Electronic Copy

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
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February 5, 2013

Mr. Jeff Ahner
4809 NW Fruit Valley Rd
Vancouver WA 98660-1243

SUBJECT: Frito Lay Vancouver Voluntary Cleanup No.: SW1024
Environmental Covenant

Dear Mr. Ahner:

We received the Environmental Covenant from your Legal Director requesting Rebecca Lawson's signature prior to Pepsico filing the document with Clark County. Normally, Rebecca signs the document after it is filed with the County; however, she will sign and return Environmental Covenant to you for filing with the County.

Once the Environmental Covenant is properly executed, please return a copy of the document to me for our site files. Once we have a copy of the filed document, Ecology will prepare and provide a No Further Action Opinion Letter for your facility.

Sincerely,

Eugene Radcliff
Site Manager

PEPSICO




JOHN A. POAKEART

Legal Director
PepsiCo, Inc.
7701 Legacy Drive
Plano, TX 75024
Direct (972) 334-3995
john.poakeart@pepsico.com

January 30, 2013

VIA UPS

Eugene Radcliff
Department of Ecology
SWRO Toxics Cleanup Program
300 Desmond Dr.
Lacey, WA 98503

Re: Frito-Lay, Inc. Environmental Covenant

Dear Mr. Radcliff:

Enclosed please find an original copy of the executed Environmental Covenant on behalf of Frito-Lay, Inc. in connection with the Company's Voluntary Cleanup Program Project # SW1024 at its facility in Vancouver, WA.

The Environmental Covenant is now ready for execution by the Department of Ecology. After Ecology signs the covenant, please send the original back to me at the address listed above so we may record it on the land records.

Thank you and please feel free to contact me with any questions.

Very truly yours,

John A. Poakeart

Restrictive (Environmental) Covenant

After Recording Return to:
Eugene Radcliff
Department of Ecology
SWRO Toxics Cleanup Program
PO Box 47775
Olympia, Washington 98504-7775

Environmental Covenant

Grantor: Frito-Lay, Inc.
Grantee: State of Washington, Department of Ecology
Legal: #33 J. Petrain DLC + platted S16-T2N-R1E WM, #1 blk 27, 17.06 Acres, Clark County. WA.
Tax Parcel Nos.: 006727-033
Cross Reference: None

Grantor, **Frito-Lay, Inc.** (hereafter "Frito Lay"), 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 10th day of January, 2013 in favor of the State of Washington Department of Ecology (Ecology). Ecology shall have full right of enforcement of the rights conveyed under this Covenant pursuant to the Model Toxics Control Act, RCW 70.105D.030(1)(g), and the Uniform Environmental Covenants Act, 2007 Wash. Laws ch. 104, sec. 12.

This Declaration of Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by Frito-Lay, 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]:

Frito-Lay Vancouver, Washington Hydraulic Lift Area Petroleum Release Remedial Investigation Report.

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

This Covenant is required because the Remedial Action resulted in residual concentrations of Diesel-range and Oil-range Petroleum Hydrocarbons which exceed the Model Toxics Control Act Method Method B Cleanup Level(s) for SOIL established under WAC 173-340-740.

The undersigned, Frito-Lay, Inc., is the fee owner of real property (hereafter "Property") in the County of Clark, State of Washington, that is subject to this Covenant. The Property is legally described in EXHIBIT A of this covenant and made a part hereof by reference.

Frito-Lay 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.

1. The Property shall be used only for traditional industrial uses, as described in RCW 70.105D.020(23) and defined in and allowed under the Clark County zoning regulations codified in Title 40 - Clark County, Washington Unified Development Code as of the date of this Restrictive Covenant.

2. Long-term groundwater monitoring is required to verify the residual soil contamination does not adversely impact the Property groundwater. Groundwater performance monitoring shall be conducted on an 18-month interval to account for seasonal variations in the Property groundwater.

a. Groundwater monitoring shall occur at three monitoring wells (wells) located down gradient (west) of the hydraulic lift location. Groundwater performance monitoring shall continue for as long as the contaminated soil remains on the Site or until Ecology

deems the monitoring is no longer necessary. A copy of the groundwater monitoring plan is included as Exhibit B.

b. Appropriate restrictions to the use of the Site groundwater shall be put in place as indicated by the laboratory analytical results and in consultation and concurrence with Ecology. No groundwater may be taken for ANY USE from the Property.

3. Maintenance is required to prevent soil disturbance.

a. A portion of the Property contains Diesel-range and Oil-range total petroleum hydrocarbon contaminated soil located beneath the southernmost 25 feet of the potato unloading area hydraulic lift. The lift is adjacent to the west central part of the processing building. The Owner shall not alter, modify, or remove the existing structure[s] in any manner that may result in the release or exposure to the environment of that contaminated soil or create a new exposure pathway without prior written approval from Ecology.

b. Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited. Some examples of prohibited activities in the capped areas 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. The following conditions are necessary to assure the effectiveness of this covenant:

i. Maintenance of an existing paved cap above petroleum contaminated soil located around and beneath the hydraulic lift.

ii. Appropriate amendments to the Employee Hazard Communication Training Program describing the constituents of concern at the Site, what effects and dangers are associated with the constituents of concern, how the employees might come into contact with the constituents of concern, what actions the employee and the company must take if an someone comes into contact with the constituents of concern, and how the environmental restrictions affect the employees and their work duties.

iii. The groundwater monitoring reports shall be provided to Ecology within 90 days of the sampling event. The report shall include (per WAC 173-340-840 General submittal requirements): a brief discussion of the sampling event, a cumulative table of the

analytical results, a groundwater contour map, laboratory analytical report, submittal of data into Ecology's electronic Environmental information Management (EIM) online database, and a status update report on the protective cap to include any maintenance activities on the cap.

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.

FRITO-LAY, INC.

[Name of Signatory] Russell A. Burton

Dir. Global Real Estate

[Title]

Dated: 1/10/13

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Rebecca S. Lawson

Rebecca S. Lawson, P.E., LHG

Section Manager
Toxics Cleanup Program
Southwest Regional Office

Dated: 2/5/13

CORPORATE ACKNOWLEDGMENT

STATE OF Texas
COUNTY OF Collin

On this 10 day of January, 2013 I certify that Russell A. Burton personally appeared before me, acknowledged that **he/she** is the Dir Global Real Estate 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.

Notary Public in and for the State of Texas ~~Washington~~, residing at Collin County
My appointment expires 10/26/14.

JACALYN SILVERGLEIT
NOTARY PUBLIC STATE OF TEXAS
COMMISSION EXPIRES:
OCTOBER 26, 2014

Exhibit A
Legal Description

For APN/Parcel ID(s): 006727-033 and 986003-224

That certain portion of the Joseph Petrain Donation land claim and of platted fractional Section 16, T2N, RIE, W. M., Clark County, Washington, being more particularly described as follows:

Beginning at the Northwest corner of Lot 27, platted fractional Section 16, as recorded under Volume "C" at Page 6, of Clark County, Washington plat records and running thence S 69° 58' 32" E, along the Northerly line thereof, 72.81 ft. to the Westerly line of Fruit Valley Road; thence S 4°37' 24" W. along said road, 1161,09 ft.; Thence along the arc of curve to the right having a radius of 686.30 ft., thru a central angle of 13° 34' 04" an arc distance of 162.52 ft.; thence continuing along said road S 18°11' 28" W 22.42 ft.; thence N 69° 58' 32" W 146.00 ft.; thence S 20° 01' 28" W 99.24 ft.; thence N 70° 08' 47" W 335.09 ft. to a concrete monument; thence N 4° 40' 48" E 1453.77 ft.; thence S 70° 13' 32" E 138.19 ft.; thence S 69° 56' 32" E 321.42 ft.; to the point of beginning.

Also a strip of land 8.5 ft. wide, being more particularly described as follows:

Beginning at the Northwest corner of the above described tract, said point being N 69° 56' 32" W 321.42' and N 70°13' 32" W 138.19' from the Northwest corner of the aforementioned Lot 27, and running thence S 4° 40' 48" W 1453.77 ft., thence N 70° 08' 47" W 8.80 ft., thence N 4° 40' 48" E 1453.76 ft., thence S 70° 13' 32" E 8.80 ft. to the point of beginning.

Except that portion conveyed to the City of Vancouver by Statutory Warranty Deed recorded August 11, 2003 under Auditor's File No. 3693611.

Exhibit B
Groundwater Monitoring Plan

FRITO-LAY
Vancouver Washington

Hydraulic Lift Area Petroleum Release

Monitoring Plan
Project Number 13003
Document Number 13003-MP R3

4808 NW Fruit Valley Road
Vancouver, Washington 98660

Submitted To:

Washington Department of Ecology
Olympia, Washington

November 30, 2012

Prepared By:

Environmental Health Management, Inc.
P.O. Box 1746
Lake Oswego, OR 97035

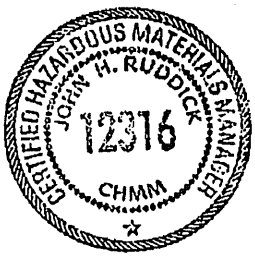
TABLE OF CONTENTS

SECTION 1. CERTIFICATIONS

This plan has been prepared in accordance with accepted hydrogeologic practices.

Timothy O'Gara, LG, LHg.

This plan has been prepared in accordance with accepted environmental practices.



John H. Ruddick. Ph.D, CHMM

SECTION 2. INTRODUCTION

This plan describes procedures to assess ground water beneath the hydraulic lift area of Frito Lay's Vancouver, Washington plant site.

2.1 Purpose

This workplan is intended to advance and further previous work which identified and delineated hydrocarbon contamination in soil beneath the hydraulic lift. It was prepared in response to a request by the Washington Department of Ecology (Ecology) for further information regarding the release.

2.2 Background

In 1991, a hydraulic lift used to tip trucks to deliver loads of potatoes collapsed. Diesel fuel and hydraulic fluid were released. The bulk of the contamination was remediated by excavation in January, 2005. This work left some contamination in place at inaccessible locations beneath the lift. Further study has defined the nature and extent of the Diesel-range petroleum and related contaminants in soil. A single ground water sample showed high molecular weight (C21-C34) aliphatic hydrocarbons, however these were also detected in the field blank.

Residual petroleum-contaminated soil was detected to depths less than 5 feet below ground surface (bgs) near the south end of the lift. Physical removal of this soil was determined to cause meaningful disruption of plant operations while in-situ treatment was determined to potentially reduce soil load bearing capacity, risking lift failure. Frito Lay is electing to leave this contamination in place beneath existing pavement and implement an inspection and monitoring program until such time as the lift is relocated or rebuilt.

2.3 Executive Summary

This plan describes the design, installation, development, sampling and analysis of ground water monitoring wells at the Frito Lay hydraulic lift. It includes information on regional ground water conditions, chemical contaminants of concern, detailed methods and reporting procedures. The plan includes an initial sampling period of 18 months (6 quarterly sampling events), as requested by Ecology.

SECTION 3. SITE DESCRIPTION

3.1 Regional

Frito Lay is located in SW Vancouver, Washington near Vancouver Lake and the Columbia River (See **Figure 1**). The plant manufactures and distributes potato chips and other snack foods. The area surrounding Frito Lay is a mix of industrial, agricultural and residential land uses. The Burlington Northern/Santa Fe Railroad right of way is located to the east with Nalco Industrial and Support Terminals tank farms to the north. Geologic and hydrogeologic conditions are described below.

3.2 Hydraulic Lift Area

The hydraulic lift is located immediately west of the main processing building (see **Figure 2**). The lift includes a concrete approach ramp and a steel platform. The north end of the platform is connected to a massive concrete buttress by a hinge. Hydraulic rams connect the platform to similar foundations located near the center of the platform. Trailers of potatoes are loaded on the platform and detached from the tractor which is driven away. The platform is then tilted using the rams to raise the western end of the platform. This allows potatoes to cascade from the trailer onto a receiving conveyor. From there, the potatoes are routed to storage bins by a network of conveyors.

Support equipment, including conveyors, hydraulic pumps, transformers and controls are located between the platform and the processing building. The platform and support equipment reduce access between the lift and the building. The area around the lift is well paved. Process waste water conveyances, storm drains and other underground utilities are present nearby.

Soil contaminated with Diesel-range organics (DRO) remains in place beneath the south part of the platform. (Gasoline-range organics (GRO) were reported during cleanup activities in 2005 but were not detected in subsequent analyses.) The horizontal extent of residual DRO contamination is estimated at 500 square feet and is shown in **Figure 2** as brown hatching. The vertical extent of DRO is estimated at 10 feet below the ground surface.

Additional regional and site details have been previously reported.

SECTION 4. HYDROGEOLOGIC STUDY

4.1 Regional Conditions

According to USGS Professional Paper 1424-B (*Hydrogeologic Framework of the Willamette Lowland Aquifer System, Oregon and Washington*), the site is located within the Portland sub basin. It is underlain by Glacial Outburst Flood Sediments. The upper 15 feet of soil at this site is comprised of sandy silt to silt. These silts are absent within ¼ mile to the west due to the historic migrations of the Columbia River.

The Willamette Aquifer is found directly beneath the silts. The upper portions of the aquifer as it transitions from the overlying silts consists of fine to medium sands. Deeper in the aquifer there are interbeds of sands and gravels that are several tens of feet thick. The upper aquifer is reported to be up to 300 feet thick in this area.

The Willamette Confining Zone begins at approximately 275 feet below sea level and is up to 1,200 feet thick. This zone consists of clays and low energy sediments. Below the Confining Zone, at a depth of approximately 1,500 feet below sea level, is the underlying basalt that forms the basin bottom.

Ground water in this area is flowing west-northwest, roughly sub-parallel to the Columbia River.

4.2 Contaminants of Concern

The source of contamination at this site is a hydraulic oil spill and potential releases from a vehicle Diesel tank. Earlier soil sampling at this site has detected gasoline and Diesel range hydrocarbons as well as a heavier lube oil fraction in some cases.

Further speciation of soil samples detected volatile organic compounds associated with the gasoline detection and low levels of PAHs associated with the Diesel/oil detections. The intent of this project is to install three ground water monitoring wells to verify ground water conditions down gradient from the spill site. Given the fact that gasoline range hydrocarbons are more mobile than the longer chain Diesel range hydrocarbons, the contaminants of concern include volatile organic compounds that are associated with gasoline as well as the semi-volatile compounds that are associated with Diesel fuels and heavy oils.

The volatile organic compounds can be detected using EPA method 8260B and the Diesel and heavy oil range will be detected using EPA method 8270C to look for polyaromatic hydrocarbons (PAHs). Additionally, the initial sampling will include collecting TPH-Dx and TPH-Gx samples. After the initial sample round, the contaminants of concern can be limited to just the compounds that were detected in the samples.

4.3 Monitoring Wells

4.3.1 Location

The wells will be installed in a down gradient direction from the spill area, and away from the location of the earlier soil excavation. One well will be placed SW of the hydraulic lift and another NW of the lift (See **Figure 2**). The third well will be located further west in an unpaved area. Prior to installing the wells, underground utilities will be located and the surface concrete cored by others. EHM will investigate the possible existence of wells east of the process building that may be useable for depth to water measurements.

4.3.2 Construction

The wells will be installed using the push probe method. The push probe sampler drives a five-foot sampler into the soil using hydraulic pressure. As the sampler is pushed into the ground, soil is allowed to enter the hollow center of the sampler. The center of the sampler is fitted with a lexan tube, which can be removed from the sampler after it has been extracted from the ground.

This allows for a continuous core of material to be removed from each location in five-foot sections. Any section of the core can be used for a sample by simply cutting the lexan sleeve at the appropriate location and placing the soil into clean jars that have been provided by the laboratory.

By collecting a complete core of the boring, a detailed lithologic column for the boring log will be obtained. No soil samples are planned to be collected. The soil cores will be used for lithologic description only.

Once the desired depth has been achieved, the well will be built by installing the well casing down through the center of the sample tube, and removing the tube from around the well casing. For this project, the well will be 2-inch diameter PVC with 0.010 slot openings on the lower 10 feet of casing. The casing will be pre-packed using a 10-20 sand. The interstitial space above the sand pack, and between the solid casing and the borehole wall will be backfilled with bentonite to allow for a good seal. It is expected that the well will be no more than 40 feet deep. The wells will use a flush mount completion so they won't be in the way of normal plant operations.

4.3.3 Lithology

As mentioned earlier, the upper soils at this site are silts down to a depth of approximately 15 feet. Below that is a fine sand that extends down to at least 30 feet below grade. The wells will be screened in this sand.

4.3.4 Development

Prior to collecting a water sample, each well will be pumped using a submersible pump until either the water is clear, or at least 10 well volumes have been removed. The water will be collected into a drum and stored at the site until the initial lab analysis is received. At that time, the water will be disposed of in an appropriate manner. During the January, 2010 site investigation, water was found at approximately 28 feet below grade. If the water is found at a similar depth during this installation, this would mean that approximately 12 gallons of water will be purged from each well during development.

4.3.5 Investigation Derived Waste.

In addition to the water that will be stored on site, soil that is generated from the probe sampling will also be stored in drums or buckets on site during the well installation process. If there is any indication of contamination detected during the drilling process, a sample of the soil will be collected for analysis. If contamination is confirmed, the soil will be removed off site to an appropriate location for landfilling.

SECTION 5. Ground Water Monitoring

5.1 Field Parameters

During a ground water monitoring event, each well will be opened and allowed to equilibrate as soon as the sampler is on site. As soon as the wells have equilibrated, a depth to water measurement will be collected and recorded in the field log book.

Once the depth to water has been collected, a clean, adjustable-rate, submersible pump will be lowered into the well to purge approximately three well volumes of water. The

pump will be either stainless steel or Teflon construction with Teflon tubing for sample delivery. The flow will be regulated to minimize drawdown in the well while still purging efficiently and will be physically measured. Drawdown will be measured with an electric probe. During the purging process, water temperature, oxidation/reduction potential (ORP), dissolved oxygen, pH, turbidity and electrical conductivity will be measured and also recorded in the field log book. After these parameters have stabilized to Ecology levels, the pump will be used to collect samples of groundwater.

5.2 Sample Collection

Water samples will be collected from the well using the low flow procedure described above. Care will be taken to avoid agitation that could result in volatilization of contaminants. The water will be delivered directly to appropriate bottles that have been provided by the lab. During the initial sampling event, six 40-ml VOA vials, one 6 ounce plastic bottle, three 1-liter unpreserved amber glass bottles and three 1-liter amber glass bottles preserved with HCl will be filled to zero headspace. Each sample bottle will be labeled showing the sample location, time, and date of the sample. They will then be placed into a cooler and kept at approximately 4 degrees C. The water samples will be transported to the analytical laboratory under strict chain of custody protocol.

5.3 QA/QC

A field blank will be collected just prior to purging by immersing the pump in distilled water prior to use and collecting the blank from the tubing outlet. The blank will consist of three 1-liter amber bottles and three 40-ml VOA vials. No duplicate samples will be collected.

5.4 Analysis

As mentioned earlier, each water sample will be analyzed for volatile organic compounds according to EPA method 8260B and for polycyclic aromatic compounds (PAHs) that are found in Diesel and heavy oils using EPA Method 8270C. The initial samples will also be analyzed for gasoline and Diesel range hydrocarbons using the NWTPH-Gx and -Dx methods.

5.4.1 Chemical Analysis

Samples will be analyzed at Specialty Analytical, Inc. in Clackamas, Oregon. Petroleum hydrocarbon fractions will be quantified using Method NWTPH-Gx and NWTPH-Dx. Volatile constituents will be quantified using EPA Method 8011 (EDB and EDC by microextraction and Gas Chromatography) for EDB and EDC and EPA Method 8260b (Volatile Organic Compounds by GC/MS) for other GRO volatile organics (Note: naphthalene was the only volatile organic previously detected in soil sample FL-07-2 which showed the highest concentration of total petroleum hydrocarbon.)

Semivolatile constituents will be quantified using EPA Method 8270-SIMM (Semivolatile Organic Compounds by GC - Selective Ion Monitoring Method) for polycyclic aromatic hydrocarbons (PAHs). Total concentrations of 8 metals (As, Ba, Cd, Cr, Pb, Hg, Se, and Ag) will be determined using EPA Method 6010b (ICP Metals)

If petroleum fractions are detected above MTCA Method A criteria, volatile petroleum hydrocarbon fractions (VPH) and/or extractable petroleum hydrocarbon fractions (EPH) analyses may be performed for comparison with MTCA Method B or C criteria.

5.5 Decontamination

There are several equipment pieces that will need to be decontaminated between samples. The water level meter will be rinsed off with distilled water between wells. The purge pump will need to be cleaned inside and out using Alconox in a bucket of water, followed by a clean water rinse. To clean the internals of the pump, soapy water is pumped through the pump until it comes out the discharge line. This is followed by a clean water rinse that is continued until all the soap has been flushed from the pump and tubing. The outside of the pump, and the bottom 10 feet of tubing that may come into contact with well water will also be scrubbed with Alconox and water and rinsed with clean water. Purge and decon water will be stored in a suitable container for appropriate disposal following receipt of analytical results.

5.6 Frequency

Six rounds of sampling will be performed after which the site status will be reviewed. A sampling round will occur at least once every 18 months. After 5 years, Ecology may evaluate the results and determine if additional monitoring is warranted.

SECTION 6. HEALTH AND SAFETY

All sampling personnel will have completed a 40-hour HAZWOPER training course and have a current annual update certificate. Level D personal protective equipment will be used during sampling. Level D will include eye protection, impervious gloves (nitrile or latex) and hard hats. Push rig operators must wear steel-toed footwear. If operating in traffic areas, reflective safety vests or jackets must be worn. Splash suits or disposable coveralls are optional. Respiratory protection is not required.

SECTION 7. CAP MAINTENANCE

An existing impervious cap is located above the entire zone of residual contamination above MTCA Level B below the hydraulic lift area. It consists of a trapezoidal area of asphalt and concrete pavement which extends from the west side of the processing building to an unpaved area (referred to as the "Contractor Island") to the west. The curved eastern edge of the Contractor Island is between 53 and 120 feet from the edge of the building, with the closest point to the center of the mass of residual contamination being approximately 55 feet. Existing pavement or the processing plant floor extends farther than 100 feet from the center of residual contamination in all remaining directions. The limits of residual contamination and the existing pavement cap are shown in **Figure 2.**

Infiltration of stormwater through the cap can mobilize and spread residual contamination beneath the cap. The primary causes of infiltration at Frito Lay are deterioration of the

pavement or construction activities that breach the pavement. The following measures will be taken to minimize infiltration through the cap:

1) The hydraulic lift area will be inspected once every three months for any signs of damaged or deteriorated pavement. The inspection will include a 50 foot diameter area centered between the hydraulic rams of the lift. This includes the area beneath the lift, the process drain catchment to the west of the lift and all other pavement in this area. Inspection will include examination of any joints between asphalt and concrete areas and other features subject to damage or deterioration.

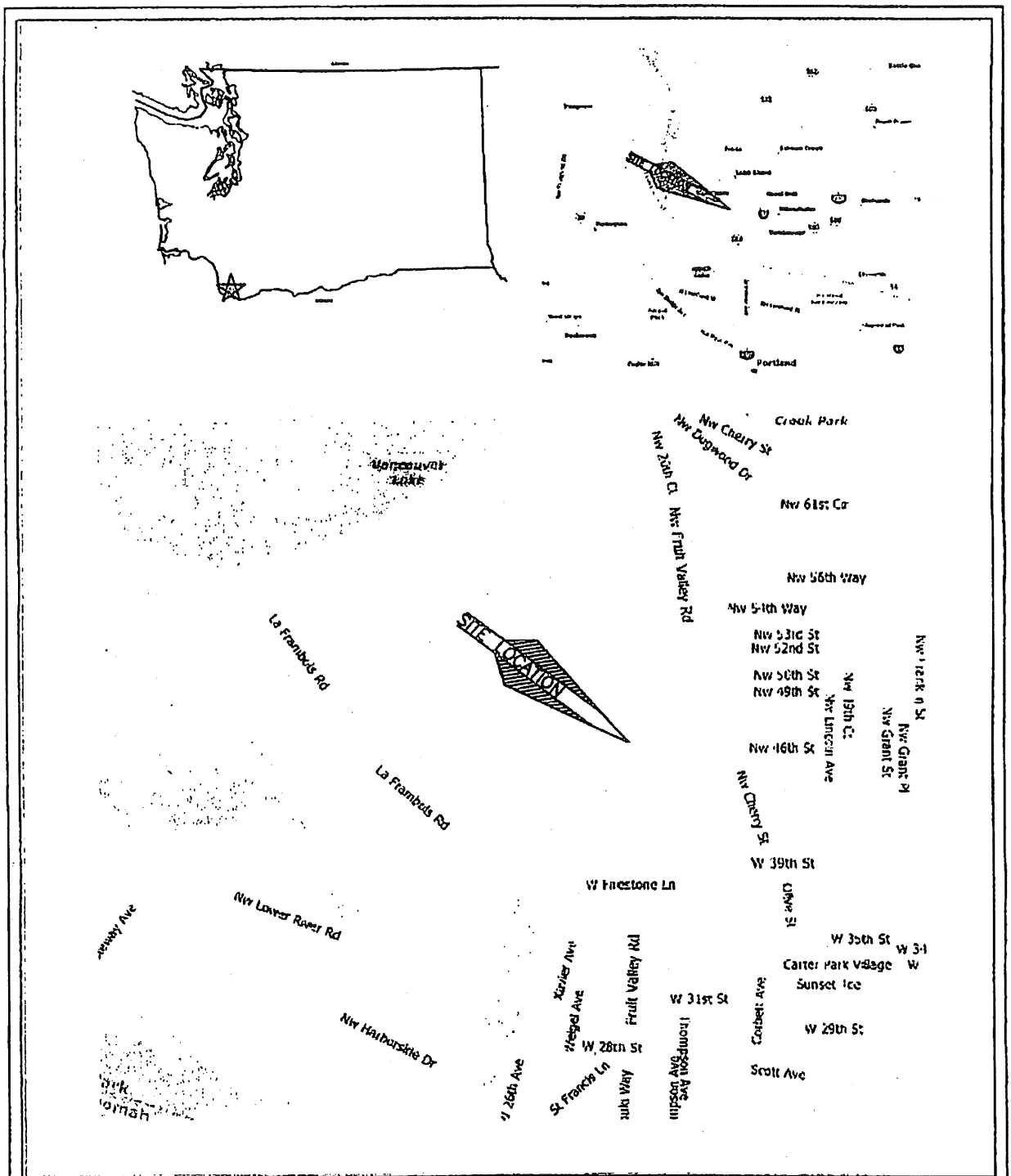
2) Frito Lay will identify the area of residual contamination in its Hazard Communication Plan and Training to ensure that personnel are aware of the petroleum contamination that remains in place. Facilities personnel should be made aware of the cap requirement to ensure that future construction in this area includes procedures for managing contaminated soil and maintaining the impervious cap.

3) Prior to any construction in the vicinity of the cap, Frito Lay will review project plans to determine if the existing cap will be breached by the work. If pavement will be removed within the cap area, Frito Lay will specify that the repair will remain water tight. If soil will be excavated in or near the zone of residual contamination, it will be screened or tested for possible petroleum contamination and appropriately managed. Restoration of the cap will be performed and the repair inspected for tightness prior to completion of the work.

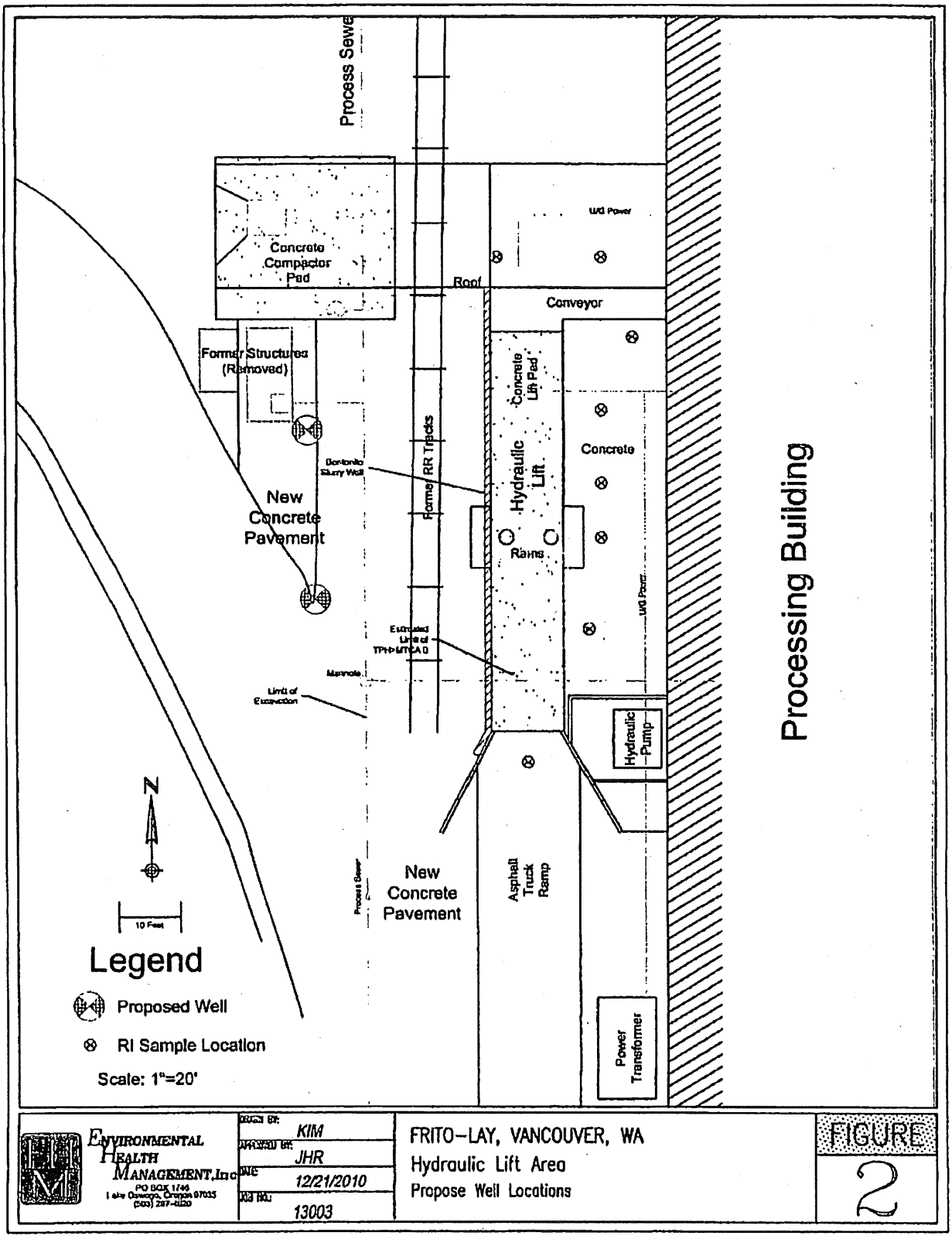
SECTION 8. REPORTING

Analytical results and field data will be summarized in a data table. Graphics will include well construction logs and location maps. The results will be presented in a formal report and entered into Ecology's EIM database.

SECTION 9. FIGURES



ENVIRONMENTAL HEALTH MANAGEMENT, Inc PO BOX 1745 Lake Oswego, Oregon 97035 (503) 697-4620	DRAWN BY: KIM APPROVED BY: JHR DATE: 3/26/09 JOB NO.: 13003	FRITO LAY – Vancouver Hydraulic Lift Area Location Map	FIGURE 1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Concrete Compactor Pad
Roof
Conveyor
Former Structures (Removed)
Concrete Lift Pad
Hydraulic Lift
Concrete
Rams
New Concrete Pavement
Bentonite Slurry Wall
Manhole
Limit of Excavation
Hydraulic Pump
Processing Building
N
10 Feet
Legend
Proposed Well
RI Sample Location
Scale: 1"=20'
New Concrete Pavement
Asphalt Truck Ramp
Power Transformer
ENVIRONMENTAL HEALTH MANAGEMENT, Inc.
PO BOX 1746
Lake Oswego, Oregon 97035
(503) 287-6825
DRAWN BY: KIM
APPROVED BY: JHR
DATE: 12/21/2010
JOB NO.: 13003
FRITO-LAY, VANCOUVER, WA
Hydraulic Lift Area
Propose Well Locations
FIGURE
2