



PERIODIC REVIEW REPORT FINAL

**Bank of Pacific Property
Facility Site ID#: 61774897
Cleanup Site ID# 6381**

**20 Butler Street
Cathlamet, Washington 98612**

**Southwest Regional Office
TOXICS CLEANUP PROGRAM**

April 2019

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1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to ensure that human health and the environment are being protected at the Bank of Pacific Property 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 petroleum hydrocarbons remaining at the Site in soil and groundwater that exceed MTCA Method A cleanup levels. The MTCA Method A cleanup levels for soil and groundwater are established under WAC 173-340-740(2), and WAC 173-340-720(2), respectively. 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.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

The Bank of Pacific Property Site is located at 20 Butler Street and 58 Main Street (adjacent properties) in Cathlamet, Washington. The Site is located in downtown Cathlamet in a residential and commercial part of the town. The Site is bounded by residential property to the west, Main Street and commercial property to the east, Butler Street and residences to the south, and the Bank of the Pacific (Bank) to the north. The Site topography slopes east to west. Bernie Creek is at the bottom of the slope. Currently the Site consists of a vacant lot (20 Butler Street property) and a parking lot (58 Main Street property). A location map and current and previous Site Plans are available as Appendix 6.1 and Appendix 6.2, respectively.

Historically the Site was developed in the 1900s, and it was developed as a service station in the 1920s. The service station facility reportedly included four underground storage tanks (USTs), a site building, and a canopied pump island. Although the exact configuration of the service station is unknown, the USTs were located along the southern boundary of the property at the corner of Butler and Main Streets. Reportedly, the service station was also used for vehicle maintenance and repair, and was operated until the mid-1970s. The station building was apparently demolished in the mid-1980s, at which time a new wood-framed building was constructed that occupied most of the footprint of the property. The new building was utilized for storage and an automobile paint shop.

Historical evidence of releases from the fuel distribution system at the former service station date back to the mid-1970s, when the City received complaints of hydrocarbon odors in the basement of a residence north of the Site. The Cathlamet Public Works Department (CPWD) investigated the complaint and reported that free product was discovered in hand auger borings installed by CPWD along the northeast Site boundary. The CPWD also reported that the lawn had died in the yard of the “Hobson Cottage” property, located immediately to the north of the Site at 60 Butler Street, Cathlamet, Washington.

The Bank purchased the Butler Street property (20 Butler Street) and an adjacent parcel (58 Main Street) to the east in 1997. The adjacent parcel (58 Main Street) was converted to a parking lot for the Bank (located at 56 Main Street), and the building on the Site (20 Butler Street) was leased. The building was demolished in 2003. In July 2018 the City of Cathlamet purchased the 20 Butler Street property, which is currently a vacant lot.

In June 1999, Pacific Northern Environmental Corporation (PNEC) abandoned the four USTs in-place by cleaning and filling the USTs with cement slurry. Prior to abandonment, soil samples collected from around the end of the USTs by PNEC confirmed the presence of total petroleum hydrocarbons (TPHs) as gasoline and oil in soil around the USTs. During USTs abandonment, PNEC excavated approximately 13 tons of TPHs-contaminated soil and transported off-site for thermal treatment. Prior to demolition of the building to facilitate remediation in summer 2003, the southern portion of the building was leased as office space to a church group, and the remainder of the building was leased for storage.

2.2 Site Geology/Hydrology

Surficial geology beneath the Site consists of brown sandy silt and clay that form the ground surface to approximately 2 to 4 feet below ground surface (bgs). Bedrock beneath the Site consists of the Wanapum Basalt-French Springs member of the Columbia River Basalts. Bedrock was encountered in borings on the Site at 2 to 8 feet bgs. During the drilling the groundwater was encountered beneath the Site in fractured basalt at depths of 8 to 12 feet bgs, which was consistent with the measured water level elevation data collected during the quarterly groundwater monitoring conducted from January through December, 2004. Groundwater elevation data generally point to a northwest groundwater flow direction, though local topography and drainage patterns suggest groundwater likely flows in a more northerly direction, following the topographic grade towards the Bernie Creek.

2.3 Site Investigations

Phase I Environmental Site Assessment

In early 1999, Bank of the Pacific (Bank) hired Pacific Northern Environmental Corporation (PNEC) to conduct a Phase I Environmental Site Assessment (Phase I ESA) at the Site. In order to determine the subsurface conditions, PNEC completed three soil borings on the Site and one boring on the adjacent "Hobson Cottage" property to the north for collecting soil samples. A soil sample was collected from each soil boring for chemical analysis where field screening indicated the highest presence of volatile organic compounds (VOCs). All the soil samples were analyzed for gasoline, diesel, and oil-range total petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O). Results of the chemical analysis detected TPH-G [122 milligrams per kilogram (mg/kg)] and TPH-O (38,000 mg/kg) concentrations above the Model Toxics Control Act (MTCA) Method A cleanup levels of 30 mg/kg and 2,000 mg/kg, respectively. Soil boring locations and soil sample results are included as Appendix 6.3.

Phase II Environmental Site Investigation

In June and September 1999, PNEC conducted a Phase II ESA during which they identified four USTs that were partially buried underneath the eastern portion of the building. These USTs were abandoned in-place. The four, four-foot diameter by twelve-foot long tanks were cut open, cleaned, and filled with control density fill (CDF). An approximate 5/8-inch hole was observed at the bottom of one of the tanks. Two soil samples were collected from the excavation at five feet below ground surface prior to backfilling activities. Results of the soil samples indicated the presence of TPH-G (186 mg/kg - 4,550 mg/kg), TPH-D (2,620 mg/kg), and TPH-O (124 mg/kg - 1,260 mg/kg). TPH-G and TPH-D concentrations were above the MTCA Method A cleanup levels of 30 mg/kg and 2,000 mg/kg, respectively. Approximately 13 tons of petroleum contaminated soil that was excavated during the USTs closure was transported to TPS Technologies in Portland, Oregon, for thermal treatment. In addition, during USTs backfilling activities, water was observed in the bottom of the excavation. PNEC installed a 4-inch slotted pipe in the deepest part of the excavation. A water sample was collected from the pipe and analyzed for TPH-G. The results indicated the presence of TPH-G at 3,630 micrograms per liter (µg/L), which exceeded its MTCA Method A cleanup level of 1,000 µg/L.

In September 1999 as a follow-up to the above, PNEC conducted a more extensive subsurface investigation to better define the extent of soil contamination. Thirteen soil borings were

advanced around the building, at the adjacent house, and in and along Butler Street adjacent to and downhill from the building. Results of TPH-HCID (hydrocarbon identification) detected the presence of hydrocarbons in the gasoline and/or heavy oil-range within five of the soil samples (BP-B3, BP-B6, BP-B7, BP-B8, and BP-B13) collected. To quantify the specific contaminants, the same samples were analyzed for TPH-G, TPH-D, and TPH-O. The results indicated the presence of TPH-G (162 mg/kg to 1,020 mg/kg) and TPH-O (144 mg/kg to 938 mg/kg) and have migrated off-site onto Butler Street and the neighboring property to the west. Both June and September 1999 Phase II ESA soil boring locations (highlighted in yellow) and soil sample results are available as Appendix 6.4.

Aspect Consulting Additional Subsurface Investigation

In May 2002, Aspect Consulting completed a total of 17 hand auger borings on the Bank's Butler Street property and the adjacent Hobson property to define the full extent of soil contamination. A total of seventeen soil samples was collected and all the samples were analyzed for TPH-G, TPH-D, TPH-O, and benzene, toluene, ethylbenzene, and xylenes (BTEX). Results of soil samples indicated that TPH-G (150 mg/kg to 3,200 mg/kg), benzene (0.12 mg/kg), ethylbenzene (40 mg/kg), xylenes (38.7 mg/kg), and/or naphthalene (17 mg/kg) concentrations exceeded their MTCA Method A cleanup levels in the soil samples collected from boring HA-9, HA-10, and/or HA-11. Locations of hand auger borings, as well as the locations of historical borings and all the soil sample results, are included as Appendix 6.5.

Groundwater Investigations

In August 2000, PNEC installed three groundwater monitoring wells (MW-1 through MW-3), with a fourth monitoring well (MW-4) installed in September 2002 by Aspect Consulting, at on- and off-site locations. Groundwater samples collected from the monitoring wells between August 2000 and December 2004 were analyzed for selected analyses, including HCID, TPH-G, TPH-D, TPH-O, BTEX, polycyclic aromatic hydrocarbons (PAHs), and total lead. Contaminants detected in groundwater at concentrations exceeding MTCA Method A cleanup levels included TPH-G (1,300 µg/L to 3,630 µg/L), TPH-D (740 µg/L to 1,300 µg/L), TPH-O (650 µg/L to 670 µg/L), and benzene (150 µg/L to 560 µg/L). Locations of groundwater monitoring wells and all the groundwater sample results are available as Appendix 6.8.

2.4 Remedial Actions

In June 1999, PNEC abandoned four USTs in-place by cleaning and filling the USTs with CDF. During USTs abandonment, PNEC excavated 13 tons of petroleum-contaminated soil and transported it to TPH Technologies in Portland, Oregon, for thermal treatment and disposal.

In 2003, based on the presence of petroleum hydrocarbons and benzene concentrations above MTCA Method A cleanup levels in groundwater downgradient of the Site, it was evident that the petroleum-impacted soil beneath the building foundation at the Site constituted a continued source of impacts to groundwater, even many years after the release had occurred. The fine-grained nature of Site soils, and location of the impacted soil beneath the building foundation slab, precluded practical application of in-situ soil remediation methods. The Bank therefore opted to demolish the building and excavate contaminated soils and effecting subsequent

reduction in dissolved concentrations in groundwater beneath the Site and on the downgradient “Hobson Cottage” property.

In July 2003, following an asbestos containing materials (ACM) survey, Burns Construction of Cathlamet, Washington, demolished the building, but left the slab in place to prevent possible exposure to impacted soils prior to initiation of the soil remediation. In August 2003, Clearcreek Contractors of Woodinville, Washington, completed demolition of the building slab. Waste concrete was transported to the Burns quarry in Cathlamet for disposal. The closed-in-place USTs were excavated and cut open. The fill materials placed in the USTs during closure was removed and stockpiled for subsequent disposal with the impacted soils. The empty USTs were then transported to Metro Metals Northwest in Kelso for recycling. During this process, a total of 1,187 tons of soil was excavated and disposed of at the Rabanco Landfill in Roosevelt, Washington.

Confirmation soil samples were collected at approximate 10-foot intervals along the excavation sidewalls. All sidewall samples were collected from the interval of native sandy fill immediately above the bedrock surface. Floor samples were not collected, per Ecology approval, due to the competent nature of the basalt bedrock in the base of the excavation. A total of 28 sidewall confirmation soil samples was collected. Each confirmation sample was analyzed for TPH-G, TPH-D, TPH-O, BTEX, and selected samples were analyzed for naphthalene and PAHs.

The results of confirmation samples did not indicate the presence of contaminants above MTCA Method A cleanup levels except in soil samples collected at CS-22 (TPH-G: 650 mg/kg; benzene: 3.3 mg/kg; ethylbenzene: 18.0 mg/kg; and total xylenes: 11.3 mg/kg); CS-24 (TPH-G: 290 mg/kg; benzene: 3.0 mg/kg; ethylbenzene: 15.0 mg/kg; and total xylenes: 19.2 mg/kg), and CS-16 [carcinogenic PAHs (cPAHs): 3.33 mg/kg]. MTCA Method A cleanup levels for these contaminants are as follows: TPH-G: 30 mg/kg, benzene: 0.3 mg/kg, toluene: 7.0 mg/kg, ethylbenzene: 6.0 mg/kg, total xylenes: 9.0 mg/kg, and cPAHs: 0.1 mg/kg. The confirmation soil sampling locations and sample results are available as Appendix 6.6.

According to Aspect Consulting, the results of the confirmation samples indicate that all accessible petroleum impacted soil has been removed from the Site. However, a small quantity of petroleum contaminated soils was left in-place right adjacent to the retaining wall and beneath the parking lot to the east of the former building in the vicinity of sample locations CS-22 and CS-24. Based on the confirmation soil sample results and historic soil sample data from surrounding borings, Aspect Consulting estimated that the volume of impacted soil in the area is likely less than 30 cubic yards. Additional areas of soil impacted by TPH-G and/or cPAHs above MTCA Method A cleanup levels is present at CS-16 and BP-B11 locations beneath Butler Street to the west of the “Hobson Cottage” property. However, the northwestward extent of this contamination beneath Butler Street is unknown. The approximate extent of contaminated soil left in-place on the Site (20 Butler Street and 58 Main Street Properties) and beneath Butler Street are shown on Figure 2 in Appendix 6.7.

2.5 Post-Remediation Groundwater Monitoring

Four rounds of quarterly post-remediation groundwater monitoring were conducted from January through December 2004. In addition, the monitoring well MW-4 was also sampled in February 2003. All the groundwater samples were analyzed for TPH-G, TPH-D, TPH-O, and BTEX. The samples collected in January 2004 were also analyzed for total lead. No contaminants were detected above MTCA Method A cleanup levels during the four rounds of quarterly monitoring conducted in 2004, following soil remediation activities. The groundwater monitoring well locations and sample results are available as Appendix 6.8.

2.6 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 for each hazardous substance. The table below presents the current MTCA Method A cleanup levels.

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

Chemical	Soil Cleanup Level (mg/kg)	Groundwater Cleanup Level (µg/L)
TPH-Gas	30/100*	800/1000*
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
*benzene present/benzene not present

2.7 Environmental Covenant

The remedial activities at the Site comprised the excavation of the majority of the contaminated soil. However, because of inaccessibility, some contaminated soil was left-in-place at the Site. As a result, an Environmental Covenant (EC) was recorded for the Site on November 30, 2005 and a no further action letter was issued on February 23, 2006. The EC imposes the following limitations:

Section 1: The Owner shall not alter, modify, or remove the parking lot or retaining wall in the area of residual petroleum hydrocarbon constituents shown in Attachment A in any manner that may result in the release or exposure to the environment of contaminated soil or create a new exposure pathway without prior written approval from Ecology. Additionally, any other activity on the Property that may result in the release or exposure to the environment of the contaminated soil beneath the area of the parking lot shown on Attachment A, or create a new exposure pathway, is prohibited without prior written approval from Ecology include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork.

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: 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 4: 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 5: 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 6: 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, and to inspect records that are 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 Environmental Covenant is available as Appendix 6.9.

3.0 PERIODIC REVIEW

3.1 Effectiveness of Completed Cleanup Actions

Based upon the Site visit conducted on December 12, 2018 the asphalt cap (Bank parking lot) and clean soil and gravel layers (next to the retaining wall) on the residual contaminated soil continue to eliminate exposure pathways (ingestion, contact) to contaminated soils. The asphalt and clean soil and gravel layers are in satisfactory condition and no repair, maintenance, or contingency actions have been required. Currently the Site consists of a vacant lot and a parking lot. A photo log is available as Appendix 6.10.

The EC for the Site was recorded and is in place. This EC 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 EC 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 February 23, 2006.

3.4 Current and Projected Site Use

A part of the Site is currently used for commercial purposes (Bank parking lot) and the remaining portion of the Site is a vacant lot. The current use of the properties is not likely to have a negative impact on the risk posed by hazardous substances contained at the Site.

The Town of Cathlamet (Town) purchased the vacant lot (20 Butler Street, Cathlamet, Washington) in July 2018. Ecology understands that the Town is planning on developing the currently vacant property into a public park. As a result of the existing Restrictive Covenant on the property, the Town is required to submit the property development plan to Ecology for review and concurrence.

3.5 Availability and Practicability of Higher Preference Technologies

The remedy implemented included the excavation of majority of the contaminated soils and containment of remaining residual 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.

4.0 CONCLUSIONS

- The cleanup actions completed at the Site continue to be protective of human health and the environment.
- Soil cleanup levels have not been 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.
- The EC 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, Ecology has determined that the requirements of the EC have been satisfactorily completed. No additional remedial action is necessary at this time. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the Site cover is maintained.

4.1 Next Review

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

5.0 REFERENCES

Department of Ecology. No Further Action Letter, Bank of Pacific Property, 20 Butler Street, Cathlamet, Washington. February 23, 2006.

Environmental Covenant. Number 2010055 dated 11/30/2005, Wahkiakum County, Washington. Grantor: Bank of the Pacific.

Aspect Consulting. Groundwater Monitoring Report, Butler Street Property, 20 Butler Street, Cathlamet, Washington. February 1, 2005.

Aspect Consulting. Groundwater Monitoring Reports, Butler Street Property, 20 Butler Street, Cathlamet, Washington. January 2004, April 2004, August 2004, and December 2004.

Aspect Consulting. Soil Remediation Report, Bank of Pacific Butler Street Property and Adjoining Hobson Property. April 21, 2004.

Aspect Consulting. Results of the May 2002 Soil Sampling, Bank of the Pacific Butler Street Property and Adjoining Hobson Property. July 9, 2002.

Robert D. Miller Consulting, Inc. Environmental Phase II Subsurface Investigation, Bank of the Pacific Property, 20 Butler Street, Cathlamet, Washington. December 1, 2000.

Pacific Northern Environmental Corporation. Subsurface Investigation Report, 20 Butler Street, Cathlamet, Washington. December 9, 1999.

Pacific Northern Environmental Corporation. Phase I Environmental Site Assessment Report, 20 Butler Street, Cathlamet, Washington. April 16, 1999.

Department of Ecology. Site Visit December 12, 2018.

6.0 APPENDICES

6.1 Location Map



6.2 Current and 1999 Site Plans

Current Site Plan



Current Site Plan-Vacant Lot

1999 Site Plan

20 BUTLER ST.
CATHLAMET, WASHINGTON

Project No. 4-9-017

Date: 04-14-99
Drawn by: W.D.J.
Approved: M.H.

NOTICE
THIS PLAN AND THE INFORMATION CONTAINED HEREON ARE FOR INFORMATIONAL PURPOSES ONLY. THE USER OF THIS PLAN SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND FOR THE ACCURACY OF THE INFORMATION CONTAINED HEREON. THE USER OF THIS PLAN SHALL BE RESPONSIBLE FOR THE DESIGN AND CONSTRUCTION OF ANY FACILITIES SHOWN ON THIS PLAN. THE USER OF THIS PLAN SHALL BE RESPONSIBLE FOR THE MAINTENANCE OF ANY FACILITIES SHOWN ON THIS PLAN.

SCALE: 1" = 20'-0"

0 10 20

MAIN STREET

BUTLER STREET
SLOPE/DOWN

Power Pole

Property Line

HOUSE

GARAGE

STORAGE

OFFICE

PARKING LOT

DRIVE THRU

BANK

PARKING LOT (LOWER)

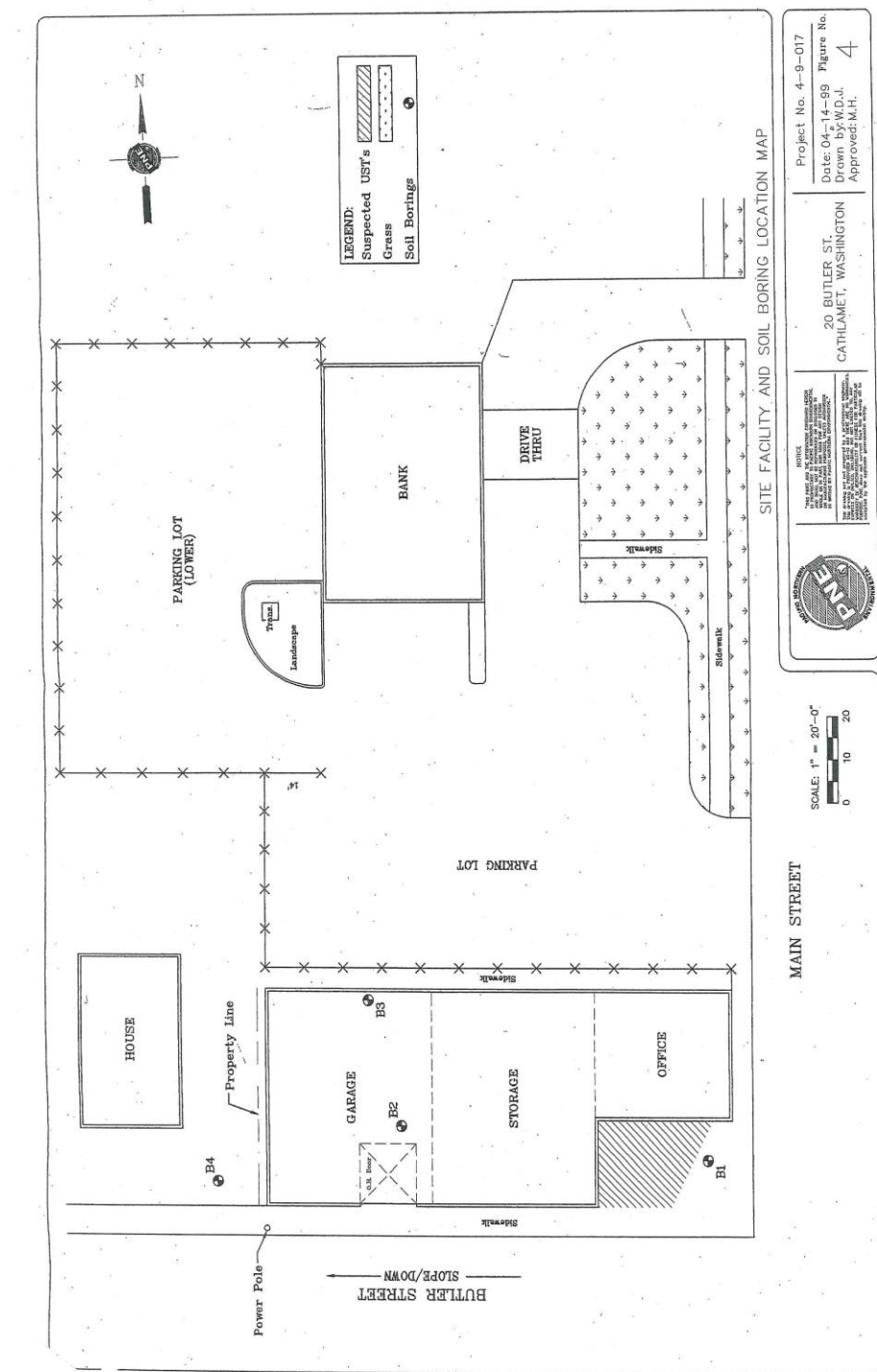
LEGEND:
Suspected UST's
Grass
Soil Borings

1" = 20'-0"

0 10 20

1999

6.3 Pacific Northern Environmental Corporation: April 1999 Phase I Environmental Site Assessment Soil Sampling Locations and Sample Results



20 Butler Street - Cathlamet, WA
Phase I Environmental Site Assessment

April 16, 1999

TABLE 1 SOIL SAMPLE RESULTS				
Sample ID	Sample Depth*	Gasoline	Diesel	Oil
PB-B2-4/9	22"	Detected	Not Detected	Detected
BP-B3-4/9	22"	Detected	Not Detected	Detected
BP-B31-4/9	35"	Detected	Not Detected	Detected
BP-B4-4/9	33"	Detected	Not Detected	Detected

* Below Ground Surface

TABLE 2 SOIL SAMPLE RESULTS		
Sample ID	Gasoline	Heavy Oil
BP-B2-4/9	2,340	1,690
BP-B3-4/9	7,790	38,900
BP-B31-4/9	4,700	663
BP-B4-4/9	122	1,330

6.5: Aspect Consulting: May 2002 Soil Investigation Hand-Boring Locations and Soil Sample Results

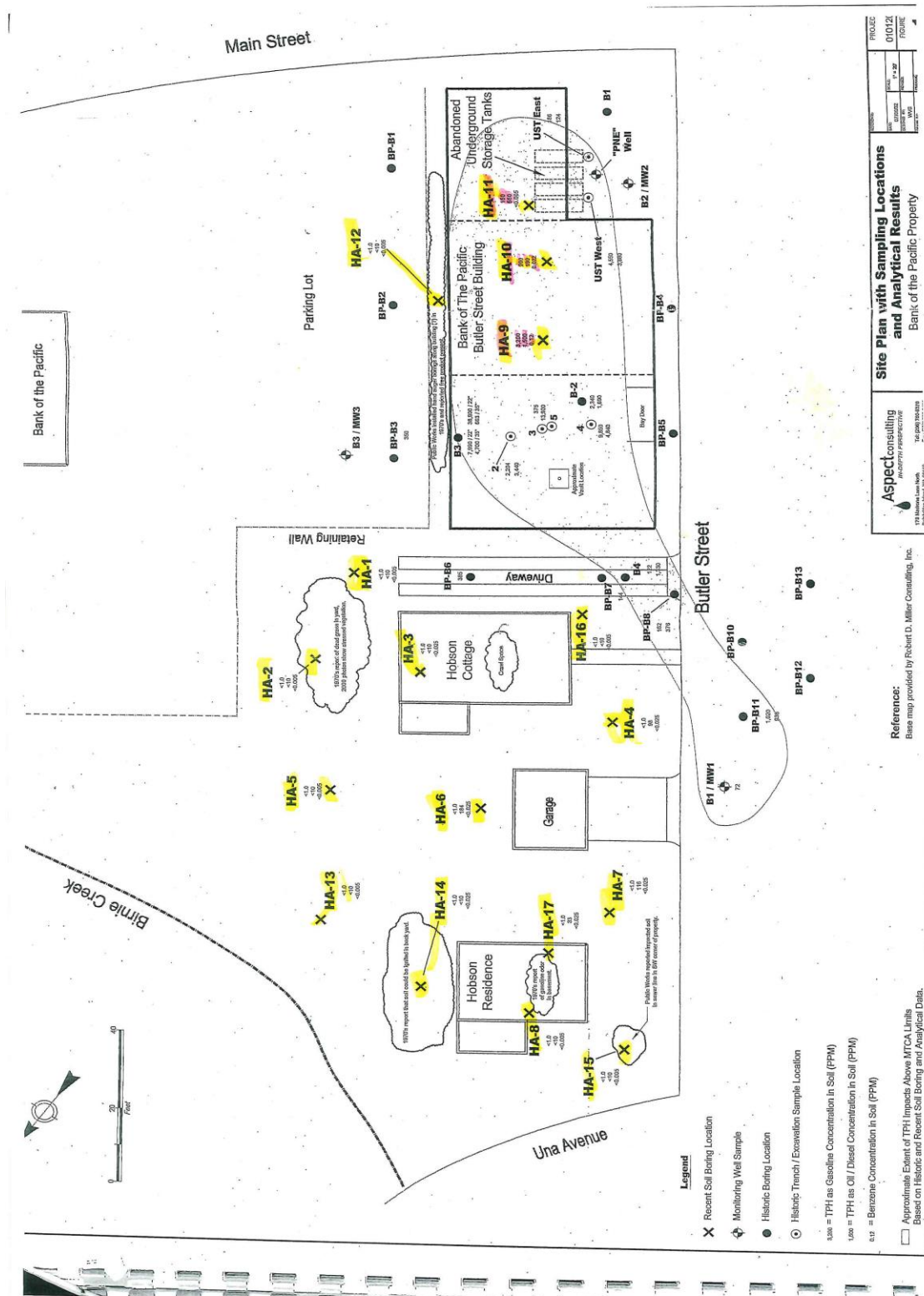


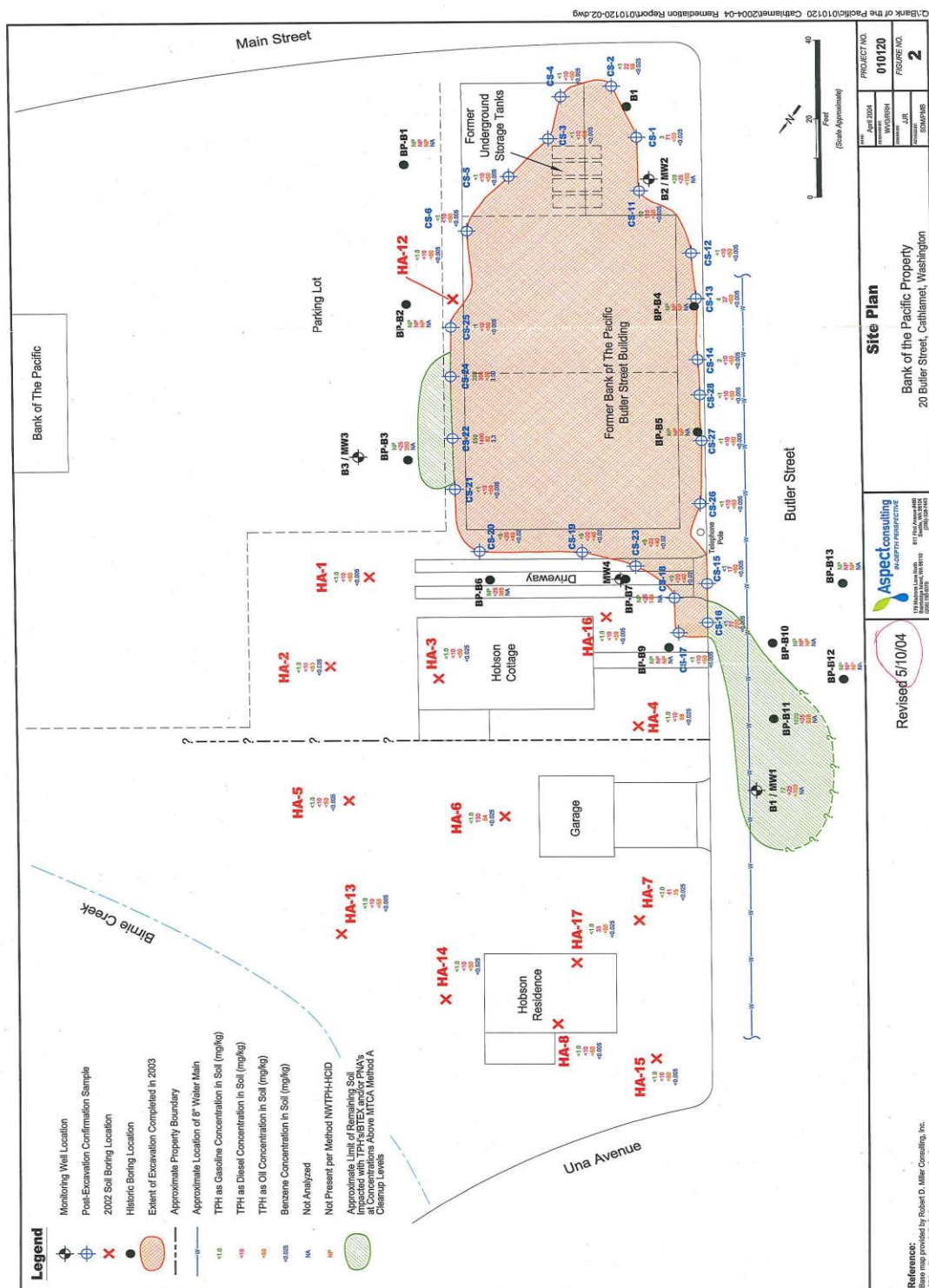
Table 1
Soil Sample Analytical Results Summary - May 2002 Sampling
Bank of the Pacific and Adjacent Hobson Property

Sample Identification	Sample Date	Gasoline by NWTPH-Gx	BTEX Compounds and Naphthalene by EPA Method 8260B					Diesel and Oil (mg/kg)	Lead by Method 6010
			Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-Benzene (mg/kg)	Total Xylenes (mg/kg)	Naphthalene (mg/kg)		
HA-1	5/21/02	<1.0	<0.005	<0.005	<0.005	<0.005	<0.005	<10	.16
HA-2	5/21/02	<1.0	<0.005	<0.005	<0.005	<0.005	<0.005	<10	12
HA-3	5/21/02	<1.0	<0.025	<0.025	<0.025	<0.025	<0.025	<10	20
HA-4	5/21/02	<1.0	<0.025	<0.025	<0.025	<0.025	<0.025	98	12
HA-5	5/21/02	<1.0	<0.005	<0.005	<0.005	<0.005	<0.005	<10	12
HA-6	5/21/02	<1.0	<0.025	<0.025	<0.025	<0.025	<0.025	184	17
HA-7	5/21/02	<1.0	<0.025	<0.025	<0.025	<0.025	<0.025	116	39
HA-8	5/21/02	<1.0	<0.005	<0.005	<0.005	<0.005	<0.005	<10	170
HA-9	5/21/02	3,200	.12	0.43	40	38.7	17	1,500	22
HA-10	5/21/02	200	0.022	0.028	3.4	0.238	2.6	190	15
HA-11	5/21/02	150	<0.005	0.028	1.8	3.58	0.97	560	17
HA-12	5/22/02	<1.0	<0.005	<0.005	<0.005	<0.005	<0.005	<10	16
HA-13	5/22/02	<1.0	<0.005	<0.005	<0.005	<0.005	<0.005	<10	12
HA-14	5/22/02	<1.0	<0.025	<0.025	<0.025	<0.025	<0.025	<10	140
HA-15	5/22/02	<1.0	<0.005	<0.005	<0.005	<0.005	<0.005	<10	24
HA-16	5/22/02	<1.0	<0.005	<0.005	<0.005	<0.005	<0.005	<10	15
HA-17	5/22/02	<1.0	<0.025	<0.025	<0.025	<0.025	<0.025	33	150
MTCA Method A Soil Cleanup Standards for Unrestricted Land Use		30*	0.03	7.00	6.00	9.00	5.00	2,000	250

* Gasoline cleanup level when benzene is present.

3,200 - Exceedances of MTCA Method A cleanup standards are indicated in bold.

6.6 Aspect Consulting: August 2003 Soil Remediation—Approximate Extent of Contaminated Soil Excavation, Confirmation Soil Sample Locations, and Sample Results



Confirmation Soil Sample Results

TABLE 3
Final Sidewall Confirmation Sample Analytical Results Summary
Hydrocarbons and Lead
Bank of the Pacific Butler Street Property

Sample ID ¹	Sample Date	BTEX Compounds by EPA Method 8260B					Gasoline by NWTPH-Gx	Diesel by NWTPH-Dx	Oil by NWTPH-Dx	Lead by Method 6010
		Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-Benzene (mg/kg)	Total Xylenes (mg/kg)	Gasoline (mg/kg)				
BP-CS-1-082003	8/20/2003	<0.025	<0.025	<0.025	<0.025	3	71	<50	<50	130
BP-CS-2-082003	8/20/2003	<0.025	<0.025	<0.025	0.070	<1	22	56	56	80
BP-CS-3-082003	8/20/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	<50	27
BP-CS-4-082003	8/20/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	<50	21
BP-CS-5-082003	8/20/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	<50	21
BP-CS-6-082003	8/20/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	<50	20
BP-CS-11-082503	8/25/2003	<0.005	<0.005	<0.005	<0.005	10	110	<50	<50	
BP-CS-12-082503	8/25/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	<50	
BP-CS-13-082603	8/26/2003	<0.005	<0.005	<0.005	0.006	4	37	<50	<50	
BP-CS-14-082603	8/26/2003	<0.005	<0.005	<0.005	<0.005	2	<10	<50	<50	
BP-CS-15-082603	8/26/2003	<0.005	<0.005	<0.005	<0.005	<1	17	<50	<50	
BP-CS-16-082603	8/26/2003	<0.005	<0.005	<0.005	<0.005	<1	77	220	<50	83
BP-CS-17-082603	8/26/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	<50	
BP-CS-18-082703	8/27/2003	<0.02	<0.05	<0.05	<0.05	<5	<20	<40	<40	
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use		0.03	7.00	6.00	9.00	30²	2,000	2,000	250	

¹ Final samples only - Results for interim samples from areas subsequently excavated are not included in this table.

² Gasoline cleanup level when benzene is present.

Exceedences of MTCA Method A cleanup levels are shaded.

3.3

TABLE 3
Final Sidewall Confirmation Sample Analytical Results Summary
Hydrocarbons and Lead
Bank of the Pacific Butler Street Property

Sample ID ¹	Sample Date	BTEX Compounds by EPA Method 8260B				Gasoline by NW/TPH-Gx	Diesel by NW/TPH-Dx	Oil by NW/TPH-Dx	Lead by Method 6010
		Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-Benzene (mg/kg)	Total Xylenes (mg/kg)				
BP-CS-19-082703	8/27/2003	<0.02	<0.05	<0.05	<0.05	<5	<20	<40	
BP-CS-20-082703	8/27/2003	<0.02	<0.05	<0.05	<0.05	<5	<20	<40	10
BP-CS-21-082703	8/27/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	
BP-CS-22-082703	8/27/2003	3.30	0.94	18.00	11.30	650	1400	82	
BP-CS-23-082703	8/27/2003	<0.02	0.07	<0.05	<0.05	<5	<20	<40	
BP-CS-24-082703	8/27/2003	3.00	0.630	15.00	19.20	290	350	<50	
BP-CS-25-082703	8/27/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	
BP-CS-26-082803	8/28/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	
BP-CS-27-082903	8/28/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	
BP-CS-28-082903	8/28/2003	<0.005	<0.005	<0.005	<0.005	<1	<10	<50	
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use		0.03	7.00	6.00	9.00	30²	2,000	2,000	250

¹ Final samples only - Results for interim samples from areas subsequently excavated are not included in this table.

² Gasoline cleanup level when benzene is present.

Exceedences of MTCA Method A cleanup levels are shaded.

3.3

TABLE 4
Final Sidewall Confirmation Sample Analytical Results Summary
Polynuclear Aromatic Compounds and Naphthalene
Bank of the Pacific Butler Street Property

EPA Method 8270 with Selective Ion Monitoring	Sample ID		MTCA Method A Soil Cleanup Levels for Unrestricted Land Use
	BP-CS-16-082603 8/26/2003	BP-CS-20-082703 ¹ 8/27/2003	
Naphthalene	0.180	<0.20	5 mg/kg
Acenaphthylene	0.250	<0.10	na
Acenaphthene	<0.05	<0.10	na
Fluorene	<0.05	<0.10	na
Phenanthrene	0.110	<0.10	na
Anthracene	0.240	<0.10	na
Fluoranthene	0.200	<0.10	na
Pyrene	0.540	<0.10	na
Benzo(g,h,i)-perylene	0.680	<0.10	na
Benzo(a)anthracene	0.400	<0.10	na
Chrysene	0.470	<0.10	0.1 mg/kg combined total of all compounds (per WAC173-340-708)
Benzo(b)fluoranthene	0.730	<0.10	
Benzo(k)fluoranthene	0.220	<0.10	
Benzo(a)pyrene	0.890	<0.10	
Indeno(1,2,3-cd)pyrene	0.480	<0.10	
Dibenzo(a,h)anthracene	0.140	<0.10	<0.05

¹ Analyzed by Libby Environmental

Notes:

All concentrations in milligrams/kilogram (mg/kg).

6.7 Approximate Extent of Residual Contaminated Soils Left on the Site (20 Butler Street and 56 Main Street Properties) and Beneath Butler Street



6.8 Groundwater Monitoring Well Locations and Summary of Groundwater Analytical Data

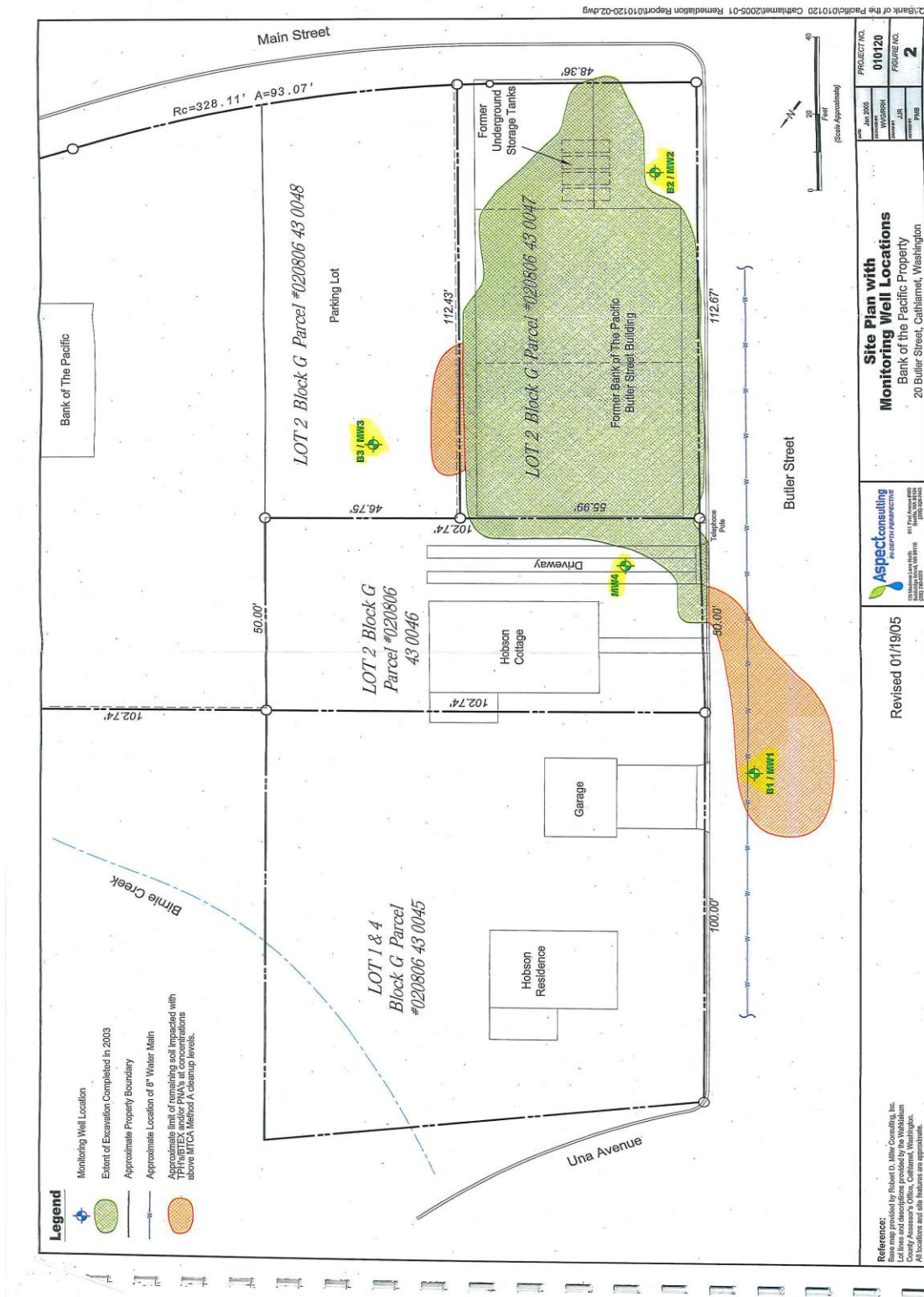


TABLE 2
Summary of Groundwater Analytical Data
Bank of the Pacific Butler Street Property

Well Designation	Sampling Date	Analytical Methods										EPA Method 8270	
		NWTPH-Gx	NWTPH-Dx	EPA Method 8021B / 8260B ¹						EPA 6000/7000 Series Methods		EPA Method 8270 SIM	
		TPHs as Gasoline (ug/L)	TPHs as Diesel (ug/L)	TPHs as Oil (ug/L)	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Total Xylenes (ug/L)	Total Lead (ug/L)	PAHs ³ and Naphthalene (ug/L)			
Standpipe ("PNE Well")	6/9/1999	3,630	ND/HClD	ND/HClD	na	na	na	na	na	na		na	
	1/30/2001	<250	ND/HClD	<500	<2	<2	<2	<2	na	na		na	
	8/17/2000	ND/HClD	ND/HClD	ND/HClD	<2	<2	<2	<2	na	na		na	
	1/30/2001	<250	ND/HClD	670	<2	<2	<2	<2	na	na		na	
MW-1	10/14/2002	<50	150	<250	<1	<1	<1	<1	na	na		na	
	1/28/2004	<50	150	<250	<1	<1	<1	<1	<1	<0.1 ⁴		<0.1 ⁴	
	4/13/2004	<50	<50	<250	<1	<1	<1	<1	na	na		na	
	8/16/2004	<50	68	<250	<1	<1	<1	<1	na	na		na	
MW-2	12/7/2004	na	na	na	na	na	na	na	na	na		na	
	1/30/2001	<250	ND/HClD	650	<2	<2	2	<2	na	na		na	
	10/14/2002	86	740	<250	<1	<1	<1	3	na	<0.1 ⁴		<0.1 ⁴	
	1/28/2004	70	250	<250	<1	<1	<1	<1	<1	na		<0.1 ⁴	
MW-3	4/13/2004	<50	<50	<250	<1	<1	<1	<1	na	na		na	
	8/16/2004	<50	120	<250	<1	<1	<1	<1	na	na		na	
	12/7/2004	<50	74	<250	<1	<1	<1	<1	0.3	na		na	
	8/17/2000	ND/HClD	1,000	<500	2	<2	<2	<2	na	na		na	
MW-4	1/30/2001	<250	<250	<500	2	<2	<2	<2	na	na		na	
	10/14/2002	<50	120	<250	<1	<1	<1	<1	na	na		na	
	1/28/2004	<50	<50	<250	<1	<1	<1	<1	<1	<0.1 ⁴		<0.1 ⁴	
	4/13/2004	<50	92	<250	<1	<1	<1	<1	na	<0.1 ⁴		<0.1 ⁴	
MW-5	8/16/2004	<50	150	<250	<1	<1	<1	<1	na	na		na	
	12/7/2004	na	na	na	na	na	na	na	na	na		na	
	10/14/2002	770	1,300	330	150	2	51	18	na	na		na	
	2/20/2003	1,300	740	<250	560	3	17	3	na	na		na	
MW-6	1/28/2004	<50	190	<250	<1	<1	<1	<1	1	<0.1 ⁴		<0.1 ⁴	
	4/13/2004	120	67	<250	4	<1	<1	<1	3	<0.1 ⁴		<0.1 ⁴	
	8/16/2004	<50	na ⁵	na ⁵	<1	<1	<1	<1	8 ⁶	na		na	
	12/7/2004	<50	51	<250	<1	<1	<1	<1	2.4	na		na	
MTCA Method A Cleanup Levels		800 ²	500	500	5	1,000	700	1,000	15	0.10			

Notes:
na - not analyzed
ND/HClD - Not detected by Method HClD (Hydrocarbon Identification Scan)
Detections are noted in bold.
MTCA Method A exceedances are noted in red.
¹ BTEX compounds for samples collected from well MW-4 in October 2002, and from all wells sampled in January and December 2004, were analyzed by EPA Method 8260B.
² Cleanup level for gasoline when benzene is present.
³ PAHs: Acenaphthylene, Acenaphthene, Fluorene, Phenanthrene, Pyrene, Benzo[a]fluoranthene, Benzo[b]fluoranthene, Benzo[k]fluoranthene, Benzo[a]pyrene, Indeno[1,2,3-cd]pyrene, Dibenzo[a,h]anthracene, Benzo[e]pyrene.
⁴ Not detected for any analyte at concentration indicated.
⁵ Well purged dry - no diesel or oil analytes due to inadequate sample volume.
⁶ Poor yield, well purged dry, elevated turbidity in sample.

6.9 Restrictive (Environmental) Covenant

Recording Requested
By and Return to:

John Van Dijk, President
Bank of the Pacific
P.O. Box 1826
Aberdeen, WA 98520

06 APR -9 11:00

RESTRICTIVE COVENANT

The Bank of the Pacific, 58 Main Street, Cathlamet, WA 98612-0337

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

An independent remedial action (hereafter "Remedial Action") occurred at the Owner's 20 Butler Street property. The 20 Butler Street property is located west of, and immediately adjacent to, the Owner's 58 Main Street property (hereafter "Property") that is the subject of this Restrictive Covenant. The Remedial Action conducted at the 20 Butler Street property is described in the following documents: 1) Soil Remediation Report, Bank of the Pacific Butler Street Property, Cathlamet, Washington, Aspect Consulting LLC, April 21, 2004, 2) Post - Remediation Groundwater Monitoring Report, Bank of the Pacific Butler Street Property, Cathlamet, Washington, Aspect Consulting LLC, February 1, 2004. These documents are on file at Ecology's Southwest Regional Office (SWRO.)

This Restrictive Covenant is required because the Remedial Action resulted in residual concentrations of petroleum hydrocarbon constituents on the Property, including total petroleum hydrocarbons (TPHs), benzene, ethylbenzene and xylenes, which exceed the applicable Model Toxics Control Act (MTCA) Method A Unrestricted Land Use Cleanup Levels for soil



RESTRICTIVE COVENANT

The Bank of the Pacific 58 Main Street Property, Cathlamet, Washington

Page 2

established under WAC 173-340-900. The approximate area of soil on the Property with residual concentrations of hydrocarbon constituents exceeding the Method A Unrestricted Land Use Cleanup Levels for soil is shown on Attachment A to this Restrictive Covenant, and made a part hereof by reference. Specifically, this area of residual petroleum hydrocarbon constituents in soil, depicted in Attachment A, is approximately 10 feet by 35 feet in area and is located from approximately 6 to 10 feet depth beneath the western portion of the main Property parking lot along the retaining wall that forms the western boundary of the Property. Contaminated soil in this area could not be removed without jeopardizing the structural integrity of the retaining wall and adjacent parking lot. Maximum detected residual petroleum hydrocarbon constituents exceeding the Method A Unrestricted Land Use Cleanup Levels for soil in this area were as follows:

- Benzene - 3.3 milligrams per kilogram (mg/kg),
- Ethylbenzene – 18 mg/kg,
- Xylenes – 19.2 mg/kg, and
- TPHs as gasoline – 650 mg/kg

The Owner is the fee owner of the Property located in the County of Wahkiakum, State of Washington that is subject to this Restrictive Covenant. The Property designation is the following described real estate, to wit:

Parcel No. One:

That portion of the Northeasterly 50 feet of Lot Two (2), in Block "G" TOWN OF CATHLAMET, as per plat thereof recorded in Book "A" of Plats, page 1, records of Wahkiakum



RESTRICTIVE COVENANT

The Bank of the Pacific 58 Main Street Property, Cathlamet, Washington
Page 3

County, Washington, lying Southeasterly of the Southeasterly line of that certain tract heretofore conveyed to George Witham, et. ux .., by deed recorded in Book 4 of Deeds, page 285, lying Northeasterly of that certain tract heretofore conveyed to Howard V. Carriker, et. ux .., by deed recorded in Book 22 of Deeds, page 327, lying Northwesterly of the Northwesterly line of Main Street, of said TOWN OF CATHALAMET, as the same presently exists, TOGETHERWITH that certain driveway easement executed by Irving Koths, et. ux .., recorded under Auditor's File No. 25493, in Volume 28 of Deeds & Mortgages, page 45, records of Wahkiakum County, Washington.

Parcel No. Two:

That portion of Lot Two (2), in Block "G", TOWN OF CATHLAMET, as per plat thereof recorded in Book "A" of plats, page 1, records of Wahkiakum County, Washington, EXCEPTING THEREFROM the Northeasterly 50 feet of said lot measured perpendicular to the Northeasterly line thereof; EXCEPT the Northwesterly 50 feet of said lot measured perpendicular to the Northwesterly line of said lot; and ALSO EXCEPTING THEREFROM that certain triangular tract described as follows, to-wit:

Beginning at the most Southerly corner of said lot; thence Northeasterly along the Southeasterly line thereof, 28 feet, more or less, to the intersection of Main Street with the Southwesterly line of said lot extended Southeasterly; thence Northwesterly along said line extended 62.5 feet, more or less, to a point on Alley Street; thence Southeasterly, along the Southwesterly line of said lot, 75 feet, more or less, to the point of beginning.

All situate in the County of Wahkiakum, State of Wasington.



RESTRICTIVE COVENANT

The Bank of the Pacific 58 Main Street Property, Cathlamet, Washington
Page 4

The Owner 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.

Section 1. The Owner shall not alter, modify, or remove the parking lot or retaining wall in the area of residual petroleum hydrocarbon constituents shown in Attachment A in any manner that may result in the release or exposure to the environment of contaminated soil or create a new exposure pathway without prior written approval from Ecology. Additionally, any other activity on the Property that may result in the release or exposure to the environment of the contaminated soil beneath the area of the parking lot shown on Attachment A, or create a new exposure pathway, is prohibited without prior written approval from Ecology. Some examples of activities that are prohibited without prior written approval from Ecology include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork.

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. 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



RESTRICTIVE COVENANT

The Bank of the Pacific 58 Main Street Property, Cathlamet, Washington
Page 5

Remedial Action.

Section 4. 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.

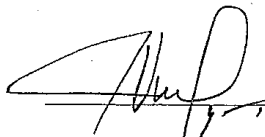
Section 5. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 6. 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, and to inspect records that are 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.

Attachment A – Approximate Extent of Residual Contaminated Soil on Property

Attachment B – Plat Map of 56 Main Street, Town of Cathlamet


PRESIDENT
The Bank of the Pacific



RESTRICTIVE COVENANT

The Bank of the Pacific 58 Main Street Property, Cathlamet, Washington
Page 6

11-28-05

[DATE SIGNED]

[NOTE: The Property Owner must have this Restrictive Covenant notarized.]

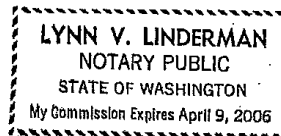
STATE OF WASHINGTON
COUNTY OF GRAYS HARBOR

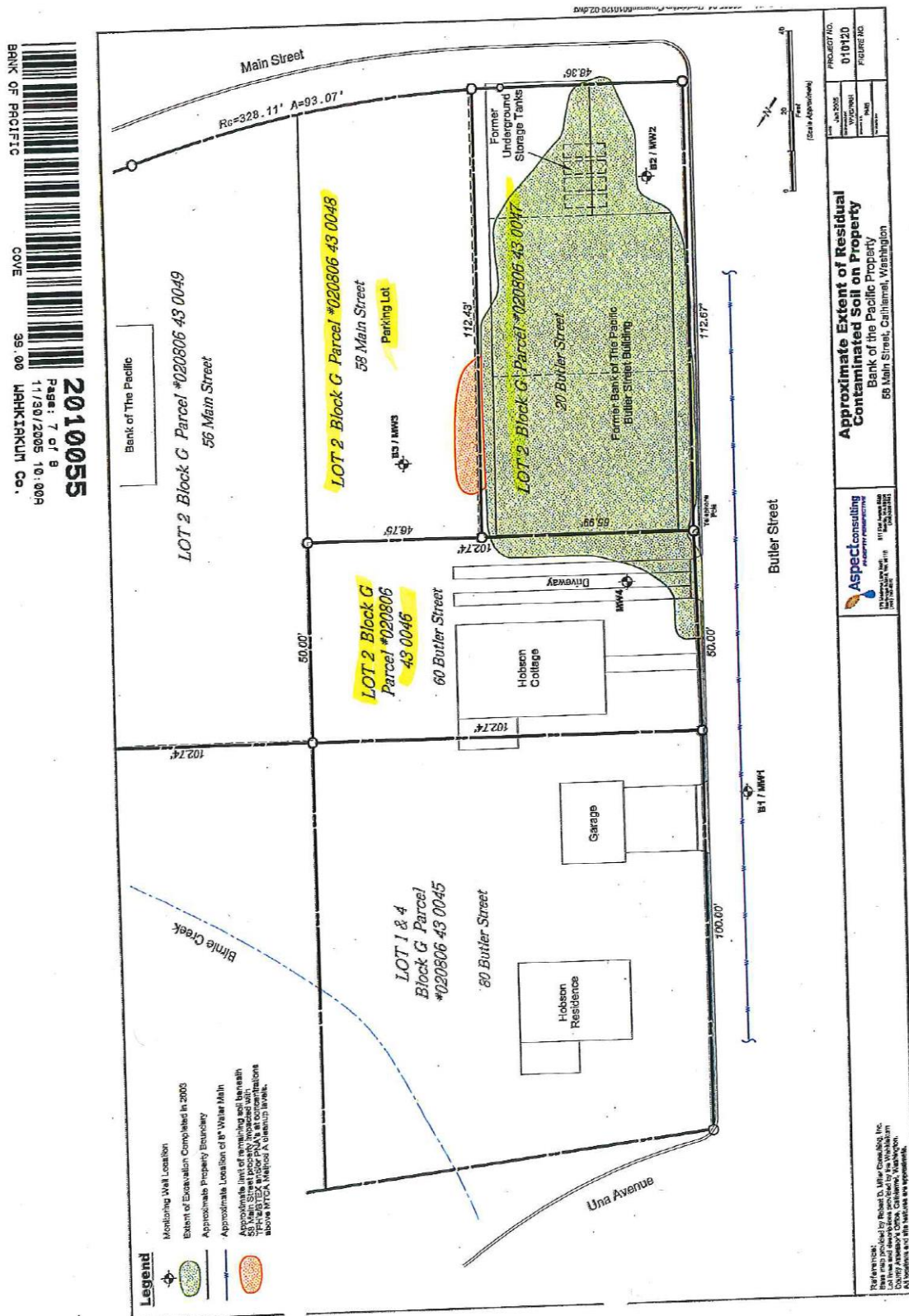
On this 28 day of November, 2005 personally came before me, a notary public in Grays Harbor County, Washington, who being by me duly sworn, personally appeared John VanDijk, known to me to be the President of the Bank of the Pacific, known to me to be the individual described in and who executed the within instrument and acknowledged that he signed and sealed the same as his free and voluntary act and deed, for the uses and purposes herein mentioned.

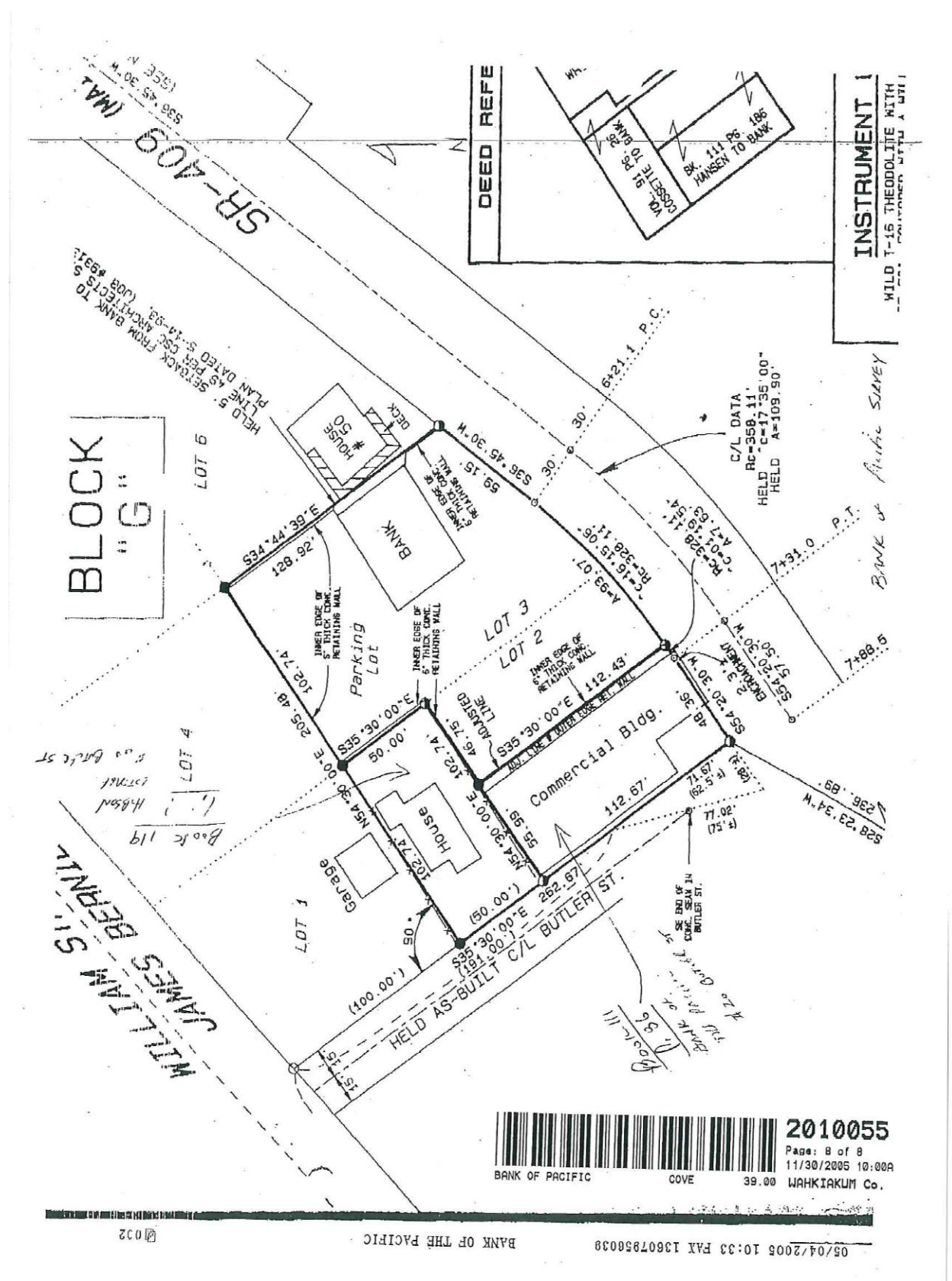
Lynn V. Linderman
Notary Public

Printed Name Lynn Linderman

My appointment expires: 4-9-06







6.10 Photo Log

Photo 1: Bank of Pacific Property Site (20 Butler Street Property-Vacant Lot) and Retaining Wall/Fence (Northwest of the Site)—From the Southeast



Photo 2: Bank of Pacific Property Site (20 Butler Street Property-Vacant Lot) and Area of Contaminated Soil Left In-Place Next to the Retaining Wall Between Two Poles; Bank's Parking Lot to the East (58 Main Street Property)—From the South



**Photo 3: Bank of Pacific Property Site (20 Butler Street Property-Vacant Lot)
Groundwater Monitoring Well MW-2, Hobson Cottage to the North and Butler
Street to the West—From the Southwest**



**Photo 4: Bank of Pacific Property Site (20 Butler Street Property-Vacant Lot), Retaining
Wall and Hobson Cottage to the North—From the Southwest**



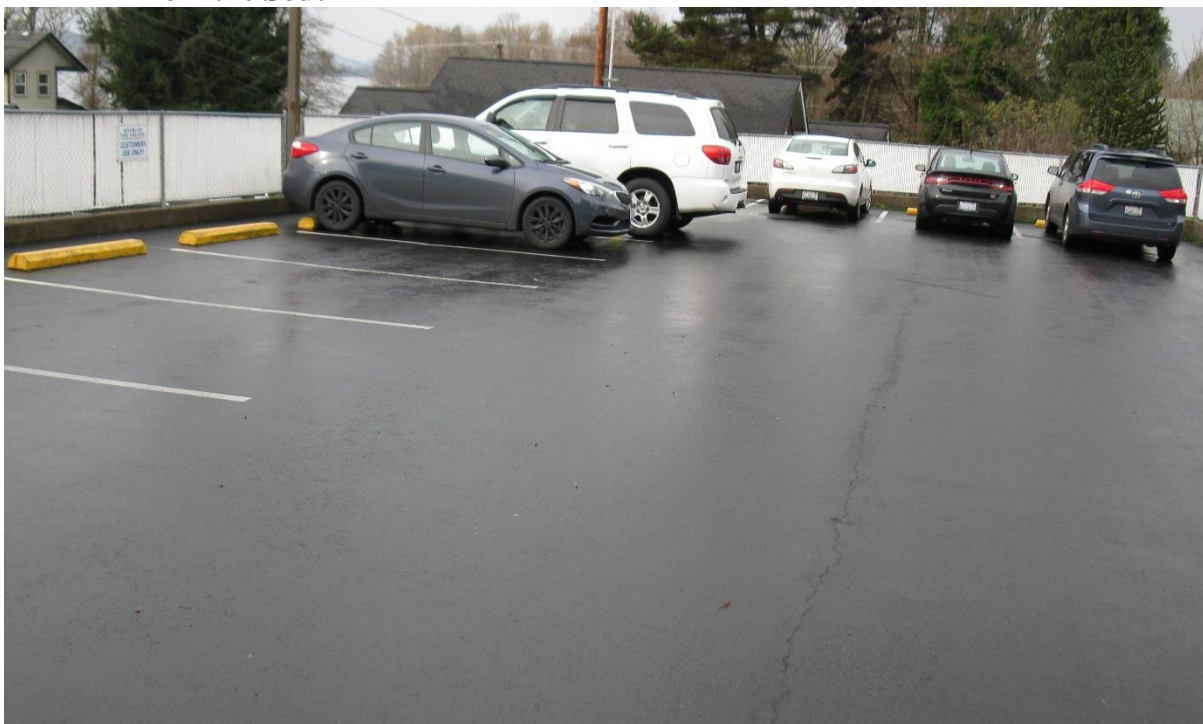
Photo 5: Bank of Pacific Property Site (20 Butler Street Property-Vacant Lot) and the Retaining Wall—From the Northeast



Photo 6: Bank of Pacific Property Site (20 Butler Street Property-Vacant Lot) and the Adjacent Hobson Cottage (North)—From the Northwest



**Photo 7: Bank of Pacific Property Site (58 Main Street Property-Bank's Parking Lot)—
From the South**



**Photo 8: Bank of Pacific Property Site (58 Main Street Property-Bank's Parking Lot),
Approximate Area of Soil Contamination Left In-Place Next to the Retaining
Wall/Fence and Asphalt Cap—From the East**

