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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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April 30, 2019

Dave McEntee  
Simpson Timber Company  
1301 5<sup>th</sup> Avenue  
Suite 2700  
Seattle, Washington 98101

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

- **Site Name:** Simpson Timber Bunker C
- **Site Address:** 700 South 1<sup>st</sup> Street, Shelton, Washington 98584
- **Cleanup Site ID:** 2690
- **Facility/Site ID:** 1188

Dear Dave McEntee,

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 periodic review was conducted at the Simpson Timber Bunker C 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.

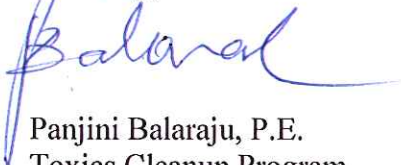
Based on the information collected during this periodic review, the Simpson Timber Bunker C Site appears to meet the requirements of chapter 173-340 Washington Administration Code (WAC), and the selected remedy continues to be protective of human health and the environment. The 30-day public comment period on the draft periodic review report was ended on April 28, 2019. We received no public comments on the draft periodic review report. Enclosed is a copy of the final periodic review report for your information.

As we discussed, please conduct annual Site inspection for the general condition of the Site and Goldsborough Creek for any oily sheen adjacent to the Site. Send me an annual inspection letter for our files.

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 April 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,

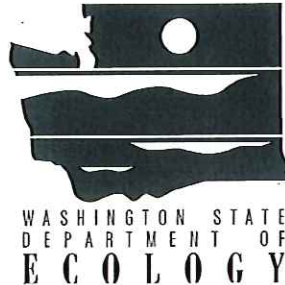
A handwritten signature in blue ink, appearing to read "Balaraju", with a stylized flourish extending from the end.

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

Enclosure: Final Periodic Review

By certified mail: 9489 0090 0027 6066 6734 68

cc: Collin Emmerson, Sierra Pacific Industries  
Ecology Site File



## **PERIODIC REVIEW REPORT FINAL**

**Simpson Timber Bunker C  
Facility Site ID#: 1188  
Cleanup Site ID#: 2690**

**700 South 1<sup>st</sup> Street  
Shelton, Washington 98584**

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**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 conditions and monitoring data to ensure that human health and the environment are being protected at the Simpson Timber Bunker C 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 that exceeds MTCA Method C cleanup levels. The MTCA Method C cleanup levels for soil are established under WAC 173-340-745(5)(c). 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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## **2.0 SUMMARY OF CONDITIONS**

### **2.1 Site History**

The Simpson Timber Bunker C Site is located at 700 South 1<sup>st</sup> Street in Shelton, Mason County, Washington. In 1991, during a trench digging at the Shelton mill operations oil was discovered near the former location of two 13,000 gallons above ground storage tanks. The tank site is located between the mill building and Goldsborough Creek. Two 13,000 gallon tanks originally occupied the Site and were originally installed around 1920 and abandoned around 1945. The tanks were thought to contain bunker C oil but there is no documentation of the actual contents and no known releases have occurred. A sheet pile bulkhead is present between the Site and Goldsborough Creek. Operating railroad tracks were also present in the vicinity of the Site. The Site of the tank removal excavation was located between the mill building and Goldsborough Creek. Pilings upon which the tanks were thought to have rested were visible in the excavation. A Vicinity Map and a Site Plan are available as Appendix 6.1 and Appendix 6.2, respectively. Following remedial activities, a Restrictive Covenant was recorded for the property. The Site received a NFA determination on December 13, 2013.

### **2.2 Site Geology and Hydrogeology**

The five soil borings drilled in 1991 by Parametrix encountered soils ranging from sand to gravel with minor amounts of silt and sand. Some wood debris were noted between ground surface and 18.5 feet to 20 feet below grade suggesting the material is likely fill. Native material was encountered below the fill.

Depth to groundwater was approximately 10 feet below ground surface (bgs) and are likely tidally influenced. Groundwater elevations were recorded over time to evaluate tidal influence on groundwater. Groundwater elevations were monitored continuously for two weeks from April 16, 2009 through May 5, 2009 by installing four pressure transducers and data loggers in three monitoring wells (B-1, B-3, and B-5) and Goldsborough Creek. The median flow direction was calculated to be 14 degrees east of north. Although the dominant flow direction is at 14 degrees, there were two other major flow directions to the east and west. The multiple groundwater flow directions indicates the influence of tidal impacts on the groundwater flow direction. The calculated groundwater flow direction is shown on Figure 2 in Appendix 6.4.

### **2.3 Cleanup Levels**

The Site is located within the industrial zoned area. Three soil samples were collected and were tested for volatile and extractable petroleum hydrocarbons (VPH/EPH) for calculating the Site-specific MTCA Method C risk-based soil cleanup levels using the MTCA TPH worksheets. The Site-specific MTCA Method C cleanup levels were calculated at 37,900 mg/kg, 46,933 mg/kg, and 36,646 mg/kg. The lowest of the three values (36,646 mg/kg) was used as the Site-specific soil cleanup level at the Site. MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for groundwater.



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## 2.4 Site Investigations

### 2.4.1 Preliminary Site Assessment

In September 1991, a preliminary Site assessment was conducted by Parametrix, Inc. To investigate the soil and groundwater conditions in the vicinity of former ASTs, five soil borings (B-1 through B-5) were drilled at depths ranging from 11.5 feet to 20.5 feet bgs. Three of the borings (B1, B-3, and B-5) were converted into groundwater monitoring wells. Field observations of seeping product and hydrocarbon odor indicated the presence of contamination in all five borings. Both soil and groundwater samples were collected for the laboratory analysis. When possible, soil samples were also field screened for volatile organic compounds (VOCs) using headspace analysis with a photoionization detector (PID).

A total of 14 soil samples were collected and analyzed for total petroleum hydrocarbons (TPH, EPA Method 418.1), diesel-range total petroleum hydrocarbons (TPH-Dx), toxicity characteristic leaching procedure (TCLP) for metals, VOCs and polychlorinated biphenyls (PCBs). Results of the soil samples indicated that TPH-D [2,200 milligrams per kilogram (mg/kg)] was detected above the MTCA Method A cleanup level of 2,000 milligrams per liter (mg/kg), 1,1,1-trichloroethane, toluene, and xylenes were detected in one soil sample above reporting limits, but below their respective MTCA Method A cleanup levels. TPH (was detected with values ranging from 63 mg/kg to 8,700 mg/kg. PCBs were not detected in soil samples. Groundwater samples were analyzed for TPH-Dx and none were detected. A free-product sheen of non-measurable thickness was observed on well development and purge water. Soil boring locations and soil and groundwater sample results are presented as Appendix 6.3.

### 2.4.2 Remedial Actions

Following the discovery of contamination during trenching of the area, Parametrix excavated and removed much of contaminated soil. The area around the Bunker C tank excavation was surrounded by a sheet pile wall, operating railroad tracks, and the mill building. Parametrix concluded that it was not feasible nor practical to remove all the hydrocarbon-contaminated soils in this specific area because of proximity to the sheet pile wall, operating railroad tracks and the mill building. Determining the full areal extent of the hydrocarbon in the soil and the floating plume product in the groundwater in this specific area also was not feasible because of obstructions on all sides of the Site. The approximate extent of petroleum contaminated soil excavation is shown on Figure 2 in Appendix 6.3.

### 2.4.3 Quarterly Groundwater Monitoring

The Pacific Groundwater Group (PGG) conducted four rounds of quarterly groundwater monitoring from May 2007 through March 2008. Groundwater samples were collected from three monitoring wells (B-1, B-3 and B-5) and samples were analyzed for TPH (HCID), gasoline, diesel, and oil-range total petroleum hydrocarbons (TPH-G, TPH-D and TPH-O), VOCs, and polycyclic aromatic hydrocarbons (PAHs). There were no detections of any analyzed constituents in the samples collected. Groundwater monitoring well locations are shown Figure 2 in Appendix 6.3.



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#### 2.4.4 Phase 2 Site Investigation

In August 2008, the PGG submitted a work plan proposing to collect and analyze soil samples to determine the source TPH concentrations in soils and also to allow for the calculation of Site-Specific MTCA Method B and Method C Cleanup Levels. In addition, a stilling well in the Goldsborough Creek and three transducers in the existing monitoring wells were proposed for the measurement of continuous water level elevations for a two week period to properly assess tidal influences on the direction of groundwater flow on the Site. Ecology reviewed the work plan and provided an opinion letter in November 2008. The opinion letter outlined the need for additional soil borings to further define the extent of soil contamination.

In May 2009, PGG conducted an additional subsurface investigation outlined in their work plan by advancing three soil borings (B-6, B-7 and B-8) surrounding the former excavated area (borings B-6, B-7 and B-8). A total of six soil samples were collected and submitted for analysis of TPH-Dx, carcinogenic PAHs, VOCs, and volatile and extractable petroleum hydrocarbons (VPH/EPH). Results of one of the soil sample collected at boring B-7 indicated a TPH-O concentration of 21,000 mg/kg. The samples tested for VPH/EPH were used calculate Site-specific risk-based Cleanup Levels using the MTCA TPH workbook. The Method C TPH Cleanup Levels were calculated at 37,900 mg/kg, 46,933 mg/kg, and 36,646 mg/kg. All concentrations detected in the samples collected on the Site were below the lowest calculated MTCA Method C Cleanup Level of 36,646 mg/kg. Pressure transducers were used in on-Site monitoring wells to record water level elevations in five-minute intervals. These data were used to determine the median groundwater flow direction at the Site. Soil boring locations and median groundwater flow direction is included on Figure 2 in Appendix 6.4.

#### 2.4.5 Long-Term Groundwater Monitoring

Although some soil contamination was left on the Site, Ecology has determined that long-term groundwater monitoring is not required at the Site based on the following reasons:

- A majority of the petroleum contaminated soil was excavated from the Site. Only a small quantity of contaminated soil remains on the Site near the railroad tracks and near the foundation supporting the above ground pipeline.
- The highest concentration of Bunker C left in soil at the Site (21,000 mg/kg in soil boring B-7), is less than the Site-specific MTCA Method C cleanup level (36,646 mg/kg) calculated for the Site.
- Due to the high viscosity of Bunker C, its mobility is very low. In addition, it has a relatively low solubility in water and is therefore less likely to impact groundwater.
- Groundwater beneath the Site has never been impacted above MTCA Cleanup Levels. Results of a total of six rounds of groundwater monitoring (included four rounds of quarterly monitoring) indicate that none of the petroleum constituents were detected above the laboratory method detection limits, even in areas where impacted soils remain in place.



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- There is an existing sheet pile wall between the residual contamination on the Site and Goldsborough Creek which reduces the potential migration of contamination into the Creek.
  - Site conditions have not changed since the cleanup was conducted in 1991 and it is unlikely they are going to change in the future. Although soil contamination has been present at the Site for an extended period of time, the results of groundwater monitoring continue to indicate no impacts. As long as Site conditions remain unchanged, Ecology believes that it is highly unlikely that the soil contamination left in place in the subsurface will have any adverse impact on the groundwater or Goldsborough Creek.

Please note that Ecology will require visual inspection of Goldsborough Creek, immediately adjacent to the Site, on a six month schedule (coinciding with heavy rainfall events) to check for any sheen emanating from the Site into the Creek.

## **2.5 Restrictive Covenant**

Following remediation activities, it was determined that institutional controls were necessary for the Site to receive a no further action (NFA) determination due to residual petroleum soil contamination at the Site. A Restrictive Covenant was recorded for the Site in Mason County and a NFA letter was issued on November 13, 2013. The Restrictive Covenant imposes the following limitations:

**Section 1:** The Property shall be used only for traditional industrial uses, as described in RCW 70.105D.020(14) and defined in and allowed under the County of Mason's zoning regulations codified in Mason County Code, Title 17 (Zoning) as of the date of this Restrictive Covenant.

Any activity on the Property that any result in the release or exposure to the environment of the contaminated soil or create a new exposure pathway, is prohibited without prior written approval from Ecology. Any such approval would be predicted on the Owner submitting and Ecology approving a plan to mitigate:

- A new exposure pathway
- The release or exposure to the environment of the contaminated soil, and or
- The release or exposure to the environment of a hazardous substance that remain on the Property as part of the Remedial Action.

Some examples of activities that are prohibited without prior written approval from Ecology in the areas adjacent to boring B7 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.

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**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 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 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; and to inspect records that 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 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 6.5.



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## **3.0 PERIODIC REVIEW**

### **3.1 Effectiveness of Completed Cleanup Actions**

Based upon the Site visit conducted on January 23, 2019, the clean soil cover continues to eliminate exposure pathways (ingestion, direct contact) to the contaminated soils. The clean soil cover and the sheet pile wall (between the Site and Goldsborough Creek) are in satisfactory condition and no repair, maintenance, or contingency actions are required. A photo log is available as Appendix 6.6.

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**

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

### **3.4 Current and Projected Site Use**

The Site is currently used for commercial purposes. This use is not likely to have a 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.

## 4.0 CONCLUSIONS

- The cleanup actions completed at the Site continues 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 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.



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## 5.0 REFERENCES

Department of Ecology. November 13, 2013. No Further Action Letter, Simpson Timber Bunker C Site, 700S 1<sup>st</sup> Street, Shelton, Washington. November 13, 2013.

Department of Ecology. April 4, 2013. Model Restrictive (Environmental) Covenant, Simpson Mill Bunker C Site, 700 1<sup>st</sup> Avenue, Shelton, Washington.

Pacific Groundwater Group. September 2009. Phase 2 Site Investigation, Simpson Mill Bunker C Site, Shelton, Washington.

Pacific Groundwater Group. August 11, 2008. Nature and Extent of Contamination Work Plan, Simpson Timber Mill Bunker C Site, Shelton, Washington.

Pacific Groundwater Group. May 1, 2008. Bunker C Tank Groundwater Monitoring Results 2008 Q1 Project Completion Report.

Parametrix, Inc. December 1991. Preliminary Site Assessment, Simpson Timber, Shelton, Washington.

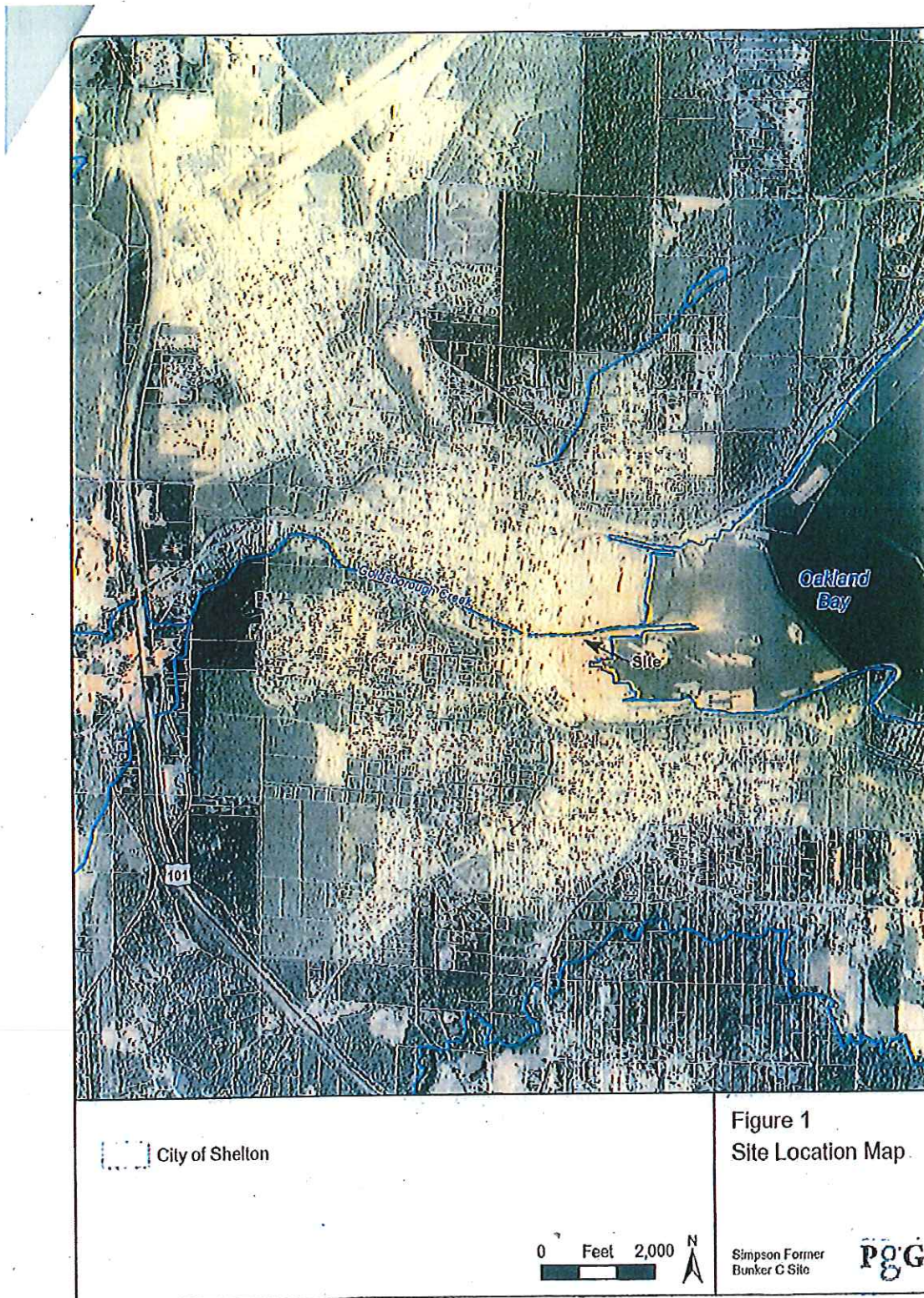
Department of Ecology. Site Visit. January 23, 2019.

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**6.0 APPENDICES**

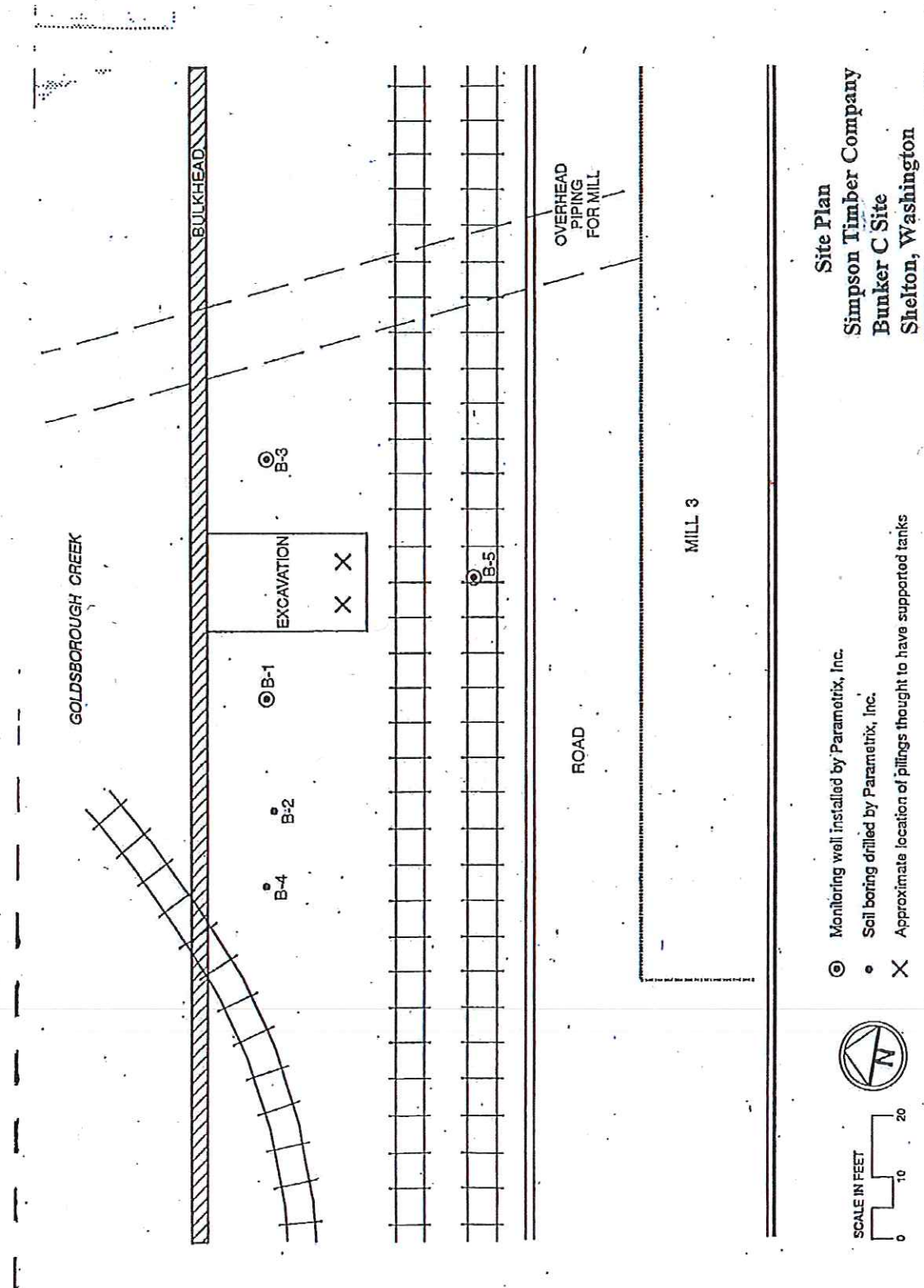


## 6.1 Vicinity Map





## 6.2 Site Plan





### 6.3 Preliminary Site Assessment: Locations of Soil Borings and Soil Sample Results

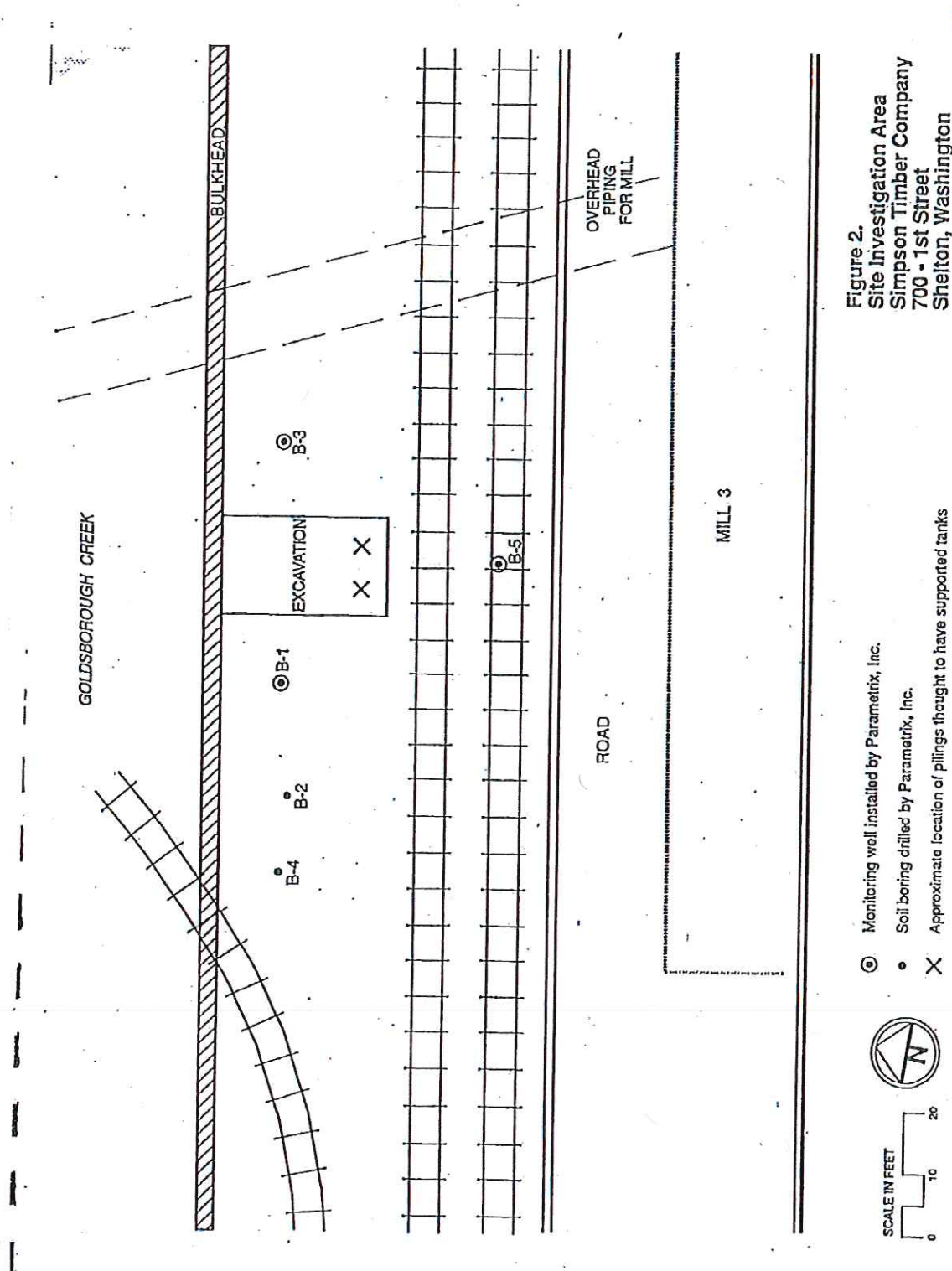


Table 2: Analytical results of petroleum hydrocarbons in groundwater samples.

Sample	Diesel Range Hydrocarbons <sup>1,2</sup> (ppm)	TPH <sup>3,4</sup> (ppm)	Level A MTCA Cleanup Level (ppb) <sup>5</sup>
B-1	1.0 <sup>U</sup>	1 <sup>U</sup>	1000
B-2 <sup>6</sup>	1.0 <sup>U,E</sup>	NA	1000
B-3	1.0 <sup>U</sup>	1 <sup>U</sup>	1000
B-4 <sup>7</sup>	NA	1.0 <sup>U</sup>	1000
B-5	1.0 <sup>U</sup>	1 <sup>U</sup>	1000

U - Indicates compound was analyzed for but not detected at the given detection limit.

E - Estimated quantity, QA criteria not met.

NA - Not applicable.

1 - GC/MS, EPA modified 8015, Value based on total peaks in C12-C24 range.

2 - Samples collected on September 11, 1991. Samples analyzed on September 25, 1991.

3 - Total Petroleum Hydrocarbons, EPA method 418.1.

4 - Samples collected on October 23, 1991. Samples analyzed on October 29, 1991.

5 - Model Toxics Control Act Cleanup Regulation (173-340 WAC), February 11, 1991.

6 - Duplicate of B-1 taken during September 11, 1991 sampling event.

7 - Duplicate of B-1 taken during October 23, 1991 sampling event.

Table 3. Analytical results<sup>1</sup> (ppm) summary of soil volatile organic analysis.

Contaminant	B-1-7.5 <sup>2</sup>	B-3-9.0 <sup>3</sup>	Method Blank	Trip Blank	MTCA Cleanup levels <sup>4</sup>
Methylene Chloride	2.8 <sup>B</sup>	3.4 <sup>B</sup>	1.1 <sup>J</sup>	1 <sup>B</sup>	0.5 <sup>5</sup>
Acetone	95 <sup>B</sup>	20 <sup>B</sup>	2.1 <sup>M</sup>	1.7 <sup>MB</sup>	8000 <sup>6</sup>
Carbon Disulfide	14	8.7 <sup>U</sup>	2.0 <sup>U</sup>	2.0 <sup>U</sup>	8000 <sup>6</sup>
2-Butanone	23	32 <sup>U</sup>	7.5 <sup>U</sup>	7.5 <sup>U</sup>	4000 <sup>6</sup>
1,1,1-Trichloroethane	5.0	4.3 <sup>U</sup>	1.0 <sup>U</sup>	1.0 <sup>U</sup>	20 <sup>5</sup>
Toluene	2.0	4.3 <sup>U</sup>	1.0 <sup>U</sup>	1.0 <sup>U</sup>	40 <sup>5</sup>
Total Xylenes	1.0 <sup>M</sup>	8.6 <sup>U</sup>	2.0 <sup>U</sup>	2.0 <sup>U</sup>	20 <sup>5</sup>

1 - Only those compounds detected at concentrations above detection limits are listed.

2 - Sample collected on September 3, 1991. Sample analyzed on September 11, 1991.

3 - Sample collected on September 4, 1991. Sample analyzed on September 11, 1991.

4 - Model Toxics Control Act Cleanup Regulation (173-340 WAC), February 11, 1991.

5 - Level A Cleanup Level.

6 - Level B Cleanup Level.

J - Indicates an estimated value when result is less than specified detection limit.

B - Analyte is found in the blank as well as sample. Indicates possible/probable blank contamination.

U - Indicates compound was analyzed for but not detected at the given detection limit.

M - Indicates an estimated value of analyte found and confirmed by analyst but with low spectral match parameters.

Bold - Above MTCA Level A Cleanup Levels.

Table 4. Analytical results (ppm) of petroleum hydrocarbons in soil samples.

Sample	Diesel Range Hydrocarbons <sup>1,2</sup>	Total Petroleum Hydrocarbons <sup>3,4</sup>	Level A MTCA Cleanup Levels <sup>5</sup>
B-1-5.0'	160	---	200
B-1-7.5'	10 <sup>U</sup>	790 <sup>E</sup>	200
B-1-11.5'	10 <sup>U</sup>	110 <sup>E</sup>	200
B-2-8.0'	52	4400 <sup>E</sup>	200
B-2-9.5'	2200	4200 <sup>E</sup>	200
B-2-11.5'	1000	5600 <sup>E</sup>	200
B-3-6.5'	170	5400 <sup>E</sup>	200
B-3-9.0'	270	8000 <sup>E</sup>	200
B-4-6.5'	40	350 <sup>E</sup>	200
B-4-9.0'	88	390 <sup>E</sup>	200
B-5-8.0'	730	8700 <sup>E</sup>	200
B-5-10.5'	87	63 <sup>E</sup>	200
B-5-12.5'	350	1000 <sup>E</sup>	200
B-7-6.5' <sup>6</sup>	120	79 <sup>E</sup>	200

E - Estimated quantity, QA criteria not met.

U - Indicates a compound was analyzed for but not detected at the given detection limit.

1 - GC/FID, EPA modified 8015, Value based on total peaks in C12-C24 range.

2 - Samples collected on September 3-5, 1991. Samples analyzed on September 16-19, 1991.

3 - Total Petroleum Hydrocarbons, EPA method 418.1.

4 - Samples collected on September 3-5, 1991. Samples analyzed on October 10 and 29, 1991.

5 - Model Toxics Control Act Cleanup Regulation (173-340 WAC), February 11, 1991.

6 - Duplicate of B-4-6.5'

Bold - Above Level A MTCA Cleanup Standards.



Table 5. Analytical results (ppb) of PCBs in soil samples.

Aroclor	B-1-7.5 <sup>2</sup>	B-3-9.0 <sup>3</sup>	MTCA Level A Cleanup Level <sup>1</sup>
1016/1242	80 <sup>U</sup>	80 <sup>U</sup>	1000
1248	80 <sup>U</sup>	80 <sup>U</sup>	1000
1254	80 <sup>U</sup>	80 <sup>U</sup>	1000
1260	80 <sup>U</sup>	80 <sup>U</sup>	1000

1 - Model Toxics Control Act Cleanup Regulation (173-340 WAC), February 11, 1991.

U - Indicates a compound was analyzed for but not detected above the given detection limit

3 - Sample collected on September 3, 1991. Sample analyzed on October 3, 1991.

4 - Sample collected on September 4, 1991. Sample analyzed on October 3, 1991.

Table 6. Analytical (mg/L) results of TCLP metals in soil samples.

Analyte	B-1-7.5 <sup>2</sup>	B-3-9.0	Dangerous Waste Criteria <sup>1</sup>
Arsenic	.05 <sup>U</sup>	.05 <sup>U</sup>	5
Barium	.849 <sup>B</sup>	.783 <sup>B</sup>	100
Cadmium	.002 <sup>U</sup>	.002 <sup>U</sup>	1
Chromium	.005 <sup>U</sup>	.005 <sup>U</sup>	5
Lead	.03 <sup>U</sup>	.03 <sup>U</sup>	5
Mercury	.0001 <sup>U</sup>	.0001 <sup>U</sup>	0.2
Selenium	.05 <sup>U</sup>	.05 <sup>U</sup>	1
Silver	.003 <sup>U</sup>	.003 <sup>U</sup>	5

1 - 173-303 WAC, April 1991.

B - Analyte is found in the blank as well as sample. Indicates possible/probable blank contamination.

U - Indicates compound was analyzed for but not detected at the given detection limit

## 6.4 Phase 2 Site Investigation Soil Boring Locations and Soil Sample Results

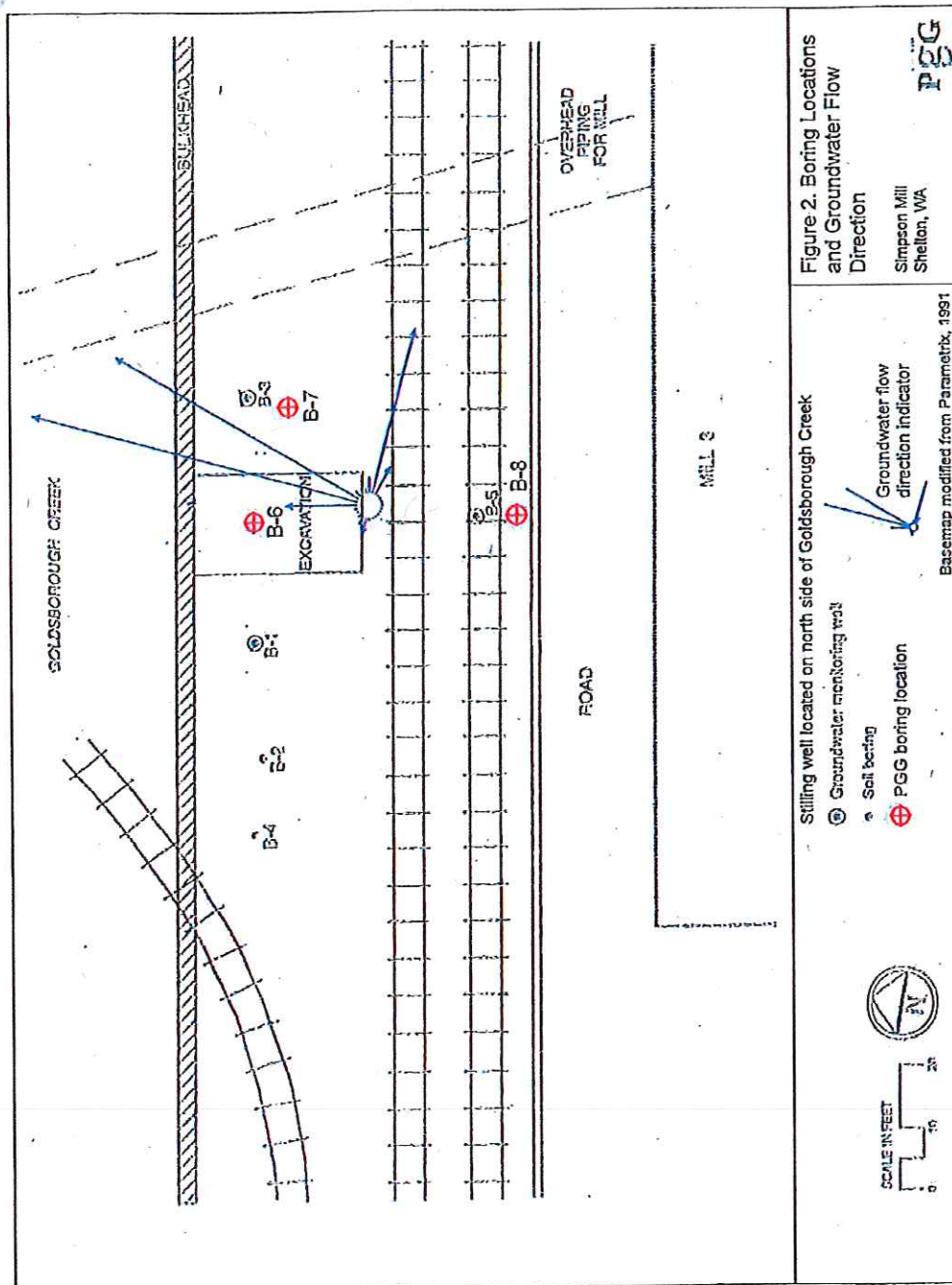


Table 1. Soil Sample Analytical Results

	Method C, Carcinogenic	Method C, Non- carcinogenic	B6-0-8	B6-12-16	B7-0-4	B7-12-16	B8-4-8	B8-12-16
<b>VOCs</b>								
acetone		350,000	0.25U	0.25U	0.31	0.34	0.25U	0.25U
tetrachloroethylene	240	35,000	0.02U	0.02	0.02	0.02U	0.02U	0.02U
toluene		280,000	0.05U	0.05U	0.16	0.05U	0.05U	0.05U
4-Methyl-2-pentanone			0.25U	0.25U	0.063	0.25U	0.25U	0.25U
Isopropyltoluene			0.05U	0.05U	0.32	0.05U	0.05U	0.05U
<b>PAHs</b>								
anthracene		1,100,000	0.02U	0.02U	0.2	0.02U	0.02U	0.02U
chrysene			0.02U	0.02U	0.11	0.18	0.02U	0.17
fluoranthene		140,000	0.02U	0.02U	0.4	0.02U	0.02U	0.02U
phenanthrene			0.02U	0.02U	0.11	0.02U	0.02U	0.02U
pyrene		110,000	0.02U	0.02U	0.28	0.02U	0.02U	0.02U
<b>VPH</b>								
Aromatic C12-C13			5.0U	5.0U	5.0U	11	5.0U	5.0U
<b>EPH</b>								
C10-C12 Aliphatics			2.1U	2.2U	22.0U	47	2.3U	2.4U
C12-C16 Aliphatics			2.1U	40	22.0U	530	2.3U	2.4U
C16-C21 Aliphatics			2.1U	52	35	560	2.3U	2.4U
C21-C34 Aliphatics			2.1U	100	180	1000	2.3U	7.1
C12-C16 Aromatics			2.1U	7.4	11.0U	72	2.3U	2.4U
C16-C21 Aromatics			2.1U	58	23	610	2.3U	2.4U
C21-C34 Aromatics			2.1U	140	210	1500	2.3U	2.7
<b>NWTPH</b>								
Oil				780	500	21000		

Cleanup levels are for Soil, Method C, Standard Formula Value, Direct Contact (ingestion only), industrial land use (mg/kg)



## 6.5 Restrictive Covenant

RECEIVED

APR 04 2013

WA State Department  
of Ecology (SWRO)

### Model Restrictive (Environmental) Covenant

RECEIVED

JUL 26 2013

WA State Department  
of Ecology (SWRO)

After Recording Return to:  
Tom Middleton  
Department of Ecology  
PO Box 47775  
Olympia, WA 98504-7775

#### Environmental Covenant

Grantor: Simpson Lumber Company, LLC  
Grantee: State of Washington, Department of Ecology  
Legal: TR S.PTNS OF: DLC #37 S 37/39: E 1/2 NE, NE SE IN SEC 19 : GOVT LOTS 2  
& 3 IN SEC 20  
Tax Parcel Nos.: ~~S309SP3ELHMP~~ 32019 41 800 700  
Cross Reference: None

Grantor, Simpson Lumber Company, 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 1<sup>st</sup> day of April, 201~~2~~<sup>3</sup> 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. 10~~4~~<sup>4</sup>, sec. 12.

This Declaration of Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by Simpson Lumber Company, 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 document[s]:

Phase 2 Site Investigation, Simpson Mill Bunker C Site, Shelton Washington. Pacific  
Groundwater Group. September 2009. Consultants Report for Simpson Timber  
Company

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 Petroleum Hydrocarbons which exceed the Model Toxics Control Act Method B Cleanup Level(s) for Soil established under WAC 173-340-740(3). No soil exceeds Method C Cleanup Level(s) for soil established under WAC 173-340-740(4).

The undersigned, Simpson Lumber Company, LLC, is the fee owner of real property (hereafter "Property") in the County of Mason, State of Washington, that is subject to this Covenant. The Property is legally described in Exhibit A of this Covenant and made a part hereof by reference.

Simpson Lumber Company, 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. The Property shall be used only for traditional industrial uses, as described in RCW 70.105D.020(14) and defined in and allowed under the County of Mason's zoning regulations codified in Mason County Code, Title 17 (Zoning) as of the date of this Restrictive Covenant.

Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil or create a new exposure pathway, is prohibited without prior written approval from Ecology. Any such approval would be predicated on the Owner submitting and Ecology approving a plan to mitigate:

- a new exposure pathway
- the release or exposure to the environment of the contaminated soil, and or

- the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action.

Some examples of activities that are prohibited without prior written approval from Ecology in the areas adjacent to boring B7 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. 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.

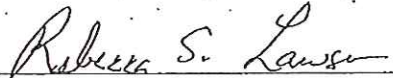


Simpson Lumber Company, LLC

  
Betsy Stauffer  
Vice President and General Counsel

Dated: 4/1/13

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

Dated: 4/29/2013

[INDIVIDUAL ACKNOWLEDGMENT]

STATE OF \_\_\_\_\_  
COUNTY OF \_\_\_\_\_

On this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I certify that \_\_\_\_\_  
personally appeared before me, and acknowledged that he/she is the individual described  
herein and who executed the within and foregoing instrument and signed the same at his/her  
free and voluntary act and deed for the uses and purposes therein mentioned.

Notary Public in and for the State of  
Washington, residing at \_\_\_\_\_  
My appointment expires \_\_\_\_\_

[CORPORATE ACKNOWLEDGMENT]

STATE OF WASHINGTON  
COUNTY OF PIERCE

On this 1<sup>st</sup> day of APRIL, 2013 I certify that Betsy G. Stauffer  
personally appeared before me, acknowledged that he/she is the VP + General Counsel of  
the corporation that executed the within and foregoing instrument, and signed said instrument  
by free and voluntary act and deed of said corporation, for the uses and purposes therein  
mentioned, and on oath stated that he/she was authorized to execute said instrument for said  
corporation.



Sharon D. Grattan  
Notary Public in and for the State of  
Washington, residing at  
616 Harbor  
My appointment  
expires 11-1-14

[REPRESENTATIVE ACKNOWLEDGEMENT]

STATE OF \_\_\_\_\_  
COUNTY OF \_\_\_\_\_

On this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I certify that \_\_\_\_\_  
\_\_\_\_\_ 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



\_\_\_\_\_ [type of authority] of \_\_\_\_\_ [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.

\_\_\_\_\_  
Notary Public in and for the State of  
Washington, residing at \_\_\_\_\_  
My appointment expires \_\_\_\_\_

---

Exhibit A  
Legal Description

Legal: TR S.PTNS OF: DLC #37 S 37/39: E 1/2 NE,NE SE IN SEC 19 : GOVT LOTS 2 & 3  
IN SEC 20

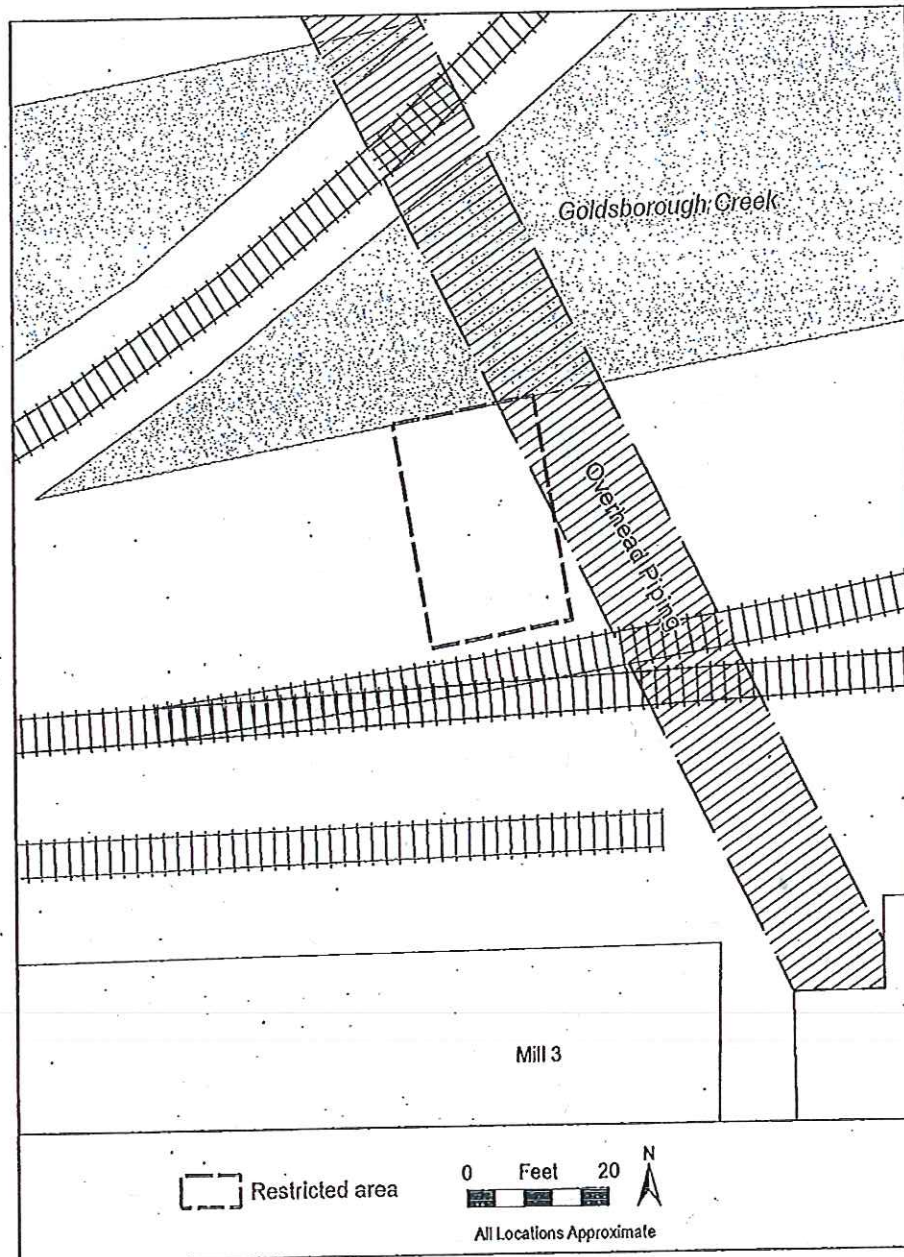
Tax Code Description: ~~S-309-S-P-B-L-H-M-P~~ 32019 41 06700

Exhibit A (Continued)  
Restricted Area Legal Description  
For a covenant restricting digging over  
A Point containing ground containing residual oil

A boring site located in the southwest one corner of the northwest one quarter of Section 20<sup>19</sup>; Township 20 North, Range 3 West, W.M. Particularly described as follows:

Beginning at the northwest corner of said Section 20; thence S 01°22'59" E, along the west line of said section, 2634.08 feet to the west one quarter corner of said section 20; thence N 46°12'43" E, 718.70 feet to a stake marking boring site No. B7, also known as B-7-12-16.







## 6.12 Photo Log

**Photo 1: Simpson Timber Bunker C Site, Groundwater Monitoring Wells B-1 and B-3 and Currently Inactive Railroad Tracks – from the West**



**Photo 2: Simpson Timber Bunker C Site/Former 13,000 Gallon Above Ground Storage Tank Location/Contaminated Soil Excavation Area – from the South**





**Photo 3: Previous Excavation Area/Residual Petroleum Soil Contamination Left-in-Place (next to the above ground pipeline foundation) – from the Southwest**



**Photo 4: Simpson Timber Bunker C Site and the Inactive Railroad Tracks – from the East**





**Photo 5: Simpson Timber Bunker C Site, Groundwater Monitoring Wells B-1 and B-3 and Currently Inactive Railroad Tracks – from the West**



**Photo 6: Goldsborough Creek and Sheet Pile Wall between the Site and the Creek– from the Northwest**





**Photo 7: Simpson Timber Bunker C Site and Sheet Pile Wall – from the Northwest**



**Photo 8: Groundwater Monitoring Well B-5.**





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 6734 75.**

#### Item Details

<b>Status:</b>	Delivered, Front Desk/Reception/Mail Room
<b>Status Date / Time:</b>	May 1, 2019, 1:33 pm
<b>Location:</b>	TACOMA, WA 98421
<b>Postal Product:</b>	First-Class Mail®
<b>Extra Services:</b>	Certified Mail™ Return Receipt Electronic

#### Shipment Details

<b>Weight:</b>	3.1oz
----------------	-------

#### Recipient Signature

Signature of Recipient:

Address of Recipient:

1940 0<sup>st</sup> St 100

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

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Washington, D.C. 20260-0004