Final
Independent Remedial Action Report
Verax Chemical Company Facility
Snohomish, Washington

November 2006

Project No.26-040

Prepared for:

Finrow Properties Partnership
P.O. Box 803
Bothell, Washington 98041

Prepared by:

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Final
Independent Remedial Action Report
Verax Chemical Company Facility
Snohomish, Washington

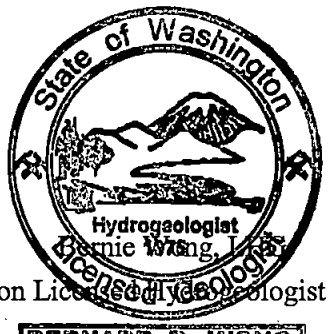
Submitted by:

Engineering/Remediation Resources Group, Inc.

Signature	November 20, 2006 Date
Bernie Wong, LHG Name	Project Manager Title
Signature	November 20, 2006 Date
John Hicks Name	Senior Project Scientist Title

CERTIFICATION

This document was prepared under the direction and supervision of a qualified Hydrogeologist



Washington Licensed Hydrogeologist (No. 1075)

BERNARD B. WONG

11/20/06

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Acronyms and Abbreviations

bgs	below ground surface
Ecology	Washington State Department of Ecology
EA	environmental assessment
ERRG	Engineering/Remediation Resources Group, Inc.
Finrow	Finrow Properties Partnership
IRAR	Independent Remedial Action Report
LTTD	low-temperature thermal desorption
mg/kg	milligrams(s) per kilogram
MTCA	Model Toxics Control Acts
NFA	no further action
NWTPH	Northwest Total Petroleum Hydrocarbon
RAWP	remedial action work plan
RCW	Regulatory Code of Washington
TPH	total petroleum hydrocarbons
TPH-gro	total petroleum hydrocarbons as gasoline-range organics
Verax	Verax Chemical Company
VOC	volatile organic compound
WAC	Washington Administrative Code

Section 1. Introduction

Finrow Properties Partnership (Finrow) has completed a remedial action in September, 2006 at the Verax Chemical Company (Verax) facility in Snohomish, Washington. The remedial action was conducted as an Independent Remedial Action pursuant to Model Toxics Control Act (MTCA), and its implementing regulations, Regulatory Code of Washington (RCW) 70.105D, and Washington Administrative Code (WAC) 173-340, and in accordance with Washington State Department of Ecology (Ecology) Guidance on Independent Remedial Action under its Voluntary Cleanup Program.

Previous site investigations (Retec, 2006 and Engineering/Remediation Resources Group, Inc. [ERRG), 2006b) identified and delineated a 12-foot by 14-foot source area within a former industrial drain field containing concentrations of total petroleum hydrocarbons (TPH) as gasoline-range organics (TPH-gro) above the MTCA Method A cleanup level for residential uses. The Independent Remedial Action was conducted to eliminate the threat to human health and the environment by substantially reducing the direct contact, ingestion, and/or airborne pathways for exposure to TPH-gro contamination found within the former industrial drain field.

The sequence of activities leading to the Independent Remedial Action was as follows:

- Phase I Site Assessment (December 2005)
- Phase II Site Investigation and Reporting (April to August 2006)
- Development of Remedial Action Work Plan (RAWP) (September 2006)
- Remedial action, contaminated soil treatment and disposal, and site restoration (September 2006)
- Preparation of Independent Remedial Action Report (IRAR) (October to November 2006)

The Independent Remedial Action was accomplished by the following activities:

- Soil containing TPH-gro concentrations greater than the MTCA Method A cleanup level for residential uses was excavated;
- Representative soil samples within the excavation area were collected after excavation to confirm that residual TPH-gro concentrations in soil are less than the MTCA Method A cleanup level for residential uses;
- Excavated soil was transported to a licensed low-temperature thermal desorption (LTTD) facility for the treatment and disposal of the contaminated soil; and
- Following receipt of acceptable confirmation sampling results, the excavated area was backfilled with clean imported fill and uncontaminated top soil.

This IRAR consists of the following sections:

- Introduction (Section 1)
- Summary of the project background (Section 2)
- Evaluation of remedial alternatives and establishment of the site cleanup level (Section 3)
- Permitting and notification requirements (Section 4)
- Remedial activities (Section 5)
- Summary of remedial action (Section 6)
- References (Section 7)

Laboratory analytical reports for the confirmation samples are included as Appendix A. A Certificate of Contamination Destruction from the LTTD facility is included in Appendix B. Remedial action site photographs are included in Appendix C.

This report documents the successful completion of the remedial action conducted at the Verax facility, and will be used to support the request for no further action (NFA) at the site, and the delisting of the site from Ecology's Hazardous Waste Site list. This report will be submitted to Ecology along with the Voluntary Cleanup Program Application Form and the Terrestrial Ecological Evaluation Exclusion Form (not included in this report).

Section 2. Project Background

The subject property is a 15-acre facility located in Maltby, an unincorporated area of Snohomish County, Washington (Figure 1). The property is currently owned by Finrow, and consists of two parcels of land. Parcel 1 is located west of Broadway Avenue and north of the Maltby Community Park ball fields. Parcel 1 contains the developed portions of the property. Parcel 2 is located west of Parcel 1 and is largely undeveloped.

2.1. SITE OPERATIONAL HISTORY

The residence in the northeast corner of Parcel 1 was built in 1936 and other structures nearby are consistent with agricultural and residential use from that time. In 1955 aerial photographs, the remainder of the parcel appeared to be pasture or farmland, while Parcel 2 remained mostly forested. Between 1957 and 1961, the three warehouses were built for use as chicken houses with batteries of wire cages suspended from the rafters. A brooder house was constructed on the northwest corner of the twenty acres and a road connected it to the front buildings. This road is no longer visible. By 1967 aerial photos show Parcel 2 to be vacant, but no longer forested. Previous owners, the Stotko family, had cattle and horses and the pastures were fenced and cross-fenced.

By the late 1960's, the Stotko family applied to Snohomish County for Industrial Park zoning and the Shamrock Industrial Park was approved. The northwest corner was sold and the building was used for building vacation home kits. Building 3 was rented to Stonehenge, manufacturers of architectural concrete products.

In 1972 Don M. and Betty Ann Finrow purchased the remaining fifteen acres, remodeled Buildings 1 and 2, and moved Verax Chemical Company to the now-named Maltby Industrial Park. Mr. and Mrs. Finrow moved into the residence and the pastures continued to be used for cattle, sheep, and horses for many years.

In 1986, ownership was transferred to Finrow Properties Partnership. Verax continued to occupy Building 1 for office and warehouse and Building 2 for warehouse and production. Stonehenge continued to rent the front of Building 3 while other tenants occupied the back of Building 3, mostly as warehouse and storage. Other tenants have included a hair salon, a coffee roaster, a mechanical contractor, and others. Currently the back of Building 3 is vacant.

2.2. ENVIRONMENTAL SETTING

In general, the property slopes slightly to the south and west and most of the southern portion (about 10 acres) of the property is currently vacant. Seasonal surface drainages are present in the vacant portion of the property. The seasonal drainages appear to drain into a surface ditch south of the property line, running along the north and west sides of the Maltby Community Park ball fields. Access roads and parking areas are scattered throughout the property.

Water is supplied by an on-site well reportedly screened at 110 to 128 feet below ground surface (bgs). No sewer hook-up is at the site. Two drain fields are present at the property. Sanitary wastewater from the residence and Buildings 1 and 3 flows into a septic tank located west of Building 3. The wastewater in the tank flows into a sump tank, and is then pumped from the sump tank into a drain field located at the northwestern part of Parcel 2. There is no sanitary wastewater connection at Building 2; however, a 500 gallon septic tank with a drain field is located adjacent to and south of Building 2, and treats rinse water from the chemical blending operation. This industrial drain field was the subject of the Phase II Site Investigation. It was reported that the industrial drain field has not been used since April 2006. Rinse water is currently collected and stored in drums for future treatment.

Municipal water supply wells are located west of the Community Park and southwest of the subject property. These wells are owned and operated by the Cross Valley Water District and pump water from a depth of approximately 400 feet bgs. Based on the assumed southerly gradient, these wells are located cross-gradient from the industrial drain field located south of Building 2. Previous sampling results indicated that these water supply wells have not detected industrial chemical contaminants.

2.3. GEOLOGY AND HYDROGEOLOGY

The geologic conditions at the site have been documented as part of the Phase I Environmental Assessment (EA) Report (Retec, 2006), and the subsurface geologic logging during the Phase II Site Investigation (ERRG, 2006b). Near-surface soil across the site is predominantly silty sand with rounded gravel and cobbles up to 5 inches in diameter. This silty sand is approximately 3 to 4 feet thick, and is underlain by a more compact till. The thickness of the till layer has not been determined. Perched groundwater is present above the till, and was observed between 3.5 to 8 feet bgs during the geotechnical test pit investigation (Earth Solutions NW, 2006) as well as during the Phase II Site Investigation soil boring program. The perched groundwater is expected to be seasonal. Based on site topography and surface-water drainage patterns, the groundwater gradient is assumed to be toward the south.

Within the industrial drain field, the top three feet of soil appeared to be fill materials, with a matrix of sand and gravel. The fill material is generally underlain by the till layer. The till layer becomes more dense and sandy at a depth of about 11 to 12 feet bgs. TPH concentrations (see Section 2.4) at the industrial drain field is generally confined to the less dense portion of the till layer above 11 feet bgs.

2.4. PREVIOUS INVESTIGATIONS

A limited sampling program conducted by the Snohomish County Department of Health in 1994 reported xylene (31 milligrams per kilogram [mg/kg]) and methylene chloride (1.1 mg/kg) in soil in the industrial drain field at levels above the Ecology's MTCA Method A cleanup levels (9 mg/kg for xylene, and 0.02 mg/kg for methylene chloride), although methylene chloride also was found in laboratory blanks in that event. The site was subsequently placed on the Confirmed and Suspected Contamination Site List maintained by Ecology. A Phase I EA was conducted in 2005 at the site to evaluate environmental impacts of the site operation. A geotechnical study was also conducted in 2005. The EA reported low levels of volatile organic compounds (VOCs) (e.g., 0.124 mg/kg of total xylenes), diesel-range TPH (160 mg/kg), and formaldehyde (105 mg/kg, result from a laboratory not certified by Ecology) in shallow soil within the industrial drain field. The EA (Retec, 2006) and the geotechnical study (Earth Solutions NW, 2006) were part of the environmental due diligence work conducted in preparation for the sale of the south portion (10 acres) of the subject properties to Atlantic Services/Underwood Nelson Development LLC.

A Phase II Site Investigation was initiated by Finrow to investigate if contaminants are present in the south portions of the property as well as in and around the industrial drain field. The Phase II site investigation field activities were conducted during the period of April and June, 2006 in accordance with the Phase II Site Investigation Work Plan (ERRG, 2006a). A direct-push drill rig was used to collect subsurface soil samples from 18 borings. Five soil borings were located at the south portion of the property, and 13 soil borings were located in and around the industrial drain field. None of the five borings in the south portion of the property contained chemical concentrations in soil that were greater than the MTCA Method A cleanup levels. Only one of the 13 borings (B-11) installed in and around the industrial drain field contained chemical concentrations in soil greater than the MTCA Method A cleanup level (Figure 2) (ERRG, 2006b). TPH-gro was detected at boring B-11 at concentrations up to 320 mg/kg (at a depth of 6 feet bgs). Additional borings installed in close proximity to B-11 served to delineate the contaminated area around the head (beginning) of the outlet drain pipe, with an estimated areal extent of 12 feet by 12 feet. Low level concentrations of VOCs were also found at boring B-11, and were associated with the TPH-gro contamination, however, these low level VOCs did not exceed their respective MTCA Method A cleanup levels.

Section 3. Remedial Action Evaluation and Cleanup Level Establishment

3.1. REMEDIAL ACTION EVALUATION AND APPROACH

Because of the localized extent of the source area within the industrial drain field (original estimate was 144 square feet by 10 feet deep), and the limited number of the contaminants above the MTCA Method A cleanup goals (TPH-gro), a hot spot soil removal action (by surgical-type excavation) was adopted to remediate the contaminated soil. Soil excavation could be easily implemented at the site because the source area was readily accessible, and the known TPH-gro contamination was found at shallow depths (less than 10 feet) well above the groundwater table. These site conditions allowed for a small "surgical-type" excavation that was effective in removing the source contaminant at relatively low cost. A RAWP was developed to describe the remedial action evaluation, the selected approach and procedures (ERRG, 2006c).

3.2. SITE CLEANUP LEVEL

Selection of the site cleanup level was discussed in the Phase II Site Investigation Report (ERRG, 2006b) and selected in the RAWP (ERRG, 2006c). The site cleanup goal was established as 100 mg/kg for TPH-gro, which corresponds to Ecology's MTCA Method A soil cleanup level for residential sites, as described in WAC 173-340-740. This cleanup level is considered conservative for this site, but its proximity to a public park and residential area is the rationale for using the MTCA Method A residential cleanup level. Selecting and meeting a conservative cleanup goal was intended to simplify Ecology's review of this IRAR and to facilitate obtaining an NFA designation from Ecology.

Section 4. Permitting and Notification

Since this remedial action was conducted as an Independent Remedial Action (under WAC 173-340) and followed guidelines under Ecology's Voluntary Cleanup Program, no State environmental cleanup permits or signed consents were needed to initiate the remedial action. Nevertheless, Finrow held an informal meeting with Ecology in April 2006 prior to additional site investigation to express the intent to conduct the site investigation and subsequent remedial action under the Voluntary Cleanup Program.

Prior to the initiation of the remedial action, Finrow notified Atlantic Services/Underwood Nelson Development LLC, the buyer of the south portion (10 acres) of the subject property, of the upcoming remedial action. Finrow also notified the tenants of the property: Stonehenge and Verax Chemical Company prior to initiation of the remedial action.

Section 5. Remedial Action

5.1. MOBILIZATION AND SITE PREPARATION

After the RAWP was finalized, mobilization activities were conducted on September 25, 2006, and consisted of mobilizing heavy equipment to the site, staking out the approximate excavation boundaries, and importing clean backfill materials. The location of underground utilities, that were initially identified during the Phase II Site Investigation, was also verified around the excavation area.

5.2. HOT SPOT EXCAVATION

A small tracked excavator was used for the soil excavation. Excavation began with the removal of the top two feet of uncontaminated top soil. The top soil was stockpiled on site for reuse as backfill. The excavated soil was loaded directly into a dump truck that was staged next to the excavation. Excavation activities were completed on September 25, 2006, and the final excavation area measured 15 feet by 14 feet by 10 feet deep. The excavation bottom was extended to a depth of approximately 10 feet bgs, where the uncontaminated native soil layer was visually identified. The main section of the drain pipe (the presumed source of contamination) was found at the center of excavation (at a depth of approximately 3.5 feet bgs) and was removed with the excavated soil. The pipe section had an east-west alignment, and was in close proximity to the soil borings installed during the Phase II investigation. No groundwater was encountered during soil excavation.

Upon the completion of excavation and confirmation sampling (see below), temporary construction fence was installed around the open excavation for safety purposes.

5.3. CONFIRMATION SAMPLING

Confirmation samples were collected from the four sidewalls and bottom of the excavation to confirm that residual TPH-gro concentrations were less than the site cleanup level. Confirmation samples from the four sidewalls were collected at approximately 6 feet bgs, with the help of the excavator bucket. The 6-foot depth was selected for confirmation sampling because the highest TPH-gro concentrations during the Phase II site investigation were found at 6 feet bgs. The bottom confirmation sample was collected at 10 feet bgs with the help of the excavator bucket. One field duplicate sample was also collected for quality control purposes. Figure 2 shows the approximate locations of the confirmation samples. Sample collection procedures and analytical requirements are described in the *Site Investigation Work Plan* (ERRG, 2006a).

All confirmation samples were analyzed for TPH-gro on a rapid turnaround schedule (24 hours), while the excavation was left open. The soil sample with the highest TPH-gro concentration (NW-01) was also

analyzed for VOCs (by U.S. Environmental Protection Agency Method 8260A) to document that no VOCs remained at the site above their respective Method A Cleanup Levels. It should be noted that no VOCs exceeded MTCA Method A Cleanup Levels from any subsurface soil samples (including the hot spot area) collected during the site investigation.

Table 1 lists the results of the confirmation sampling. For the sample analyzed for VOCs (NW-01), only detected VOCs are listed on the table. Appendix A contains the complete laboratory report of the confirmation sampling analyses.

TPH-gro concentrations in all confirmation samples ranged from 5 mg/kg to 39 mg/kg, or below the MTCA Method A Cleanup Level of 100 mg/kg. Furthermore, none of the VOCs detected in sample NW-01 exceeded their respective MTCA Method A Cleanup Levels (where available).

5.4. SITE RESTORATION

After confirmation sampling results documented that residual TPH-gro concentrations at the source area were below the site cleanup level, the excavation was backfilled with a combination of uncontaminated top soil, stockpiled sand from other parts of the property, and clean materials imported from a local source (Granite Falls quarry). Backfill was placed and compacted by a tractor to prevent surface erosion. Site restoration was completed on September 28, 2006.

5.5. OFF-SITE TREATMENT AND DISPOSAL

A total of 64.36 tons of contaminated soil were excavated from the site, and transported to Rinker Materials' LTTD facility in Everett, Washington for treatment and disposal. Appendix B includes a copy of the treatment certificate indicating complete destruction of contaminants (TPH-gro) in the soil, and documenting that the soil was properly disposed of in accordance to State and Federal Regulations.

5.6. INSTITUTIONAL CONTROL

Confirmation sampling results indicated that residual TPH-gro concentrations at the source area were below the MTCA Method A cleanup level for residential sites. Therefore, the pathway for human and ecological contact with the TPH-gro contaminated soil has been mitigated. In addition, the industrial drain field had been abandoned and is no longer in use, and all entry points to the drainfield have been sealed. As a result, no institutional controls or additional monitoring is warranted at the site.

Section 6. Summary of Remedial Action

The Independent Remedial Action was conducted at the Verax facility in September 2006, after the completion of a detailed site investigation in April and June of 2006 (ERRG, 2006b). The construction activities and procedures outlined in the RAWP (ERRG, 2006c) were followed during the remedial action. At the completion of the remedial action, 64.36 tons of TPH-gro contaminated soil were excavated from a 15 by 14 feet area, and transported to Rinker Materials' LTTD facility in Everett, Washington for treatment and disposal. One round of confirmation sampling was conducted during the remedial action, and final TPH-gro concentrations at 5 confirmation sampling locations were below the Method A cleanup level for residential sites (100 mg/kg). The excavated site was backfilled with clean materials to the existing ground surface.

In conclusion, the residual TPH-gro concentrations are well below the Method A cleanup level for residential uses, and therefore site conditions do not pose an unacceptable risk to human health and the environment. Finrow hereby requests site closure and an NFA determination based upon the requirements set forth in WAC 173-340-360. After Ecology's review of this report and resolution of any questions and comments, Finrow will seek to remove the site from Ecology's Hazardous Waste Site List.

Section 7. References

Earth Solutions NW. 2006. Geotechnical Engineering Study, Proposed Warehouse Development. 20102 Broadway Avenue, Maltby, Washington. Prepared for Underwood Nelson Development, Seahurst, Washington. Prepared by Earth Solutions NW, LLC, Redmond, Washington. January 25, 2006.

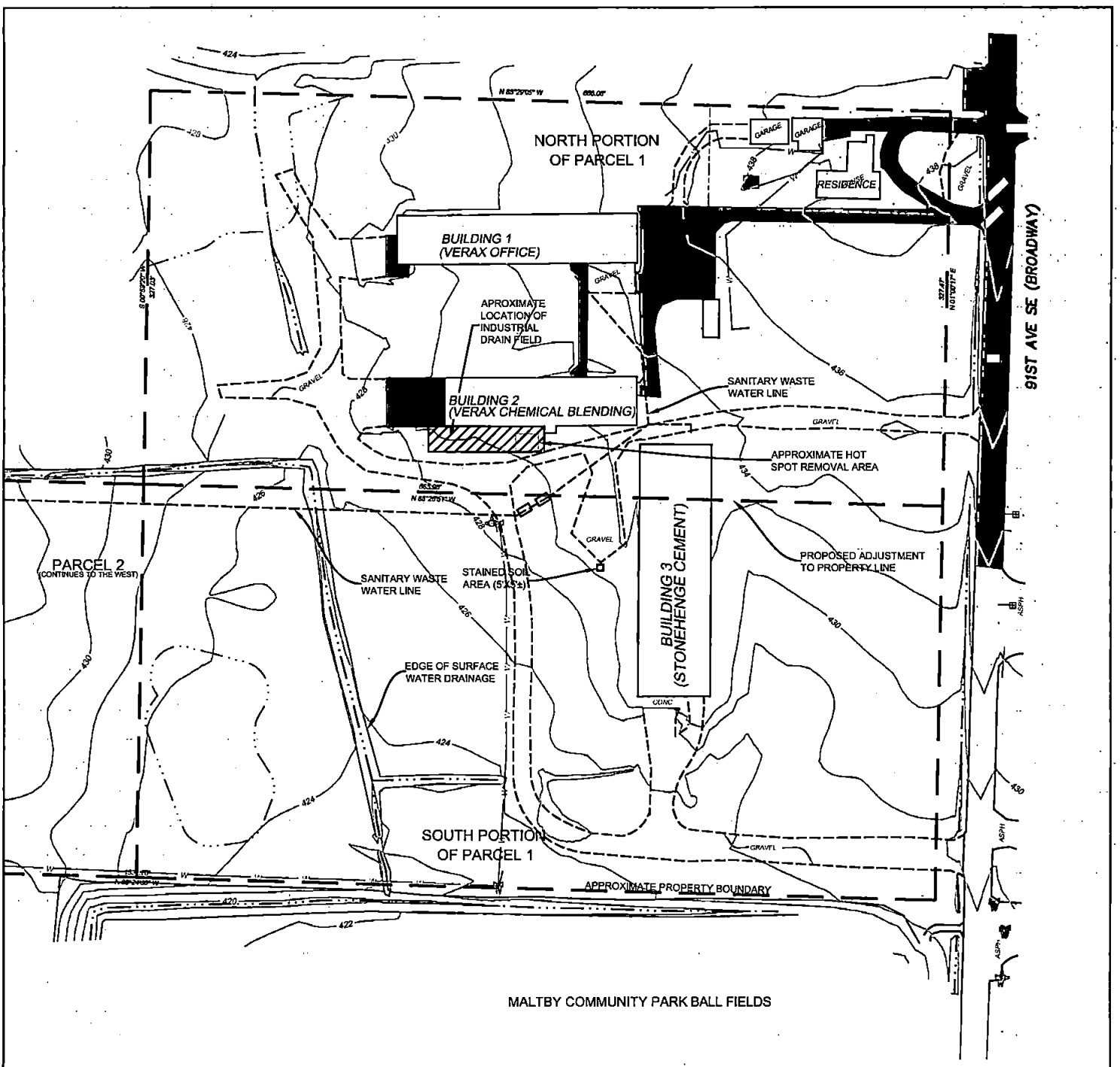
ERRG, 2006a. Site Investigation Work Plan, Verax Chemical Company, Maltby, Washington. Prepared for Finrow Properties Partnership, Bothell, Washington. Prepared by Engineering Remediation/Resources Group, Seattle, Washington. April 17, 2006.

ERRG, 2006b. Phase II Site Investigation Report, Verax Chemical Company, Maltby, Washington. Prepared for Finrow Properties Partnership, Bothell, Washington. Prepared by Engineering Remediation/Resources Group, Seattle, Washington. August 29, 2006.

ERRG, 2006c. Remedial Action Work Plan, Verax Chemical Company, Maltby, Washington. Prepared for Finrow Properties Partnership, Bothell, Washington. Prepared by Engineering Remediation/Resources Group, Seattle, Washington. September 21, 2006.

Retec, 2006. Phase I Environmental Assessment, 20102 Broadway Avenue, Maltby, Washington. Prepared for Underwood Nelson Development, Seahurst, Washington. Prepared by The RETEC Group, Seattle, Washington. January 25, 2006.

Figures



LEGEND

- 420 — CONTOUR (FEET ABOVE MEAN SEA LEVEL)
- CONCRETE AREA
- EDGE OF DIRT/GRAVEL ROADWAY/PARKING
- PAVED ROADWAY
- PROPERTY/PARCEL BOUNDARY

SCALE IN FEET
0 120
N

ERRG
Engineering/Remediation Resources Group, Inc.
1910 Fairview Avenue East
Suite 103
Seattle, WA 98102
Phone 206-423-7784

CLIENT:	DESIGNED BY:	
FINROW PROPERTIES	M.L.G. 8/23/06	SITE PLAN
	CHECKED BY: B.W.8/23/06	
LOCATION: VERAX CHEMICAL SNOHOMISH, WASHINGTON	P.E/P.G.: -	

ERRG PROJECT NO.	REVISION NO.	SHEET	OF	FIG NO.
26-040	0	1	1	1

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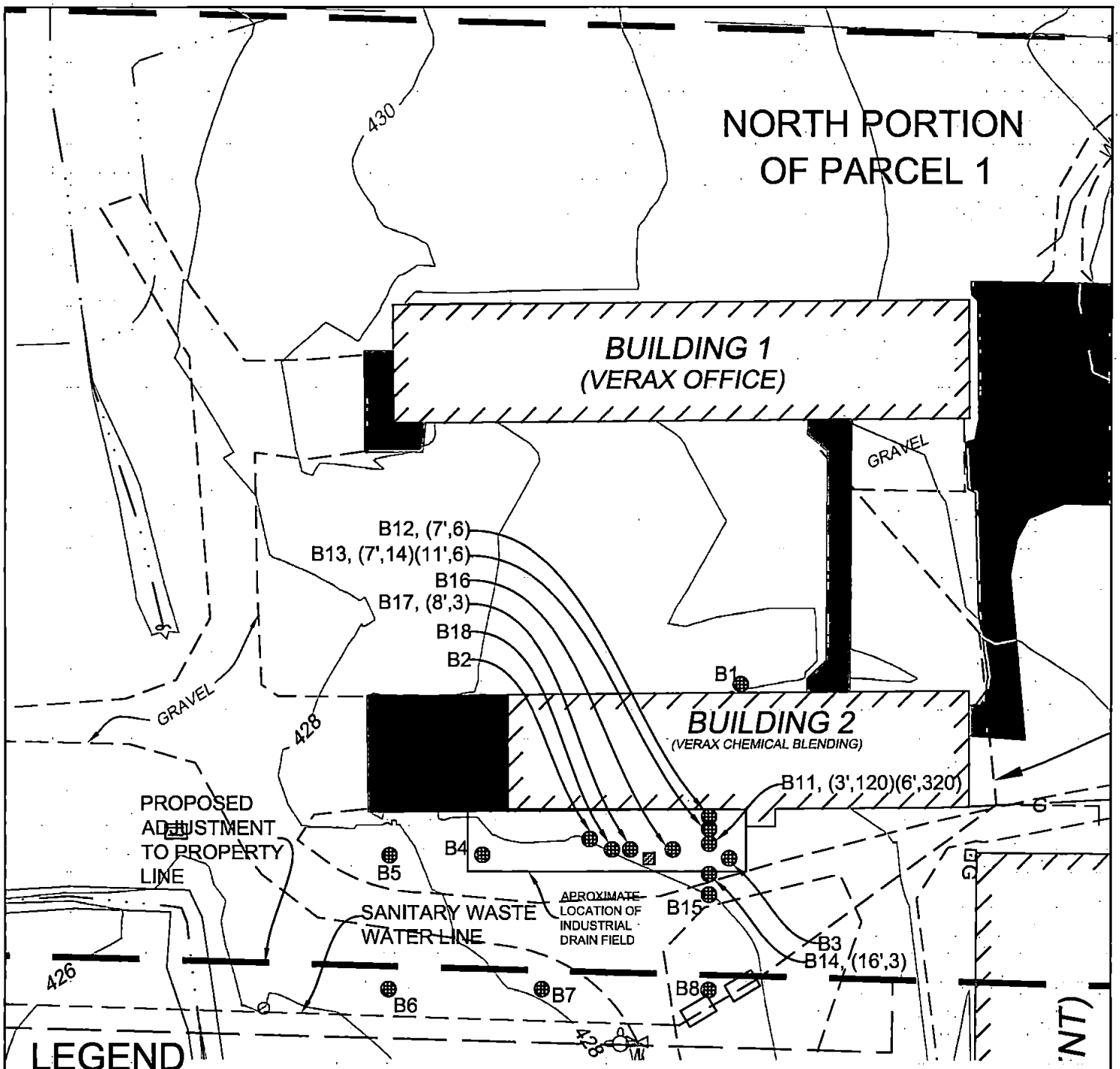

ERRG Engineering/Remediation Resources Group, Inc. 1910 Fairview Avenue East Suite 103 Seattle, WA 98102 Phone 206-423-7784	CLIENT: FINROW PROPERTIES	DESIGNED BY: M.L.G. 8/23/06	INDUSTRIAL DRAIN FIELD SAMPLING LOCATIONS AND GASOLINE RANGE ORGANICS DETECTIONS
	LOCATION: VERAX CHEMICAL SNOHOMISH, WASHINGTON	CHECKED BY: B.W.8/23/06	
		P.E/P.G.: -	

ERRG PROJECT NO.	REVISION NO.	SHEET	OF	FIG NO.
26-040	0	1	1	2

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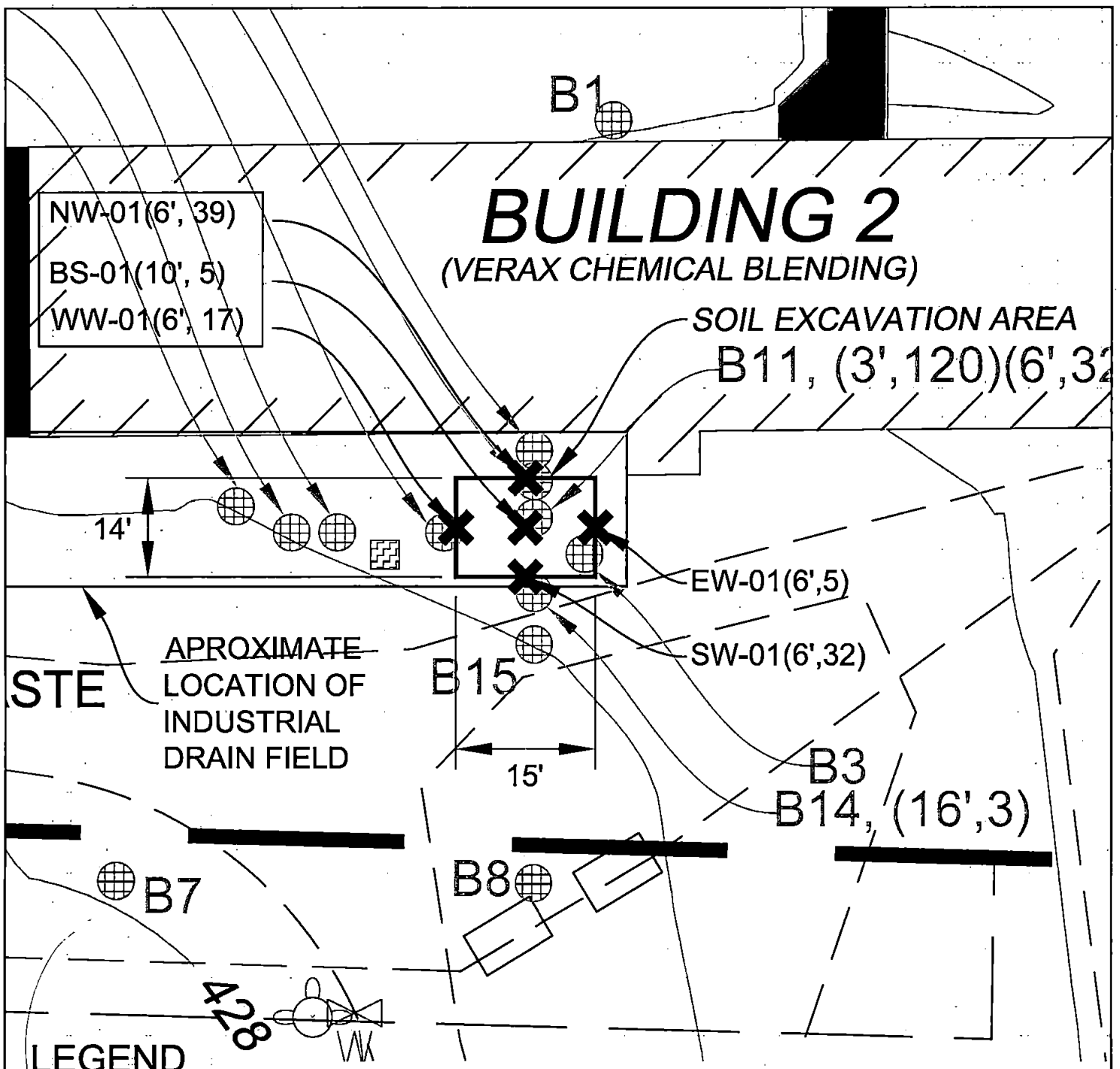

ERRG Engineering/Remediation Resources Group, Inc. 1910 Fairview Avenue East Suite 103 Seattle, WA 98102 Phone 206-423-7784	CLIENT: FINROW PROPERTIES LOCATION: VERAX CHEMICAL SNOHOMISH, WASHINGTON	DESIGNED BY: M.L.G. 8/23/06 CHECKED BY: B.W.8/23/06 P.E/P.G.: -	INDUSTRIAL DRAIN FIELD REMEDIAL ACTION AREA AND CONFIRMATION SAMPLING RESULTS

ERRG PROJECT NO.	REVISION NO.	SHEET	OF	FIG NO.
26-040	0	1	1	3

P:\2006_Projects\26-040_Finrow_Verax_Chem_Site_Inv\DWGS\FIG3.dwg

Tables

Table 1
Confirmation Sampling Results
Independent Remedial Action, Verax Chemical Site
Snohomish County, Washington

Analyte	MTCA Method A Cleanup Goal Level (mg/kg)	CON-NW-01 (north wall) (mg/kg) [1]	CON-EW-01 (east wall) (mg/kg) [1]	CON-SW-01 (south wall) (mg/kg) [1]	CON-WW-01 (west wall) (mg/kg) [1]	CON-BS-01 (excavation bottom) (mg/kg) [2]	CON-DUP-01 (Field Duplicate of SW) (mg/kg) [1]
Petroleum Hydrocarbons							
TPH-gro	100	39	5	32	17	5	26
Volatile Organic Compounds							
Ethylbenzene	6	0.2	NA	NA	NA	NA	NA
Total Xylene (m+, p-, o-)	9	1.29	NA	NA	NA	NA	NA
P-Isopropyltoluene	NA	0.99	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	NA	1.2	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	NA	0.018	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	NA	0.047	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	0.036	NA	NA	NA	NA	NA

Notes:

Soil samples collected on September 25, 2006

[1] - Sidewall samples collected at 6 feet below ground surface

[2] - Bottom sample collected at 10 feet below ground surface

mg/kg - milligrams per kilogram

MTCA - Model Toxics Control Act

NA - not analyzed

ND - not detected

TPH-gro - Total petroleum hydrocarbons, gasoline range organics

Appendix A. Analytical Reports for Confirmation Soil Samples

CCI
ANALYTICAL
LABORATORIES, INC

CERTIFICATE OF ANALYSIS

CLIENT: ERRG
1910 FAIRVIEW AVE. E SUITE 103
SEATTLE, WA 98124

DATE: 10/10/2006
CCIL JOB #: 0609129
DATE RECEIVED: 9/25/2006
WDOE ACCREDITATION #: C142

CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 10:50 CON-BS-01
CCIL SAMPLE #: -01

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	5	MG/KG	9/25/2006	GAP

NOTE: CHROMATOGRAM INDICATES SAMPLE CONTAINS UNIDENTIFIED VOLATILE RANGE PRODUCT

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

APPROVED BY:

8620 Holly Drive Suite 100 Everett, WA 98208 425 356-2600 FAX 425 356-2626 Seattle 206 292-9059

CCI
ANALYTICAL
LABORATORIES, INC

CERTIFICATE OF ANALYSIS

CLIENT: ERRG
1910 FAIRVIEW AVE. E SUITE 103
SEATTLE, WA 98124

DATE: 10/10/2006
CCIL JOB #: 0609129
DATE RECEIVED: 9/25/2006
WDOE ACCREDITATION #: C142

CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 11:00 CON-NW-01
CCIL SAMPLE #: -02

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	39	MG/KG	9/25/2006	GAP
Dichlorodifluoromethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Chloromethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Vinyl Chloride	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Bromomethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Chloroethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Trichlorofluoromethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Acetone	EPA-8260	ND(<370)	UG/KG	10/4/06	CCN
1,1-Dichloroethene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Methylene Chloride	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Acrylonitrile	EPA-8260	ND(<50)	UG/KG	10/3/2006	CCN
Methyl T-Butyl Ether	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Trans-1,2-Dichloroethene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,1-Dichloroethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
2-Butanone	EPA-8260	ND(<50)	UG/KG	10/3/2006	CCN
Cis-1,2-Dichloroethene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
2,2-Dichloropropane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Bromochloromethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Chloroform	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,1,1-Trichloroethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,1-Dichloropropene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Carbon Tetrachloride	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,2-Dichloroethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Benzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Trichloroethene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,2-Dichloropropane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Dibromomethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Bromodichloromethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Trans-1,3-Dichloropropene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
4-Methyl-2-Pentanone	EPA-8260	ND(<50)	UG/KG	10/3/2006	CCN
Toluene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Cis-1,3-Dichloropropene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,1,2-Trichloroethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
2-Hexanone	EPA-8260	ND(<50)	UG/KG	10/3/2006	CCN
1,3-Dichloropropane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN

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CERTIFICATE OF ANALYSIS

CLIENT: ERRG
1910 FAIRVIEW AVE. E SUITE 103
SEATTLE, WA 98124

DATE: 10/10/2006
CCIL JOB #: 0609129
DATE RECEIVED: 9/25/2006
WDOE ACCREDITATION #: C142

CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 11:00 CON-NW-01
CCIL SAMPLE #: -02

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
Tetrachloroethylene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Dibromochloromethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,2-Dibromoethane	EPA-8260	ND(<5)	UG/KG	10/3/2006	CCN
Chlorobenzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,1,1,2-Tetrachloroethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Ethylbenzene	EPA-8260	200	UG/KG	10/4/06	CCN
M+P Xylene	EPA-8260	970	UG/KG	10/4/06	CCN
Styrene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
O-Xylene	EPA-8260	320	UG/KG	10/4/06	CCN
Bromoform	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Isopropylbenzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,1,2,2-Tetrachloroethane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,2,3-Trichloropropane	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Bromobenzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
N-Propyl Benzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
2-Chlorotoluene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,3,5-Trimethylbenzene	EPA-8260	47	UG/KG	10/3/2006	CCN
4-Chlorotoluene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
T-Butyl Benzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,2,4-Trimethylbenzene	EPA-8260	36	UG/KG	10/3/2006	CCN
S-Butyl Benzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
P-Isopropyltoluene	EPA-8260	990	UG/KG	10/4/06	CCN
1,3 Dichlorobenzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,4-Dichlorobenzene	EPA-8260	18	UG/KG	10/3/2006	CCN
N-Butylbenzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,2-Dichlorobenzene	EPA-8260	1200	UG/KG	10/4/06	CCN
1,2-Dibromo 3-Chloropropane	EPA-8260	ND(<50)	UG/KG	10/3/2006	CCN
1,2,4-Trichlorobenzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Hexachlorobutadiene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
Naphthalene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN
1,2,3-Trichlorobenzene	EPA-8260	ND(<10)	UG/KG	10/3/2006	CCN

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CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 11:00 CON-NW-01
CCIL SAMPLE #: -02

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY

NOTE: CHROMATOGRAM INDICATES SAMPLE CONTAINS UNIDENTIFIED VOLATILE RANGE PRODUCT

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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DATE RECEIVED: 9/25/2006
WDOE ACCREDITATION #: C142

CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 11:10 CON-WW-01
CCIL SAMPLE #: -03

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	17	MG/KG	9/25/2006	GAP

NOTE: CHROMATOGRAM INDICATES SAMPLE CONTAINS UNIDENTIFIED VOLATILE RANGE PRODUCT

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

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CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 11:15 CON-SW-01
CCIL SAMPLE #: -04

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	32	MG/KG	9/25/2006	GAP

NOTE: CHROMATOGRAM INDICATES SAMPLE CONTAINS UNIDENTIFIED VOLATILE RANGE PRODUCT

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CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 11:20 CON-DUP-01
CCIL SAMPLE #: -05

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	26	MG/KG	9/25/2006	GAP

NOTE: CHROMATOGRAM INDICATES SAMPLE CONTAINS UNIDENTIFIED VOLATILE RANGE PRODUCT

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DATE: 10/10/2006
CCIL JOB #: 0609129
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WDOE ACCREDITATION #: C142

CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 11:30 CON-EW-01
CCIL SAMPLE #: -06

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	5	MG/KG	9/25/2006	GAP

NOTE: CHROMATOGRAM INDICATES SAMPLE CONTAINS UNIDENTIFIED VOLATILE RANGE PRODUCT

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** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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WDOE ACCREDITATION #: C142

CLIENT CONTACT: BERNIE WONG
CLIENT PROJECT ID: VERAX CHEMICAL
CLIENT SAMPLE ID: 9/25/2006 11:55 TRIP BLANK
CCIL SAMPLE #: -07

DATA RESULTS

ANALYTE	METHOD	RESULTS*	UNITS**	ANALYSIS DATE	ANALYSIS BY
TPH-Volatile Range	NWTPH-GX	ND(<50)	UG/L	9/25/2006	GAP

* "ND" INDICATES ANALYTE ANALYZED FOR BUT NOT DETECTED AT LEVEL ABOVE REPORTING LIMIT. REPORTING LIMIT IS GIVEN IN PARENTHESES.

** UNITS FOR ALL NON LIQUID SAMPLES ARE REPORTED ON A DRY WEIGHT BASIS

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CLIENT PROJECT ID: VERAX CHEMICAL

QUALITY CONTROL RESULTS

SURROGATE RECOVERY

CCIL SAMPLE ID		METHOD	SUR ID	% RECV
0609129-01		NWTPH-GX	TFT	86
0609129-02		NWTPH-GX	TFT	88
0609129-02		EPA-8260	1,2-Dichloroethane-d4	112
0609129-02		EPA-8260	Toluene-d8	98
0609129-02		EPA-8260	4-Bromofluorobenzene	120
0609129-02	DILUTION	EPA-8260	1,2-Dichloroethane-d4	126
0609129-02	DILUTION	EPA-8260	Toluene-d8	88
0609129-02	DILUTION	EPA-8260	4-Bromofluorobenzene	92
0609129-03		NWTPH-GX	TFT	81
0609129-04		NWTPH-GX	TFT	85
0609129-05		NWTPH-GX	TFT	74
0609129-06		NWTPH-GX	TFT	86
0609129-07		NWTPH-GX	TFT	92

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QUALITY CONTROL RESULTS

BLANK RESULTS

METHOD	MATRIX	QC BATCH ID	ASSOCIATED SAMPLES	ANALYTE	RESULT	UNITS
NWTPH-GX	Soil	GS092106	0609129 -01 to 06	TPH-Volatile Range	ND(<3)	MG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Dichlorodifluoromethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Chloromethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Vinyl Chloride	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Bromomethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Chloroethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Trichlorofluoromethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Acetone	ND(<50)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,1-Dichloroethene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Methylene Chloride	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Acrylonitrile	ND(<50)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Methyl T-Butyl Ether	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Trans-1,2-Dichloroethene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,1-Dichloroethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	2-Butanone	ND(<50)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Cis-1,2-Dichloroethene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	2,2-Dichloropropane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Bromochloromethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Chloroform	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,1,1-Trichloroethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,1-Dichloropropene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Carbon Tetrachloride	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2-Dichloroethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Benzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Trichloroethene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2-Dichloropropane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Dibromomethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Bromodichloromethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Trans-1,3-Dichloropropene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	4-Methyl-2-Pentanone	ND(<50)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Toluene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Cis-1,3-Dichloropropene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,1,2-Trichloroethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	2-Hexanone	ND(<50)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,3-Dichloropropane	ND(<10)	UG/KG

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QUALITY CONTROL RESULTS

BLANK RESULTS

METHOD	MATRIX	QC BATCH ID	ASSOCIATED SAMPLES	ANALYTE	RESULT	UNITS
EPA-8260	Soil	VS27100306	0609129 -02	Tetrachloroethylene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Dibromochloromethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2-Dibromoethane	ND(<5)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Chlorobenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,1,1,2-Tetrachloroethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Ethylbenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	M+P Xylene	ND(<20)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Styrene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	O-Xylene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Bromoform	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Isopropylbenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,1,2,2-Tetrachloroethane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2,3-Trichloropropane	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Bromobenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	N-Propyl Benzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	2-Chlorotoluene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,3,5-Trimethylbenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	4-Chlorotoluene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	T-Butyl Benzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2,4-Trimethylbenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	S-Butyl Benzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	P-Isopropyltoluene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,3 Dichlorobenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,4-Dichlorobenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	N-Butylbenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2-Dichlorobenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2-Dibromo 3-Chloropropane	ND(<50)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2,4-Trichlorobenzene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Hexachlorobutadiene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	Naphthalene	ND(<10)	UG/KG
EPA-8260	Soil	VS27100306	0609129 -02	1,2,3-Trichlorobenzene	ND(<10)	UG/KG
NWTPH-GX	Water	GW092206	0609129 -07	TPH-Volatile Range	ND(<50)	UG/L

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CLIENT PROJECT ID: VERAX CHEMICAL

QUALITY CONTROL RESULTS

SPIKE/SPIKE DUPLICATE RESULTS

METHOD	MATRIX	QC BATCH ID	ASSOCIATED SAMPLES	ANALYTE	SPIKE RECOVERY	SPIKE DUP RECOVERY	RPD
NWTPH-GX	Soil	GS092106	0609129 -01 to 06	TPH-Volatile Range	73 %	73 %	0
EPA-8260	Soil	VS27100306	0609129 -02	1,1-Dichloroethene	108 %	99 %	8
EPA-8260	Soil	VS27100306	0609129 -02	Benzene	95 %	99 %	4
EPA-8260	Soil	VS27100306	0609129 -02	Trichloroethene	100 %	101 %	1
EPA-8260	Soil	VS27100306	0609129 -02	Toluene	91 %	99 %	8
EPA-8260	Soil	VS27100306	0609129 -02	Chlorobenzene	79 %	87 %	9
NWTPH-GX	Water	GW092206	0609129 -07	TPH-Volatile Range	93 %	92 %	1

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Appendix B. Certificate of Contamination Destruction

Rinker MATERIALS™

Release of Liability/Certificate of Disposal

FINROW PROPERTIES; is released from liability for all petroleum contaminated soil originating from:

20102 BROADWAY AVE
SNOHOMISH WA.

and transported to:

Rinker Materials, Northwest Division.
6300 Glenwood Ave.
Everett WA 98203

On 09/26/2006

A total of 64.36 tons of petroleum contaminated soil were transported to the above facility. The material was treated and disposed of in the following manner:

Thermal Desorption/Landfill for Reclamation

Treatment/Disposal of the contaminated soil was performed in accordance with all applicable federal, state, and local laws and regulations.

Signed: Date: 11/20/20063:31:00 PM

Larry W. Baker

Operations Manager
Soil Remediation Division

Appendix C. Remedial Action Site Photographs

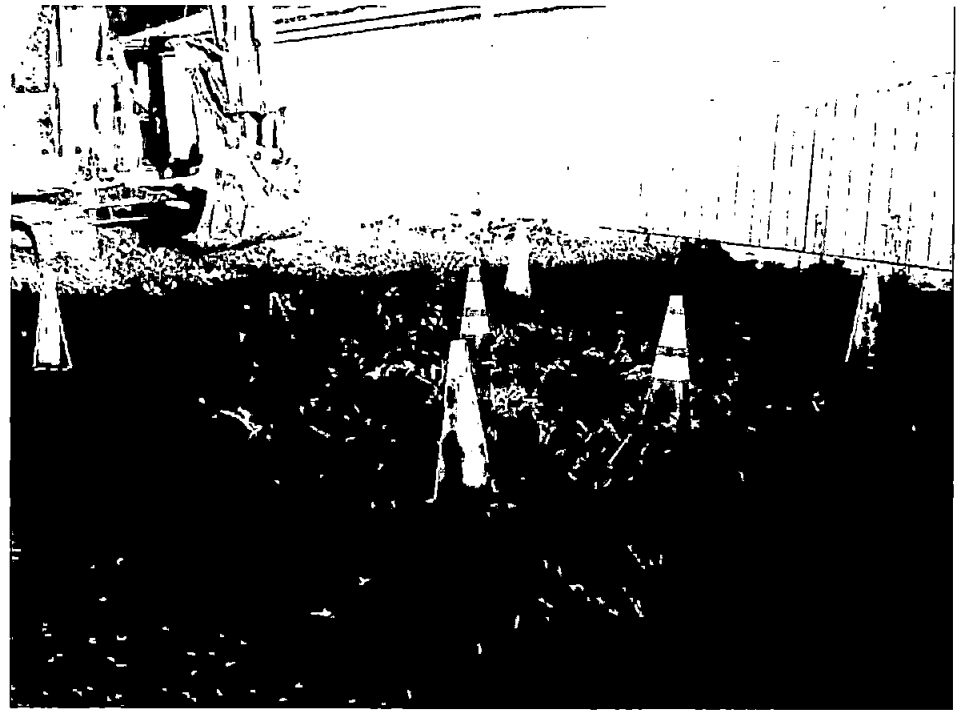

Photo 1: Traffic cones delineating the excavation limits

Photo 2. Excavation at the west wall showing the drain pipe buried approximately 3.5 feet below ground surface.

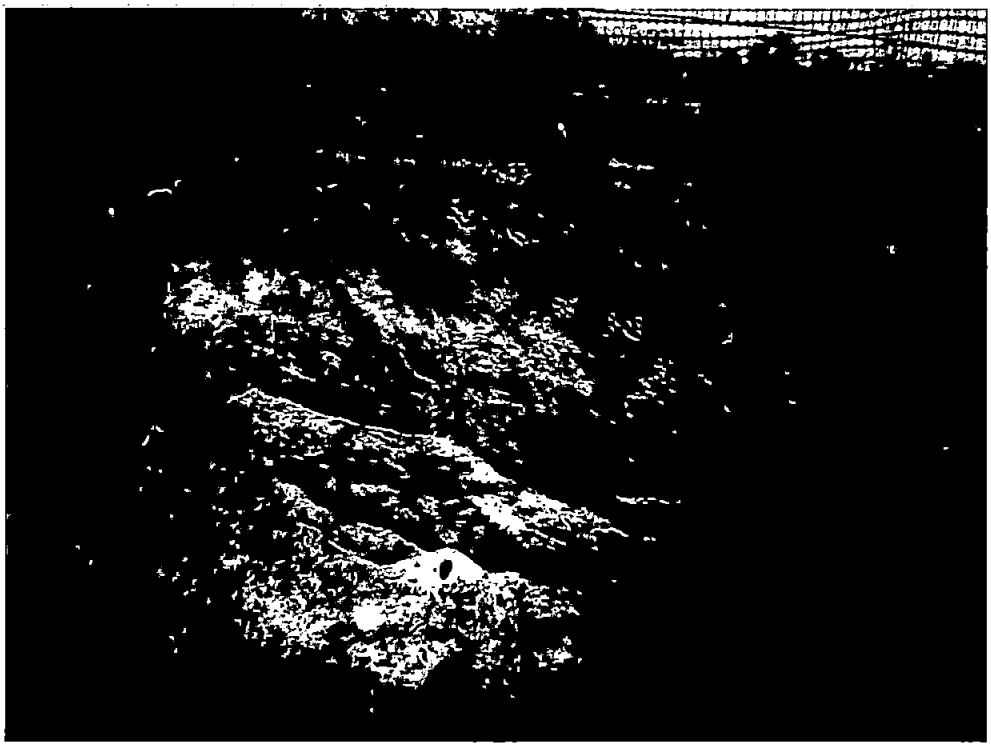

Photo 3. Excavation at the north wall showing the uncontaminated top soil (brown soil), and the underlying gray sand layer impacted by TPH-gro.

Photo 4. The completed excavated area surrounded by construction fence. Stockpiled backfill materials can be seen behind the excavation.

Photo 5. View of the excavation area following backfilling operations.