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April 1, 2019

Tonya Martinez
Pacific Bell, Inc.
111 West 39th Street
Vancouver, WA 98660

Re: Notice of Periodic Review Conducted at the following Hazardous Waste Site:

- **Site Name:** Exxon Station 73594
- **Site Address:** 13204 Northeast Highway 99. Vancouver, Washington 98665
- **Facility/Site ID :** 53876575
- **Cleanup Site ID:** 6242

Dear Tonya Martinez:

Under the Model Toxics Control Act (MTCA), chapter 70.105D Revised Code of Washington (RCW), which governs the cleanup of hazardous waste sites in Washington State, the Department of Ecology (Ecology) must conduct a periodic review of all sites with institutional controls and Environmental Covenants every five years. This letter serves to inform you that a second periodic review has been conducted at the Exxon Station 73594 Site.

The periodic review process includes the following steps:

- Confirmation that the Environmental Covenant is still active and recorded with the Title to the property.
- A review of any monitoring data collected since the cleanup was completed or since the last review was conducted.
- A Site visit to confirm the institutional controls and conditions of the Environmental Covenant are being followed.
- A 30-day public comment period on the draft periodic review report.

Based on the information collected during this periodic review, the Exxon Station 73594 Site appears to meet the requirements of chapter 173-340 of the Washington Administrative Code (WAC), and the selected remedy continues to be protective of human health and the environment. The 30-day public comment period on the draft periodic review report was ended on March 30, 2019. We received no public comments on the draft report. Enclosed is a copy of the final periodic review report for your information.

A periodic review will continue to be required every five years as long as institutional controls and/or an environmental covenant are required to protect human health and the environment. The next periodic review will be due in March 2024.

If you have any questions regarding this letter or if you would like additional information regarding the cleanup of hazardous waste sites, please call me at (360) 407-6335. Thank you for your cooperation.

Sincerely,

Panjini Balaraju, P.E.
Toxics Cleanup Program
Southwest Regional Office

Enclosure: Final Periodic Review Report

By certified mail: 9489 0090 0027 6066 6647 70

cc: Melissa Smith, Pacific Bell, Inc.
Ecology Site File

PERIODIC REVIEW REPORT
FINAL

Exxon Station 73594
Facility Site ID#: 53876575
Cleanup Site ID#: 6242

13204 Northeast Highway 99
Vancouver, Washington 98665

Southwest Regional Office
TOXICS CLEANUP PROGRAM

March 2019

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1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup conditions and monitoring data to ensure that human health and the environment are being protected at the Exxon Station 73594 Site (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP). The cleanup actions resulted in concentrations of lead remaining at the Site in groundwater that exceeds MTCA Method A cleanup levels. The MTCA Method A cleanup levels for soil are established under WAC 173-340-740(2). The MTCA Method A cleanup levels for groundwater are established under WAC 173-340-720(3). WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a Site every five years under the following conditions:

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

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

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

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

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to southwest and groundwater is typically encountered at depths ranging from approximately 23 feet to 24 feet below ground surface. A geological cross-section is available as Appendix 6.3.

2.3 Cleanup Levels

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

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for this Site. The cleanup actions conducted at the Site were determined to be 'routine', few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A Tables for each hazardous substance. The table below presents the old and current MTCA Method A cleanup levels.

Table-1: MTCA Method A Soil and Groundwater Cleanup Levels

Chemical	Current Soil Cleanup Level (mg/kg)	Current Groundwater Cleanup Level (µg/L)
TPH	NA	NA
TPH-Gas	100	800/1,000
TPH-Diesel	2,000	500
TPH-Oil	2,000	500
Benzene	0.03	5
Toluene	7	1,000
Ethylbenzene	6	700
Xylenes	9	1,000
Lead	250	15

Note: mg/kg: milligrams per kilogram
µg/L: micrograms per liter

2.4 Site Investigations and Remedial Actions

2.4.1 CH2M Hill

In April and June 1988, CH2M Hill installed three groundwater monitoring wells (MW-1 through MW-3) near the former USTs and pump islands. Three soil and three groundwater samples were collected for laboratory analysis. All the samples were analyzed for total petroleum hydrocarbons (TPH, Method 418.1) and benzene, toluene, ethylbenzene and xylenes (BTEX). The TPH results ranged from a method detection limit of 20 milligrams per kilogram (mg/kg) in the samples from MW-1 and MW-2 to 172 mg/kg in MW-3. None of the other contaminants of concern were detected above the laboratory detection limits. Results of groundwater samples collected from MW-2 and MW-3 showed benzene concentrations of 184 micrograms per liter (µg/L) and 14 µg/L, respectively. The lead concentration of 184 µg/L in

2.0 SUMMARY OF CONDITIONS

2.1 Site History

The Exxon Station 73594 Property is located at 13204 NE Highway 99, 0.25 mile south of the intersection of interstate 5 and Interstate 205 in the City of Vancouver, Clark County, Washington. The Site is surrounded by commercial properties. The Site is bounded on the north, west, and south by commercial properties and on the east by Northeast Highway 99. An operating Taco Bell restaurant currently occupies the Site with an adjacent parking lot. A Vicinity Map is available as Appendix 6.1. The current and previous Site Plans with locations of former underground storage tanks (USTs), service bays, canopy, groundwater monitoring wells, current Taco Bell building and other selected features are shown on Plate 2 and Figure 2, respectively in Appendix 6.2. Also the current Taco Bell restaurant building in relation to the previous Site Plan is shown on Plate 2 in Appendix 6.2. Following remedial activities, a Restrictive Covenant was recorded for the property on May 14, 2013. The Site received a NFA determination on August 20, 2013.

Previously the property is known to have been used as an Exxon service station. The service station included a pump island with a canopy, service bays, three regular and unleaded gasoline underground storage tanks (USTs; 6,000 gallons, 8,000 gallons and 10,000 gallons), one fuel oil UST (500 gallons) and one waste oil UST (1,000 gallons). There is lack of information regarding the list of previous owners and operators, operational history. During the service station operation releases from some of these USTs had impacted the Site's soil and groundwater with petroleum related contamination. Prior to April 1988, all the USTs and pump island were removed from the Site. However, there are no records detailing the removal of the USTs or the pump island including the exact date. Approximate locations of former USTs, pump islands and other site features are shown on Figure 2 in Appendix 6.2.

2.2 Site Geology and Hydrogeology

The Site is located on a level terrace north of the Portland Basin in Township 3 North, Range 1 East of the Willamette Meridian. The region is underlain by consolidated volcanic rocks of Eocene to Miocene age. These bedrock formations are overlain by semi-consolidated Pliocene deposits of fine grained sands, silts and clays, which comprise the lower member of the Troutdale Formation.

Soils present at the Site are classified by the United States Geological Survey (USGS) as somewhat poorly drained, stratified silt loams of the Hillsboro-Gee-Odne Association. Semi-consolidated Quaternary-aged periglacial flood gravel, sand, and silt deposits are mapped as underlying the Site and are underlain by Quaternary/Pliocene continental rocks and volcanic rocks of Grande Rhonde Basalt flows of Miocene age (Geologic Map GM-34, Washington Division of Geology and Earth Resources, 2002).

The Site lies at an elevation of 200 feet above mean sea level, and the local topography slopes generally to the southeast. The average groundwater gradient historically ranges from northwest

Method A cleanup levels. Locations of all the groundwater monitoring wells and all the soil and groundwater sample results are available as Appendix 6.7.

2.4.3 Soil Vapor Extraction System (Remedial Action)

The groundwater monitoring results indicated that elevated benzene concentrations were present only in groundwater monitoring well MW-2. Based on these results, Exxon assessed a cleanup option for the Site by testing a soil vapor extraction (SVE) system on MW-2 during December 1989 and January-February 1990. The goal of the test was to determine whether an SVE system will reduce the level of benzene in soil and groundwater at the Site. The process consisted of a blower to create a vacuum on MW-2 and two granular activated carbon drums connected in series to capture the gasoline vapor emissions. The 90-day pilot study was completed, and operations were discontinued prior to February 27, 1990. Air samples were periodically collected from in front of the carbon beds to determine the rate of hydrocarbon extraction. The results indicated that prior to shutdown, the system was removing approximately 0.9 pounds per day (lbs/day) of gasoline vapor constituents. In August of 1990, the system was given authorization to operate by the Southwest Air Pollution Control Authority. Subsequently the SVE system was operated continuously through December of 1991. A schematic process diagram of SVE system, extraction rate and air sample results are available as Appendix 6.8.

In April 1992, the SVE system was restarted and operated until September 1993, when it was shut down pending expansion. In April 1994, SECOR International, Inc. (SECOR) installed and connected air sparging well SP1 to the SVE system. In August 1995, EA Engineering, Science and Technology (EA) reportedly completed the installation and started the combined air sparging and soil vapor extraction (AS/SVE) system. In June 1997, the AS/SVE system was shut down and the system was expanded between June 1997 and June 1999 to include three additional air sparging wells (Sp2 through SP4), and restarted in June 1999. The AS/SVE system operated until January 2002, when it was shut down in preparation for the Site closure, having removed a total of approximately 1,290 pounds of hydrocarbon vapors.

2.4.4 EA Engineering Science and Technology

In May 1998, EA Engineering Science and Technology advanced two soil borings (B1 and B2) in the area of former pump islands, and three soil samples were collected for analysis. Laboratory results indicated that soil samples collected approximately 10 feet and 20 feet bgs from boring B2 contained TPH-G (5,960 mg/kg to 7,290 mg/kg), benzene (4.45 mg/kg to 28.9 mg/kg), toluene (195 mg/kg to 217 mg/kg), ethylbenzene (56.8 mg/kg to 190 mg/kg), and xylenes (95.4 mg/kg to 620 mg/kg) exceeding their MTCA Method A Cleanup Levels of 30 mg/kg, 0.5 mg/kg, 40 mg/kg, 20 mg/kg, and 20 mg.kg, respectively. The soil samples collected from boring B1 did not contain any analyte concentrations exceeding the laboratory detection limits. In July 1998, six additional soil borings (B2/MW8 through B7) were advanced in the area of the former pump islands and up-gradient of this area, and six soil samples were collected for laboratory analysis for petroleum constituents. Laboratory results indicated that soil samples collected from boring B2/MW8 and B4 in the northwest corner of the former UST basin contained petroleum hydrocarbons exceeding MTCA Method A cleanup levels, with up to 3,770 mg/kg TPH-G and 12.6 mg/kg benzene in boring B4. Borings B3, B5, and B7 were completed as pressure monitoring wells PM3, PM2, PM1, respectively. Boring B2 was completed as

MW-2 was above the Model Toxics Control Act (MTCA) Method A cleanup level of 15 µg/L. The groundwater monitoring well locations are available as Appendix 6.4.

In May 24 and June 19, 1989, all the three wells were again sampled and water samples were analyzed for TPH and BETX. Laboratory results of water sample collected in MW-2 indicated that only the benzene concentration (120 µg/L to 170 µg/L) was above the MTCA Method A cleanup level (5 µg/L) during both sampling events. All other contaminant concentrations were either not detected or below MTCA Method A cleanup levels. During these sampling rounds, the depth to groundwater ranged from 21 feet to 23 feet below ground surface (bgs). The water elevation contour maps indicated that the groundwater appears to be flowing in an east and southeast direction and the flow direction have not changed much since the previous sampling events. The groundwater monitoring well locations, groundwater sample results and water elevation contour map showing the approximate groundwater flow direction are included as Appendix 6.5.

From December 1990 through August 1991, CH2M Hill conducted four rounds of quarterly groundwater monitoring at the Site. During these sampling events, all three wells (MW-1 through MW-3) were sampled and groundwater samples were analyzed for TPH and BETX. Results indicated that only benzene concentration (27 µg/L to 54 µg/L) exceeded MTCA Method A cleanup level (5 µg/L) in monitoring well MW-2. The depth to groundwater ranged from 20 feet to 23 feet bgs and the groundwater flow direction was to the east to southeast. The depth of groundwater and the groundwater flow direction were consistent with the previous sampling events without any significant change. The groundwater monitoring well locations, groundwater sample results and water elevation contour map showing the approximate groundwater flow direction are included as Appendix 6.6.

2.4.2 Enviro-Logic, Inc.

In February 1992, Enviro-Logic, Inc. (ELI) conducted a Phase I investigation by drilling a four-inch boring to a depth of 25 feet and installing a monitoring well (MW-4) in it. The monitoring well was placed down gradient of MW-2 which was previously found to contain petroleum hydrocarbons/benzene. Soil samples were collected during the drilling and samples were field screened using an organic vapor analyzer (OVA). Two samples were collected (one of the soil sample just above the groundwater table) and one water sample from the monitoring well MW-4 for TPH and BTEX analysis. Results of soil and groundwater samples indicated that all the contaminant concentrations were either non-detects or below the MTCA Method A cleanup levels.

As a follow-up to the above Phase I investigation, ELI conducted a limited Subsurface Environmental Investigation in December 1993. Two soil borings (B-5 and B-6) were drilled to a depth of 35 feet and the borings were converted into two new groundwater monitoring wells (MW-4 and MW-5). During the drilling soil samples were collected every 5 foot intervals, field screened with an OVA and selected soil samples were analyzed for gasoline-range petroleum hydrocarbons (TPH-G), BTEX and total lead. In addition, monitoring wells MW-4 and MW-5 were also sampled and water samples were analyzed for the same above parameters. Results of soil and groundwater samples were either below the laboratory detection limits or below MTCA

lead data. The results indicated that the total and dissolved lead concentrations (39.7 µg/L and 29.2 µg/L, respectively) were above the MTCA Method A cleanup level (15 µg/L) in only one of the temporary well (TMW17). The temporary well locations and sample results are available as Appendix 6.12.

2.4.7 Feasibility Study/Disproportionate Cost Analysis

Cardno used the above groundwater investigation data to develop a feasibility study and disproportionate cost analysis (FS/DCA) that was submitted to Ecology in October 2012. The FS/DCA was prepared to demonstrate that the establishment of an Environmental Covenant is the most practicable alternative cleanup action and the costs of the most practicable permanent cleanup action alternative are disproportionate to the degree of benefits achieved by that alternative. As part of FS/DCA, the following three alternatives were evaluated:

- Restrictive Covenant with long-term groundwater monitoring plan,
- Excavation, Off-Site Transport/Disposal, and
- Groundwater Pump and treat system installation and operation.

Based on the analysis of available options, the Restrictive Covenant with a long-term groundwater monitoring plan was selected as the most viable approach for the Site. The long-term groundwater plan included the initial temporary well sampling event and one additional event in five years to assess the groundwater conditions for the 5-year Ecology review. The approximate extent of lead-impacted groundwater is included as Appendix 6.13.

2.4.8 5-year Groundwater Compliance Investigation

As required by the no further action letter, in October 2018, Cardno drilled five temporary groundwater monitoring wells (TMW-19 through TMW-23) to depths ranging from 20 feet to 35 feet. Groundwater samples were collected from all five TMWs and samples were analyzed for total and dissolved lead. The laboratory results indicated that the total dissolved lead was detected (10.5 µg/L of total lead and 11.4 µg/L of dissolved lead) in only TMW-21 and all other sample results were below the laboratory detection limits. The detected lead concentrations were below MTCA Method A cleanup level of 15 µg/L. The temporary monitoring well locations and water sample results are available as Appendix 6.14.

2.5 Environmental Covenant

Following the remediation and subsequent groundwater monitoring/investigation activities, it was determined that institutional controls were necessary for the Site to receive a no further action (NFA) determination due to residual lead contamination in the groundwater at the Site. A Restrictive Covenant was recorded for the Site in Clark County on May 14, 2013 and a NFA letter was issued on August 20, 2013. The Restrictive Covenant imposes the following limitations:

Section 1: No groundwater may be taken for any use from the Property.

monitoring well MW8, and boring B4 was completed as vapor extraction well VE1. Boring B6 was abandoned. The May 1998 (Plate 4) and July 1998 (Figure 2 and Plate 4) boring locations and soil sample results are available as Appendix 6.9.

Groundwater monitoring was conducted by CH2M Hill and Environmental Resolutions, Inc. (ERI) between April 1988 and October 1999. All groundwater samples were analyzed for TPH-G, BTEX, and total lead. Results showed that groundwater samples collected from MW-2, MW-4, and MW-5 periodically contained petroleum hydrocarbon (TPH-G, and BTEX) concentrations exceeding MTCA Method A cleanup levels. In addition, the Environmental Resolutions, Inc. (ERI) conducted a total of seven groundwater sampling events at the Site from May 2000 through June 2002. The groundwater samples collected contained no dissolved petroleum hydrocarbon concentrations exceeding the MTCA Method A cleanup levels. The locations of groundwater monitoring wells and groundwater sample results are available as Appendix 6.10.

2.4.5 Environmental Resolutions, Inc.

In April 2002, ERI advanced seven confirmation soil borings (B1 through B7) to a depth of 20 to 24 feet bgs near the former pump islands and USTs, in areas of impacted soil identified during previous investigations. Following field screening, a total of 13 soil samples were collected for laboratory analysis. All the soil samples were analyzed for TPH-G, BTEX, and lead. None of the soil samples analyzed contained any analyte concentrations exceeding MTCA Method A cleanup levels. Boring locations and soil sample results are available as Appendix 6.11.

The Department of Ecology (Ecology) in its response letter of January 16, 2007 expressed concerns regarding the lack of information in the vicinity of former used oil and waste oil USTs and northeast of the pump island and requested additional investigation. On March 18, 2008, ERI submitted an additional investigation Work Plan to address Ecology's concerns. On July 11, 2008, ERI completed the work outlined in the proposed work plan. As a part of this investigation, three soil borings (B8 through B10) were advanced to a depth of 30 feet and soil and groundwater samples were collected for laboratory analysis. No petroleum hydrocarbons were detected either in soil or groundwater samples above MTCA Method A cleanup levels. Groundwater samples were also analyzed for total and dissolved lead. Results from these samples indicated that both total and dissolved lead in groundwater samples exceeded the MTCA Method A cleanup level of 15 µg/L in MW-2 (88.7 µg/L total lead and 85.3 µg/L dissolved lead) and MW-8 (35.7 µg/L total lead and 34.9 µg/L dissolved lead). A second sampling in these wells confirmed that the results were representative of the previous sampling event. At that time, only total and dissolved lead, in groundwater in MW-2 and MW-8 were in exceedance of the MTCA Method A cleanup level.

2.4.6 Cardno Environmental Resolutions, Inc.

As a follow-up to the above ERI investigation, in September 2010, Cardno Environmental Resolutions (Cardno) decommissioned monitoring wells MW-2 and MW-8 and replaced them with new wells (MW-2a and MW-8a). These two new wells were sampled and the results indicated similar total and dissolved lead concentrations, continued to exceed MTCA Method A cleanup levels. After discussions with Ecology, Cardno decommissioned all the wells on the Site and advanced a series of temporary monitoring wells to collect additional total and dissolved

3.0 PERIODIC REVIEW

3.1 Effectiveness of Completed Cleanup Actions

Based upon the Site visit conducted on January 11, 2019, the asphalt pavement continues to eliminate exposure pathways (ingestion, direct contact) to the contaminated groundwater. The Taco Bell Restaurant building surrounding area and the parking lot asphalt pavement are in satisfactory condition and no repair, maintenance, or contingency actions are required. A photo log is available as Appendix 6.16.

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

3.2 New Scientific Information for Individual Hazardous Substances for Mixtures Present at the Site

Cleanup levels at the Site were based on regulatory standards rather than calculated risk for chemicals and/or media. These standards were sufficient to be protective of Site-specific conditions.

3.3 New Applicable State and Federal Laws for Hazardous Substances Present at the Site

The Model Toxics Control Act cleanup levels have not changed since the no further action determination letter was issued for the Site on August 20, 2013.

3.4 Current and Projected Site Use

The Site is currently used for commercial purposes. This use is not likely to change and the current land use has no negative impact on the risk posed by hazardous substances contained at the Site.

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 actions were capable of detection below MTCA Method A cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

Section 2: Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3: Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4: The Owner of the property must give thirty (30) days advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5: The owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6: The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7: The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples; to inspect remedial actions conducted at the property; to determine compliance this Covenant, and to inspect records that related to the Remedial Action.

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

The Restrictive Covenant is available as Appendix 6.15.

5.0 REFERENCES

Cardno ERI (Cardno). November 27, 2018. *5-Year Compliance Monitoring Work Plan,* Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.

Cardno ERI (Cardno). August 25, 2011a. *Groundwater Potability Evaluation – Request for Closure Report*, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.

Cardno ERI (Cardno). August 25, 2011b. *Proposal to Destroy Monitoring Wells Letter*, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.

Cardno ERI (Cardno). August 15, 2011c. *Groundwater Monitoring Report – Second Quarter 2011*, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.

Cardno ERI (Cardno). May 30, 2012. *Long-Term Groundwater Sampling Work Plan,* Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.

Cardno ERI (Cardno). October 25, 2012. Feasibility Study/Disproportionate Cost Analysis, Former Exxon Station 73594, 1320 Northeast Highway 99, Vancouver, Washington.

Cardno ERI (Cardno). October 25, 2012. Corrective Action Plan-Environmental Covenant, Former Exxon Station 73594, 1320 Northeast Highway 99, Vancouver, Washington.

CH2M HILL Companies Ltd. (CH2M Hill). July 22, 1988. *Sensitive Receptor Risk Assessment and Divestment Environmental Investigation*, Exxon Company USA, Store 7-3594, 13204 N.E. Highway 99, Vancouver, Washington.

CH2M HILL Companies Ltd. (CH2M Hill). September 26, 1988. *Site Environmental Investigation*, Exxon Company USA, R/S 7-3594, 13204 N.E. Highway 99, Vancouver, Washington.

EA Engineering, Science, and Technology (EA). October 17, 1998. *Soil Vapor Extraction and Air Sparging System Installation at Former Exxon Station RS 7-3594*, 13204 NE Highway 99, Vancouver, Washington.

Enviro-Logic, Inc. (ELI). February 25, 1992. *Hydrocarbon Delineation Investigation*, Former Exxon Service Station No. 7-3594, 13204 NE Highway 99, Vancouver, Washington.

Enviro-Logic, Inc. (ELI). January 3, 1994. *Limited Subsurface Environmental Investigation*, Former Exxon Service Station No. 7-3594, 13204 Northeast Highway 99, Vancouver, Washington.

4.0 CONCLUSIONS

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

- Groundwater cleanup level for lead was not met at the Site; however, under WAC 173-340-740(6) (f), the cleanup action is determined to comply with cleanup standards, since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met. However, the results of 5-Year Groundwater Compliance Monitoring Investigation conducted in October 2018 indicates that the lead concentrations are below MTCA Method A cleanup level.

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

Based on this review, the Department of Ecology has determined that the requirements of the Restrictive Covenant are being satisfactorily met and no additional remedial actions are needed at this time. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the cap 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.

6.0 APPENDICES

Environmental Resolutions, Inc. (ERI). September 19, 2002. *Confirmatory Boring and Soil Sampling Report*, Former Exxon Station 7-3594, 13204 Northeast Highway 99, Vancouver, Washington.

Environmental Resolutions, Inc. (ERI). March 18, 2003. *Monitoring Well Installation and Soil Sampling Report*, Former Exxon Station 7-3594, 13204 Northeast Highway 99, Vancouver, Washington.

Environmental Resolutions, Inc. (ERI). August 20, 2008. *Closure Report*, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington, Ecology VCP ID: SW 0447.

Environmental Resolutions, Inc. (ERI). June 29, 2009b. *Sparge Well Groundwater Sampling Report*, 13204 Northeast Highway 99, Vancouver, Washington.

Environmental Resolutions, Inc. (ERI). April 8, 2010a. *Work Plan for Destruction and Installation of Two Groundwater Monitoring Wells*, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.

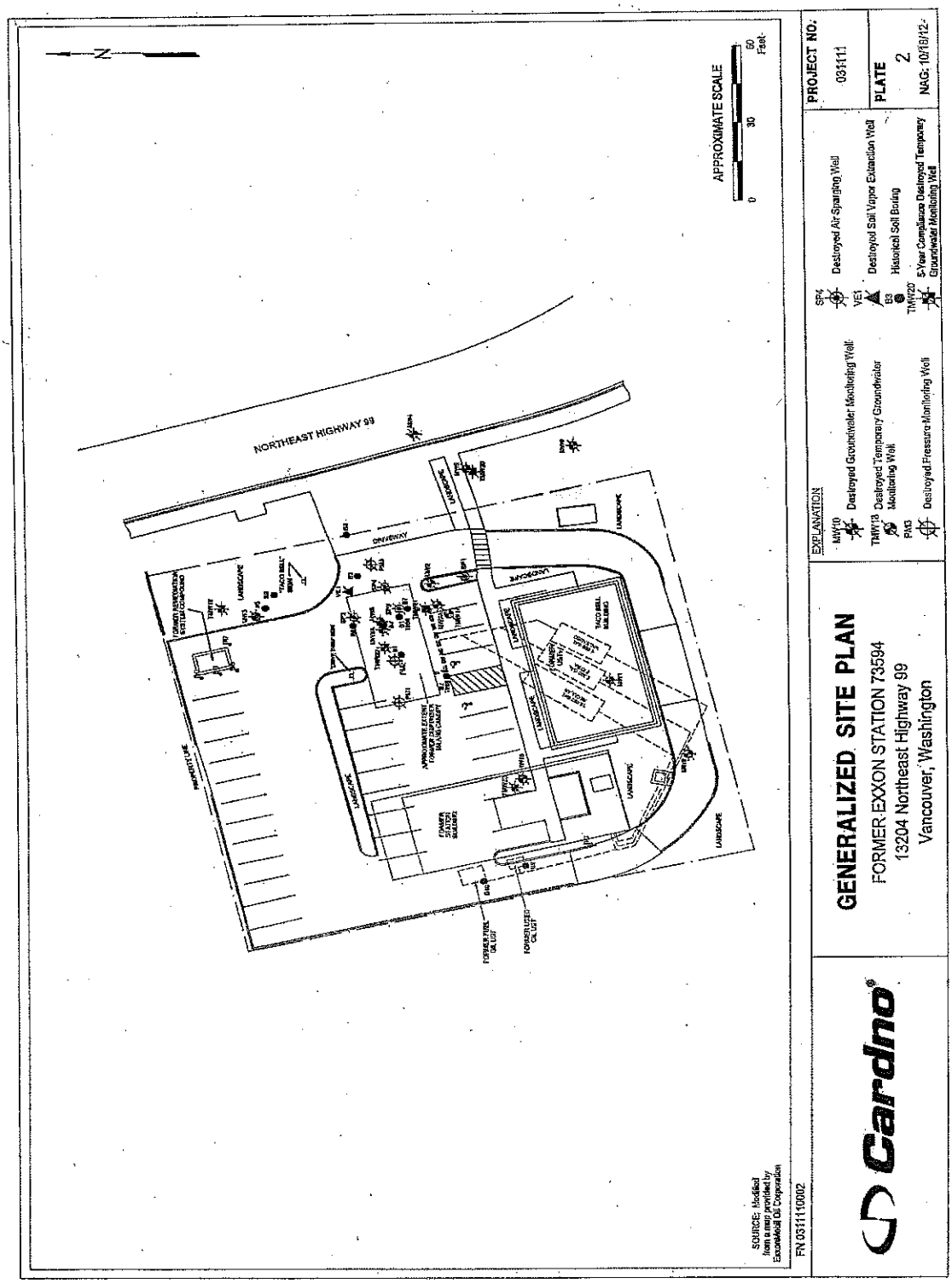
Environmental Resolutions, Inc. (ERI). September 14, 2010b. *Well Destruction, Installation and Groundwater Monitoring Report*, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.

Washington State Department of Ecology (Ecology). November 24, 2008. Letter Requiring *Further Action at the following site: Former Exxon Station 7-3594, 13204 Northeast Highway 99, Vancouver, WA.*

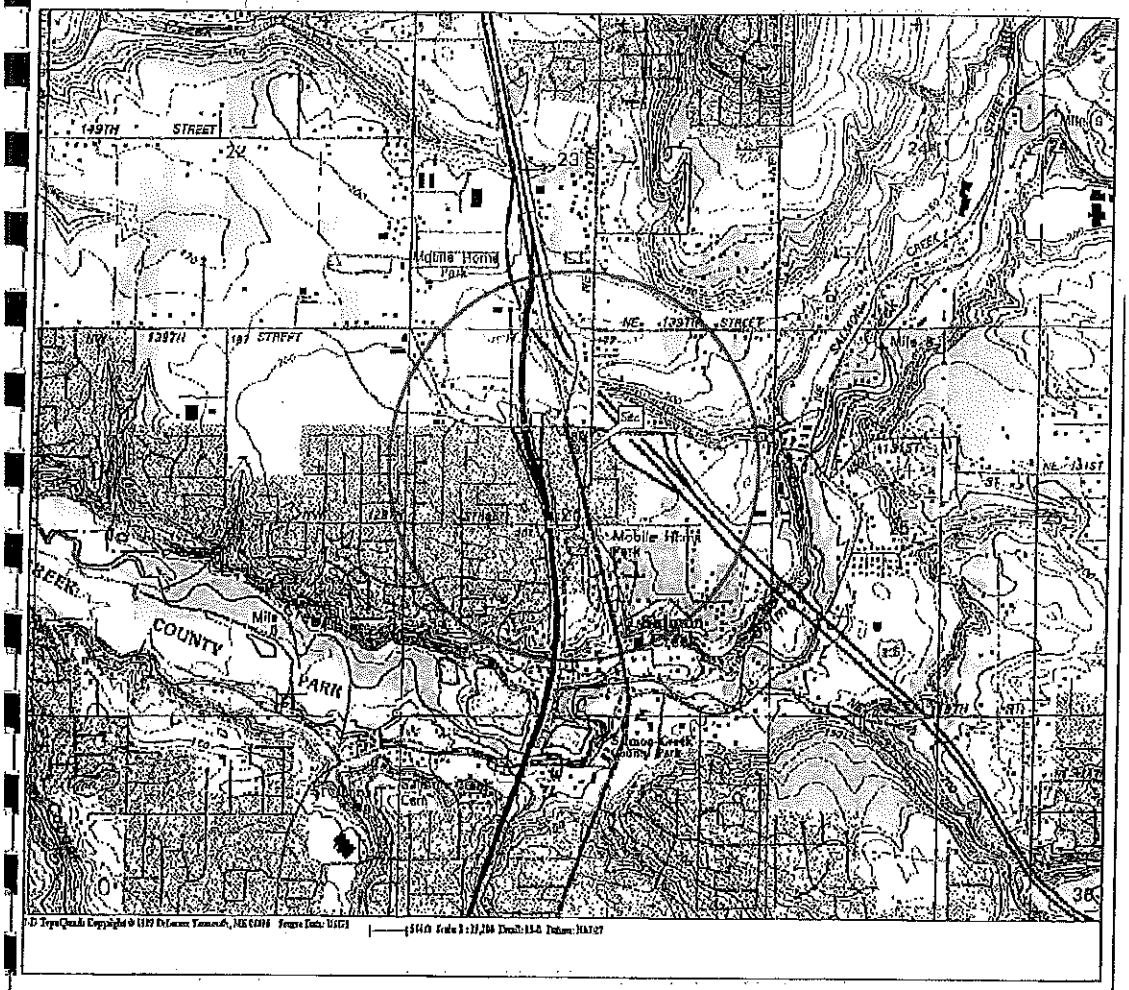
Washington State Department of Ecology (Ecology). August 20, 2013. *No Further Action at the following site: Former Exxon Station 7-3594, 13204 Northeast Highway 99, Vancouver, WA.*

Department of Ecology. January 11, 2019. Site Visit.

6.2 Current Site Plan with Previous Site Plan Overlay



6.1 Vicinity Map



FN 311110001

EXPLANATION

1/2-mile radius circle

N

APPROXIMATE SCALE

0 0.5 1 mile

SOURCE:
Modified from a map
provided by
DeLorme 3-D TopoQuads

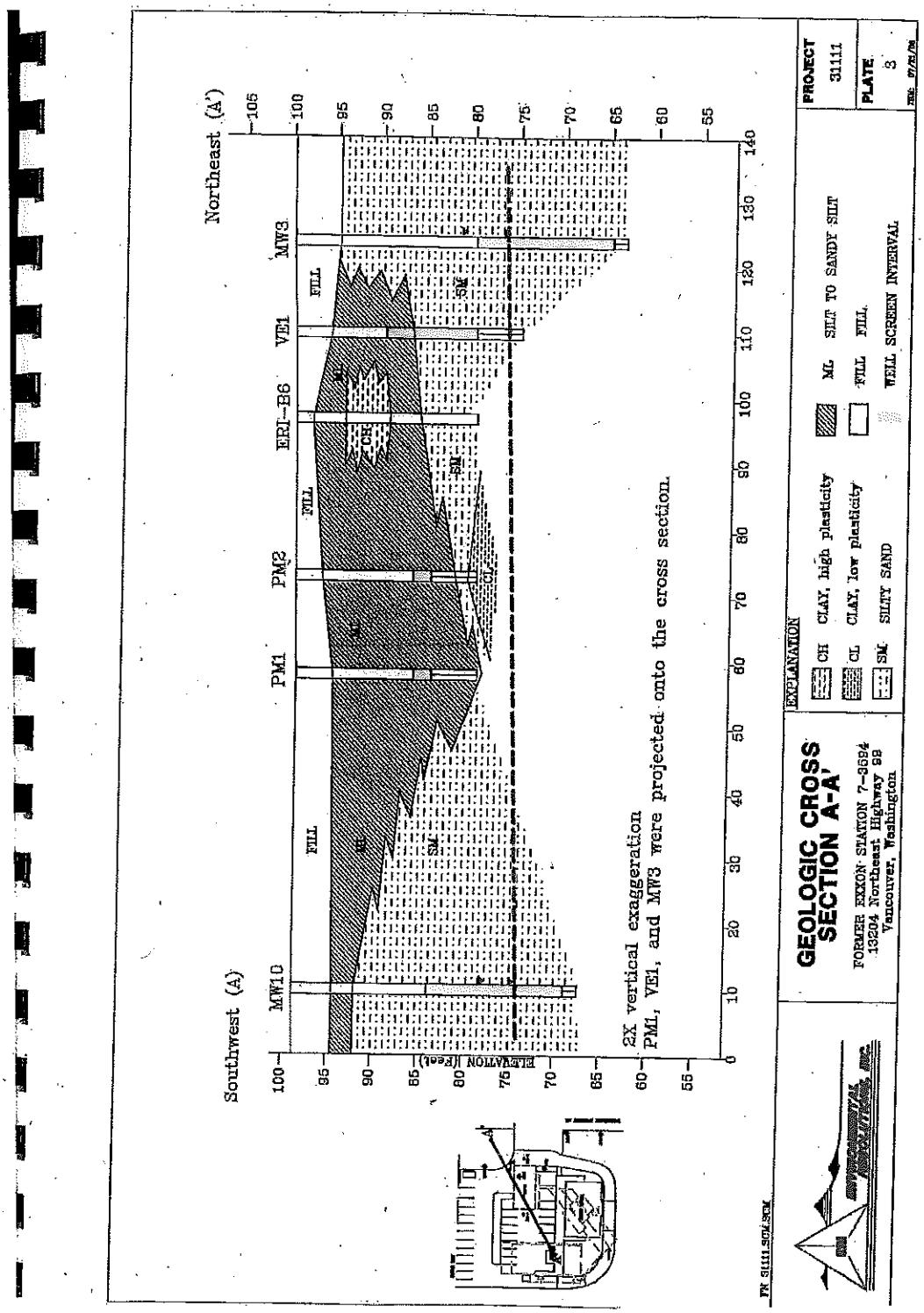
ENVIRONMENTAL RESOLUTIONS, INC

SITE LOCATION MAP

FORMER EXXON STATION 7-3594
13204 Northeast Highway 99
Vancouver, Washington

PROJECT NO.
31111
PLATE
1
BKC: 01/18/02

6.3 Site Geological Cross - Section



Previous Site Plan: Exxon Service Station in 1998

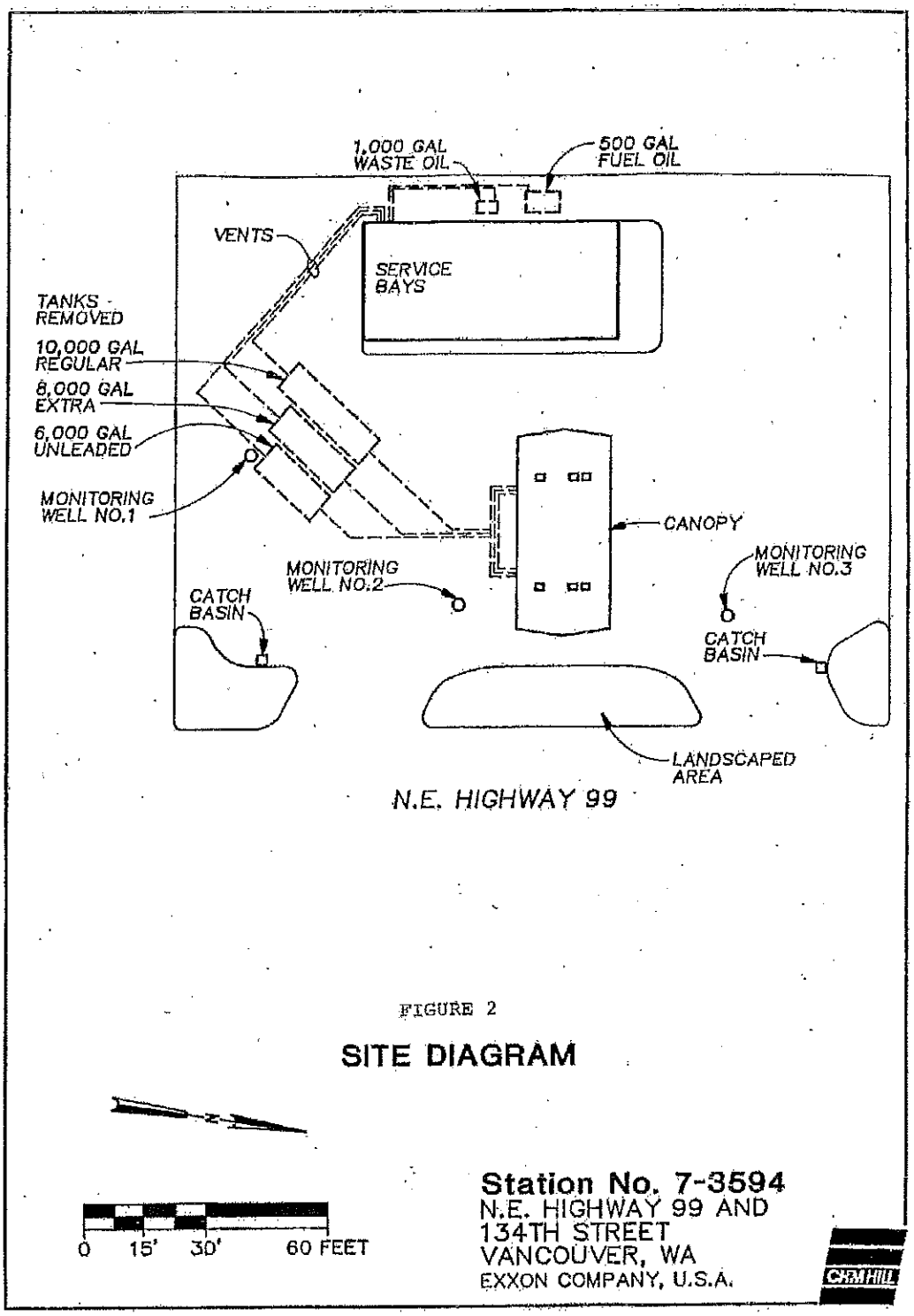
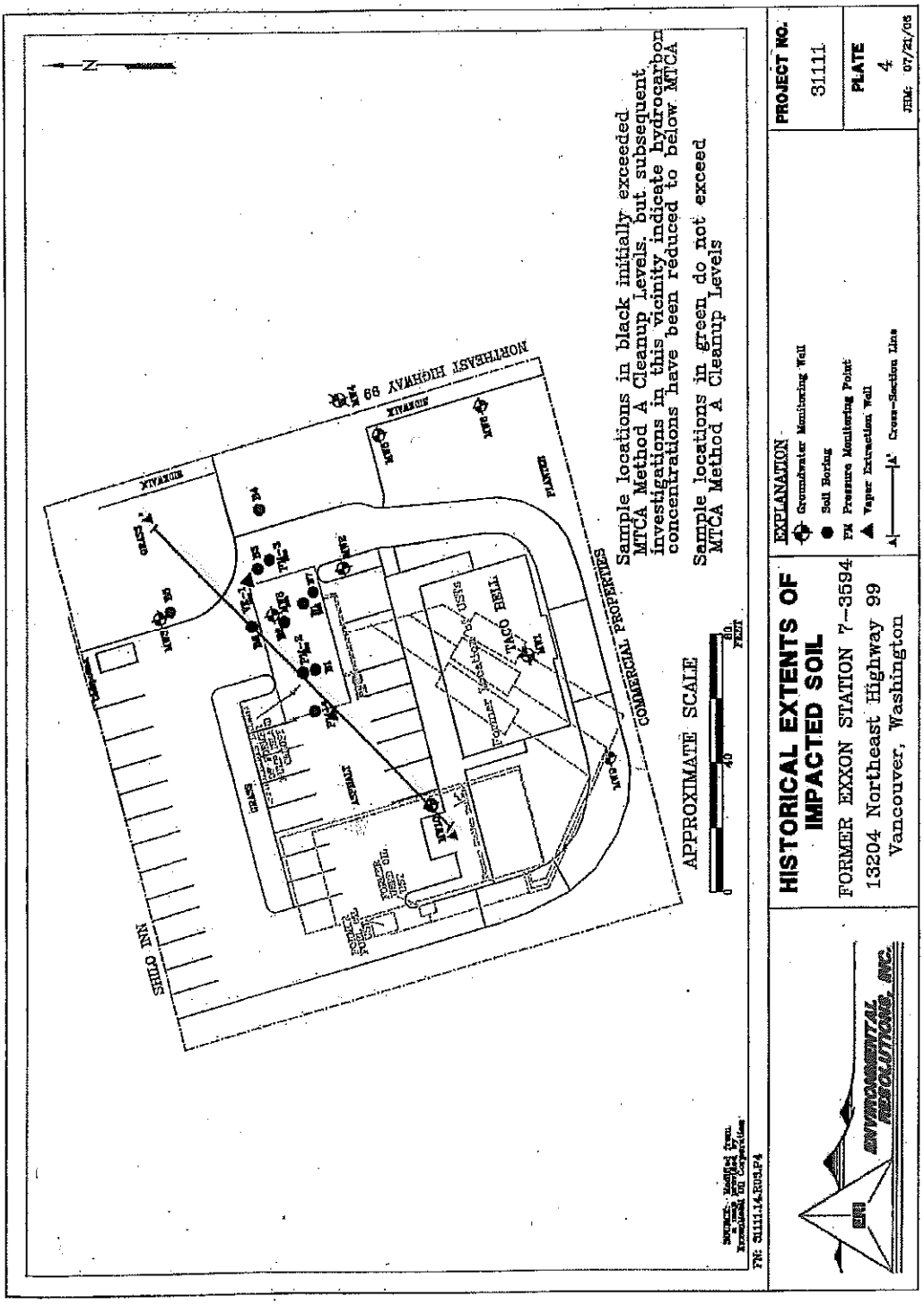
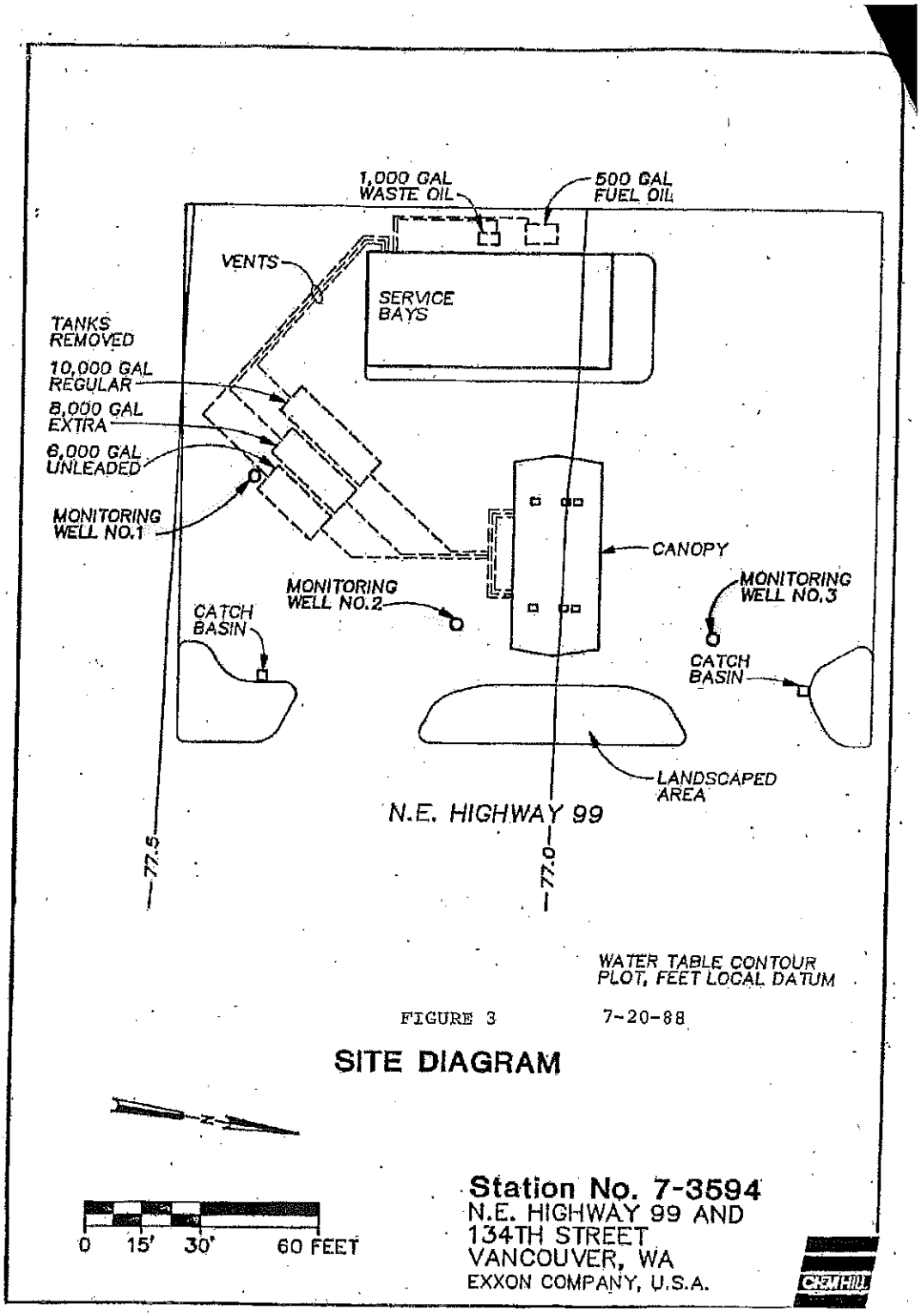


FIGURE 2

SITE DIAGRAM


N
NORTHEAST HIGHWAY 99
SHILO INN
COMMERCIAL PROPERTIES
Former Waste Oil Tanks
TOYO BELT
Sample locations in black initially exceeded MTCA Method A Cleanup Levels, but subsequent investigations in this vicinity indicate hydrocarbon concentrations have been reduced to below MTCA
Sample locations in green do not exceed MTCA Method A Cleanup Levels
APPROXIMATE SCALE
0
40
80
FEET
HISTORICAL EXTENTS OF IMPACTED SOIL
FORMER EXXON STATION 7-3594
13204 Northeast Highway 99
Vancouver, Washington
EXPLANATION
Groundwater Monitoring Well
Soil Boring
PM Pressure Monitoring Point
Vapor Extraction Well
A
A'
Cross-Section Line
PROJECT NO.
31111
PLATE
4
DATE: 07/21/05
ENVIRONMENTAL RESOLUTIONS, INC.

6.4 CH2M Hill: June 1988 Investigation Soil Borings/Monitoring Well Locations



6.5 CH2M Hill: May and June 1989 Groundwater Monitoring Results

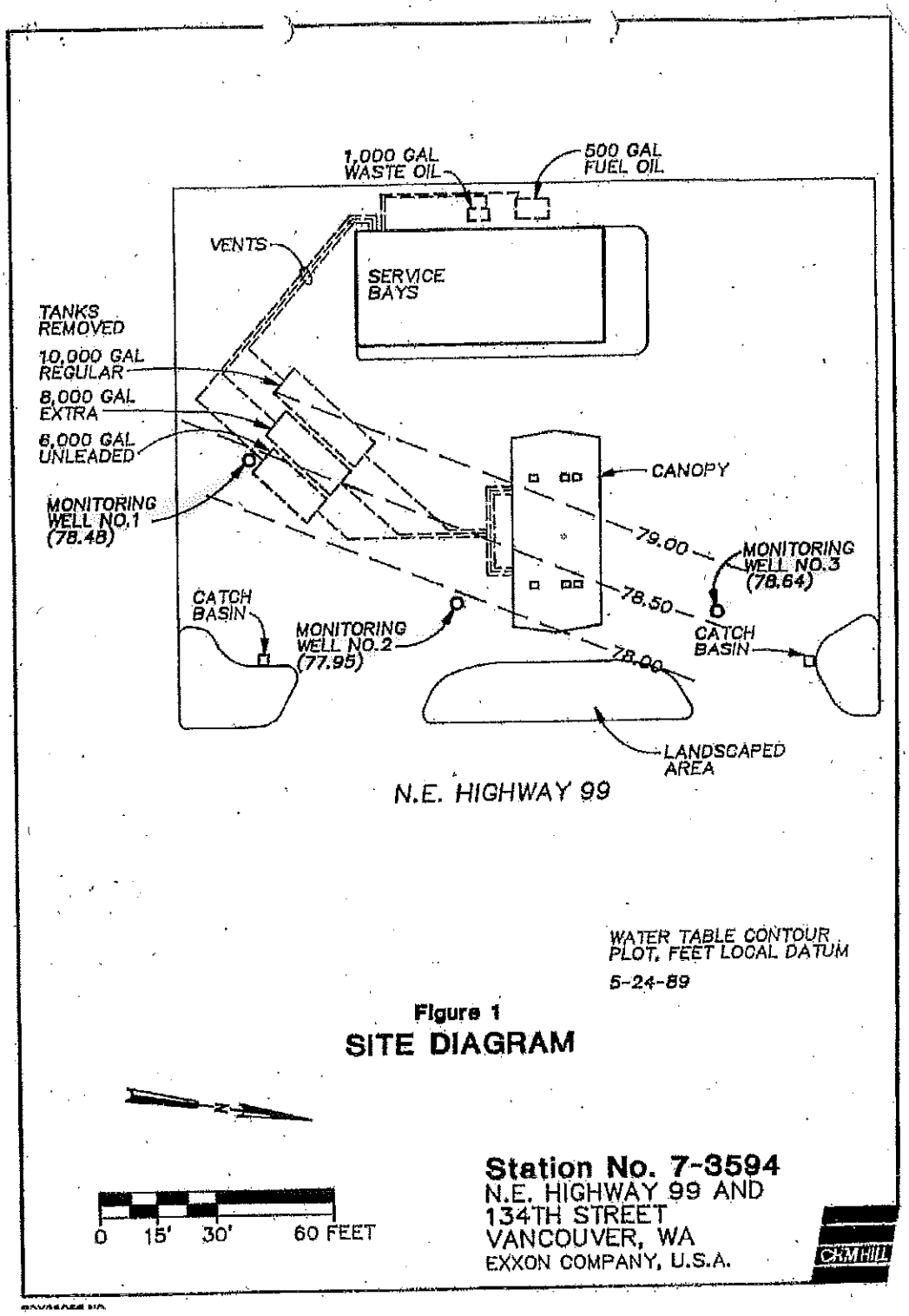


Table I
SUMMARY OF WATER QUALITY TEST RESULTS
EXXON SERVICE STATION 7-3594

	Benzene[a]	Toluene[a]	Total Xylenes[a]	Ethylbenzene	Total Petroleum Hydrocarbons[b]
MW-1					
4-05-88	<25	<1	<1	<1	<0.1
3-27-89	<1.0	<0.5	1.7	<0.6	0.2
5-24-89	<1	<1	<1	<1	<0.5 (0.7)
6-19-89	<1	1.0	1	<1	NA
MW-2					
4-05-88	184	8	5	2	<0.1
3-27-89	210	2.2	4.8	0.7	1.7
5-24-89	120	3	19	2	<0.05 (14)
6-19-89	170	5	12	<1	NA
MW-3					
7-19-88	14	<1	4	2	<0.8
3-27-89	<4.1	<0.5	<1.0	<0.6	<0.2
5-24-89	NA	NA	NA	NA	NA
6-19-89	NA	NA	NA	NA	NA
TEST METHODOLOGY	EPA 8020	EPA 8020	EPA 8020	EPA 8020	EPA (DHS LUFT) 418.1

[a]Concentrations reported in µg/l.
[b]Concentrations reported in mg/l.
NA No sample collected or analyzed.

pdx395/021.50/1

6.6 CH2M Hill: Quarterly Groundwater Monitoring Results and Groundwater Flow Direction

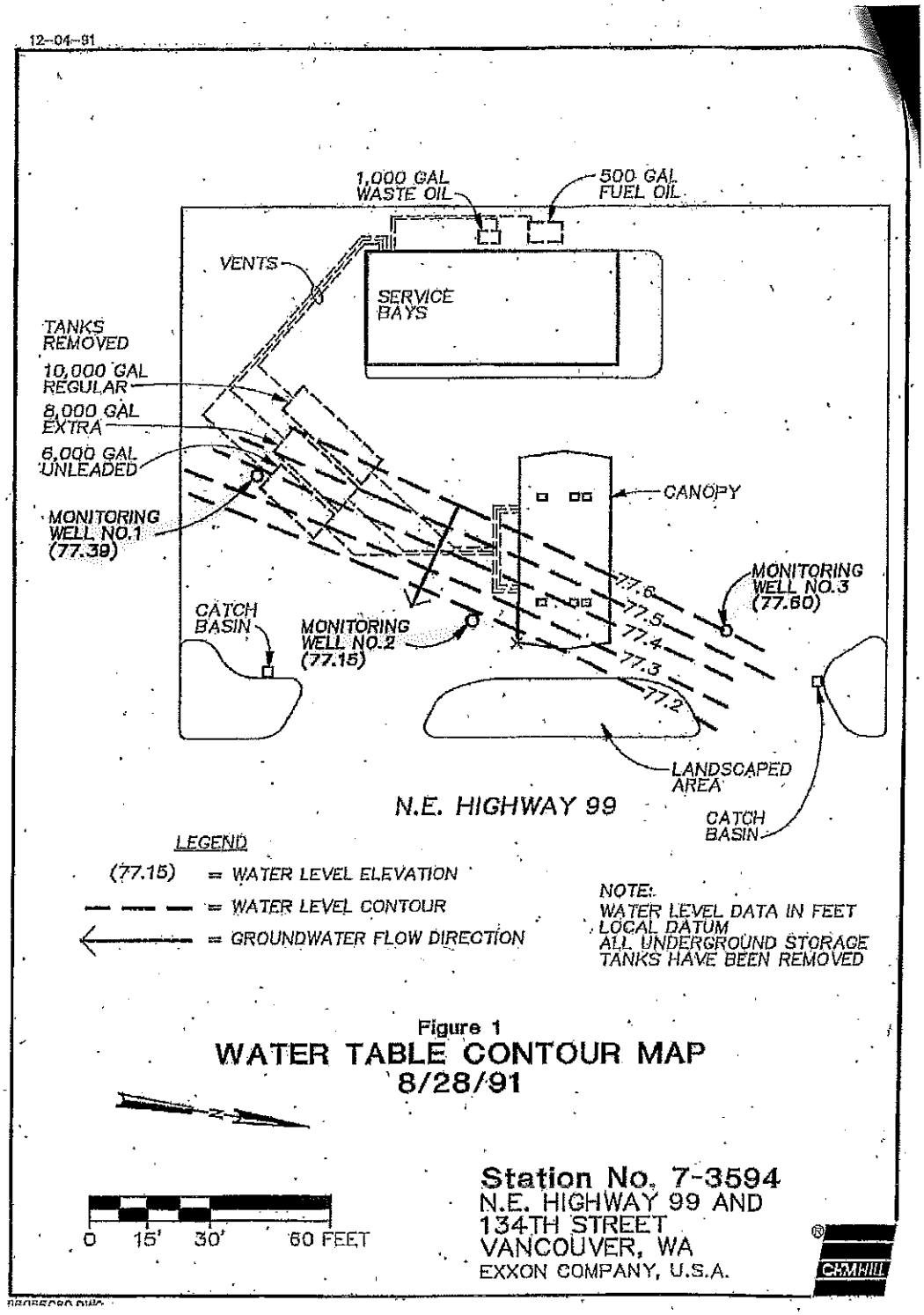


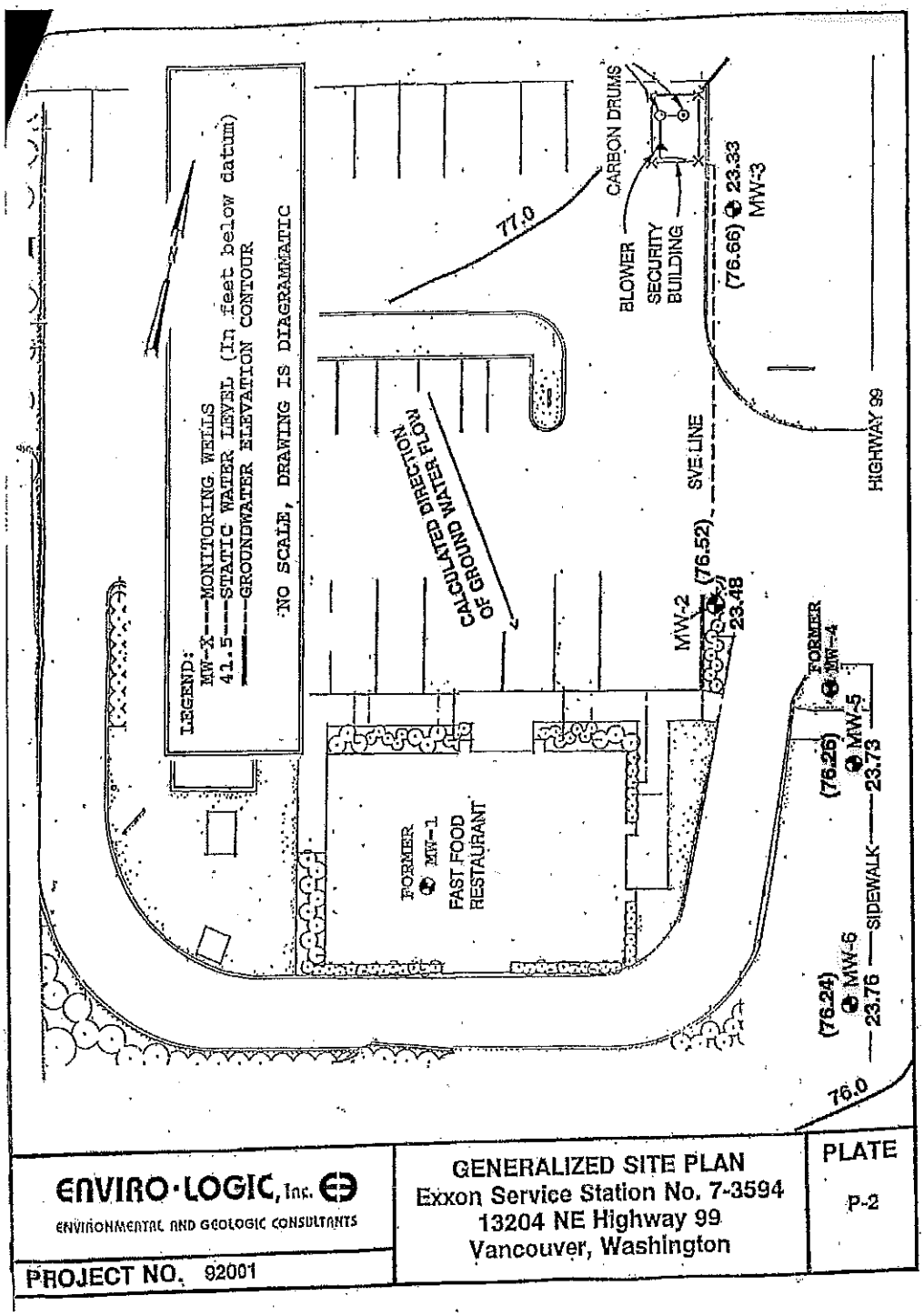
Table 2
Summary of Water Quality Test Results
Exxon Site R/S No. 7-3594
April 1988 to August 1991

	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Total Xylenes (µg/L)
MW-1				
4-05-88	<25	<1	<1	<1
3-27-89	<1.0	<0.5	<0.6	1.7
5-24-89	<1	<1	<1	<1
6-19-89	<1	1	<1	1
12-03-90	<1	<1	<1	<1
3-05-91	<1	<1	<1	<1
5-20-91	<1	<1	<1	<1
5-20-91	<1[a]	<1[a]	<1[a]	<1[a]
8-28-91	<0.5	<0.5	<0.5	1.1
MW-2				
4-05-88	184	8	2	5
3-27-89	210	2.2	0.7	4.8
5-24-89	120	3	2	19
6-19-89	170	5	<1	12
12-03-90	27	19	2.7	12
3-05-91	31	52	3.1	23
3-05-91	27[a]	46[a]	2.4[a]	18[a]
5-20-91	14	<1	2.1	1.4
8-28-91	54	12	1.2	7.9
8-28-91	48[a]	8.1[a]	0.7[a]	7.7[a]
MW-3				
7-19-88	14	<1	2	4
3-27-89	<4.1	<0.5	<0.6	<1
5-24-89	NA	NA	NA	NA
6-19-89	NA	NA	NA	NA
12-10-90	1.4	<1	<1	<1
3-05-91	<1	<1	<1	<1
5-20-91	<1	<1	<1	<1
8-28-91	<0.5	<0.5	<0.5	<0.5
Test Methodology	EPA 8020	EPA 8020	EPA 8020	EPA 8020

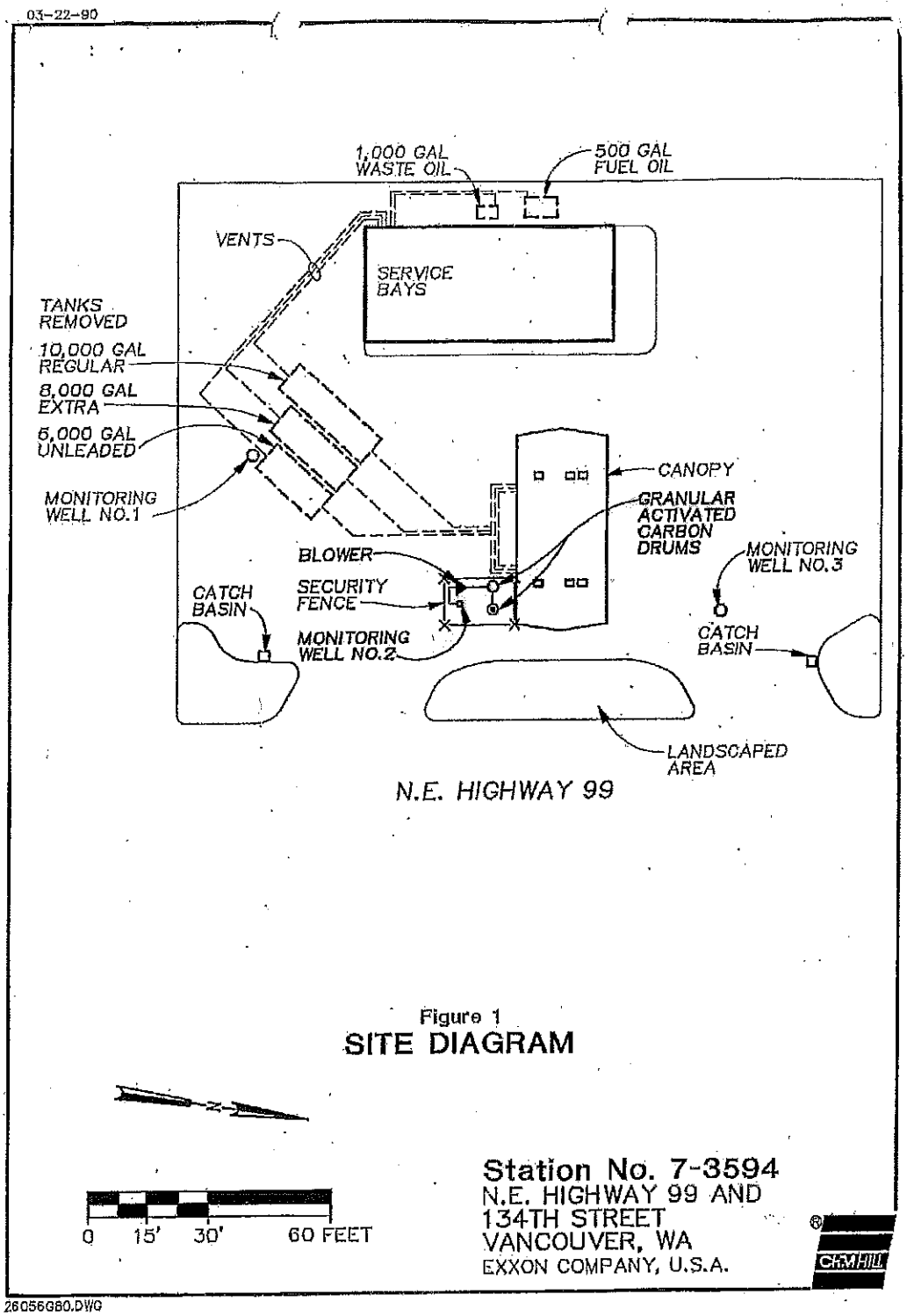
[a]Duplicate sample
NA = no sample collected or analyzed

PDX504/019.51

6.7 Enviro-Logic: 1992 and 1993 Soil and Groundwater Investigations, Locations of Groundwater Monitoring Wells, MW-4, MW-5 and MW-6.



6.8 Soil Vapor Extraction System and Vapor Sample Results



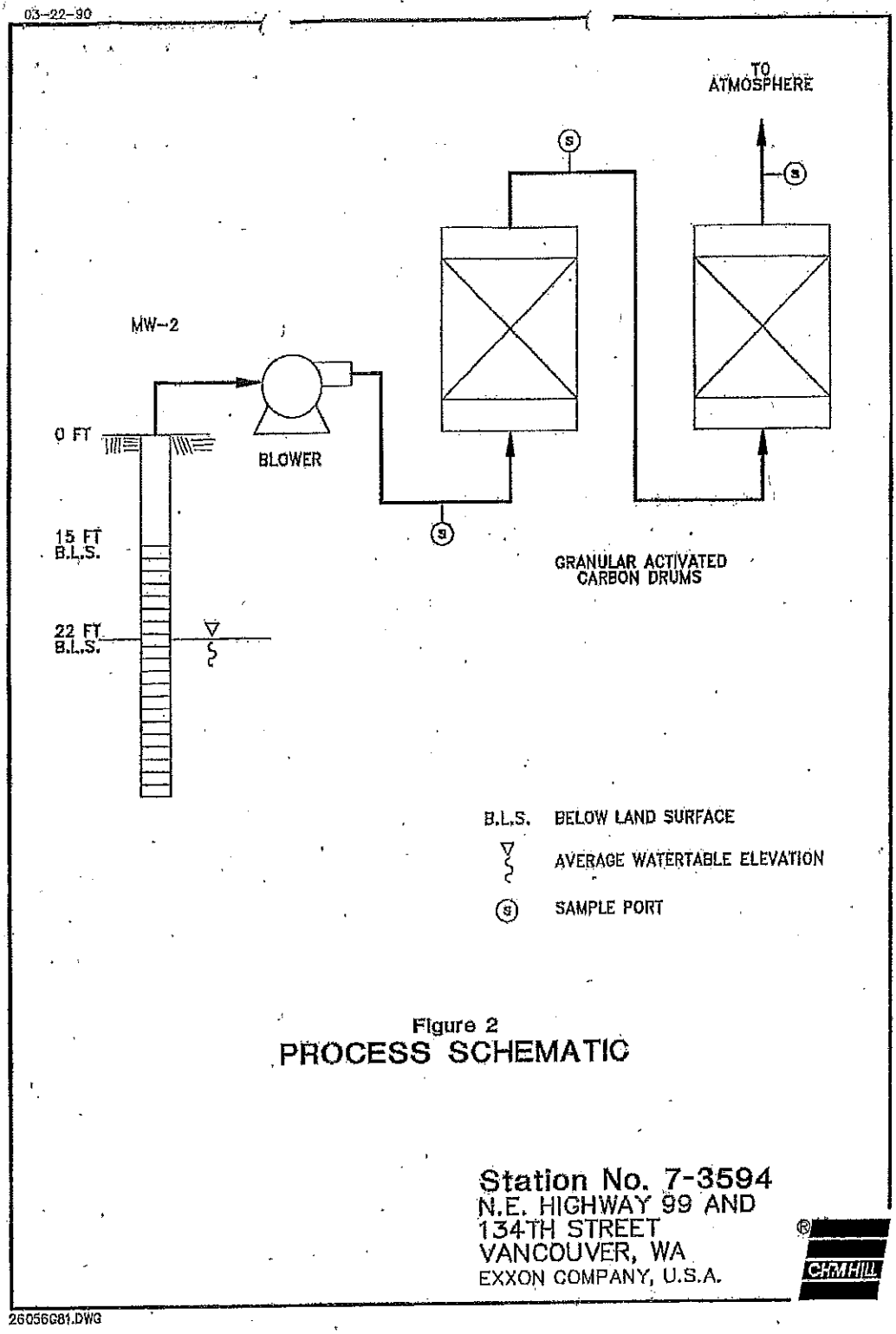


Figure 2
PROCESS SCHEMATIC

February 25, 1992
Exxon Service Station No. 7-3594

ELI Job No. 92001-1
Vancouver, Washington

TABLE 2
ANALYTICAL RESULTS AND EXTRACTION RATES
SOIL VAPOR EXTRACTION SYSTEM
Exxon Service Station No. 7-3594
Vancouver, Washington

Parameter	Date Sampled 7/18/91	2/27/91	2/27/90
Total Hydrocarbon Concentration (ug/cubic meter)	13.9	7.5	14.7
Average Daily Hydrocarbon Extraction Rate (lb/day)	0.5	3.2	0.9
Analytical Method	EPA TO-12	EPA TO-14	EPA 8015 & 8020

6.9 EA Engineering Science and Technology: Soil Investigation Boring Locations and Soil Sample Results

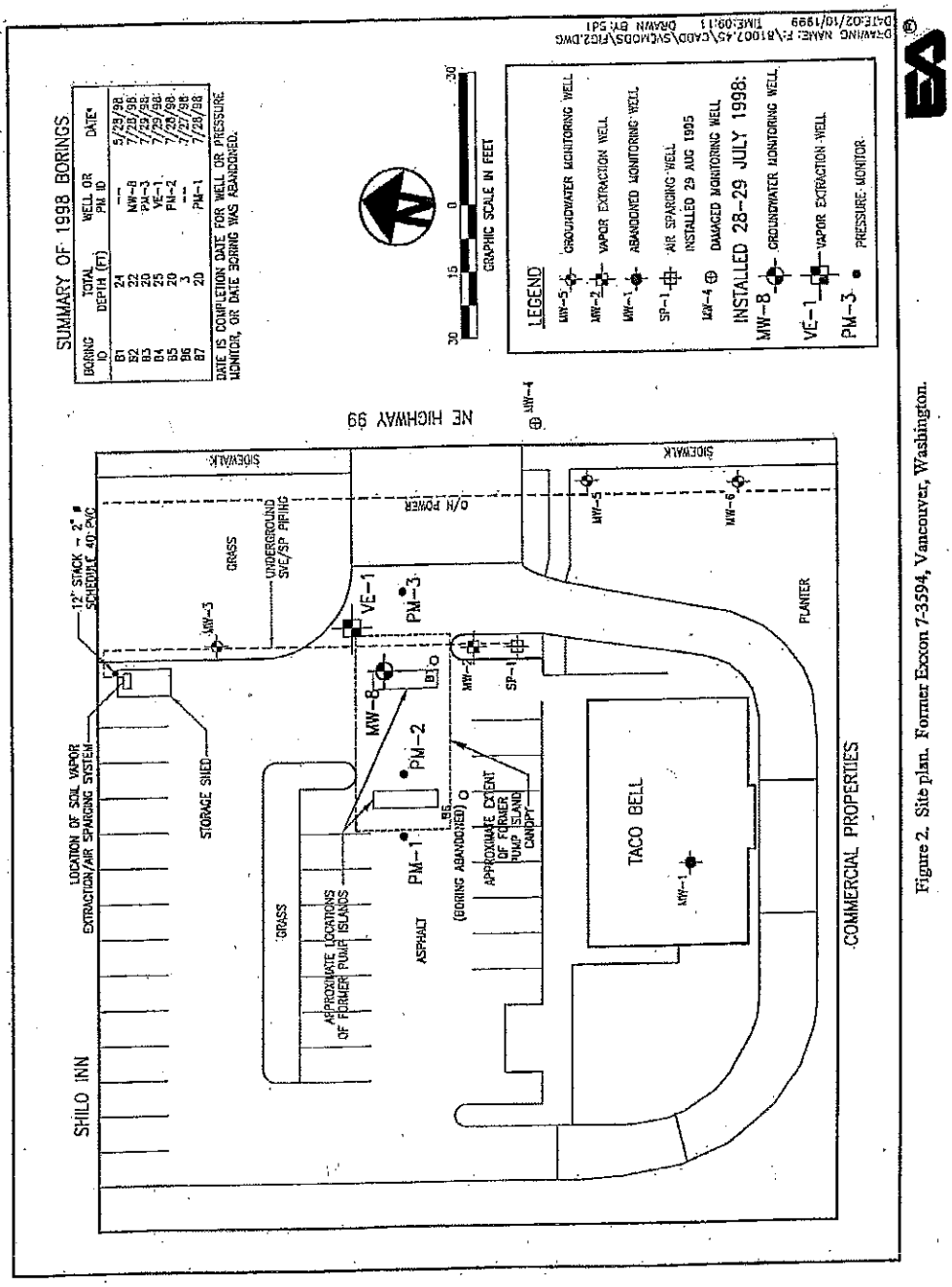


Figure 2. Site plan. Former Exxon 7-3594, Vancouver, Washington.

TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
Former Exxon Station 7-3594
13204 Northeast Highway 99
Vancouver, Washington
October 4, 2005
Page 1 of 1

Sample Name	Sample Date	Depth	TPH-G	B	T	E	X	Total Pb
Site Environmental Investigation CH2M Hill September 26,1988								
MW-1	4/4/1988	15-16.5	<20	<0.2	<0.2	<0.2	<0.2	--
MW-2	4/4/1988	10-11.5	<20	<0.2	<0.2	<0.2	<0.2	--
MW-3	7/19/1988	15-16.5	172	<0.1	<0.1	<0.1	<0.1	--
Hydrocarbon Delineation Investigation Enviroteck February 26,1992								
S-10-B4/MW4	2/7/1992	10	<1	<0.005	<0.005	<0.005	<0.005	--
Limited Subsurface Environmental Investigation Enviro-Tech January 13,1994								
B5-S-20/MW5	12/14/1993	20	<5.0	<0.1	<0.1	<0.1	<0.1	11
B5-S-35/MW5	12/14/1993	35	<5.0	<0.1	<0.1	<0.1	<0.1	<10
B6-S-25/MW6	12/14/1993	25	<5.0	<0.1	<0.1	<0.1	<0.1	19
B6-S-35/MW6	12/14/1993	35	<5.0	<0.1	<0.1	<0.1	<0.1	11
Stock Pile Sample								
SP-1	12/14/1993	--	<5.0	<0.1	<0.1	<0.1	<0.1	10
1998 Confirmation Borings/ Well Install E. A.								
B1-8	5/27/98-5/28/98	8	<5.00	<0.0500	<0.0500	<0.0500	<0.100	--
B2-10	5/27/98-5/28/98	10	7,280	4.45	217	190	820	--
B2-20	5/27/98-5/28/98	20	5,960	28.9	195	56.8	425	--
D2/MW8	7/29/1998	unknown	--	<1.00	4.92	12.9	95.4	--
B2/MW8	7/29/1998	unknown	2,560	8.02	101	34.3	214	--
B3/PM3	7/29/1998	unknown	<5.00	<0.0500	<0.0500	<0.0500	<0.100	--
B3-13-15/PM3	7/29/1998	13-15	<5.00	<0.0500	<0.0500	<0.0500	<0.100	--
B4/VE1	7/29/1998	unknown	3,770	12.8	142	57.4	331	--
B5/PM2	7/29/1998	unknown	341	<0.0500	0.163	0.518	3.16	--
B5/PM2	7/29/1998	unknown	--	<0.0500	<0.0500	<0.300	<0.400	--
B7/PM1	7/29/1998	unknown	<5.00	<0.0500	<0.0500	<0.0500	<0.100	--
Confirmatory Boring and Soil Sampling Report ERI- September 19,2002								
S-8-B1*	1/8/2002	8	<5.00	<0.0100	<0.0100	<0.0100	<0.0100	5.30
S-20-B1*	1/8/2002	20	<5.00	<0.0100	<0.0100	<0.0100	<0.0100	2.35
S-12-B2	1/8/2002	12	<0.48	<0.013	<0.013	<0.013	<0.013	8.92
S-20-B2	1/8/2002	20	<5.15	<0.010	<0.010	<0.010	<0.010	4.79
S-12-B3	1/8/2002	12	<0.54	<0.013	<0.013	<0.013	<0.013	10.6
S-20-B3	1/8/2002	20	99.1	<0.013	0.359	0.407	0.766	8.31
S-8-B4	1/8/2002	8	<6.33	<0.013	<0.013	<0.013	<0.013	9.52
S-16-B4	1/8/2002	16	<5.09	<0.012	<0.012	<0.012	<0.012	4.67
S-12-B5	1/8/2002	12	<6.23	<0.012	<0.012	<0.012	<0.012	5.25
S-20-B5	1/8/2002	20	<6.27	<0.013	<0.013	<0.013	<0.013	5.62
S-20-B6	1/8/2002	20	<6.44	<0.013	<0.013	<0.013	<0.013	5.90
S-8-B7	1/8/2002	8	<6.52	<0.013	<0.013	<0.013	<0.013	8.04
S-16-B7	1/8/2002	16	<5.80	<0.012	<0.012	<0.012	<0.012	4.38
Monitoring Well Installation and Soil Sampling Report ERI- March 18, 2003								
MW9	1/8/2003	20	<5.85	<0.001	<0.001	<0.001	0.001	3.98
MW10	1/8/2003	20	<5.89	<0.001	<0.001	<0.001	<0.001	3.88
MTCA Method A Cleanup Level			100	0.5	40	20	20	250

EXPLANATION:
All concentrations in mg/kg (ppm).
Depths are in feet below ground surface.
TPH-G = Total Petroleum Hydrocarbons as Gasoline by Ecology Method NWTPH-Gx.
B = Benzene; T = Toluene; E = Ethylbenzene; X = Total Xylenes.
BTEX = Aromatic compounds by EPA Method 8021B.
Total Pb = Total Lead by EPA Method 6010B.
< = Less than the stated laboratory reporting limit.
* = Indicates samples were reported on a wet weight basis.
Depth marked unknown is sampled from Cuttings

31111.14.R03.T1

6.10 CH2M Hill and Environmental Resolutions: Groundwater Monitoring Well Locations and Water Sample Results – April 1988 through June 2002

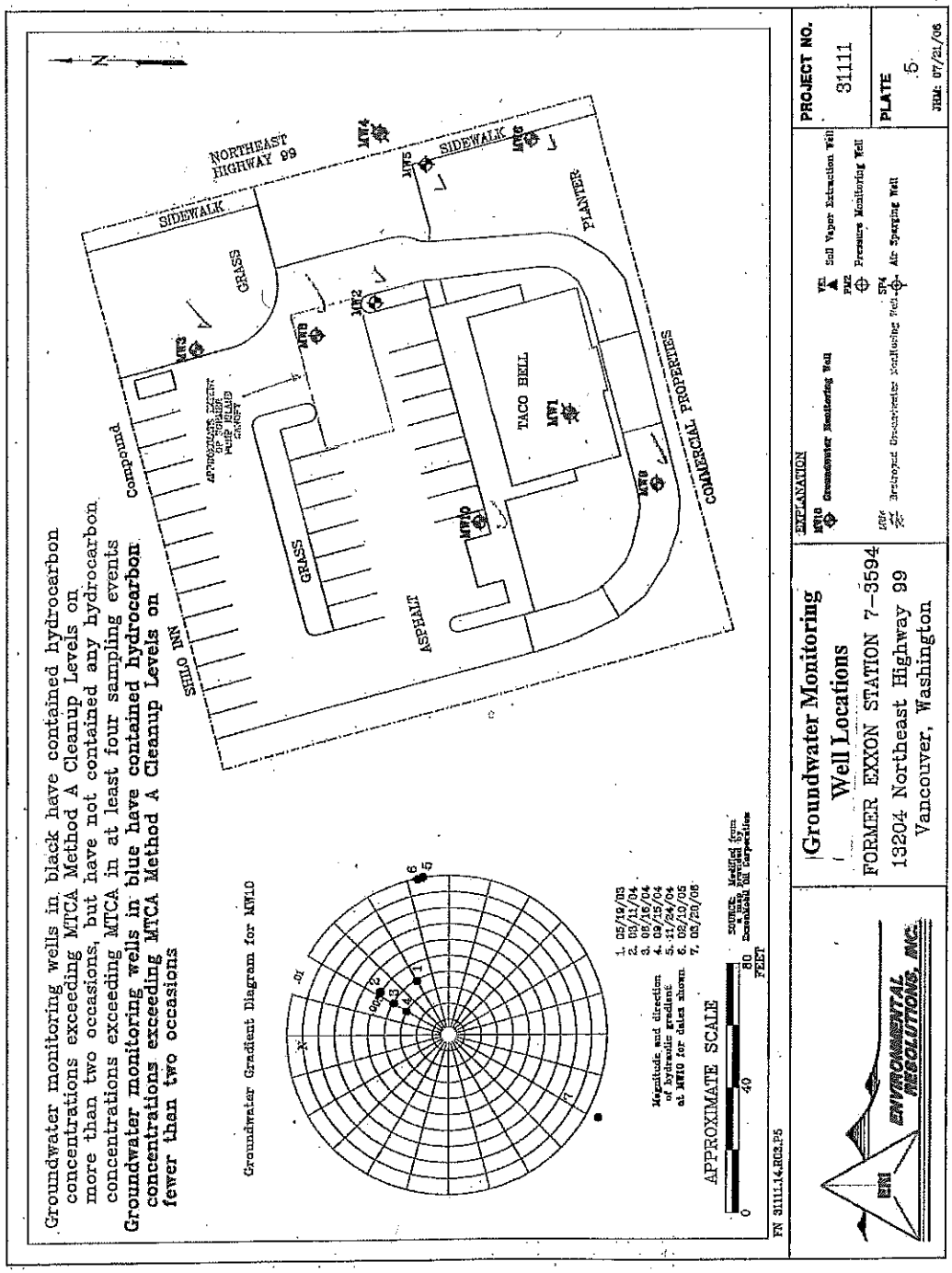


TABLE 2
HISTORICAL GROUNDWATER ANALYTICAL RESULTS
Former Exxon Station 7-3594
13204 Northeast Highway 99
Vancouver, Washington
Page 1 of 4

Well Name	Sample Date	DTW	GW Elev.	TPH-G	TPH-D	TPH-O	B	T	E	X	Total Pb	Diss Pb	TSS
MW1	04/05/88	22.49	77.54	--	--	--	<25.0	<1.0	<1.0	<1.0	--	--	--
100.03	07/20/88	22.90	77.13	--	--	--	--	--	--	--	--	--	--
	03/27/89	21.70	78.33	--	--	--	<1.0	0.5	0.6	1.7	--	--	--
	05/24/89	21.55	78.48	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	08/18/89	NM	--	--	--	--	<1.0	1.0	<1.0	<1.0	--	--	--
	12/03/90	NM	--	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	12/10/90	22.75	77.25	--	--	--	--	--	--	--	--	--	--
	03/05/91	22.04	77.99	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	05/20/91	21.25	78.78	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	08/28/91	22.64	77.39	--	--	--	<0.5	<0.5	<0.5	1.1	--	--	--
NE	04/23/92	21.67	--	52	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--
	07/16/92	22.67	--	70	--	--	0.6	0.6	<0.5	<0.5	--	--	--
	10/19/92	23.08	--	90	--	--	<0.5	0.7	0.7	<0.5	--	--	--
	02/25/93	22.35	--	<50	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--
	05/04/93	NM	--	--	--	--	<1.0	<1.0	--	<1.0	--	--	--
	08/16/93	21.23	--	<50	--	--	<0.5	<0.5	<0.5	<0.5	5.0	5.0	--
	12/03/93	NM	--	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	02/18/94	NM	--	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	06/01/94	NM	--	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	12/04/94	NM	--	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	Destroyed	--	--	--	--	--	--	--	--	--	--	--	--
MW2	04/05/88	22.74	76.80	--	--	--	184	8.0	2.0	5.0	--	--	--
99.60	07/20/88	22.40	77.20	--	--	--	--	--	--	--	--	--	--
	03/27/89	21.45	78.15	--	--	--	210	2.2	0.7	4.8	--	--	--
	05/24/89	21.65	77.95	--	--	--	120	3.0	2.0	18.0	--	--	--
	08/18/89	NM	--	--	--	--	170	5.0	<1.0	12.0	--	--	--
	12/03/90	NM	--	--	--	--	27	19.0	2.7	12.0	--	--	--
	12/10/90	22.75	76.84	--	--	--	--	--	--	--	--	--	--
	03/05/91	22.13	77.47	--	--	--	31	52.0	3.1	23.0	--	--	--
	05/20/91	21.30	78.30	--	--	--	14	<1.0	2.1	1.4	--	--	--
	08/28/91	22.45	77.15	--	--	--	54	12.0	1.2	7.9	--	--	--
76.52	04/23/92	21.75	54.77	1,400	--	--	9.5	0.6	2.4	1.1	--	--	--
	07/16/92	22.42	54.10	2,200	--	--	310	66.0	6.9	40.0	--	--	--
	10/19/92	23.44	53.08	2,300	--	--	500	150.0	8.9	100.0	--	--	--
	02/25/93	22.14	54.38	2,900	--	--	370	220.0	12.0	150.0	--	--	--
	06/16/93	21.22	55.30	3,300	--	--	650	390.0	21.0	230.0	6.0	<3.0	--
	12/27/93	22.88	53.58	--	--	--	--	--	--	--	--	--	--
98.56	06/12/94	22.63	75.93	1,500	--	--	340	2.0	75.0	17.0	4.0	<3.0	--
	09/12/94	23.32	75.24	4,600	--	--	2,700	340.0	270.0	560.0	7.9	<3.0	--
	12/12/94	22.31	76.25	1,100	--	--	67	0.5	20.0	0.9	<3.0	--	--
	02/22/95	NM	--	1,400	--	--	23	0.7	4.1	2.6	<2.0	--	--
	05/22/95	NM	--	11,000	--	--	4,200	510	410	970	<2.0	--	--
	08/01/95	NM	--	21,000	--	--	9,900	3,700	700	2,500	<2.0	--	--
	01/24/96	NM	--	<50	--	--	0.6	<0.5	<0.5	<1.0	13.0	--	--
	04/18/96	NM	--	<50	--	--	<0.5	<0.5	<0.5	<1.0	10.0	--	--
	08/20/97	NM	--	<50	--	--	<0.5	<0.5	<0.5	<1.0	--	--	--
	05/27/98	20.76	77.80	115	--	--	88.7	<1.0	6.3	<2.0	--	--	--
	11/19/98	22.87	75.69	3,380	--	--	1,750	<25.0	<25.0	<50.0	--	--	--
	11/23/99	24.07	74.49	<250	--	--	<1	<1	<1	<1	--	--	--
	05/09/00*	NM	--	<50	--	--	<0.5	<0.5	<0.5	<1	--	--	--
	03/20/01	23.05	75.51	<50.0	--	--	<0.500	<0.500	<0.500	<1.00	--	--	--
	05/22/01	23.62	74.94	<50.0	--	--	<0.500	0.593	<0.500	<1.00	--	--	--
	09/14/01	23.85	74.70	<50.0	--	--	<0.500	<0.500	<0.500	<1.00	--	--	--
	03/26/02	21.08	77.48	<100	--	--	<1.00	<1.00	<1.00	<1.00	--	--	--
	07/11/02	22.35	76.21	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	02/11/03	20.50	78.06	<100	<100	<100	<1.0	<1.0	<1.0	<1.0	<3.0	<3.0	64,100
	05/19/03	21.10	77.46	--	--	--	--	--	--	--	--	--	--
	08/11/04	21.05	77.51	--	--	--	--	--	--	--	--	--	--
	08/18/04	NM	--	--	--	--	--	--	--	--	--	--	--
	08/15/04	NM	--	--	--	--	--	--	--	--	--	--	--
	11/24/04	NM	--	--	--	--	--	--	--	--	--	--	--
	02/10/05	NM	--	--	--	--	--	--	--	--	--	--	--
	08/02/05	NM	--	--	--	--	--	--	--	--	--	--	--
	12/29/05	NM	--	--	--	--	--	--	--	--	--	--	--
	03/20/06	NM	--	--	--	--	--	--	--	--	--	--	--
MTCA Method A Cleanup Levels				1,000*			5	40	30	20	5	5	NA

Continued on page 2

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TABLE 2
HISTORICAL GROUNDWATER ANALYTICAL RESULTS
Former Exxon Station 7-3594
13204 Northeast Highway 99
Vancouver, Washington
Page 2 of 4

Well Name	Sample Date	DTW	GW Elev.	TPH-G	TPH-D	TPH-O	B	T	E	X	Total Pb	Diss Pb	TSS
MW3	07/20/88	22.72	77.08	--	<50	--	14.0	<1.0	<2.0	4.0	--	--	--
99.80	03/27/89	21.55	78.25	--	--	--	<4.1	<0.5	<0.5	<1.0	--	--	--
	05/24/89	21.16	78.64	--	--	--	--	--	--	--	--	--	--
	12/10/90	22.26	77.54	--	--	--	1.4	<1.0	<1.0	<1.0	--	--	--
	03/05/91	21.51	78.29	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	05/20/91	20.60	79.20	--	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	08/28/91	22.20	77.60	--	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--
76.66	04/23/92	21.21	55.45	<50	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--
	07/16/92	22.23	54.43	<50	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--
	10/19/92	23.30	53.36	70	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--
	02/25/93	21.97	54.69	<50	--	--	1.1	<0.5	<0.5	<0.5	--	--	--
	06/15/93	20.82	55.84	<50	--	--	<0.5	<0.5	<0.5	<0.5	3.0	<3.0	--
	12/27/93	22.16	54.50	--	--	--	--	--	--	--	--	--	--
98.00	06/13/94	21.94	76.06	<50	--	--	<0.5	<0.5	<0.5	<0.5	16.0	<3.0	--
	09/12/94	22.71	75.29	<50	--	--	<0.5	0.6	<0.5	<0.5	8.3	<3.0	--
	12/12/94	21.54	76.46	<50	--	--	<0.5	<0.5	<0.5	<0.5	<3.0	--	--
	02/22/95	NM	--	<50	--	--	<0.5	<0.5	<0.5	<1.0	<2.0	--	--
	08/01/95	NM	--	<50	--	--	0.8	1.4	<0.5	2.0	<2.0	--	--
	01/24/96	NM	--	<50	--	--	<0.5	<0.5	<0.5	<1.0	4.3	--	--
	06/20/97	NM	--	<50	--	--	<0.5	<0.5	<0.5	<1.0	--	--	--
	11/19/98	21.95	76.05	--	--	--	--	--	--	--	--	--	--
	11/23/99	22.27	75.73	--	--	--	--	--	--	--	--	--	--
	03/20/01	23.15	74.85	<50.0	--	--	<0.500	<0.500	<0.500	<1.00	--	--	--
	06/22/01	23.70	74.30	<50.0	--	--	<0.500	<0.500	<0.500	<1.00	--	--	--
	09/14/01	23.42	74.58	<50.0	--	--	<0.500	<0.500	<0.500	<1.00	--	--	--
	03/26/02	20.06	77.94	<100	--	--	<1.00	<1.00	<1.00	<1.00	--	--	--
	07/11/02	21.43	76.57	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--
	02/11/03	20.75	77.25	<100	<100	<100	<1.0	<1.0	<1.0	<1.0	<3.0	<3.0	181,000
	05/19/03	20.11	77.89	--	--	--	--	--	--	--	--	--	--
	03/11/04	19.06	78.94	--	--	--	--	--	--	--	--	--	--
	06/15/04	21.53	76.47	--	--	--	--	--	--	--	--	--	--
	09/15/04	22.40	75.60	--	--	--	--	--	--	--	--	--	--
	11/24/04	22.37	75.63	--	--	--	--	--	--	--	--	--	--
	02/10/05	22.36	75.64	--	--	--	--	--	--	--	--	--	--
	09/02/05	23.52	74.48	--	--	--	--	--	--	--	--	--	--
	12/20/05	NM	--	--	--	--	--	--	--	--	--	--	--
	03/20/06	20.91	77.09	--	--	--	--	--	--	--	--	--	--
MW4	04/23/92	19.84	--	<50	--	--	<0.5	20.0	--	440	--	<3	--
NM	07/16/92	20.82	--	<50	--	--	<0.5	<0.5	140.0	0.8	--	<3	--
	10/19/92	21.85	--	--	--	--	--	--	--	--	--	--	--
	02/25/93	20.60	--	--	--	--	--	--	--	--	--	--	--
	10/25/93	NM	--	<50	<50	--	<0.5	0.5	<0.5	0.9	--	<3	--
	06/15/93	21.32	--	<50	160	--	1.2	<0.5	<0.5	<0.5	<3	<3	--
	Destroyed	--	--	--	--	--	--	--	--	--	--	--	--
MTCA Method A Cleanup Levels					1,000*		5	40	30	20	5	5	NA

Continued on page 3

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TABLE 2
HISTORICAL GROUNDWATER ANALYTICAL RESULTS
Former Exxon Station 7-3594
13204 Northeast Highway 99
Vancouver, Washington
Page 3 of 4

Well Name	Sample Date	DTW	GW Elev.	TPH-G	TPH-D	TPH-O	B	T	E	X	Total Pb	Diss Pb	TSS
MW6	12/20/93	NM	–	<50	–	–	<0.5	<0.5	<0.5	2.6	<3.0	–	–
76.26	12/27/93	21.70	54.56	–	–	–	–	–	–	–	–	–	–
97.20	06/13/94	21.37	75.83	98	–	–	<0.5	<0.5	3.8	4.4	33.0	7.0	–
	09/12/94	21.92	75.28	290	–	–	0.6	40.6	<0.5	<0.5	44.0	<3.0	–
	12/12/94	20.65	76.55	<50	–	–	1.4	0.6	<0.5	0.6	22.0	–	–
	02/22/95	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	<2.0	–	–
	05/22/95	NM	–	–	–	–	–	–	–	–	<2.0	–	–
	08/01/95	NM	–	<50	–	–	17.0	<0.5	<0.5	<1.0	<2.0	–	–
	10/31/95	NM	–	150	–	–	350	<0.5	9.4	5.5	11.0	–	–
	01/24/96	NM	–	<50	–	–	21.0	<0.5	1.5	<1.0	5.1	–	–
	04/18/96	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	13.0	–	–
	08/20/97	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	–	–	–
	05/27/98	18.32	78.68	<50	–	–	<0.5	<0.5	<0.5	<1.0	–	–	–
	11/19/98	21.45	75.75	–	–	–	–	–	–	–	–	–	–
	11/23/99	21.49	75.71	–	–	–	–	–	–	–	–	–	–
	05/09/00	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	–	–	–
	03/20/01	22.58	74.62	<50.0	–	–	<0.500	<0.500	<0.500	<1.00	–	–	–
	06/22/01	22.40	74.80	<50.0	–	–	<0.500	0.525	<0.500	<1.00	–	–	–
	09/14/01	22.65	74.55	<50.0	–	–	<0.500	<0.500	<0.500	<1.00	–	–	–
	03/28/02	19.59	77.61	<100	–	–	<1.00	<1.00	<1.00	<1.00	–	–	–
	07/11/02	20.78	76.42	<100	–	–	<1.0	<1.0	<1.0	<1.0	–	–	–
	02/11/03	20.40	76.80	<100	<100	<100	<1.0	<1.0	<1.0	<1.0	<3.0	<3.0	67,700
	05/19/03	19.25	77.95	–	–	–	–	–	–	–	–	–	–
	03/11/04	NM	–	–	–	–	–	–	–	–	–	–	–
	06/16/04	NM	–	–	–	–	–	–	–	–	–	–	–
	09/15/04	21.90	75.30	–	–	–	–	–	–	–	–	–	–
	11/24/04	22.90	74.30	–	–	–	–	–	–	–	–	–	–
	02/10/05	22.65	74.35	–	–	–	–	–	–	–	–	–	–
	09/02/05	22.04	75.16	–	–	–	–	–	–	–	–	–	–
	12/29/05	NM	–	–	–	–	–	–	–	–	–	–	–
	03/20/06	20.40	76.80	–	–	–	–	–	–	–	–	–	–
MW6	12/20/93	NM	–	<50	–	–	<0.5	<0.5	<0.5	<0.5	4.0	–	–
76.24	12/27/93	21.75	54.49	–	–	–	–	–	–	–	–	–	–
97.29	06/13/94	21.48	75.81	<50	–	–	<0.5	<0.5	<0.5	<0.5	<3.0	<3.0	–
	09/12/94	22.05	75.24	<50	–	–	<0.5	<0.5	<0.5	<0.5	3.7	<3.0	–
	12/12/94	21.19	76.10	<50	–	–	<0.5	<0.5	<0.5	<0.5	<3.0	–	–
	02/22/95	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	<2.0	–	–
	08/01/95	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	<2.0	–	–
	01/24/96	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	<2.0	–	–
	08/20/97	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	–	–	–
	11/19/98	21.20	76.09	–	–	–	–	–	–	–	–	–	–
	11/23/99	21.64	75.65	–	–	–	–	–	–	–	–	–	–
	03/20/01	22.72	74.57	<50.0	–	–	<0.500	<0.500	<0.500	<1.00	–	–	–
	06/22/01	22.32	74.97	<50.0	–	–	<0.500	<0.500	<0.500	<1.00	–	–	–
	09/14/01	22.62	74.67	<50.0	–	–	<0.500	<0.500	<0.500	<1.00	–	–	–
	03/28/02	19.68	77.61	<100	–	–	<1.00	<1.00	<1.00	<1.00	–	–	–
	07/11/02	20.90	76.39	<100	–	–	<1.0	<1.0	<1.0	<1.0	–	–	–
	02/11/03	20.53	76.76	<100	<100	<100	<1.0	<1.0	<1.0	<1.0	<3.0	<3.0	160,000
	05/19/03	19.68	77.61	–	–	–	–	–	–	–	–	–	–
	03/11/04	19.71	77.58	–	–	–	–	–	–	–	–	–	–
	06/16/04	21.10	76.19	–	–	–	–	–	–	–	–	–	–
	09/15/04	21.90	75.39	–	–	–	–	–	–	–	–	–	–
	11/24/04	21.97	75.32	–	–	–	–	–	–	–	–	–	–
	02/10/05	21.90	75.39	–	–	–	–	–	–	–	–	–	–
	09/02/05	NM	–	–	–	–	–	–	–	–	–	–	–
	12/29/05	NM	–	–	–	–	–	–	–	–	–	–	–
	03/20/06	20.49	76.80	–	–	–	–	–	–	–	–	–	–
MTCA Method A Cleanup Levels				1,000*			5	40	30	20	5	5	NA

Continued on page 3

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TABLE 2
HISTORICAL GROUNDWATER ANALYTICAL RESULTS
Former Exxon Station 7-3594
13204 Northeast Highway 99
Vancouver, Washington
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Well Name	Sample Date	DTW	GW Elev.	TPH-G	TPH-D	TPH-O	B	T	E	X	Total Pb	Diss Pb	TSS
MW8	11/16/99	22.48	75.88	117,000	–	–	23,600	29,300	2,020	12,290	–	–	–
98.36	11/26/99	22.72	75.64	460	–	–	<1	<1	4.3	97	–	–	–
	05/09/00	NM	–	<50	–	–	<0.5	<0.5	<0.5	<1.0	–	–	–
	03/20/01	22.05	76.31	<50.0	–	–	<0.500	<0.500	<0.500	<1.00	–	–	–
	06/22/01	23.34	75.02	<50.0	–	–	<0.500	<0.500	<0.500	<1.00	–	–	–
	09/14/01	24.20	74.16	<50.0	–	–	<0.500	<0.500	<0.500	<1.00	–	–	–
	03/26/02	20.81	77.55	<100	–	–	<1.00	<1.00	<1.00	<1.00	–	–	–
	07/11/02	22.10	76.26	<100	–	–	<1.0	<1.0	<1.0	<1.0	–	–	–
	02/11/03	21.50	76.86	<100	626	210	<1.0	<1.0	<1.0	<1.0	<3.0	4.0	57,700
	05/19/03	20.60	77.76	–	–	–	–	–	–	–	–	–	–
	03/11/04	NM	–	–	–	–	–	–	–	–	–	–	–
	06/16/04	22.25	76.11	–	–	–	–	–	–	–	–	–	–
	09/15/04	NM	–	–	–	–	–	–	–	–	–	–	–
	11/24/04	NM	–	–	–	–	–	–	–	–	–	–	–
	02/10/05	NM	–	–	–	–	–	–	–	–	–	–	–
	09/02/05	24.02	74.34	–	–	–	–	–	–	–	–	–	–
	12/29/05	NM	–	–	–	–	–	–	–	–	–	–	–
	03/20/06	NM	–	–	–	–	–	–	–	–	–	–	–
MW9	02/11/03	21.61	77.27	<100	<143	<143	<1.0	<1.0	<1.0	<1.0	19.0	<3.0	1,030,000
98.88	05/19/03	21.33	77.76	<100	135	<111	4.30	9.0	1.5	10.1	20.0	<3.0	1,550,000
	03/11/04	21.24	77.84	<100	<111	<111	<1.00	<1.0	<1.0	<1.0	<5.0	<5.0	–
	06/16/04	22.76	76.32	<100	<111	<111	<1.00	<1.0	<1.0	<1.0	20.0	<5.0	–
	09/15/04	23.67	75.51	<100	229	<100	<1.00	<1.0	<1.0	<1.0	18.0	<5.0	–
	11/24/04	23.50	75.58	<100	–	–	1.9	1.90	1.5	9.1	16.0	<5.0	–
	02/10/05	23.12	75.96	<100	–	–	<1.00	<1.0	<1.0	1.7	35.0	<5.0	–
	09/02/05	25.31	73.77	<100	–	–	1.46	1.58	<1.00	3.36	89.7	<5.00	–
	12/29/05	24.48	74.60	<100	–	–	<1.00	<1.00	<1.00	<1.00	–	<5.00	–
	03/20/06	22.51	76.57	<100	–	–	<1.00	16.2	<1.00	<3.00	–	<5.00	–
MW10	02/11/03	21.87	77.01	<100	<100	<100	<1.0	<1.0	<1.0	<1.0	41.0	<3.0	9,960,000
98.88	05/19/03	21.35	77.53	134	<111	<111	8.10	21.1	3.8	26.2	22.0	<3.0	3,660,000
	03/11/04	21.25	77.63	<100	<143	<143	<1.00	<1.0	<1.0	<1.0	10.0	<5.0	–
	06/16/04	22.78	76.10	<100	<111	<111	<1.00	2.1	1.2	4.8	17.0	<5.0	–
	09/15/04	23.57	75.31	<100	654	<100	<1.00	<1.0	<1.0	<1.0	25.0	<5.0	–
	11/24/04	23.52	75.36	253	–	–	16.6	13.2	10.7	34.7	26.0	<5.0	–
	02/10/05	23.25	75.63	<100	–	–	<1.00	1.2	1.1	3.6	23.0	<5.0	–
	09/02/05	24.97	73.91	<100	–	–	<1.00	1.71	<1.00	2.45	31.8	<5.00	–
	12/29/05	24.21	74.67	<100	–	–	<1.00	<1.00	<1.00	<1.00	–	<5.00	–
	03/20/06	22.41	76.47	<100	–	–	<1.00	<1.00	<1.00	<3.00	–	<5.00	–
MTCA Method A Cleanup Levels				1,000[a]			5	40	30	20	5	5	NA

EXPLANATION:
All concentrations are in ug/L (ppb).
Wellhead elevations were taken from prior consultant reports.
DTW = Depth to water in feet below top of casing
GW Elev. = Groundwater elevation relative to top of casing elevations
TPH-G = Total Petroleum Hydrocarbons as Gasoline by Ecology Method NWTPH-Gx
TPH-D and TPH-O = Total Petroleum Hydrocarbons as Diesel and Oil, respectively, by Ecology Method NWTPH-Dx
B = Benzene; T = Toluene; E = Ethylbenzene; X = Total Xylenes
BTEX = Aromatic compounds by EPA Method 8021B
Total Pb = Total Lead; Diss Pb = Dissolved lead
Total and Dissolved Pb analyses by EPA Method 7421 and 6010B, refer to laboratory reports
TSS = Total Suspended Solids by EPA Method 160.2
NE = Not Established; NM = Not Measured; – = Not Analyzed or Sampled; NA = Not Applicable
< = Less than the stated laboratory reporting limit
Shaded values equal or exceed MTCA Method A Cleanup Levels.
[a] Total Petroleum Hydrocarbons
[b] Methyl Tert-Butyl Ether not detected
Data collected before 03/20/01 were taken from prior consultants.
Samples on 12/29/05 and 03/20/06 were collected using low-flow sampling techniques.

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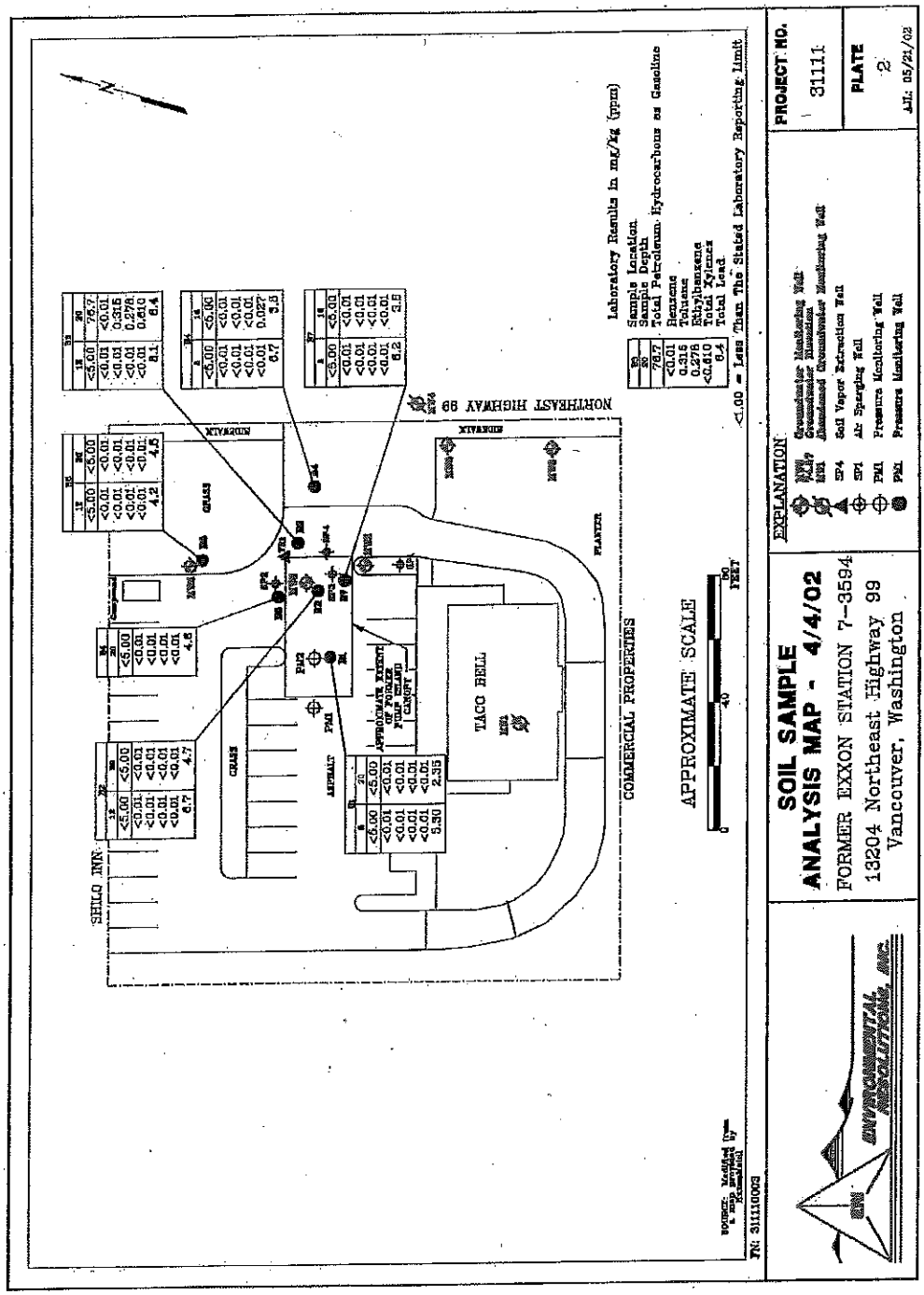
6.11 Environmental Resolutions: April 2002 Soil Investigation Boring Locations and Soil Sample Results



6.12 Cardno Environmental Resolutions: September 2010, Locations of Soil Borings/MW-2a and MW-8a and Groundwater Sample Results

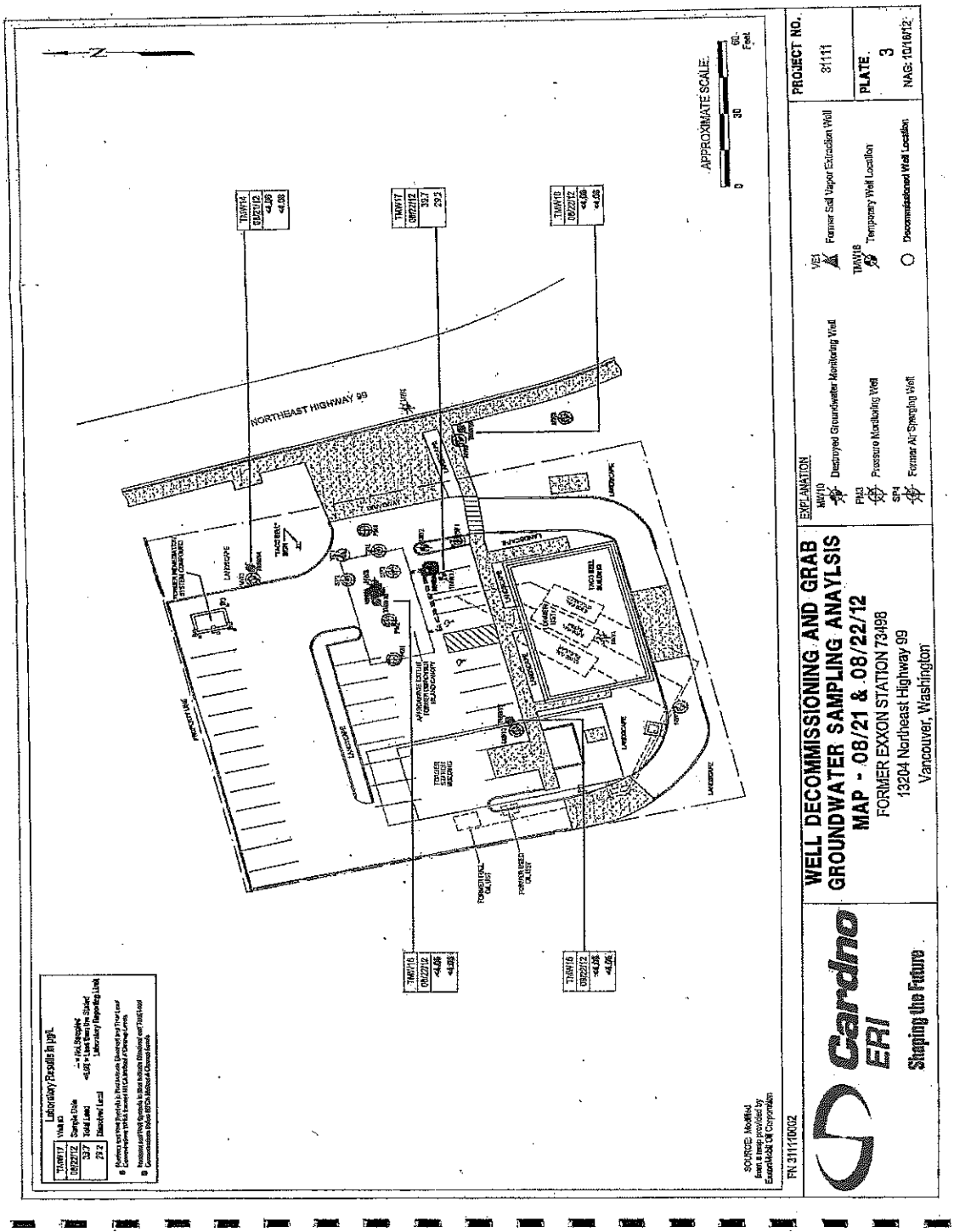
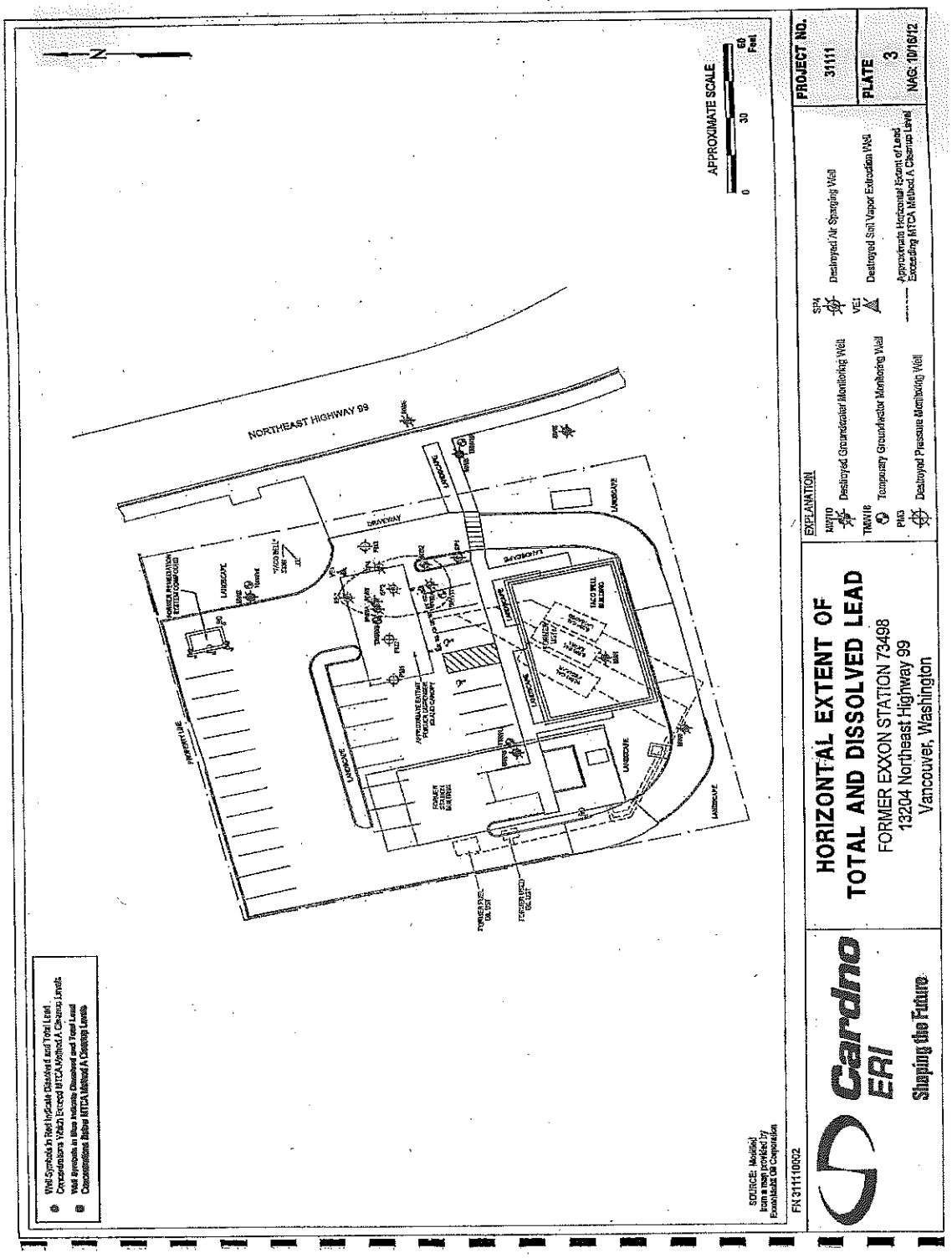


TABLE 1
CUMULATIVE GRAB GROUNDWATER ANALYTICAL RESULTS
Former Exxon Station 73594
13204 Northeast Highway 99
Vancouver, Washington
Page 1 of 1

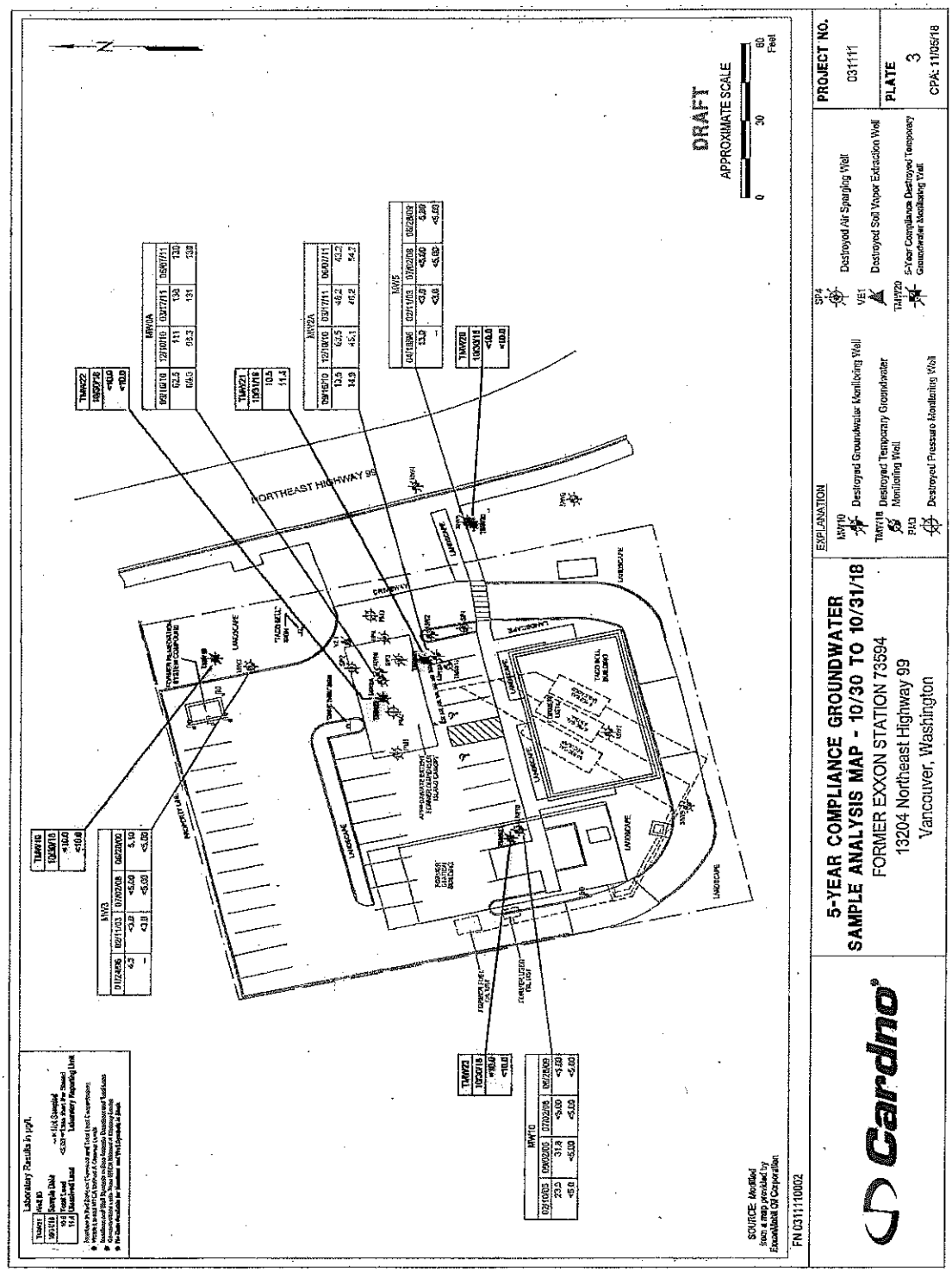
Sample ID	Well ID	Date	Total Lead (µg/L)	Dissolved Lead (µg/L)
W-30-B14	TMW14	08/21/12	<4.06	<4.06
W-30-B15	TMW15	08/22/12	<4.06	<4.06
W-30-B16	TMW16	08/22/12	<4.06	<4.06
W-30-B17	TMW17	08/22/12	39.7	29.2
W-30-B18	TMW18	08/22/12	<4.06	<4.06
MTCA Method A Cleanup Levels			15	15

EXPLANATION:
µg/L = microgam per liter
< = Less than the stated laboratory method reporting limit
Total Lead and Dissolved Lead in accordance EPA Method 6010B
Shaded values equal or exceed MTCA Method A Cleanup Levels

6.13 Approximate Extent of Lead-Impacted Groundwater in 2012



6.14 Cardno Environmental Resolutions: 5-Year Compliance Groundwater Sampling Locations and Water Sample Results



6.15 Environmental Covenant

4971334 COV
T RecFee - $162.00 Pages: 41 - WASHINGTON STATE DEPARTMEN
Clark County, WA 05/14/2013 11:36

RETURN ADDRESS
Thomas Middleton L.HG
Washington State Dept of Ecology SWRO
PO Box 47775
Olympia, WA 98504-7440

Please print neatly or type information
Document Title(s)

Environmental Covenant

Reference Numbers(s) of related documents:

Additional Reference #'s on page ____

Grantor(s) (Last, First and Middle Initial)

Border Express LLC

Additional grantors on page ____

Grantee(s) (Last, First and Middle Initial)

State of Washington Department of Ecology

Additional grantees on page ____

Legal Description (abbreviated form: i.e. lot, block plat or section, township, range, quarter/quarter)

#263 SEC 26 T3N R1E WM ; 60A

Additional legal is on page ____

Assessor's Property Tax Parcel/Account Number

186754000

Additional parcel #'s on page ____

The Auditor/Recorder will rely on the information provided on this form. The staff will not read the document to verify the accuracy or completeness of the indexing information provided herein.

I am requesting an emergency nonstandard recording for an additional fee as provided in RCW 36.18.010. I understand that the recording processing requirements may cover up or otherwise obscure some part of the text of the original document.

Signature of Requesting Party

After Recording Return to:
Thomas Middleton LHG.
Washington State Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, Washington 98504-7440

Environmental Covenant

Grantor: Border Express LLC
Grantee: State of Washington, Department of Ecology
Legal: #263 SEC 26 T3N R1EWM .60A
Tax Parcel Nos.: 186754000
Cross Reference: N/A

Grantor, Border Express LLC., hereby binds Grantor, its successors and assigns to the land use restrictions identified herein and grants such other rights under this environmental covenant (hereafter "Covenant") made this 14th day of February 2013 in favor of the State of Washington Department of Ecology (Ecology). Ecology shall have full right of enforcement of the rights conveyed under this Covenant pursuant to the Model Toxics Control Act, RCW 70.105D.030(1)(g), and the Uniform Environmental Covenants Act, 2007 Wash. Laws ch. 104, sec. 12.

This Declaration of Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by Border Express LLC, its successors and assigns, and the State of Washington Department of Ecology, its successors and assigns (hereafter "Ecology").

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

Cardno ERI. October 25, 2012. *Corrective Action Plan – Environmental Covenant Submittal, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.*

Cardno ERI. October 25, 2012. *Feasibility Study/Disproportionate Cost Analyses, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.*

Cardno ERI. August 25, 2011. *Groundwater Potability Evaluation – Request for Closure, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.*

Cardno ERI. January 7, 2011. *ExxonMobil Environmental Services Aquifer Test Report, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.*

Cardno ERI. June 13, 2011. *ExxonMobil Environmental Services Groundwater Monitoring Report, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.*

CH2M HILL Companies Ltd. (CH2M Hill). July 22, 1988. *Sensitive Receptor Risk Assessment and Divestment Environmental Investigation, Exxon Company USA, Store 7-3594, 13204 N.E. Highway 99, Vancouver, Washington.*

CH2M HILL Companies Ltd. (CH2M Hill). September 26, 1988. *Site Environmental Investigation, Exxon Company USA, R/S 7-3594, 13204 N.E. Highway 99, Vancouver, Washington.*

EA Engineering, Science, and Technology (EA). October 17, 1995. *Soil Vapor Extraction and Air Sparging System Installation at Former Exxon Station RS 7-3594, 13204 NE Highway 99, Vancouver, Washington.*

Enviro-Logic, Inc. (ELI). February 25, 1992. *Hydrocarbon Delineation Investigation, Former Exxon Service Station No. 7-3594, 13204 NE Highway 99, Vancouver, Washington.*

Enviro-Logic, Inc. (ELI). January 3, 1994. *Limited Subsurface Environmental Investigation, Former Exxon Service Station No. 7-3594, 13204 Northeast Highway 99, Vancouver, Washington.*

Environmental Resolutions, Inc. (ERI). September 19, 2002. *Confirmatory Boring and Soil Sampling Report, Former Exxon Station 7-3594, 13204 Northeast Highway 99, Vancouver, Washington.*

Environmental Resolutions, Inc. (ERI). March 18, 2003. *Monitoring Well Installation and Soil Sampling Report, Former Exxon Station 7-3594, 13204 Northeast Highway 99, Vancouver, Washington.*

Environmental Resolutions, Inc. (ERI). September 8, 2006. *Site Characterization Summary and Site Conceptual Model, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington.*

Environmental Resolutions, Inc. (ERI). August 20, 2008. *Closure Report, Former Exxon Station 73594, 13204 Northeast Highway 99, Vancouver, Washington, Ecology VCP ID: SW 0447.*

Environmental Resolutions, Inc. (ERI). June 29, 2009. *ExxonMobil Environmental Services Sparge Well Groundwater Sampling Report, 13204 Northeast Highway 99, Vancouver, Washington.*

Environmental Resolutions, Inc. (ERI). December 3, 2009. *ExxonMobil Environmental Services Sensitive Receptor Survey, 13204 Northeast Highway 99, Vancouver, Washington.*

Environmental Resolutions, Inc. (ERI). September 14, 2010. *ExxonMobil Environmental Services Sparge Well Destruction, Installation and Groundwater Sampling Report, 13204 Northeast Highway 99, Vancouver, Washington.*

Environmental Resolutions, Inc. (ERI). January 29, 2010. *ExxonMobil Environmental Services Groundwater Monitoring Report, 13204 Northeast Highway 99, Vancouver, Washington.*

Washington State Department of Ecology (Ecology). November 24, 2008. *Letter Requiring Further Action at the following site: Former Exxon Station 7-3594, 13204 Northeast Highway 99, Vancouver, WA.*

These documents are on file at Ecology's Southwest Regional Office.

This Covenant is required because the Remedial Action resulted in residual concentrations of total and dissolved lead, which exceed the Model Toxics Control Act Method A Cleanup Level for groundwater established under WAC 173-340-704. Plate 3 from the FS/DCA report is attached to illustrate the remaining extent of total and dissolved lead present at the site.

The undersigned, Border Express LLC., is the fee owner of real property (hereafter "Property") in the County of Clark, State of Washington, that is subject to this Covenant. The Property is legally described as follows: #263 SEC 26 T3N R1EWM :60A.

Border Express LLC makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter "Owner")

Section 1.
No groundwater may be taken for any use from the Property.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5. The Owner must restrict leases to uses and activities consistent with the Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, to determine compliance with this Covenant, and to inspect records that are related to the Remedial Action.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

Border Express LLC

Thomas M. Cook
President

Dated: March 26, 2013

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Rebecca S. Lawson, P.E. LHG
Section Manager
Toxics Cleanup Program
Southwest Regional Office

Dated: March 26, 2013

STATE OF Washington
COUNTY OF Clark

On this 26th day of March, 2013, I certify that Thomas M. Cook personally appeared before me, acknowledged that he/she signed this instrument, on oath stated that he/she was authorized to execute this instrument, and acknowledged it as the President [type of authority] of Border Express LLC [name of party being represented] to be the free and voluntary act and deed of such party for the uses and purposes mentioned in the instrument.

VONDA K. LARA
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
APRIL 9, 2013

Notary Public in and for the State of Washington, residing at Vancouver.
My appointment expires April 9, 2013.

Exhibit A

Legal Description

Abbreviated Legal Description from the Clark County Property Information Center:#263 SEC 26 T3N R1EWM .60A

6.16 Photo Log

Photo 1: Current Taco Bell Restaurant / Former Exxon Station, Former Location of Three Underground Storage Tanks (underneath the building) - from the North

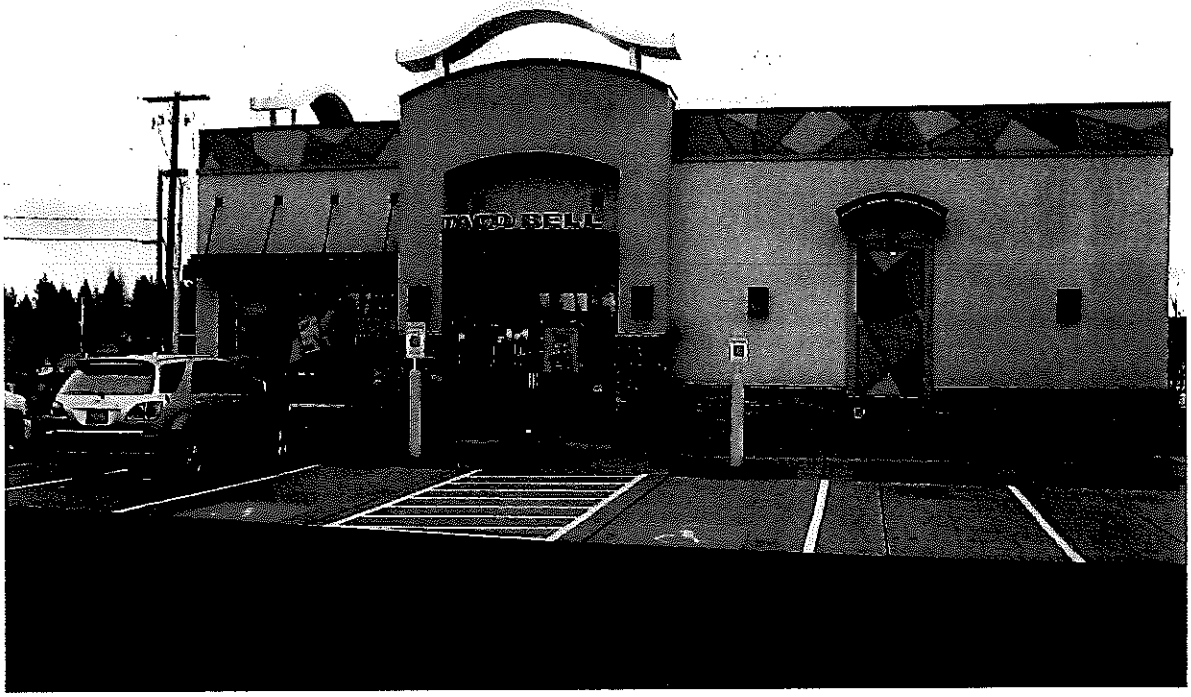


Photo 2: Current Taco Bell Restaurant / Former Exxon Station – from the Northwest

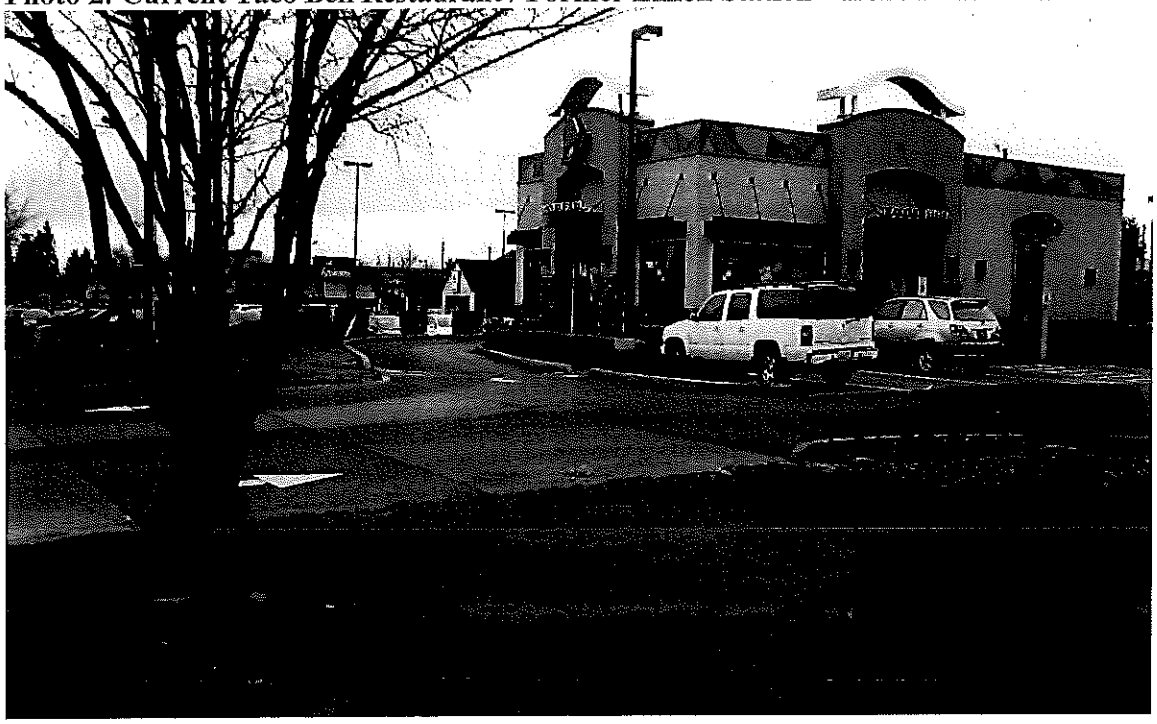


Photo 3: Current Taco Bell Restaurant and Landscape/ Former Exxon Station – from the Southeast

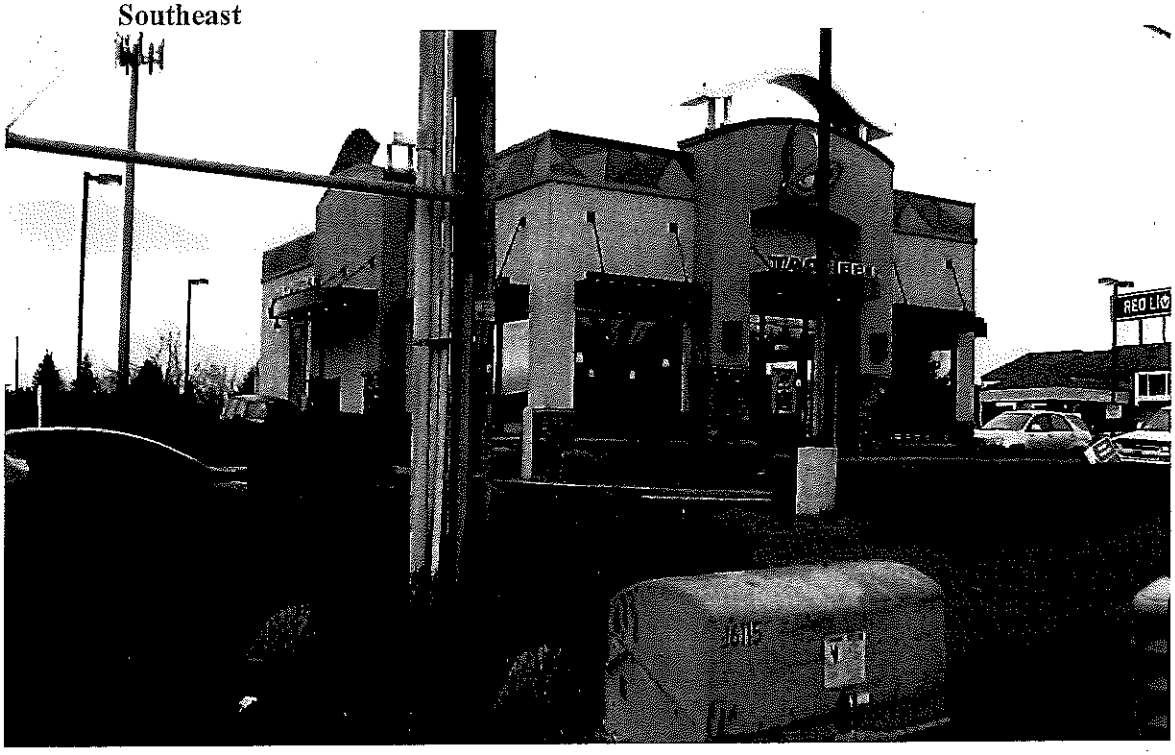


Photo 4: Current Drive-Through / Former Fuel and Waste Oil Storage USTs Location – from the North

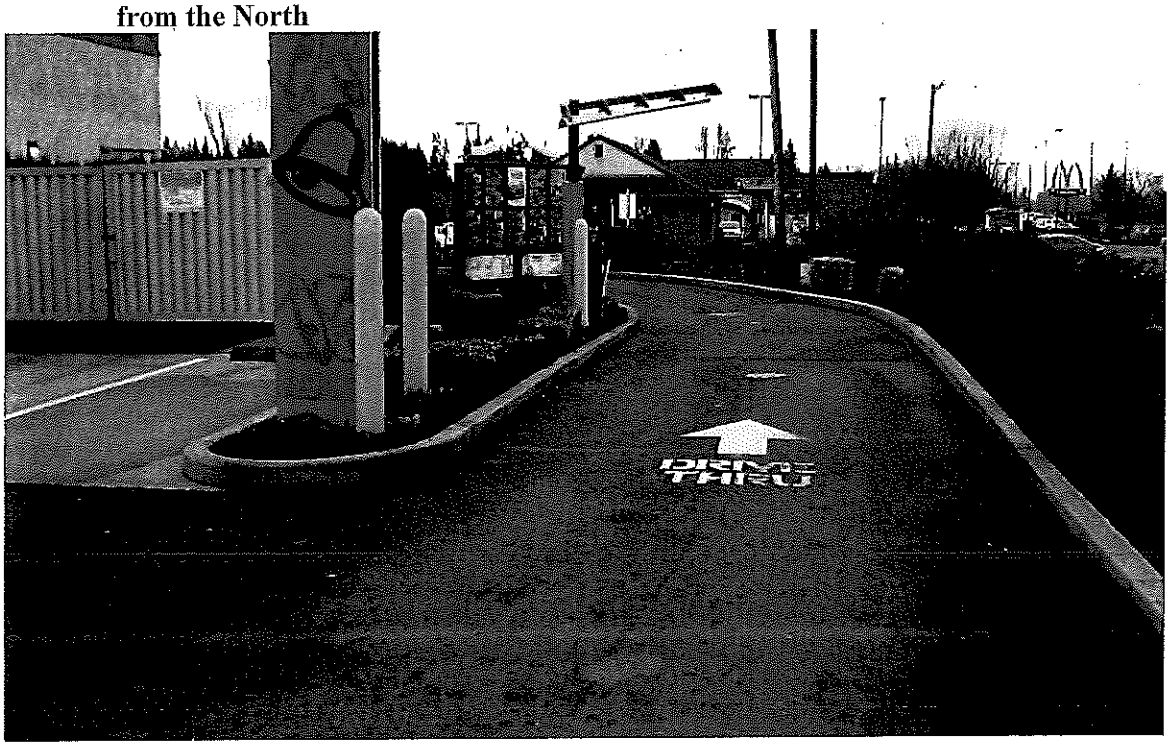


Photo 5: Current Taco Bell Restaurant Parking Lot / Former Soil Vapor Extraction Treatment Area - from the Northeast

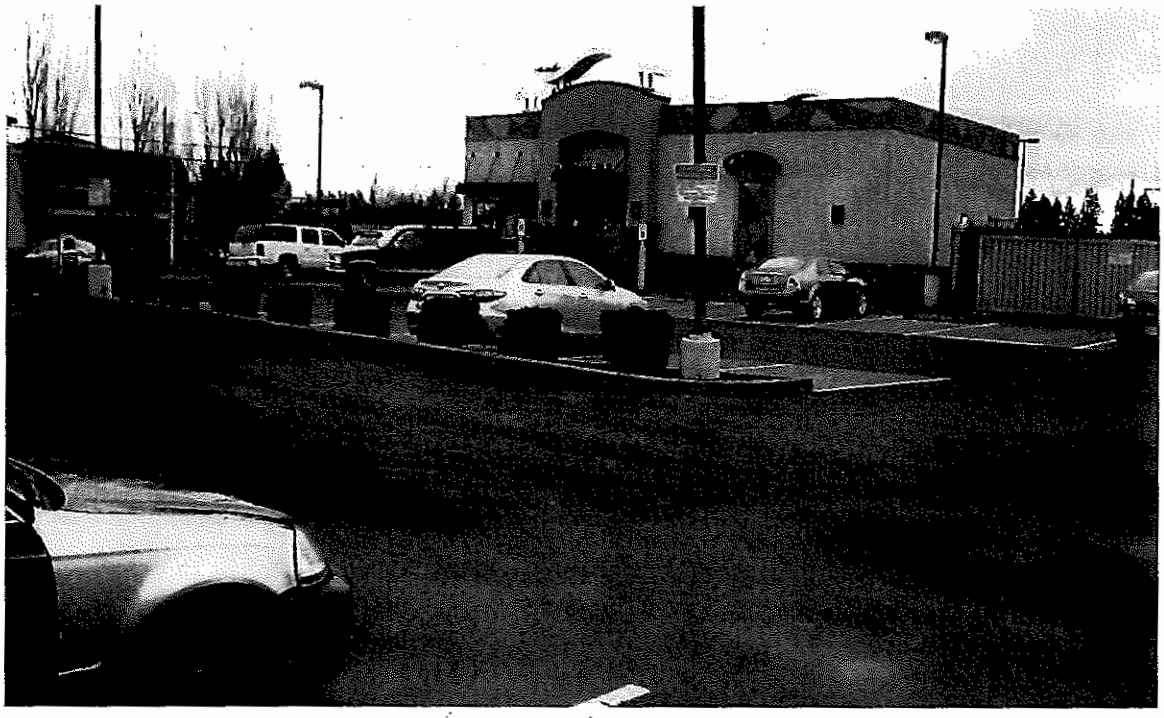
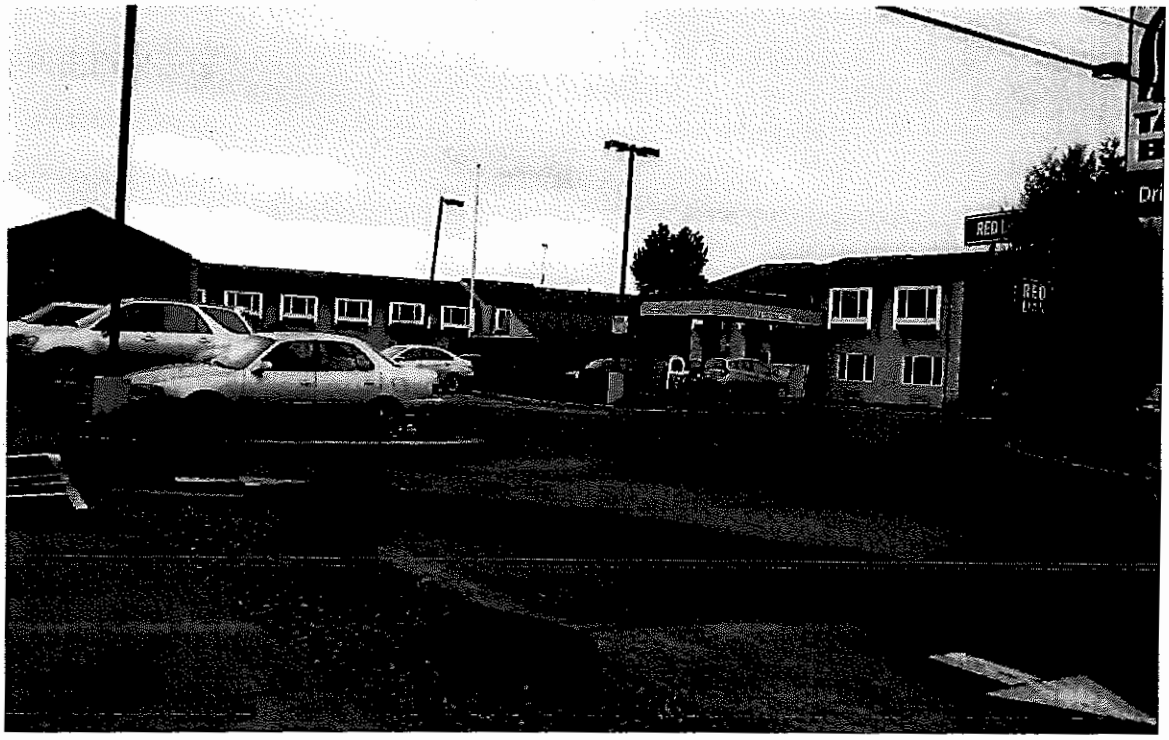


Photo 6: Current Taco Bell Restaurant Parking Lot / Former Soil Vapor Extraction Treatment Area - from the Southeast



UNITED STATES POSTAL SERVICE

May 10, 2019

Dear s l:

The following is in response to your request for proof of delivery on your item with the tracking number: **9489 0090 0027 6066 6647 70**.

Item Details

Status:	Delivered, Front Desk/Reception/Mail Room
Status Date / Time:	April 3, 2019, 10:01 am
Location:	VANCOUVER, WA 98660
Postal Product:	First-Class Mail®
Extra Services:	Certified Mail™
	Return Receipt Electronic
Recipient Name:	PACIFIC BELL INC

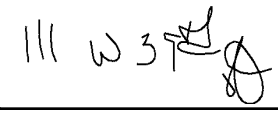
Shipment Details

Weight:	5.3oz

Recipient Signature

Signature of Recipient:

Address of Recipient:



Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
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Washington, D.C. 20260-0004