter 70.105D RCW and Chapter 173-340 WAC shall control the meanings of the terms used in this Order.

For purposes of this Order, Ecology is defined as the Toxics Cleanup and Hazardous Waste/Toxics Reduction Programs, Central Regional Office, Yakima, Washington.

5.2. Public Notices

RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that the Order is inadequate or improper in any respect.

5.3 Remedial Action Costs

Cameron-Yakima, Inc., shall pay to Ecology costs incurred by Ecology pursuant to this Order. These costs shall include work performed by Ecology or its contractors for investigations, remedial actions, and Order preparation, oversight and administration. For work performed prior to September 30, 1995, the amount of \$ 127,060.74 shall be paid to Ecology. For work commencing on October 1, 1995, Ecology costs shall include costs of direct activities and support costs of direct activities as defined in WAC 173-340-550(2), and interest charges for delayed payments, as defined in WAC 173-340-550(4).

Cameron-Yakima, Inc., shall pay the required amount within ninety (90) days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved staff, and the amount of time spent by involved staff members on the project. A general description of work performed will be provided upon request. Itemized statements shall be prepared quarterly. Failure to pay Ecology's costs within ninety (90) days of receipt of an itemized statement of costs will result in interest charges pursuant to WAC 173-340-550(4).

5.4 Designated Project Coordinators

The project coordinator for Ecology is:

Tom Mackie (509) 457-7109
Department of Ecology
Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902-3401

The project coordinator for CYI is:

Eric Egbers (509) 452-6605
Cameron-Yakima, Inc.
P.O. Box 1554
Yakima, Washington 98907

The project coordinator(s) shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communications between Ecology and CYI, and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order, shall be directed through the project coordinator(s). Should Ecology or CYI change

project coordinator(s), written notification shall be provided to Ecology or CYI, at least ten (10) calendar days prior to the change.

5.5. Performance

All work performed pursuant to this Order shall be under the direction and supervision, as necessary, of a professional engineer or hydrogeologist, or similar expert, with appropriate training, experience, and expertise in hazardous waste site investigation and cleanup. Cameron-Yakima, Inc., shall notify Ecology as to the identity of such engineer(s) or hydrogeologist(s), and of any contractors and subcontractors to be used in carrying out the terms of this Order, in advance of their involvement at the facility. Cameron-Yakima, Inc., shall provide a copy of this Order to all agents, contractors, and subcontractors retained to perform work required by this Order and shall ensure that all work undertaken by such agents, contractors, and subcontractors will be in compliance with this Order.

Except where necessary to abate an emergency situation, or to comply with RCRA requirements, Cameron-Yakima, Inc., shall not perform any remedial actions at the Cameron-Yakima, Inc., Facility outside that required by this Order unless Ecology concurs, in writing, with such additional remedial actions.

WAC 173-340-400(7)(b)(i) requires that "construction" performed on the site must be under the supervision of a professional engineer registered in Washington state.

5.6. Access

Ecology or any Ecology-authorized representative shall have the authority to enter and freely move about all property at the Facility at all reasonable times for the purposes of, inter alia: inspecting records, operation logs, and contracts related to the work being performed pursuant to this Order; reviewing the progress in carrying out the terms of this Order; conducting such tests or collecting samples as Ecology or the project coordinator may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done pursuant to this Order; and verifying the data submitted to Ecology by Cameron-Yakima, Inc. In the course of conducting oversight of this Order under the Model Toxics Control Act, Ecology shall provide reasonable notice before entering property unless an emergency prevents notice. When Ecology is acting under a statute other than the Model Toxics Control Act, Ecology shall provide notice consistent with that statute. Ecology shall allow split or replicate samples to be taken by Cameron-Yakima, Inc., during an inspection unless doing so would interfere with Ecology's sampling. Cameron-Yakima, Inc., shall allow split or replicate samples to be

taken by Ecology and shall provide Ecology fourteen (14) days notice before any sampling activity.

5.7. Public Participation

Cameron-Yakima, Inc., shall prepare a public participation plan for the Facility. Said public participation plan shall be coordinated with the public participation plan being developed for the Yakima Railroad Area. Ecology shall maintain the responsibility for public participation at the Facility. Cameron-Yakima, Inc., shall help coordinate and implement public participation for the Facility. Cameron-Yakima, Inc., shall designate a point of contact for the development and implementation of said public participation plan.

5.8. Retention of Records

Cameron-Yakima, Inc., shall preserve in a readily retrievable fashion, during the pendency of this Order and for ten (10) years from the date of completion of the work performed pursuant to this Order, all records, reports, documents, and underlying data in its possession relevant to this Order. Should any portion of the work performed hereunder be undertaken through contractors or agents of Cameron-Yakima, Inc., then Cameron-Yakima, Inc., agrees to include in their contract with such contractors or agents a record retention requirement meeting the terms of this paragraph.

5.9 Dispute Resolution

Cameron-Yakima, Inc., may request Ecology to resolve disputes which may arise during the implementation of this Order. Such request shall be in writing and directed to the signatories, or their successor(s), to this Order. Ecology resolution of the dispute shall be binding and final. Cameron-Yakima, Inc., is not relieved of any requirements of this Order during the pendency of the dispute and remains responsible for timely compliance with the terms of the Order unless otherwise provided by Ecology in writing.

5.10 Reservation of Rights/No Settlement

Ecology reserves all rights to issue additional Orders or take any action authorized by law in the event or upon the discovery of a release or threatened release of hazardous substances not addressed by this Order, upon discovery of any factors not known at the time of issuance of this Order, in order to abate an emergency, or under any other circumstances deemed appropriate by Ecology.

Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the releases or threatened releases of hazardous substances from the Cameron-Yakima, Inc., Facility.

In the event Ecology determines that conditions at the Facility are creating, or have the potential to create, a danger to the health or welfare of the people at the Facility or in the surrounding area or to the environment, Ecology may order Cameron-Yakima, Inc., to stop further implementation of this Order for such period of time as needed to abate the danger.

5.11 Transference of Property

No voluntary or involuntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Facility shall be consummated by Cameron-Yakima, Inc., without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Prior to transfer of any legal or equitable interest Cameron-Yakima, Inc., may have in the Facility or any portions thereof, Cameron-Yakima, Inc., shall serve a copy of this Order upon any prospective purchaser, lessee, transferee, assignee, or other successor in such interest. At least thirty (30) days prior to finalization of any transfer, Cameron-Yakima, Inc., shall notify Ecology of the contemplated transfer.

5.12 Compliance with Other Applicable Laws

All actions carried out by Cameron-Yakima, Inc., pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements.

VI.

Satisfaction Of This Order

The provisions of this Order shall be deemed satisfied upon Cameron-Yakima, Inc's., receipt of written notification from Ecology that Cameron-Yakima, Inc., has completed the remedial activity required by this Order, as amended by any modifications, and that all other provisions of this Order have been complied with.

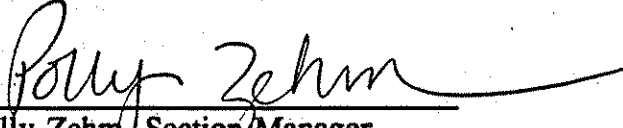
VII.

Enforcement

- 7.1. Pursuant to RCW 70.105D.050, this Order may be enforced as follows:
- A. The Attorney General may bring an action to enforce this Order in a state or federal court.
 - B. The Attorney General may seek, by filing an action if necessary, to recover amounts spent by Ecology for investigative and remedial actions and Orders related to the Facility.
 - C. In the event Cameron-Yakima, Inc., refuses, without sufficient cause, to comply with any term of this Order, Cameron-Yakima, Inc., will be liable for:
 - (1) up to three times the amount of any costs incurred by the state of Washington as a result of its refusal to comply; and
 - (2) civil penalties of up to \$25,000 per day for each day it refuses to comply.
 - D. This Order is not appealable to the Washington Pollution Control Hearings Board. This Order may be reviewed only as provided under RCW 70.105D.060.

Effective date of this Order: February 5, 1996.


Anthony W. Grever, Section Manager
Toxics Cleanup Program


Polly Zehm, Section Manager
Hazardous Waste and Toxics Reduction Program

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DEPARTMENT OF ECOLOGY

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Findings of Fact

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- 2.2. On June 28, 1988 the Environmental Protection Agency (EPA), via contractor, completed a preliminary site assessment of CYI. A manifest review showed tetrahydrofurane, xylene, acetate, tetrachloroethene (perchloroethylene, PCE), dichloroethene, trichloroethylene (TCE), and dichlorobromopropane adsorbed on the carbon arriving at the Facility. Based on information gathered during a Facility Assessment (RFA), the EPA assigned a high priority for corrective action.

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Ecology Determinations

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- 3.2. The Facility is known as Cameron-Yakima, Incorporated, and is located at 1414 South First Street in Yakima, Washington 98901, Parcel Number 19133042441.
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Terms and Condition of Order

5.1. Definitions

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5.4 Designated Project Coordinators

The project coordinator for Ecology is:

Tom Mackie (509) 457-7109
Department of Ecology
Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902-3401

The project coordinator for CYI is:

Eric Egbers (509) 452-6605
Cameron-Yakima, Inc.
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WAC 173-340-400(7)(b)(i) requires that "construction" performed on the site must be under the supervision of a professional engineer registered in Washington state.

5.6. Access

Ecology or any Ecology-authorized representative shall have the authority to enter and freely move about all property at the Facility at all reasonable times for the purposes of, inter alia: inspecting records, operation logs, and contracts related to the work being performed pursuant to this Order; reviewing the progress in carrying out the terms of this Order; conducting such tests or collecting samples as Ecology or the project coordinator may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done pursuant to this Order; and verifying the data submitted to Ecology by Cameron-Yakima, Inc. In the course of conducting oversight of this Order under the Model Toxics Control Act, Ecology shall provide reasonable notice before entering property unless an emergency prevents notice. When Ecology is acting under a statute other than the Model Toxics Control Act, Ecology shall provide notice consistent with that statute. Ecology shall allow split or replicate samples to be taken by Cameron-Yakima, Inc., during an inspection unless doing so would interfere with Ecology's sampling. Cameron-Yakima, Inc., shall allow split or replicate samples to be

taken by Ecology and shall provide Ecology fourteen (14) days notice before any sampling activity.

5.7. Public Participation

Cameron-Yakima, Inc., shall prepare a public participation plan for the Facility. Said public participation plan shall be coordinated with the public participation plan being developed for the Yakima Railroad Area. Ecology shall maintain the responsibility for public participation at the Facility. Cameron-Yakima, Inc., shall help coordinate and implement public participation for the Facility. Cameron-Yakima, Inc., shall designate a point of contact for the development and implementation of said public participation plan.

5.8. Retention of Records

Cameron-Yakima, Inc., shall preserve in a readily retrievable fashion, during the pendency of this Order and for ten (10) years from the date of completion of the work performed pursuant to this Order, all records, reports, documents, and underlying data in its possession relevant to this Order. Should any portion of the work performed hereunder be undertaken through contractors or agents of Cameron-Yakima, Inc., then Cameron-Yakima, Inc., agrees to include in their contract with such contractors or agents a record retention requirement meeting the terms of this paragraph.

5.9 Dispute Resolution

Cameron-Yakima, Inc., may request Ecology to resolve disputes which may arise during the implementation of this Order. Such request shall be in writing and directed to the signatories, or their successor(s), to this Order. Ecology resolution of the dispute shall be binding and final. Cameron-Yakima, Inc., is not relieved of any requirements of this Order during the pendency of the dispute and remains responsible for timely compliance with the terms of the Order unless otherwise provided by Ecology in writing.

5.10 Reservation of Rights/No Settlement

Ecology reserves all rights to issue additional Orders or take any action authorized by law in the event or upon the discovery of a release or threatened release of hazardous substances not addressed by this Order, upon discovery of any factors not known at the time of issuance of this Order, in order to abate an emergency, or under any other circumstances deemed appropriate by Ecology.

Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the releases or threatened releases of hazardous substances from the Cameron-Yakima, Inc., Facility.

In the event Ecology determines that conditions at the Facility are creating, or have the potential to create, a danger to the health or welfare of the people at the Facility or in the surrounding area or to the environment, Ecology may order Cameron-Yakima, Inc., to stop further implementation of this Order for such period of time as needed to abate the danger.

5.11 Transference of Property

No voluntary or involuntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Facility shall be consummated by Cameron-Yakima, Inc., without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Prior to transfer of any legal or equitable interest Cameron-Yakima, Inc., may have in the Facility or any portions thereof, Cameron-Yakima, Inc., shall serve a copy of this Order upon any prospective purchaser, lessee, transferee, assignee, or other successor in such interest. At least thirty (30) days prior to finalization of any transfer, Cameron-Yakima, Inc., shall notify Ecology of the contemplated transfer.

5.12 Compliance with Other Applicable Laws

All actions carried out by Cameron-Yakima, Inc., pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements.

VI.

Satisfaction Of This Order

The provisions of this Order shall be deemed satisfied upon Cameron-Yakima, Inc.'s, receipt of written notification from Ecology that Cameron-Yakima, Inc., has completed the remedial activity required by this Order, as amended by any modifications, and that all other provisions of this Order have been complied with.

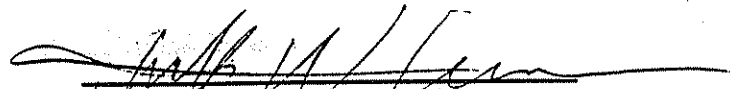
VII.

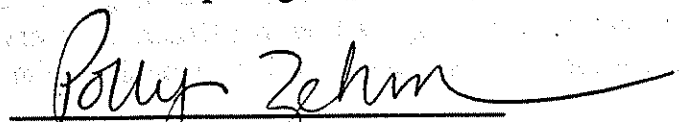
Enforcement

7.1. Pursuant to RCW 70.105D.050, this Order may be enforced as follows:

- A. The Attorney General may bring an action to enforce this Order in a state or federal court.
- B. The Attorney General may seek, by filing an action if necessary, to recover amounts spent by Ecology for investigative and remedial actions and Orders related to the Facility.
- C. In the event Cameron-Yakima, Inc., refuses, without sufficient cause, to comply with any term of this Order, Cameron-Yakima, Inc., will be liable for:
 - (1) up to three times the amount of any costs incurred by the state of Washington as a result of its refusal to comply; and
 - (2) civil penalties of up to \$25,000 per day for each day it refuses to comply.
- D. This Order is not appealable to the Washington Pollution Control Hearings Board. This Order may be reviewed only as provided under RCW 70.105D.060.

Effective date of this Order: February 5, 1996.


Anthony W. Grover, Section Manager
Toxics Cleanup Program


Polly Zehm, Section Manager
Hazardous Waste and Toxics Reduction Program

Revised
DE 96HW-0113

DEPARTMENT OF ECOLOGY

April 1, 1994

TO: Debbie Iness
Budget, Accounting, and Support Services

FROM: Pat Melone *PMM*
Toxics Cleanup Program

SUBJECT: New Cost Recovery

Please invoice on the following:

Cameron-Yakima, Project 8287

Enforcement Order DE 94 TC-C168

As stated on the cover form, past costs should be included on the first quarterly invoice.

Thank you.

PAM:hc
Attachments

cc: Rick Roeder, CRO TCP

TO: Negotiation Review Team Coordinator

FROM: Rick Roeder

SUBJECT: Final Document

DATE: 4/1/94

SITE NAME: Cameron-Yakima

SIS NUMBER: _____

SITE MANAGER: Rick Roeder

SCAN # 558-7837

OFFICE LOC: CRO

SITE PIC: _____

PROJECT NO. 8287

(Cost Rec. Coord. Provides)

Type of Document:

- | | | | |
|---------------------------|---|---------------------------|-----|
| Agreed Order (AO) | [] | Ch. 90.48 RCW Order (WQ) | [] |
| Cleanup Action Plan (CAP) | [] | Ch. 70.105 RCW Order (HW) | [] |
| Emergency Order (EEO) | [] | Record of Decision (ROD) | [] |
| Enforcement Order (EO) | [<input checked="" type="checkbox"/>] | State Memorandum of | |
| Consent Decree (CD) | [] | Agreement (SMOA) | [] |
| Fed. Fac. Agreement (FFA) | [] | Other | [] |

EFFECTIVE DATE OF DOCUMENT: 3/31/94

ASSISTANT ATTORNEY GENERAL _____

IS PLP ADDRESS SHOWN IN DOCUMENT: YES NO
(If NO, put address here:)

Are past costs included? YES NO
(If YES, for what time period)

Are there any billing restrictions? YES NO
(If YES, describe:)

If more than one PLP, how should invoice amount be apportioned?

PLP _____	_____ %	PLP _____	_____ %
PLP _____	_____ %	PLP _____	_____ %
PLP _____	_____ %	PLP _____	_____ %
PLP _____	_____ %	PLP _____	_____ %

FISCAL OFFICE USE ONLY



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

106 South 6th Ave. • Yakima, Washington 98902-3387 • (509) 575-2490

MAR 31 1994

CERTIFIED MAIL

P 371 103 072

Bob Hanson, President
Cameron-Yakima, Inc.
P.O. Box 1554
Yakima, WA 98907-1554

Dear Mr. Hanson:

Enclosed please find Enforcement Order No. DE 94TC-C168 for the Cameron Yakima, Inc., facility located at 1414 South First Street in Yakima, Washington. This Enforcement Order is issued by the Department of Ecology under the authority of the Model Toxics Control Act.

Please direct any questions regarding this Order to Rick Roeder, Ecology Site Manager, at (509) 454-7837.

Sincerely,

Anthony W. Grover
Section Manager
Toxics Cleanup Program

AWG:RR:vw

g:ctr.ord

Enc: Enforcement Order No. DE 94TC-C168

cc: Chuck Blumenfeld, Bogle & Gates
Eric Egbers, Cameron-Yakima, Inc.
Art Kreger, Cameron-Yakima, Inc.
Steve Thiele, AAG, Lacey
Tony Valero, TCP-CRO
Rick Roeder, TCP-CRO
Brian Dick, HWTR-CRO
Marty Werner, HWTR-HQ
Jack Boller, EPA-WOO
Christy Ahlstrom-Brown, EPA, Region 10

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF REMEDIAL ACTION BY:)
)
CAMERON-YAKIMA, INCORPORATED) ENFORCEMENT ORDER
1414 SOUTH FIRST STREET) No. DE 94TC-C168
PO BOX 1554)
YAKIMA, WASHINGTON 98901)

TO: Bob Hansen, President
CAMERON-YAKIMA, INCORPORATED

I.

Jurisdiction

This Order ("Order") is issued pursuant to the authority of the Revised Code of Washington (RCW) 70.105D.050(1).

II.

Findings of Fact

The Department of Ecology (Ecology) makes the following Findings of Fact.

2.1. The Facility, Cameron-Yakima, Inc., (CYI) is located at 1414 South First Street in Yakima, Washington, on Parcel Number 19133042441 (according to Yakima County Assessor's records). CYI has been owned and operated as an activated carbon recycling business since 1944.

CYI is an active Facility that regenerates spent carbon from air, water, and industrial process filtration systems. Management areas include, but are not limited to, multiple hearth furnaces, drum storage, and a decant unit (which was identified in a September 10, 1990 Part A RCRA permit application by CYI as an in-ground spent carbon transfer tank). The CYI Facility operations are regulated under a RCRA interim status permit.

2.2. On June 28, 1988 the Environmental Protection Agency (EPA), via a contractor, completed a preliminary site assessment of CYI. A manifest review showed tetrahydrofurane, xylene, tetrachloroethene (perchloroethylene, PCE), dichloroethene, trichloroethylene (TCE), and dichlorobromopropane adsorbed on the carbon arriving at the Facility. Based on information gathered during a Facility Assessment (RFA), the EPA assigned the Facility a high priority for corrective action.

- 2.3. On March 29, 1988 the EPA issued a 3013 Order to CYI pursuant to RCRA. The Order stated that inspectors "...discovered that the Facility has been storing outdoors approximately 500 55-gallon drums of charcoal contaminated with Perchloroethylene."
- 2.4. On August 1 through 3, 1988 CYI consultants, Black and Veatch, Waste Management Incorporated, conducted soil sampling at the CYI Facility as required in the March 29, 1988 3013 Order. Contamination of soil by Perchloroethylene (PCE) was found in concentrations as high as 170 mg/kg (ppm). Additional contaminants found included trichloroethene, methylene chloride, chloroform, toluene, ethylbenzene, xylene, and carbon disulfide.
- 2.5. Delta Environmental, consultants to CYI, conducted a hydrogeologic assessment in August of 1988 as required under the March 29, 1988 3013 Order. Data from this study showed tetrachlorethene in groundwater as high as 960 ppb in an on-site monitoring well MW-4.
- 2.6. Ecology & Environment, Inc. (E&E), contractors to EPA, conducted a soil-gas study of a 2-1/2 square mile area in the downtown industrial section of Yakima between June 5, 1989 and July 22, 1989. CYI is located within the area of the study known as the Yakima Railroad Area (YRRA). In its report, E&E stated "...it is believed that Cameron-Yakima, Inc., property is a ...potential source of PCE in groundwater contamination."
- 2.7. On October 24, 1991, after notice and opportunity for comment, Ecology issued a final determination of Potentially Liable Person (PLP) status under RCW 70.105D.040 for the YRRA to CYI.
- 2.8. On February 11, 1992 the YRRA PLPs were issued an Order by Ecology (Order No. DE 92TC-C108) which directed them to provide bottled water to those residences in the YRRA on private wells.
- 2.9. On October 8, 1993 Cameron-Yakima, Inc., provided Ecology with a "Preliminary Site Assessment" prepared by Hart Crowser, dated September 28, 1993. Contamination of soil by PCE was found in concentrations as high as 720 mg/kg (ppm). Additional contaminants found at the Facility included Trichloroethene, 1,2-Dichloroethane, 1,2-Dichloroethene, 1,1,1-Trichloroethane, Ethylbenzene, Toluene, Xylene, Freon

12, Freon 11, Freon 113, Vinyl Chloride, Methylene Chloride, cis-1,2-Dichloroethene, Benzene, Styrene, 1,2,4-Trimethylbenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene. Additionally, it was found that soil moisture levels appear elevated in various locations at the Facility including the barrel washing area and the surface impoundment unit presently undergoing closure.

III.

Ecology Determinations

- 3.1. CYI is an "owner or operator" as defined in RCW 70.105D.020(6) of a "Facility" as defined in RCW 70.105D.020(3).
- 3.2. The Facility is known as Cameron-Yakima, Incorporated, and is located at 1414 South First Street in Yakima, Washington 98901, Parcel Number 19133042441.
- 3.3. The substances found at the Facility as described above are "hazardous substances" as defined in RCW 70.105D.020(5).
- 3.4. Based on the presence of these hazardous substances at the Facility and all factors known to Ecology, there is a release or threatened release of hazardous substances from the Facility, as defined in RCW 70.105D.020(10).
- 3.5. CYI is one of the facilities from which there is a release or threatened release of PCE within the YRRA.
- 3.6. By letter dated October 24, 1991 Ecology notified CYI of its status as a "potentially liable person" under RCW 70.105D.040 after notice and opportunity for comment.
- 3.7. Pursuant to RCW 70.105D.030(1) and RCW 70.105D.050, Ecology may require PLPs to investigate or conduct other remedial actions with respect to the release or threatened release of hazardous substances, whenever it believes such action to be in the public interest.
- 3.8. Based on the foregoing facts, Ecology believes the remedial action required by the Order is in the public interest.

IV.

Work to be Performed

Based on the foregoing Facts and Determinations, it is hereby ordered that Cameron-Yakima, Incorporated, take the following remedial actions and that these actions be conducted in accordance with Chapter 173-340 of the Washington Administrative Code (WAC) unless otherwise specifically provided for herein.

- 4.1. No later than thirty (30) days after issuance of this Enforcement Order, Cameron-Yakima, Inc., shall submit to Ecology for review and approval, a draft Work Plan (Plan) for completion of a Remedial Investigation/Feasibility Study (RI/FS). This draft Plan shall consist of a detailed RI/FS work plan which, at a minimum, shall address the components outlined in Attachment A. Attachment A is incorporated by this reference and is an integral and enforceable part of this Order. The draft Plan will also include a Schedule of Deliverables as outlined in Attachment B. Attachment B is incorporated by this reference and is an integral and enforceable part of this Order.

Twenty (20) days after receipt of Ecology's comments on the draft Plan, Cameron-Yakima, Inc., shall submit a final Plan for approval by Ecology.

No later than thirty (30) days after receipt of Ecology's written approval of the final Plan, Cameron-Yakima, Inc., shall begin the RI/FS work described in the Plan. The RI/FS work shall be completed according to the time frame and schedules described in the approved Plan.

The RI/FS will collect, develop, and evaluate sufficient information regarding the Facility to enable the selection of a cleanup action under WAC 173-340-360. The RI/FS will be implemented to meet the requirements of WAC 173-340-350.

- 4.2. Samples from the initial round of groundwater and soil sampling conducted for the RI/FS shall be analyzed for all constituents specified in Appendix IX of 40 CFR, Part 264. Parameters for subsequent sampling events shall be selected, subject to Ecology review and approval, based on initial sampling and analysis, and upon the composition of wastes that are, or have been,

managed at CYI. The rationale for selection of all parameters shall be provided.

- 4.3. Cameron-Yakima, Inc., will develop and submit to Ecology for approval a Quality Assurance/Quality Control (QA/QC) Plan in accordance with the Ecology Guidelines and Specifications for Preparing Quality Assurance Project Plans (May 1991), Attachment C. Attachment C is incorporated by this reference and is an integral and enforceable part of this Order. No sampling associated with this Order may be conducted prior to Ecology approval of the QA/QC Plan.
- 4.4. Results from sampling shall be provided to Ecology's project coordinator within 14 days of receipt from the laboratory.
- 4.5. Written progress reports shall be submitted to Ecology with a copy to EPA and RCRA by CYI at least monthly from the date of this Order to completion. CYI shall immediately notify Ecology by telephone of any unexpected delays in the work required as part of this Order.
- 4.6. In accordance with WAC 173-340-840(5), sampling data shall be submitted according to Attachment D: DATA SUBMITTAL REQUIREMENTS. Attachment D is incorporated by this reference and is an integral and enforceable part of this Order.
- 4.7. Cameron-Yakima, Inc., shall prepare and submit to Ecology a detailed, written estimate, in current dollars, of the cost of completion of all RI/FS activities required by this Order, including development of work plans, implementation, and satisfactory performance of the RI/FS. The cost estimate must be based on the costs to respondent of hiring a third party to perform all RI/FS activities required by this Order. Respondent shall annually adjust and submit to Ecology the most up-to-date corrective action cost estimate for inflation within thirty (30) days after close of their fiscal year. The original cost estimate will be developed within ninety (90) days of the effective date of this Order. Respondent shall adjust and submit to Ecology the most up-to-date RI/FS cost estimate within thirty (30) days after CYI becomes aware of new information which may increase the cost of satisfactory completion of this Order. Within 120 days of the effective date of this Order, CYI shall establish and shall continuously maintain financial assurance for performance of remaining RI/FS activities at the Facility in at least the amount of the most up-to-date

cost estimate prepared in accordance with this Order. The mechanism(s) for obtaining and demonstrating financial assurance for corrective action must be one of the forms specified in paragraphs (a) through (f) of 40 CFR, section 265.143.

- 4.8 Deviations from the Scope of Work may only be made with prior Ecology approval.

V.

Terms and Condition of Order

5.1. Definitions

Unless otherwise specified, the definitions set forth in Chapter 70.105D RCW and Chapter 173-340 WAC shall control the meanings of the terms used in this Order.

For purposes of this Order, Ecology is defined as the Toxics Cleanup Program, Central Regional Office, Yakima, Washington.

5.2. Public Notices

RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that the Order is inadequate or improper in any respect.

5.3 Remedial Action Costs

Cameron-Yakima, Inc., shall pay to Ecology costs incurred by Ecology pursuant to this Order. These costs shall include work performed by Ecology or its contractors at the Facility under Chapter 70.105D RCW both prior to and subsequent to the issuance of this Order for investigations, remedial actions, and Order preparation, oversight and administration. Ecology costs shall include costs of direct activities and support costs of direct activities as defined in WAC 173-340-550(2). Cameron-Yakima, Inc., shall pay the required amount within ninety (90) days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved staff, and the amount of time spent by involved staff

members on the project. A general description of work performed will be provided upon request. Itemized statements shall be prepared quarterly. Failure to pay Ecology's costs within ninety (90) days of receipt of an itemized statement of costs will result in interest charges pursuant to WAC 173-340-550(4).

5.4 Designated Project Coordinators

The project coordinator for Ecology is:

Rick Roeder (509) 454-7837
Department of Ecology
Central Regional Office
106 South 6th Avenue
Yakima, Washington 98902-3387

Cameron-Yakima, Inc., shall notify Ecology of its project coordinator within ten (10) calendar days of receiving this Order. The project coordinator(s) shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communications between Ecology and CYI, and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order, shall be directed through the project coordinator(s). Should Ecology or CYI change project coordinator(s), written notification shall be provided to Ecology or CYI, at least ten (10) calendar days prior to the change.

5.5. Performance

All work performed pursuant to this Order shall be under the direction and supervision, as necessary, of a professional engineer or hydrogeologist, or similar expert, with appropriate training, experience, and expertise in hazardous waste site investigation and cleanup. Cameron-Yakima, Inc., shall notify Ecology as to the identity of such engineer(s) or hydrogeologist(s), and of any contractors and subcontractors to be used in carrying out the terms of this Order, in advance of their involvement at the Facility. Cameron-Yakima, Inc., shall provide a copy of this Order to all agents, contractors, and subcontractors retained to perform work required by this Order and shall ensure that all work undertaken by such agents, contractors, and subcontractors will be in compliance with this Order.

Except where necessary to abate an emergency situation, or to comply with RCRA requirements, Cameron-Yakima, Inc., shall not perform any remedial actions at the Cameron-Yakima, Inc., Facility outside that required by this Order unless Ecology concurs, in writing, with such additional remedial actions.

WAC 173-340-400(7)(b)(i) requires that "construction" performed on the site must be under the supervision of a professional engineer registered in Washington state.

5.6. Access

Ecology or any Ecology-authorized representative shall have the authority to enter and freely move about all property at the Facility at all reasonable times for the purposes of, inter alia: inspecting records, operation logs, and contracts related to the work being performed pursuant to this Order; reviewing the progress in carrying out the terms of this Order; conducting such tests or collecting samples as Ecology or the project coordinator may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done pursuant to this Order; and verifying the data submitted to Ecology by Cameron-Yakima, Inc. In the course of conducting oversight of this Order under the Model Toxics Control Act, Ecology shall provide reasonable notice before entering property unless an emergency prevents notice. When Ecology is acting under a statute other than the Model Toxics Control Act, Ecology shall provide notice consistent with that statute. Ecology shall allow split or replicate samples to be taken by Cameron-Yakima, Inc., during an inspection unless doing so would interfere with Ecology's sampling. Cameron-Yakima, Inc., shall allow split or replicate samples to be taken by Ecology and shall provide Ecology fourteen (14) days notice before any sampling activity.

5.7. Public Participation

Cameron-Yakima, Inc., shall prepare a public participation plan for the Facility. Said public participation plan shall be coordinated with the public participation plan being developed for the Yakima Railroad Area. Ecology shall maintain the responsibility for public participation at the Facility. Cameron-Yakima, Inc., shall help coordinate and implement public participation for the Facility. Cameron-

Yakima, Inc., shall designate a point of contact for the development and implementation of said public participation plan.

A draft public participation plan shall be submitted to Ecology within sixty (60) days of the date of this Order. A final public participation plan shall be submitted for approval within thirty (30) days of receipt of Ecology comments on the draft.

5.8. Retention of Records

Cameron-Yakima, Inc., shall preserve in a readily retrievable fashion, during the pendency of this Order and for ten (10) years from the date of completion of the work performed pursuant to this Order, all records, reports, documents, and underlying data in its possession relevant to this Order. Should any portion of the work performed hereunder be undertaken through contractors or agents of Cameron-Yakima, Inc., then Cameron-Yakima, Inc., agrees to include in their contract with such contractors or agents a record retention requirement meeting the terms of this paragraph.

5.9. Dispute Resolution

Cameron-Yakima, Inc., may request Ecology to resolve disputes which may arise during the implementation of this Order. Such request shall be in writing and directed to the signatory, or his/her successor(s), to this Order. Ecology resolution of the dispute shall be binding and final. Cameron-Yakima, Inc., is not relieved of any requirements of this Order during the pendency of the dispute and remains responsible for timely compliance with the terms of the Order unless otherwise provided by Ecology in writing.

5.10. Reservation of Rights/No Settlement

Ecology reserves all rights to issue additional Orders or take any action authorized by law in the event or upon the discovery of a release or threatened release of hazardous substances not addressed by this Order, upon discovery of any factors not known at the time of issuance of this Order, in order to abate an emergency, or under any other circumstances deemed appropriate by Ecology.

Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from

the releases or threatened releases of hazardous substances from the Cameron-Yakima, Inc., Facility.

In the event Ecology determines that conditions at the Facility are creating, or have the potential to create, a danger to the health or welfare of the people at the Facility or in the surrounding area or to the environment, Ecology may order Cameron-Yakima, Inc., to stop further implementation of this Order for such period of time as needed to abate the danger.

5.11 Transference of Property

No voluntary or involuntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Facility shall be consummated by Cameron-Yakima, Inc., without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Prior to transfer of any legal or equitable interest Cameron-Yakima, Inc., may have in the Facility or any portions thereof, Cameron-Yakima, Inc., shall serve a copy of this Order upon any prospective purchaser, lessee, transferee, assignee, or other successor in such interest. At least thirty (30) days prior to finalization of any transfer, Cameron-Yakima, Inc., shall notify Ecology of the contemplated transfer.

5.12 Compliance with Other Applicable Laws

All actions carried out by Cameron-Yakima, Inc., pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements.

VI.

Satisfaction Of This Order

The provisions of this Order shall be deemed satisfied upon Cameron-Yakima, Inc.'s., receipt of written notification from Ecology that Cameron-Yakima, Inc., has completed the remedial activity required by this Order, as amended by any modifications, and that all other provisions of this Order have been complied with.

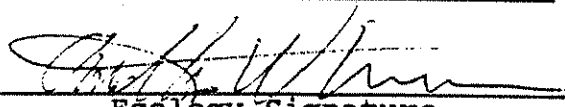
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Enforcement

7.1. Pursuant to RCW 70.105D.050, this Order may be enforced as follows:

- A. The Attorney General may bring an action to enforce this Order in a state or federal court.
- B. The Attorney General may seek, by filing an action if necessary, to recover amounts spent by Ecology for investigative and remedial actions and Orders related to the Facility.
- C. In the event Cameron-Yakima, Inc., refuses, without sufficient cause, to comply with any term of this Order, Cameron-Yakima, Inc., will be liable for:
 - (1) up to three times the amount of any costs incurred by the state of Washington as a result of its refusal to comply; and
 - (2) civil penalties of up to \$25,000 per day for each day it refuses to comply.
- D. This Order is not appealable to the Washington Pollution Control Hearings Board. This Order may be reviewed only as provided under RCW 70.105D.060.

Effective date of this Order: MAR 31 1994


Ecology Signature

DEPARTMENT OF ECOLOGY

August 12, 1999

TO: Debbie Iness, Fiscal
FROM: Jan Swanberg, Toxics Cleanup Program
SUBJECT: Cost Recovery projects numbered 8504, 8278/8R13 and 8387

The Ecology project manager, Rick Roeder, has requested adjustments to billings as follows:

Cameron-Yakima, Inc. – Project 8287/8R13

Do not send invoices to Cameron-Yakima. They no longer exist in this manner and have no physical address (your invoices came back in the mail last quarter). However, they are still responsible for clean-up expenditures. They are also part of the Yakima Railroad project 8387. This will all be resolved at a later date (in legal settlement).

Meanwhile, costs will continue to be tracked and interest should continue to accrue on this project – but no invoices sent out.

Westco Martinizing – Project 8504

This project was settled through a revised consent decree signed very recently – May or June 1999. I will forward a copy to you when I receive one in the mail. I have attached a copy of a fax of the specific pages from the consent decree that discusses The \$18,210.61 agreed on settlement.

This June billing should not be sent to Westco. Although Rick Roeder wants to continue to track expenditures, if any, that occur after the agreed settlement for this project. The project number and SIC should remain, but the project should become inactive – no invoices.

Yakima Railroad Area – Project 8387

The June invoice (and future invoices) should not include Cameron-Yakima Inc., Westco Martinizing, and Investment Management and Trust Services. Please do not send copies of the bills to these three.

Let me know if you have any questions. My number is 407-7213

Cc: Cergio Castillo, Fiscal



1 beginning on December 1, 1998. At the end of these initial two monitoring periods, Westco ma
2 provide sample results twice yearly until the results demonstrate that groundwater cleanup level
3 have been achieved.

4 B. Within *thirty (30) days* of the effective date of this decree, Westco agrees to pay
5 \$130,407.17 to the Trust Fund established in Exhibit D. Payment shall be made to the order of
6 Yakima Railroad Area Qualified Settlement Trust Account [No. 20-20-509-4021000] and
7 delivered by certified or cashier's check to ATTN: Inv. Mgmt. and Trust Svcs., Seafirst Bank,
8 P.O. Box 232, Yakima, Washington 98907. In addition, Westco shall reimburse Ecology for its
9 oversight costs, which are \$18,210.61. Payment shall be made within *thirty (30) days* of the
10 effective date of the decree by certified or cashier's check payable to Department of Ecology,
11 Cashier's Section, P.O. Box 5128, Lacey, Washington, 98509-5128; with reference to: Westco
12 Mart. Site (No. J1C52).

13 C. The Trust Fund shall be used by Ecology for the exclusive purposes of financing
14 past and future remedial actions at the YRRA Site. Defendant's financial contribution expressly
15 and specifically includes, but is not limited to, the Defendant's share of the following past and
16 future costs: (1) costs of grants provided to the cities of Yakima and Union Gap, Washington for
17 the purposes of municipal water system installation and upgrades; and (2) costs of work
18 performed by Ecology or its contractors for, or on, the YRRA Site under Ch. 70.1050 RCW, both
19 prior to and subsequent to the issuance of this Decree, for investigations, remedial actions, and
20 Decree preparation, negotiations, oversight and administration of this Decree. Ecology costs
21 include costs of direct activities and support costs of direct activities as defined in WAC 173-
22 340-550(2). Defendant's financial contribution shall be held in the Trust Fund pursuant to the
23 terms of Exhibit D. Ecology shall be designated as having the power of appointment under the
24 Trust.

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This document is part of the official
Administrative Record for the
Yakima Railroad Area.
Washington State
Department of Ecology

CONSENT DECREE

ATTORNEY GENERAL OF WASHINGTON
Ecology Division
PO Box 40117
Olympia, WA 98504-0117
FAX (360) 438-7743

*Decree
was filed
5/7/99*

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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF YAKIMA**

STATE OF WASHINGTON,
DEPARTMENT OF ECOLOGY,

Plaintiff,

v.

WESTCO, INC., a Washington Corporation,

Defendant.

NO. 99 2 01235 5

CONSENT DECREE

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- Exhibit A: Map of Yakima Railroad Area
- Exhibit B: Legal Description of Property
- Exhibit C: Westco Martinizing Site History
- Exhibit D: Trust Agreement
- Exhibit E: Compliance Monitoring Plan

