PERIODIC REVIEW REPORT
FINAL

BRUMFIELD TWIDWELL
Facility Site ID#: 94658144
Cleanup Site ID#: 6914

301 E Pioneer Avenue
Montesano, Washington 98563

Southwest Regional Office
TOXICS CLEANUP PROGRAM

December 2020

This page intentionally left blank
for double-sided copying.

TABLE OF CONTENTS

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 Brumfield Twidwell 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 an Agreed Order No. DE 2953 dated March 27, 2006 (Order). The cleanup actions resulted in concentrations of petroleum hydrocarbons remaining at the Site in soil and groundwater that exceeds MTCA Method A cleanup levels. The MTCA Method A cleanup levels for soil are established under WAC 173-340-740(2). The MTCA Method A cleanup levels for groundwater are established under WAC 173-340-720(3). WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a Site every five years under the following conditions:

(a) Whenever the department conducts a cleanup action.
(b) Whenever the department approves a cleanup action under an order, agreed order or consent decree.
(c) Or, as resources permit, whenever the department issues a No Further Action (NFA) opinion.
(d) And one of the following conditions exists:
    1. Institutional controls or financial assurance are required as part of the cleanup.
    2. Where the cleanup level is based on a practical quantitation limit.
    3. Where, in the department's judgment, modifications to the default equations or assumptions using Site-specific information would significantly increase the concentration of hazardous substances remaining at the Site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

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

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

The department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 SUMMARY OF CONDITIONS

2.1 Site History

The Brumfield Twidwell Property is located at 301 East Pioneer Street, Montesano, Washington, in Grays Harbor County. The property is comprised of multiple parcels, located on the south side of Pioneer Avenue in the City of Montesano. The property is currently a commercial property surrounded by other commercial businesses in the downtown district of Montesano. The Site elevation is approximately 25 feet above sea level moderately descending to the south, west and east. The Site is bounded by Pioneer Avenue to the north, vacant property to the south, Sylvia Street to the west and Grays Harbor Community Hospital to the east. 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 on June 16, 2006 and a satisfaction letter meeting the requirements of the Order was issued by Ecology on November 5, 2013.

Records indicated that the property was originally developed by Shell Oil Company as a gasoline service station and garage in 1927. The original building was on the corner of Pioneer Avenue and Sylvia Street. The building was added on to in 1936, 1939, and again in 1988. The property was put together through multiple purchasers over a period of many years. The purchases were made mostly by Brumfield-Twidwell, Inc. and consolidated into the Brumfield-Twidwell Ford car dealership. In 1988, the Brumfield-Twidwell Company was dissolved but retained the ownership of the property and the property was leased to the Ford Motor Company. Throughout the life of the building, it was consistently been used as an auto service station, auto repair and auto sales shop, until Ford Motor Company closed it down. Brumfield Twidwell acquired the property in 1966 and added the automotive dealership and Mr. Bryan Kolb purchased the property from Brumfield Twidwell in 1997. Mr. Kolb leased the building spaces to various tenants until 2005 when the structure was demolished to make way for proposed new development.

In 2005, GeoEngineers under contracted to Ecology, conducted a soil and groundwater assessment in the downtown commercial area of the City of Montesano. The preliminary results indicated that there was a widespread area of soil and groundwater contamination from a cluster of contaminated sites along Main Street and Pioneer Avenue. The Brumfield-Twidwell Site is one of six confirmed contaminated sites, along with ten other suspected sites, within this cluster.

During the Site operation, four underground storage tanks (USTs) were present at the Site. Three of the USTs (5,000-gallon, 10,000-gallon and one unknown capacity) were used to store gasoline and one 500-gallon UST was used to store the waste oil. Releases from some of these USTs had affected the soil and groundwater at the Site.

2.2 Site Geology and Hydrogeology

The subject property is underline by soils of the Wishkah silty clay loam classification. These very deep, somewhat poorly drained soils are on old alluvial terraces of glacial outwash plains. The slope is 0-2 percent. The soils commonly have a surface layer of very dark grayish brown silty clay loam approximately six inches thick. The substratum to a depth of 60 inches or more is mottled, light olive gray clay. In some areas, the substratum is as much as 50 percent gravel. These soils have a seasonal high water table that is at a depth of 30 to 42 inches from November to April. Runoff is slow and the hazard of water erosion is slight.

The groundwater flow is generally expected to follow surface topography. Based on the groundwater water gradient, the groundwater flows in southwesterly direction.

2.3 Cleanup Levels

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

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

Table 1. MTCA Method A soil and groundwater cleanup levels.

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

[1] mg/kg: milligrams per kilogram
[2] µg/L: micrograms per liter

2.4 Site Investigations and Remedial Actions

2.4.1 Previous Underground Storage Tanks System Decommissioning

In 1991, KD&S Environmental Services (KD&S) performed a Phase I and II Environmental Site Assessment (ESA) investigation. According to the KD&S reports, the original building constructed in 1927 was expanded in Phases in 1936, 1939, and 1989, which included the pouring of concrete floors. These modifications prompted the removal/closure of four USTs that had been in use up to that time. Tank #1 (500 gallon) was closed in-place by filling with sand slurry, Tank #2 (5,000 gallon) and Tank #4 (500 gallon) were also closed in-place by filling concrete slurry and Tank #3 (10,000 gallon) was removed. No soil samples were collected during the decommissioning of Tank #s 1, 2, and 4. However, five soil samples were collected during the decommissioning of Tank #3 and soil samples were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total petroleum hydrocarbons (TPH) using the hydrocarbon identification (HCID), EPA Method 418.1 Method. All the results were below the Model Toxics Control Act (MTCA) Method A cleanup levels. A figure showing the approximate locations of USTs and soil sample results are included as Appendix 6.3.

2.4.2 Montesano Fire Station, USTs Decommissioning, and Site Characterization

The Montesano Fire Station is located on Pioneer Avenue north of Brumfield Twidwell Site. In 1995, Northwest Testing Company (NTC) decommissioned two 300-gallon unleaded gasoline USTs at the Montesano Fire Department Station located directly up-gradient from the Brumfield Twidwell property. Northwest Testing reported that the contaminated soil with gasoline-range total petroleum hydrocarbons (TPH-G) and BTEX exceeding MTCA Method A cleanup levels were left in place. A composite soil sample from the east sidewall of the tank excavation and composted to the surface to a depth of 19 feet below ground surface (bgs) contained TPH-G at 15,800 mg/kg. There were extremely high levels of BTEX as well, up to 1,000 mg/kg benzene, 3,130 mg/kg of toluene, 1,600 mg/kg of ethylbenzene, and 4,450 mg/kg of xylenes. Northwest testing indicated that samples from the base of the excavation could not be obtained but that the soil appeared to be contaminated. Groundwater was assumed to be impacted but no testing was conducted. Approximate locations of two USTs and soil sample results are included as Appendix 6.4.

In May 2000, NTC completed a “Level II Site Characterization Study” for the Montesano Fire Station (MFS). Eight strata-probe soil borings were drilled around the MFS and eight soil samples (one sample per boring) were collected at a depth of 12 to 15 feet bgs. In addition, a second soil sample was collected at a depth of 9 to 12 feet bgs from two borings in the southwest portion of the property which was thought to be down-gradient from the former USTs locations. Groundwater samples were also collected on the two borings in the southwest portion of the property. Results of soil and groundwater samples did not indicate any contamination. However, soil samples were not collected in or adjacent to the sewer line or in the former tank excavation area where contamination had previously been documented. This potential pathway was not investigated. Approximate locations of soil borings and soil and groundwater sample results are included as Appendix 6.5.

2.4.3 GeoEngineers – Montesano Groundwater Investigation

The near surface aquifer beneath downtown Montesano has been contaminated with petroleum products because of number of leaking USTs. In 2005 and 2007, because of the reports of widespread contamination in the area, GeoEngineers under contract to Ecology, conducted a soil and groundwater assessment in the downtown commercial area of the City of Montesano. The preliminary results indicated that there was a widespread area of soil and groundwater contamination from a cluster of contaminated sites along Main Street and Pioneer Avenue. The Brumfield Twidwell site was one of the six confirmed sites, along with ten other suspected sites, within this cluster. The former gravity flow sanitary sewer system was replaced with a new pressurized step-up system. The investigation concluded that the former sewer system was not abandoned by backfilling with concrete slurry. The former sewer system along with the City of Montesano storm drainage system might be acting as a preferential pathway for petroleum-related contamination to spread from downtown Montesano towards the waterway to the south.

2.4.4 Site Subsurface Investigation – 2005

In June 2005, Entrix and Advance Environmental excavated a series of test pits along the west side of the Site to delineate the extent of soil contamination. The results indicated that clean soil extended from ground surface to depths of between four feet at the northeast corner of the property to approximately eight feet in the middle of the property. Below these depths to the groundwater table, the soil appeared to contain petroleum hydrocarbons at concentrations greater than MTCA Method A cleanup levels. Groundwater depths ranged from approximately 11.5 feet to 12.3 feet bgs at the time of investigation.

2.4.5 Interim Remedial Action (Soil Excavation and UST Decommissioning) – 2005

In September 2005, AEG and Advance Environmental conducted the excavation and disposal of approximately 2,079 tons of petroleum-contaminated soil from the Site. The contaminated soil was identified at approximately four feet bgs to a total depth of 19 feet bgs. The excavation extended from northwestern corner of the property approximately 37 feet to the east and 130 feet to the south.

During the soil excavation activities, another UST, approximately 10,000 gallon in capacity, was discovered in the western portion of the Site. It was determined that this tank may have been a “waste oil” tank. The tank was decommissioned by removing it from the ground. The soils beneath the tank indicated signs of being heavily impacted by petroleum contamination and were subsequently excavated for disposal. The results of confirmation soil samples collected beneath the tank, showed no detectable concentrations of petroleum contamination. The approximate extent of contaminated soil excavation is shown on Figure 2 in Appendix 6.6.

2.4.6 Supplemental Site & Off-Site Remedial Investigation – 2005 & 2006

In November and December 2005, additional test pits were excavated to characterize the Site more fully. Petroleum-contaminated soil was identified at the southern edge of the September 2005 excavation, to a depth of 12 feet bgs. The laboratory analytical results indicated that soils contained low levels of TPH-G (below MTCA Method A cleanup level) and benzene concentrations slightly above the MTCA Method A cleanup levels. Based on the laboratory results, a determination was made that the benzene concentrations were inconsistent and that the contamination was not widespread enough to warrant additional excavation of the soils.

In February 2006, groundwater from four existing wells at the Site and two off-Site wells located in the middle of Pioneer Street in front of the Fire Station known as the Steman wells were sampled. The results indicated that monitoring well MW-2 in the northwest corner of the former Brumfield Twidwell property was impacted by TPH-G and BTEX, above the MTCA Method A cleanup levels. The samples from the Steman wells, and the on-Site wells MW-1, and MW-4 contained no detectable concentrations of TPH-G and BTEX (because of the area-wide contamination, the Site wells, MW-1 through MW-6 were re-designated as BTMW-1 through BTMW-6 in order to be consistent with the designation used by Ecology during the regional groundwater investigations).

In March 2006, nine Geoprobe borings along Sylvia Street to further characterize the subsurface conditions in the area. Analytical results of soil samples collected during this phase of Supplemental Remedial Investigation at off-Site areas indicated that the east side of Sylvia Street was impacted to the north of the City of Montesano PUD property (near boring B-7) and the west side of Sylvia Street was impacted to the Pick-Rite Thriftway parking lot to the west were also impacted. Pick-Rite Thriftway conducted a separate investigation of the Thriftway property along with monitoring wells. Because of the findings from this Geoprobe borings, two additional groundwater monitoring wells (BTMW-5 and BTMW-6) were installed on the west side of Sylvia Street to supplement the four existing on-Site wells. Locations of all the soil borings and soil samples collected during various stages of subsurface investigation and Interim Remedial Action at the Site are shown in Figure 2, Site Characterization included in Appendix 6.6.

2.4.7 Pre-Agreed Order Quarterly Groundwater Monitoring

Four consecutive rounds of quarterly groundwater monitoring was conducted from February 2006 through March 2007. During these sampling events, groundwater analytical results from wells BTMW-1, BTMW-3, and BTMW-4 indicated either no detectable concentrations of constituents of concern (COCs) or concentrations below MTCA Method A cleanup levels. However, groundwater analytical results showed elevated TPH-G and benzene in well MW-2 at concentrations above MTCA Method A cleanup levels. The groundwater monitoring was ceased at wells BTMW-1, BTMW-3, and BTMW-4 after March 2007 event due no detectable concentrations of TPH-G and other COCs.

2.4.8 Agreed Order – 2006

Subsequent to the interim remedial action/source removal of the petroleum-contaminated soil at the Site and soil investigations, Mr. Kolb entered into an Agreed Order No. DE 2953 (AO) with Ecology. The AO required additional soil and groundwater Supplemental Remedial Investigations to evaluate the extent of impacted soil and groundwater at areas off-Site to the west and southwest of the Site. In addition, the AO required the monitoring of on-Site wells BTMW-2, BTMW-5, and BTMW-6 on an annual basis until the implementation of the remedy and the development of a Cleanup Action Plan (CAP) as part of the final Site cleanup.

As required by the AO, annual groundwater monitoring activities began in 2006 and continued until post-remedial action quarterly monitoring that was begun in April 2012. Two additional off-Site (PRMW-9 and PRMW-10) not specified in the required annual monitoring were added to the quarterly monitoring in 2012 as part of the confirmation monitoring following the remedial action at the Site. Initially groundwater sample results indicated elevated levels of TPH-G and BTEX above MTCA Method A cleanup levels in BTMW-2. However, after the Interim Remedial Action, there was decreasing trend in the concentrations in BTMW-2 and other down-gradient wells. The groundwater monitoring well locations and groundwater sample results are included as Appendix 6.7.

2.4.9 Off-Property Upgradient Issues – Montesano Fire Station and Other Potential Sources

The Montesano Fire Station is located directly upgradient to the north of the Site, across Pioneer Avenue in Montesano. Petroleum hydrocarbons contamination associated with this property and at areas adjacent to the south of the Fire Station were not fully investigated. Thus a remedial investigation at this property and at off-property locales downgradient to the south (at Pioneer Avenue and towards the former Brumfield-Twidwell property) and farther to the south-southwest along Sylvia Street was conducted to understand the overall petroleum hydrocarbons impact in this area of Montesano.

Additionally, AEG confirmed the presence of a former Mobile gasoline station, located adjacent to the east of the Montesano Fire Station, and the potential for this former gas station to be a contributing factor to the area-wide contamination and an upgradient facility to the Brumfield-Twidwell Site. Also, it was believed that the groundwater contamination exhibited at monitoring well BTMW-2 at the northwest corner of the Site was from off-property upgradient sources to the north, northeast, and/or northwest of the Site and not as a result of previous/residual contamination at the Site. In addition, it was determined that the City's abandoned open (not plugged with concrete slurry) old sanitary sewer lines located along Pioneer Avenue and Sylvia Street acting as a preferential pathway for the contamination.

2.4.10 Final Remedial Investigation

The lateral extent of impacted off-property area associated with the former Brumfield-Twidwell property was investigated during the Supplemental Remedial Investigation phase. However, the investigation did not extend beyond the western side of Sylvia Street (adjacent to the west of the Site). Hence, the goal of the Final Remedial Investigation was to investigate the nature and

extent of contamination at nearby down-gradient areas on the adjacent property to the west of the Site the Pick-Rite Thriftway property and at the intersection of Sylvia Street and Wynoochee Avenue (south of the Site) to fully characterize the lateral end of the plume. Two additional groundwater monitoring wells (PRMW-9 and PRMW-10) were installed and included in the monitoring program.

2.4.11 Feasibility Study

As per the requirements of the Cleanup Action Plan (CAP), a Site-specific Conceptual Site Model (CSM) was developed. Based on the CSM, a feasibility study (FS) was developed evaluating the following remedial alternatives.

- Alternative 1: No Action.
- Alternative 2: Soil Source Removal with Land Farming.
- Alternative 3: Soil Source Removal with Disposal.
- Alternative 4: Soil Source Removal with Disposal, Groundwater Treatment, and Groundwater Monitoring for Natural Attenuation.

After the evaluation of above remedial alternatives, Alternative 4 was selected as the most appropriate remedial alternative for the Site.

2.4.12 Remedial Actions

The remedial actions conducted at the Site included the source removal and disposal, groundwater treatment and long-term groundwater monitoring. As part of source removal and disposal and groundwater treatment, the following activities were conducted.

- Removal and disposal of two 10,000-gallon USTs.
- One 5,000-gallon and two 500-gallon USTs were closed-in-place.
- Excavation and off-Site disposal of approximately 2,079 tons of petroleum contaminated soil.
- In-situ bioremediation was used to accelerate the microbial degradation of remaining petroleum hydrocarbon impacted soil and groundwater. A total of 1,000 pounds of Oxygen Releasing Compound (ORC) was injected into the subsurface at 10 injection points (three near well PRMW-9, two near well BTMW-5, three near well BTMW-2, and two near well BTMW-6) at the Site. Locations of ORC injection points are shown on Figure 2 in Appendix 6.8.

2.4.13 Post Remedial Action Groundwater Monitoring

Following the remedial action/injection of ORC in January 2012, quarterly groundwater monitoring was conducted from April 2012 through January 2013. Groundwater samples were collected from wells BTMW-2, BTMW-5, BTMW-6, PRMW-9, and PRMW-10. All the water samples were analyzed for TPH-G, volatile organic compounds (including BTEX) and total lead.

Results of TPH-G concentrations in well BTMW-2 (871 µg/l to 1,860 µg/l) were above the MTCA Method A cleanup level of 800 µg/l. However, the TPH-G concentrations decreased during this quarterly monitoring period from 1,860 µg/l to 871 µg/l. In addition, ethylbenzene and total xylenes were detected below the MTCA Method A cleanup levels. All other contaminant concentrations were either below the MTCA Method A cleanup levels or below the laboratory detection limits.

TPH-G (482 µg/l to 1,430 µg/l), ethylbenzene (2.0 µg/l to 9.1 µg/l) and xylenes (9.4 µg/l to 45 µg/l) were detected in the groundwater samples collected from the off-Site well PRMW-9. However, ethylbenzene, and xylenes concentrations were below their MTCA Method A cleanup levels of 700 µg/l and 1,000 µg/l, respectively. The TPH-G concentration decreased from 1,430 µg/l to 482 µg/l during the quarterly monitoring period (April 2012 to January 2013). The TPH-G concentration of 482 µg/l during January 2013 sampling event was below the MTCA Method A cleanup level of 800 µg/l. No other COCs were detected above the laboratory detection limits. Groundwater monitoring well locations, groundwater elevation contour map and water sample results are included in Appendix 6.9.

Based on the presence of other contaminant sources in the Site vicinity, it was concluded that the petroleum related contamination found in wells BTMW-2 and PRMW-9 was from off-Site sources and the groundwater monitoring was discontinued and not requiring any more additional monitoring.

2.5 Restrictive Covenant

Following remediation activities, it was determined that institutional controls were necessary for the Site because the Remedial Action resulted in residual concentrations of TPH-G which exceeded the MTCA Method A cleanup levels for soils and groundwater established under WAC 173-340-740 and WAC 173-340-720, respectively. A Restrictive Covenant was recorded for the Site in Grays Harbor County on June 16, 2006. On November 15, 2013, Ecology issued Satisfaction of Agreed Order No. DE 2953 letter for completing the implementation of the selected remedial alternative as required by the CAP at the Site. The Restrictive Covenant imposes the following limitations:

Section 1:

a. No groundwater may be taken for domestic, agricultural or industrial uses from the Property.

b. A portion of the Property contains TPH-G contaminated soil located under the sidewalks and street right-of-way adjacent to the site. Owner shall not alter, modify, or remove these existing structures 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.

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:

a. The six monitoring wells installed to assess the ongoing status of groundwater that has been affected by the historical releases of TPH-G, shall be sampled in the locations, in the manner and according to the schedule provided in Exhibit B, at the soil cost of Owner. Upon completion of the sampling schedule set forth in Exhibit B, Ecology will then determine whether additional monitoring is needed, based on the first round of data. If such additional monitoring is required by Ecology, Ecology and Owner shall meet to discuss the appropriate extent and schedule of such additional monitoring. Such additional sampling shall also be at the sole cost of Owner. Samples will be analysed for TPH-G range constituents in accordance with the Remedial Investigation Work Plan, AEG, LLC, February 2006, a copy of which is on file with Ecology.

b. The integrity of monitoring wells placed on or adjacent to the Property for the purpose of groundwater monitoring shall be maintained by Owner for a minimum of three years form the date the monitoring wells are constructed and commence operation, or for a longer period if required by Ecology, if deemed necessary as a consequence of monitoring results. In the event future construction activities on the Property require abandonment or removal of monitoring wells on the Property, such removal or abandonment shall not occur without the prior written approval of Ecology. If groundwater monitoring wells are constructed on the Property but later need to be replaced, the monitoring wells shall be replaced in a manner approval by Ecology.

c. No right of access or use by a third party to any portion of the Property is conveyed by this instrument.

Section 4: Any activity on the Property that may result in the release or exposure to the environment of a hazardous that remains on the Property as part of the Remedial Acton, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 5: Owner of the Property must give thirty (30) days advance notice to Ecology of 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 Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 6: Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all leases of the restrictions on the use of the Property.

Section 7: Owner must notify and obtain approval form Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 8: Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the Property, and to inspect records that are related to the Remedial Action.

Section 9: 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.

Section 10: Pursuant to WAC 173-340-440(11), Owner shall maintain an adequate financial assurance mechanism to cover all costs associated with institutional controls, such as compliance monitoring and corrective measures at the Site.

Within sixty (60) days of the effective date of this Restrictive Covenant, Owner shall submit to Ecology for review and approval an estimate of the costs that it will incur in carrying out the terms of this Restrictive Covenant. Within sixty (60) days after Ecology approves the aforementioned cost estimate, Owner shall provide proof of financial assurances sufficient to cover all such costs in a form acceptable to Ecology.

Owner shall adjust the financial assurance and provide Ecology's project coordinator with documentation of the updated financial assurance for inflation, annually, within thirty (30) days of the anniversary date of the entry of this Restrictive Covenant or if applicable, ninety (90) days after the close of Owner's fiscal year if he financial test or corporate guarantee is used.

The Restrictive Covenant is available as Appendix 6.10.

3.0 PERIODIC REVIEW

3.1 Effectiveness of Completed Cleanup Actions

Based upon the Site visit conducted on January 10, 2020, the Site is occupied by the First Security Bank and other buildings. Some of the off-site groundwater contamination is beneath the Sylvia Street to the west. The building concrete floors and Sylvia Street asphalt pavement continues to eliminate exposure pathways (ingestion, direct contact) to the contaminated soils and groundwater. The concrete floors and asphalt pavement are in satisfactory condition and no repair, maintenance, or contingency actions are required.

Since the petroleum contaminated soil and groundwater were left in-place, four rounds of post remediation/compliance quarterly groundwater monitoring was conducted at five on and off-Site wells (BTMW-2, BTMW-5, BTMW-6, PRMW-9, and PRMW-10) at the Site. Results indicated that only TPH-G concentration exceeded the MTCA Method A cleanup level in well BTMW-2 and all other contaminant concentrations were either below MTCA Method A cleanup levels or below the laboratory detection limits in all other wells. Based on the other contaminant sources present in the Site vicinity, it was concluded that the contamination found in BTMW-2 and other off-site wells were from upgradient off-Site sources. As a result, the groundwater monitoring was discontinued requiring no additional long term monitoring.

The Environmental Covenant for the Site was recorded and is in place. This Environmental 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 Environmental Covenant serves to assure the long-term property use and integrity of the property surface.

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

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

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

The MTCA cleanup levels have not changed since the no further action determination letter was issued for the Site on February 24, 2014.

3.4 Current and Projected Site Use

The Site is currently used for commercial purposes and this use is not likely to change in the future. This land 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 the excavation and off-Site disposal of majority of contaminated soils, in-situ treatment of contaminated soil and groundwater by ORC, containment of remaining residual contaminated soils and natural attenuation of contaminated groundwater. The implemented remedy 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.
- Groundwater cleanup levels have not been met at well BTMW-2 at the Site. However, based on the other contaminant sources present in the Site vicinity, it was concluded that the petroleum contamination detected in well BTMW-2 and other wells were from off-Site sources. As a result, the groundwater monitoring was discontinued and the long term groundwater monitoring was not required at the Site.
- 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, Ecology has determined that the requirements of the Environmental 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.

4.1 Next Review

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

5.0 REFERENCES

Associated Environmental Group, LLC. Site Remedial Action, Groundwater Summary Report, and No Further Action Request, Former Brumfield-Twidwell, 301 East Pioneer Avenue, Montesano, Washington. April 10, 2013.

Restrictive Covenant. Brumfield Twidwell, Restrictive Covenant No. 20076-06160114 recorded on June 16, 2006 in Grays Harbor County, Washington.

Department of Ecology. Satisfaction of Agreed Order No. DE 2953, Dated 3/27/2006, Brumfield Twidwell, Montesano, Washington. November 15, 2013.

Associated Environmental Group, LLC. Final Cleanup Action Plan, Former Brumfield Twidwell (Ecology Agreed Order No. AE DE29523), September 26, 2011.

Associated Environmental Group, LLC. Final Remedial Investigation/Feasibility Study Report, Former Brumfield Twidwell, 301 Pioneer Avenue, Montesano, Washington. October 6, 2011.

Department of Ecology. Agreed Order No. AE DE2953, Brumfield Twidwell, Montesano, Washington. March 27, 2006.

GeoEngineers White Paper. Leaking Underground Storage Tanks, Montesano, Washington. 2007.

Department of Ecology. Montesano Groundwater Investigation of Leaking Underground Storage Tanks. September 2008 and April 2009.

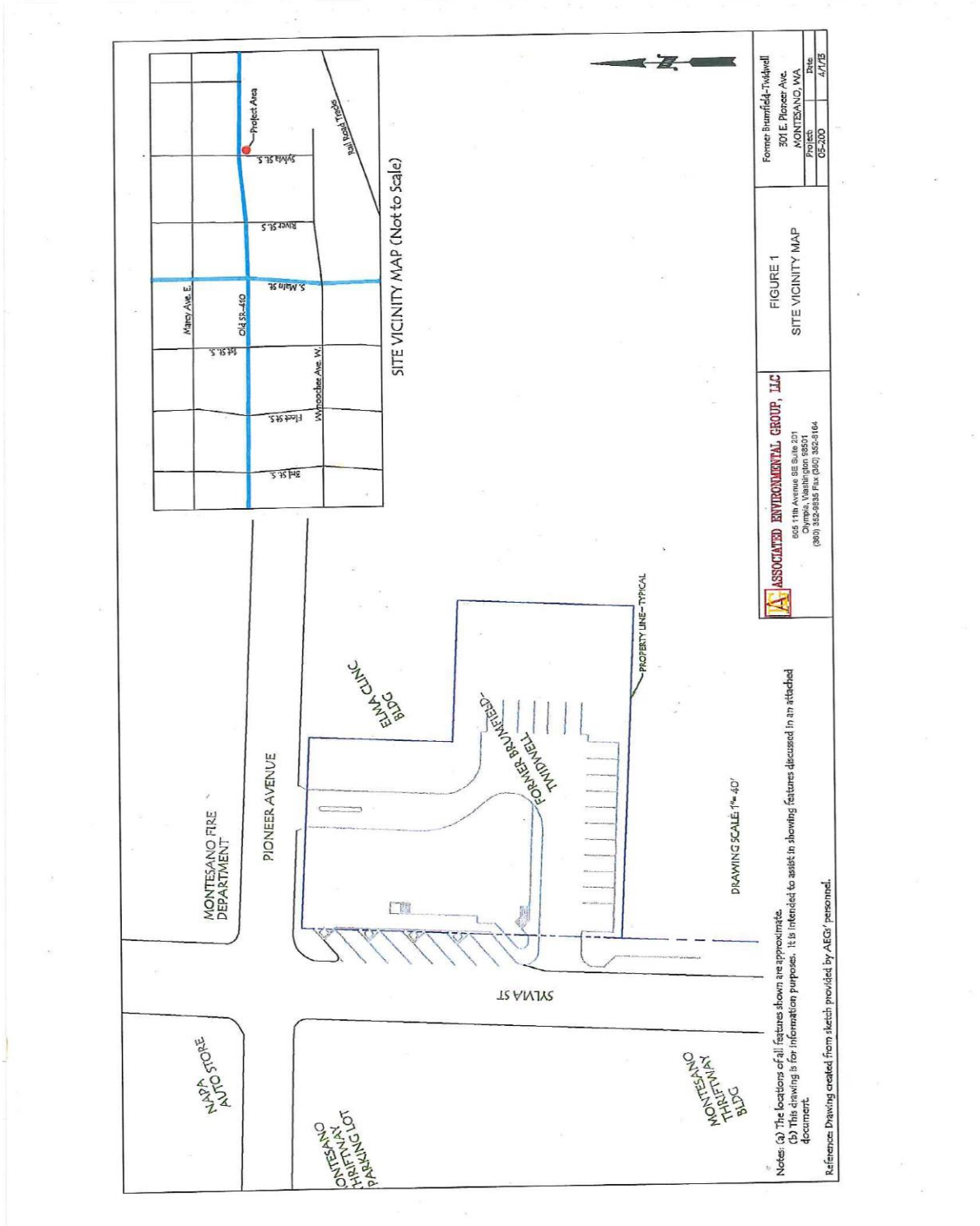
Department of Ecology. Montesano Groundwater Investigation of Leaking Underground Storage Tanks. October 2004 and March 2005.

Department of Ecology. Site Hazard Assessment, Brumfield Twidwell 301 Pioneer Avenue, Montesano, Grays Harbor County, Washington 98563.

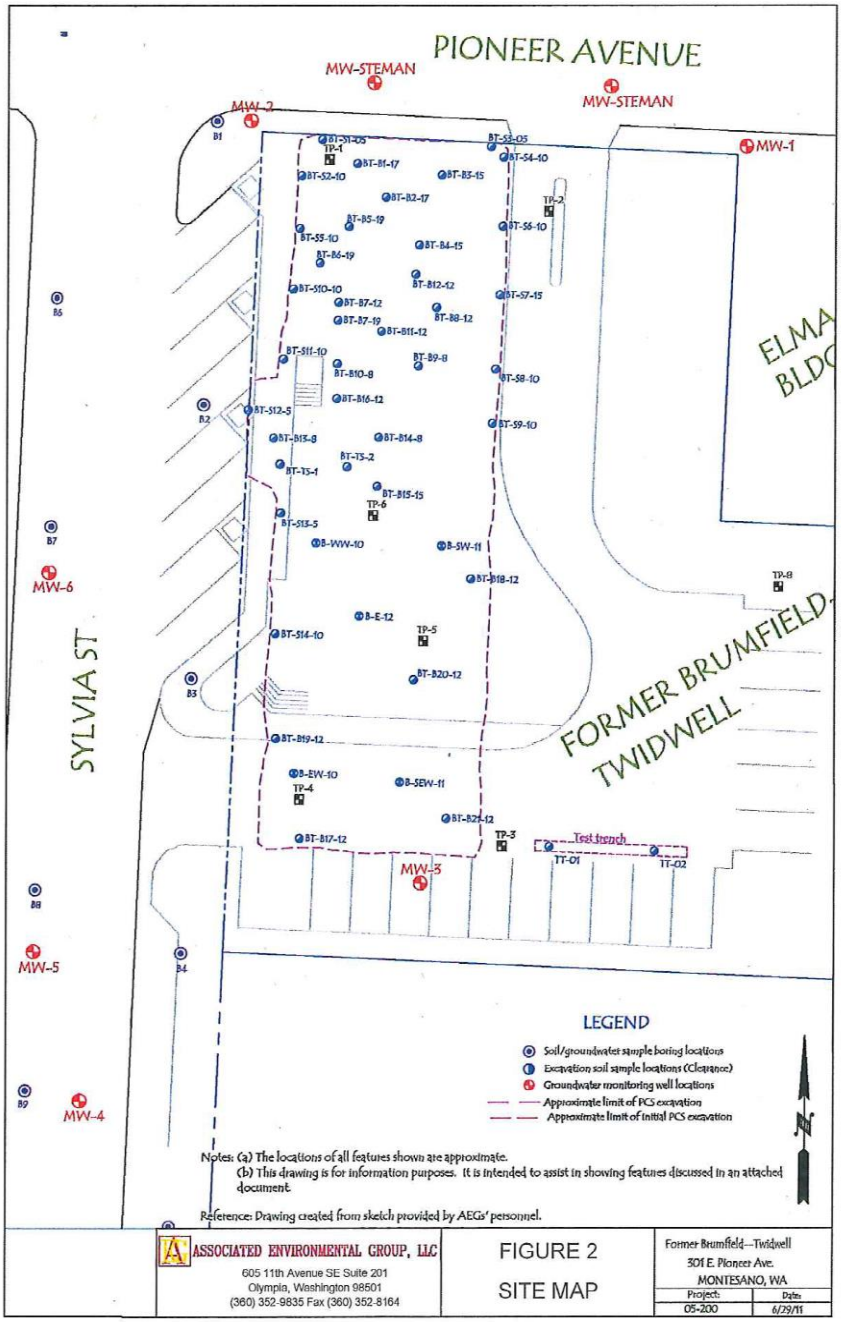
Department of Ecology. Site Visit. January 10, 2020.

6.0 APPENDICES

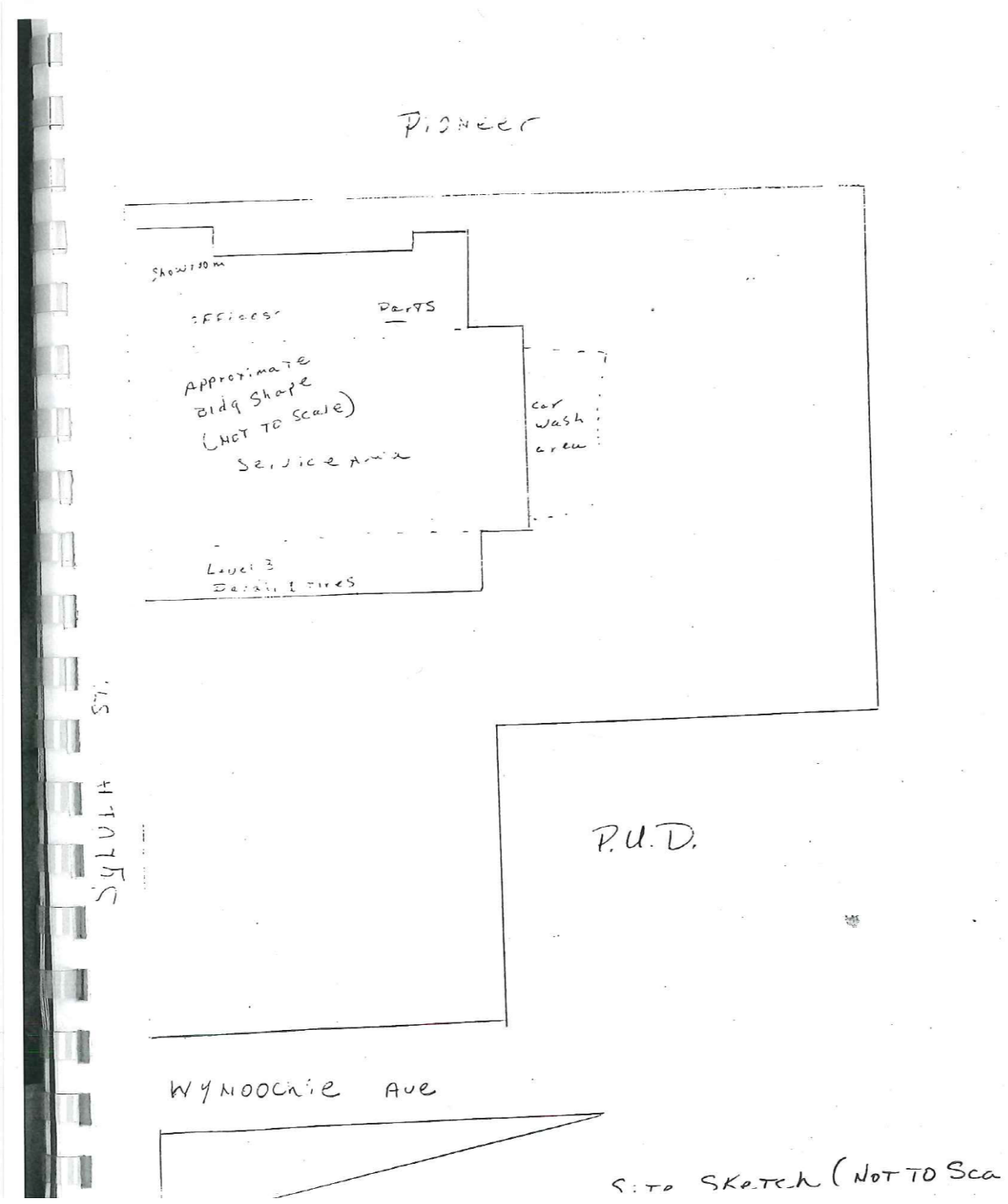
6.1 Vicinity Map

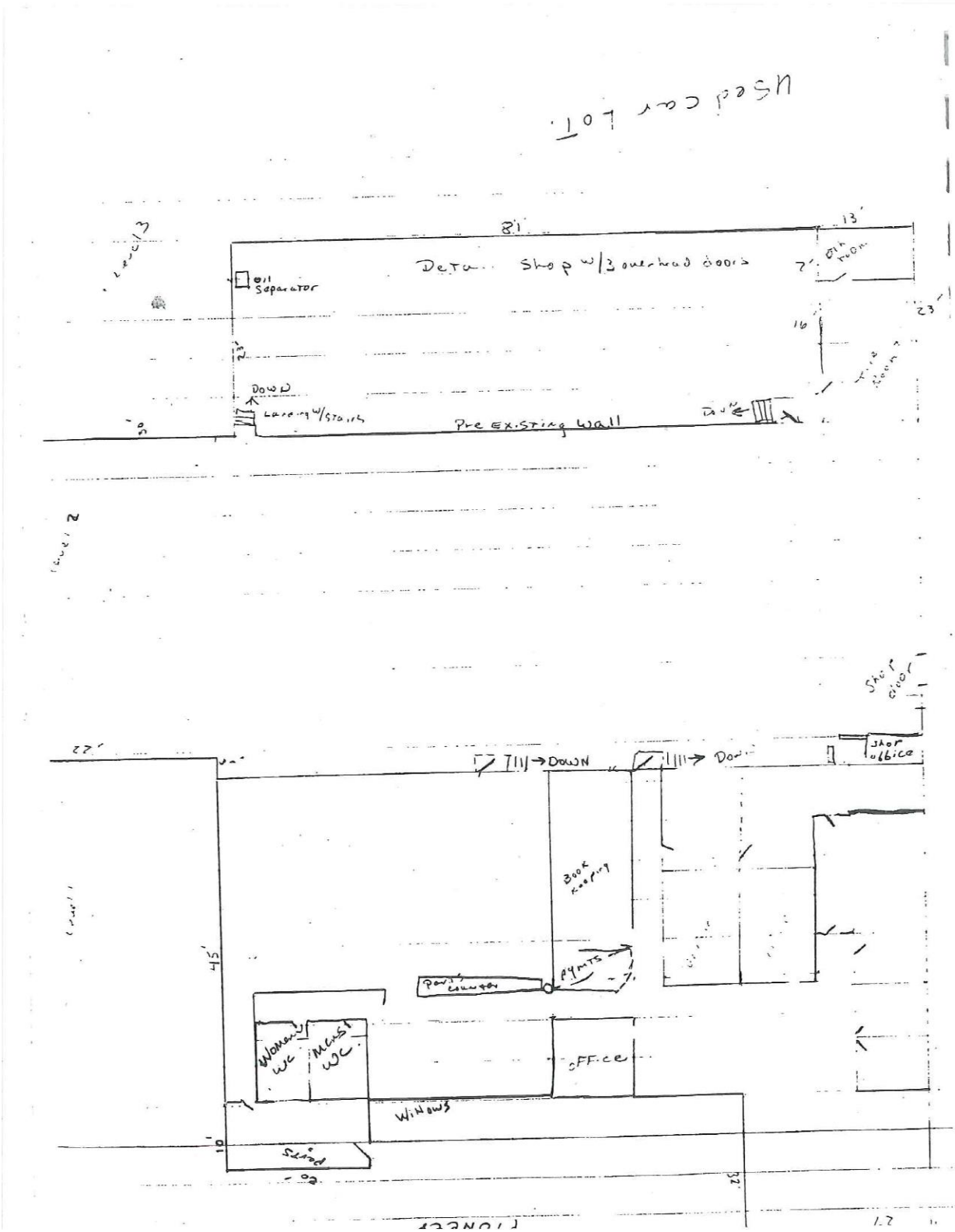


6.2 Site Plan


PIONEER AVENUE
MW-STEMAN
MW-STEMAN
MW-2
MW-1
MW-6
MW-5
MW-4
MW-3
SYLVIA ST
FORMER BRUMFIELD-TWIDWELL
ELMA BLDG
Test trench
TT-01
TT-02
LEGEND
Soil/groundwater sample boring locations
Excavation soil sample locations (Clearance)
Groundwater monitoring well locations
Approximate limit of PCS excavation
Approximate limit of initial PCS excavation
Note: (a) The locations of all features shown are approximate.
(b) This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.
Reference: Drawing created from sketch provided by AEG's personnel.
ASSOCIATED ENVIRONMENTAL GROUP, LLC
605 11th Avenue SE Suite 201
Olympia, Washington 98501
(360) 352-9835 Fax (360) 352-9164
FIGURE 2
SITE MAP
Former Brumfield---Twidwell
301 E. Pioneer Ave.
MONTESANO, WA
Project: 05-200
Date: 6/29/11

6.3 1991 – Underground Storage Tanks Decommissioning: Approximate Locations of USTs and Soil Sample Results




Used car lot.
81'
13'
Oil Separator
Detail Shop w/3 overhead doors
7'
Oil room
23'
16'
Tire room
DOWN
Landing w/stairs
Pre Existing Wall
DOWN
Shop office
DOWN
DOWN
Book keeping
Parts counter
PAYMTS
Woman's WC
Men's WC
OFFICE
WINDOWS
Stairs
45'
10'
22'
32'

KD&S
ENVIRONMENTAL SUPPORT SERVICES
269-16 Brady Loop Rd. Montesano,Wa98563 (206) 249-5540

TABLE OF RESULTS

Client: BRUMFIELD & SCOTT
Attention: BYRON SCOTT
Contractor: KD&S
Project: MONTE FORD

Job number: 9112
Report Date: 9/10/91
Report Number: 1
Page 1 of 1

Sample ID Number	SCOTT1SD	SCOTT2SD	SCOTT3SD	SCOTT4SD	SCOTT5SD		
Lab ID Number	73450	73451	73452	73453	73454		
Type of Sample	SOIL	SOIL	SOIL	SOIL	SOIL		
Location of Sample	EAST PROP.LINE	EAST PROP.LINE	NEAR PARTS DOOR	NEAR PUD STA.	NEAR WYNOOCHIE AVE.		
Date Sampled	8/13/91	8/13/91	8/13/91	813/91	8/13/91		
Sampled By	DEAN ----------				WILSON		
Container	GLASS 4 OZ. JARS SUPPLIED BY SPECTRA ANALYTICAL LABS.						
Type of Analysis	BTEX, TOTAL PETROLEUM HYDROCARBONS, AND TOTAL LEAD ON EACH SAMPLE						
Laboratory	SPECTRA LABORATORIES, INC TACOMA WASHINGTON. ----------						
Date Analyzed	8/20/91	8/20/91	8/20/91	8/20/91	8/20/91		
Analyzed by	STEVEN G. HIBBS, CHEMIST WITH SPECTRA LABS----------						
Date Results Received	8/22/91	8/22/91	8/22/91	8/22/91	8/22/91		
Analysis Results B	<0.3	<0.3	<0.3	<0.3	<0.3		
T	<0.3	<0.3	<0.3	<0.3	<0.3		
E	<0.3	<0.3	<0.3	<0.3	<0.3		
X	<0.5	<0.3	<0.3	<0.3	<0.3		
(above action level) TPH	47	13	5	19	10		

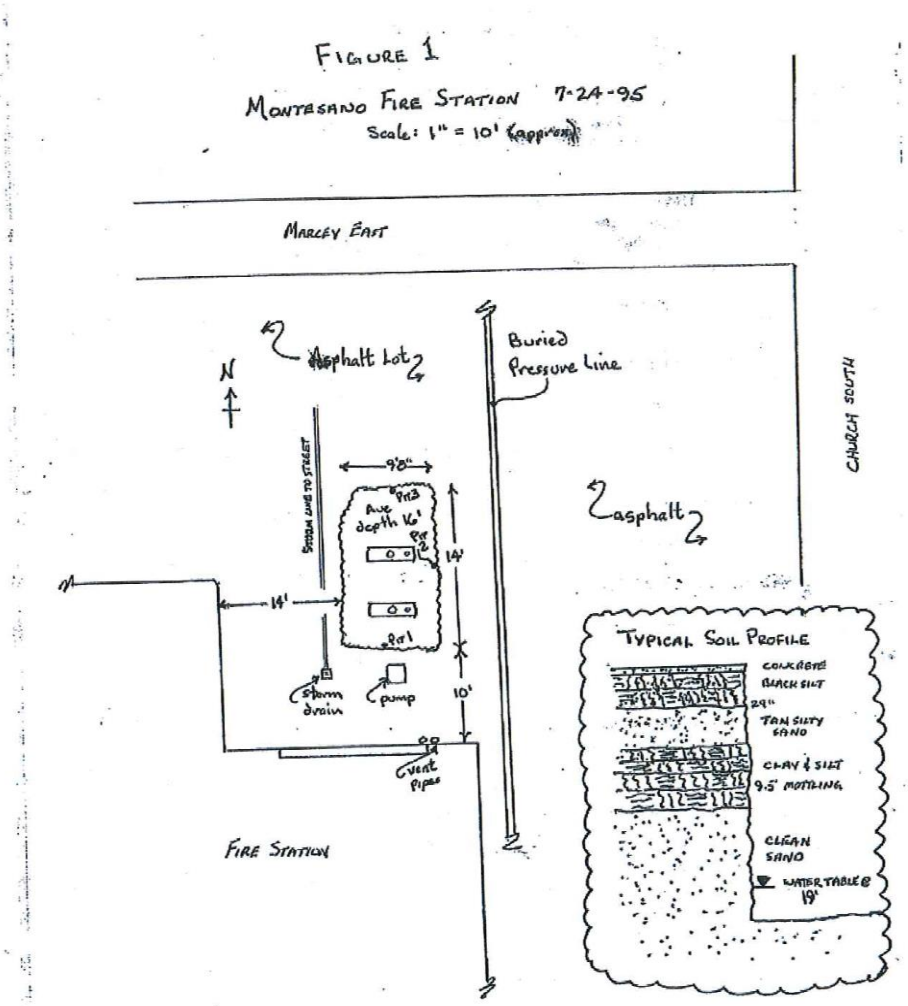
Action taken for each sample above action level:-NONE OF THE SAMPLES WERE EVEN CLOSE TO THE LEVEL THAT WOULD REQUIRE ANY REMEDIAL ACTION BE TAKEN
ALL LEAD SAMPLES WERE WELL BELOW THE LEVEL OF 250 PPM ALLOWABLE FOR SOIL.

signature

11

table 1-2 site check/assessment

6.4 1995 – Montesano Fire Station USTs Decommissioning: Approximate Location of USTs, Locations of Soil Samples, and Sample Results



2

WASHINGTON STATE DEPARTMENT OF ECOLOGY

INITIAL INVESTIGATION FIELD REPORT

FS ID: 26655668 **Start Date:** 7/24/1995 **County:** Grays Harbor

LUST ID: 3894 **Site ID:** 006500 **Number:** **Letter:**

SITE NAME: MONTESANO FIRE DEPT

File Here: TCP **Name on File:** Montesano Fire Dept.

Archive/Records Center/Comments: None

Gasline detections range from 91 to 15,800 ppm. There are extremely high levels of BTEX as well. up to 1000 ppm of benzene, 3130 ppm toluene, 1600 ethyl benzene, and 4450 ppm xylenes. All of these exceed MTCA Method A values. It appears that groundwater was never sampled.Report from 2000 - Report states that prior to the removal described above there were tanks removed from the site because it used to be a gas station. Also that two hoists were removed at some point. There was no information on the previous tank removal. The scope of this investigation is eight location selected for subsurface strata-probe sampling. Two of these were sampled for groundwater. There were no detections during this investigation. They state that the conditions reported around the USTs have not changed but nothing is migrating off site.

HCID:

TRANSGLOBAL ENVIRONMENTAL GEOSCIENCES NORTHWEST INC.

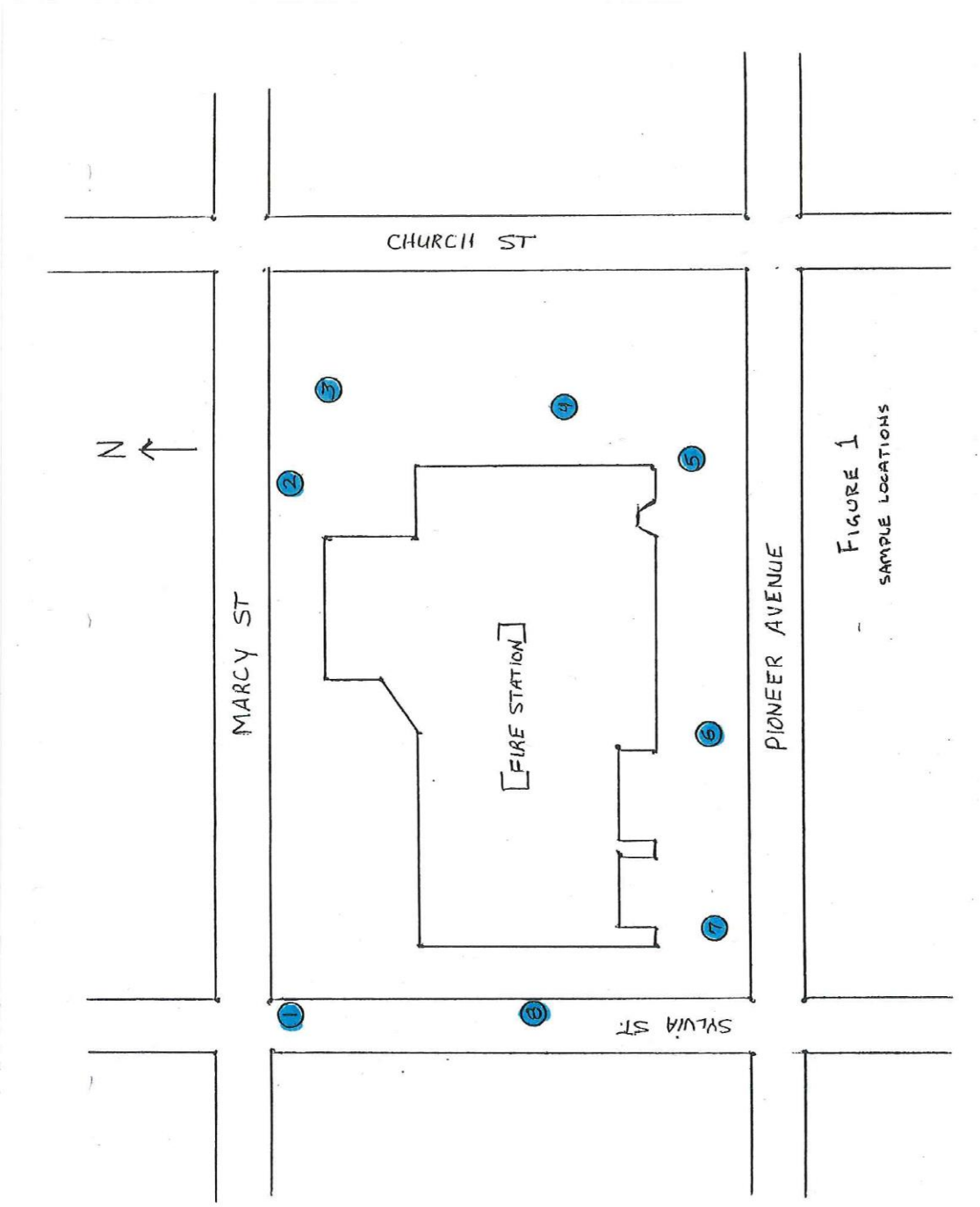
MONTESANO FIRE STATION PROJECT
Montesano, Washington
NW Testing, Inc.

Gasoline (WTPH-G) & BTEX (EPA 8020) Analyses for Soils

Sample Number	Date Analyzed	Benzene mg/kg	Toluene mg/kg	Eth Benz mg/kg	Xylene mg/kg	Gasoline mg/kg	Recovery (%)
Meth. Blank	07/25/95	nd	nd	nd	nd	nd	89
Pit 1	07/25/95	10.10	25.00	4.52	27.10	91	int
Pit 2	07/25/95	1000.00	3130.00	1600.00	4450.00	15800	int
Pit 3	07/25/95	103.00	446.00	144.00	695.00	3130	int
Stockpile 1	07/25/95	109.00	376.00	157.00	638.00	8340	int
Stockpile 2	07/25/95	690.00	2390.00	1110.00	3870.00	10600	int
Stockpile 3	07/25/95	143.00	822.00	158.00	1180.00	9470	int
Detection Limits		0.05	0.05	0.05	0.05	10	

"nd" Indicates not detected at the listed detection limits.
"int" Indicates that interferences prevent determination.

6.5 May 2000 – Montesano Fire Station Level II Site Characterization: Approximate Locations of Soil Borings and Soil and Groundwater Sample Results



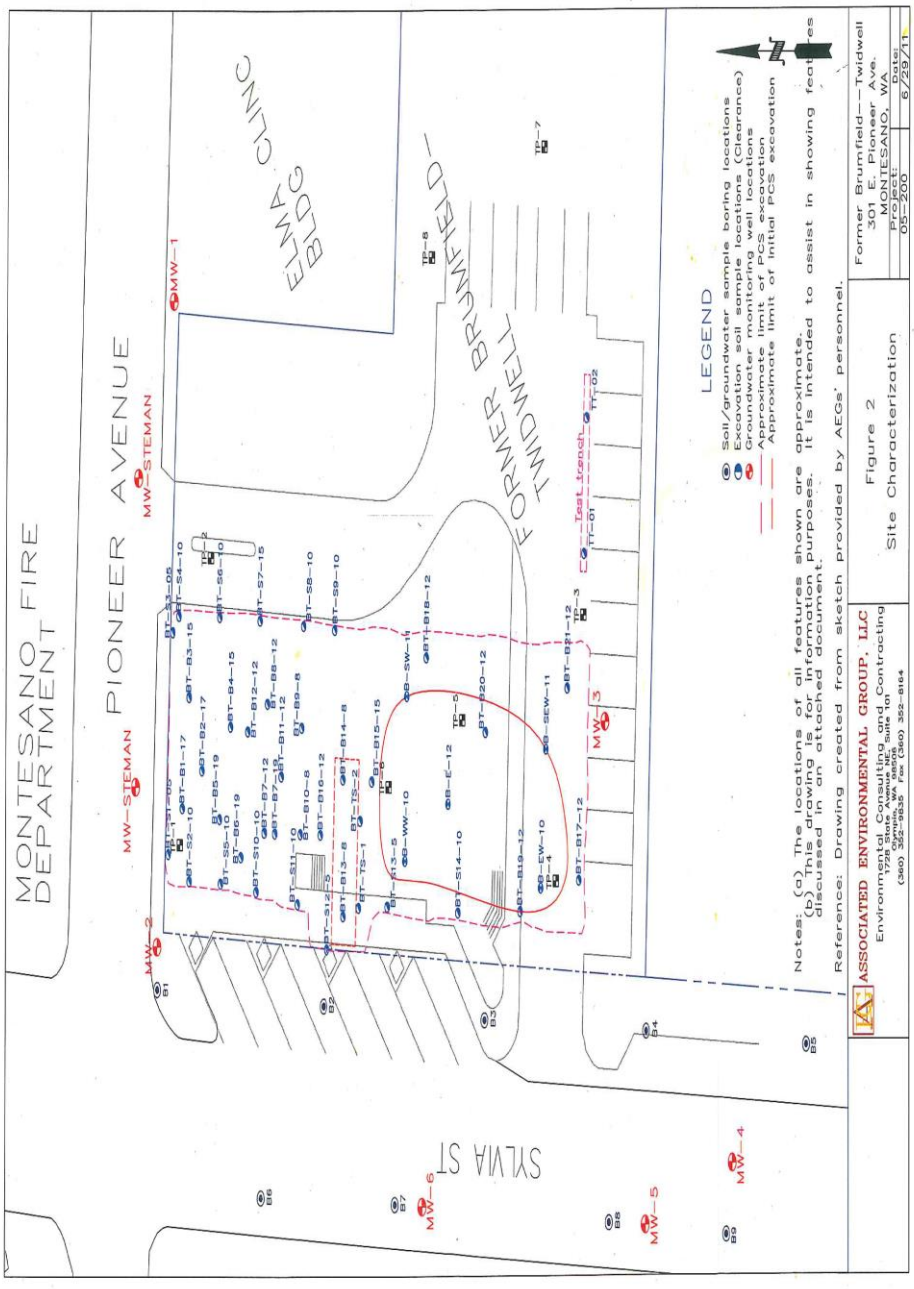
MONTESANO FIRE DEPARTMENT
RESULTS OF SOIL and GROUNDWATER SAMPLING ANALYSIS

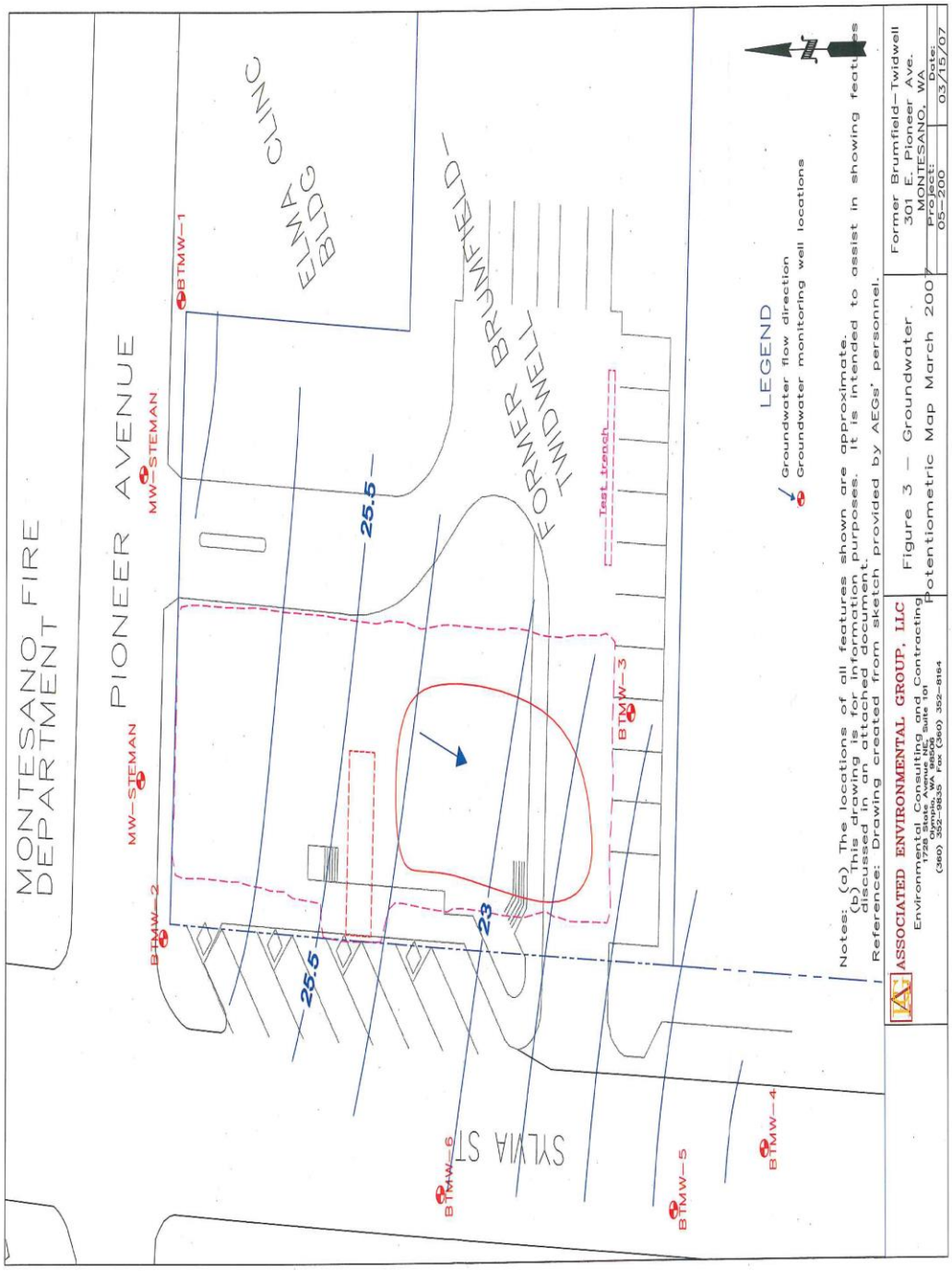
Sample Number	Sample Location	Sample Depth	Date Sample	Field Screen Results	Total Diesel/Oil	Total Gas	B	T	EB	X	
					WTPH-D Ext	WTPH-G					
					mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
	Diesel/Oil										
000504-1	Intersection of Marcey Street/Sylvia Street. SE corner.	14'-16'	5/4/00	nd	na	nd	na	na	na	na	na
000504-2	2' E of E building wall, 38' N of alcove N building wall.	14'-17'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd
000504-3	49' E of alcove E building wall, in line with N building wall.	13'-16'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd
000504-4	29' E of E building wall, 15' N of S building wall.	13'-16'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd
000504-5	28' S of S building wall, 2' E of E building wall.	12'-15'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd
000504-6A	28' S of S building wall, in line with E end of E Bay doorway.	9'-12'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd
000504-6B	28' S of S building wall, in line with E end of E Bay doorway.	12'-15'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd
000504-7A	28' S of S building wall, in line with W end of W Bay doorway.	9'-12'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd
000504-7B	28' S of S building wall, in line with W end of W Bay doorway.	12'-15'	5/4/00	nd	nd/nd	nd	nd	nd	nd	nd	nd
000504-8	40' N of S building wall, 14' W of W building wall.	12'-15'	5/4/00	nd	na	nd	na	na	na	na	na
					ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
000504-W6	28' S of S building wall, in line with E end of E Bay doorway.	10'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd
000504-W7	28' S of S building wall, in line with W end of W Bay doorway.	11'	5/4/00	nd	na	nd	nd	nd	nd	nd	nd

Table Notes:
na=not applicable
nd=non-detect
hs=heavy sheen
ms=moderate sheen
ss=slight sheen
ns=no sheen
mg/kg=parts per million
ug/l=parts per billion

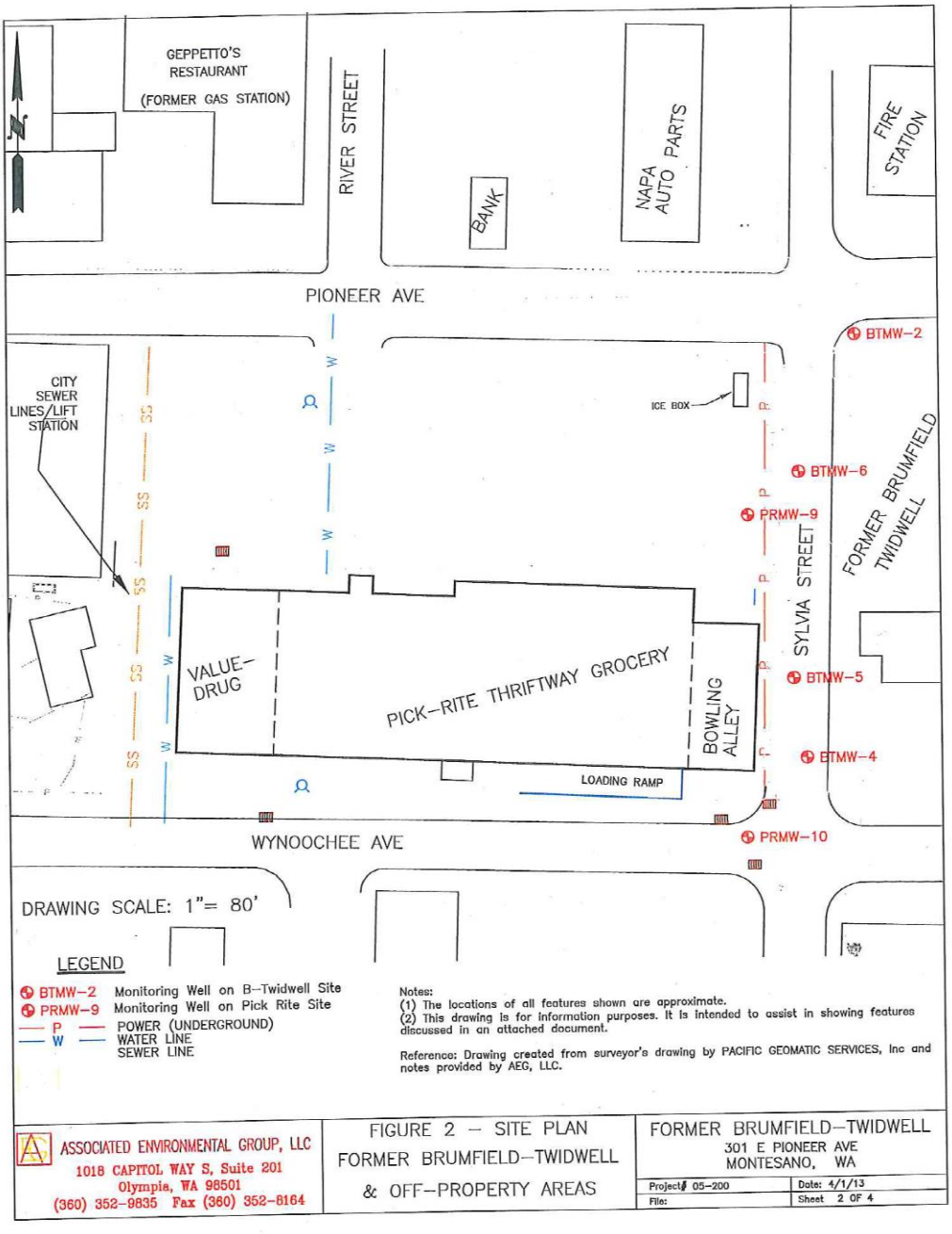
Page 1 of 1

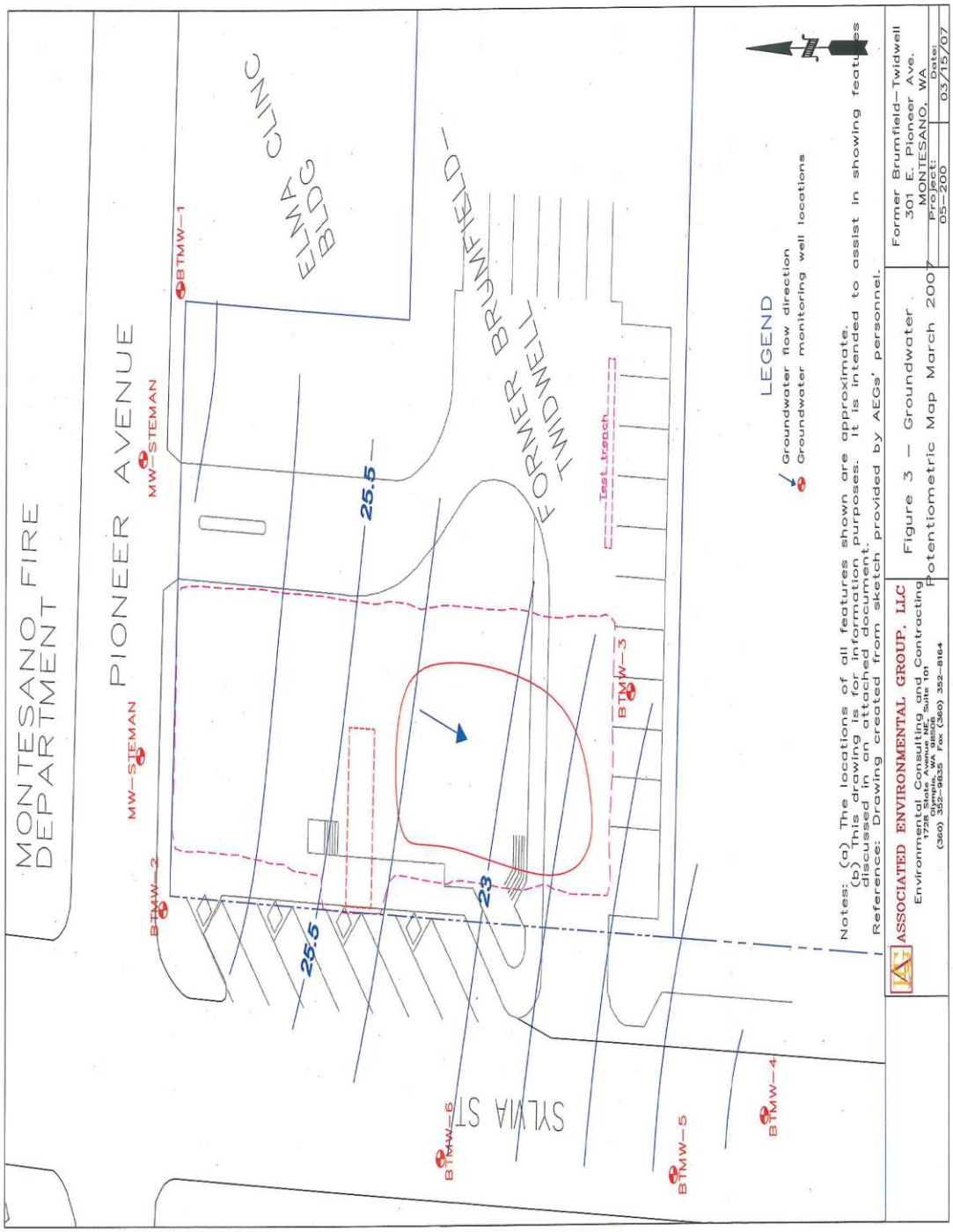
6.6 Site Charecterization Soil Sample Locations: All Phases of Investigation and Water Level Elevation Contour Map

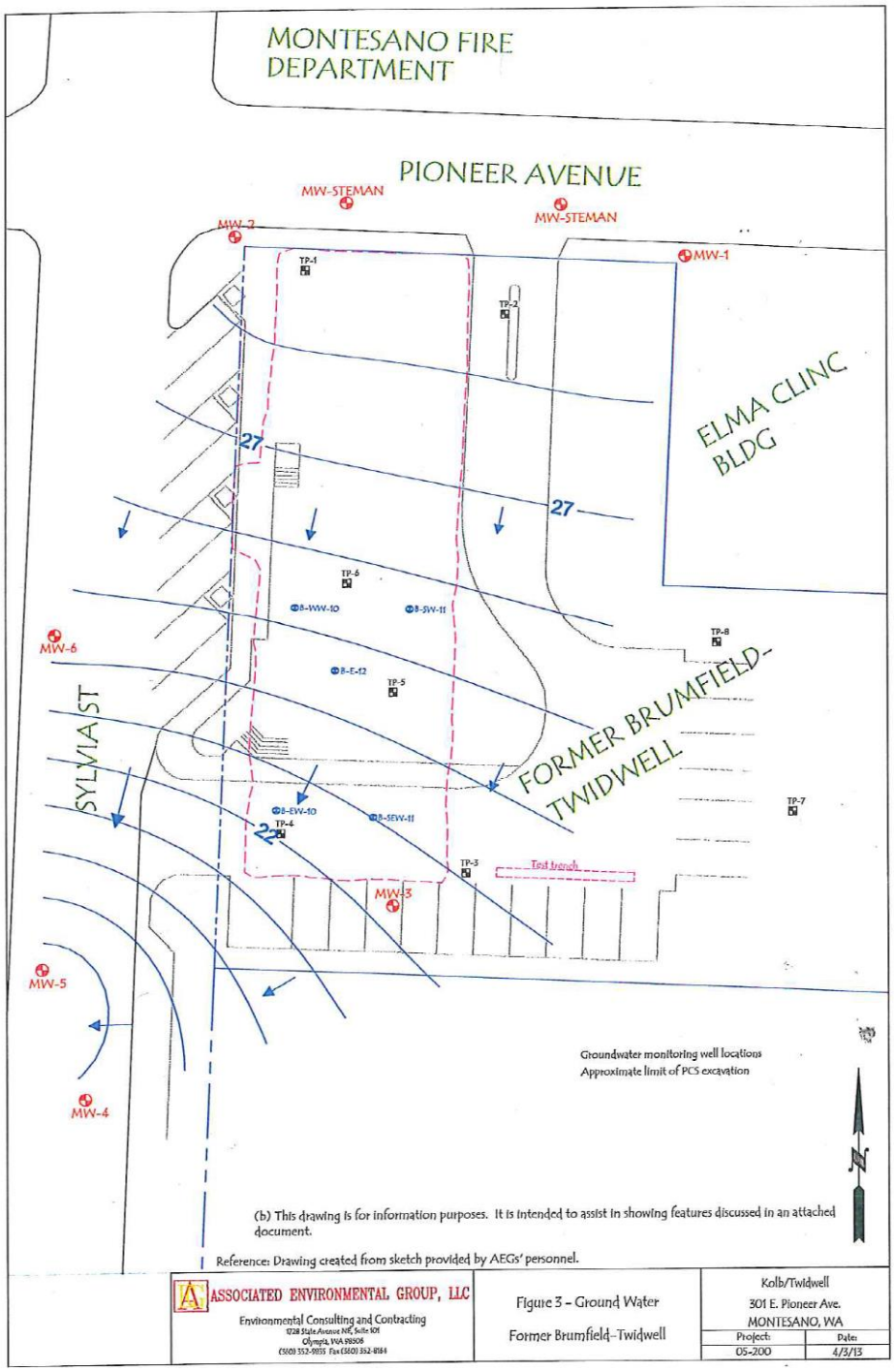



MONTESANO FIRE DEPARTMENT
PIONEER AVENUE
ELMA CLINIC BLDG
FORMER BRUMFIELD-TWIDWELL
Test trench
SYLVIA ST
MW-STEMAN
MW-STEMAN
BTMW-1
BTMW-2
BTMW-3
BTMW-4
BTMW-5
BTMW-6
25.5
25.5
23
LEGEND
Groundwater flow direction
Groundwater monitoring well locations
Notes: (a) The locations of all features shown are approximate.
(b) This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.
Reference: Drawing created from sketch provided by AEGs' personnel.
ASSOCIATED ENVIRONMENTAL GROUP, LLC
Environmental Consulting and Contracting
1728 State Avenue NE, Suite 101
Olympia, WA 98506
(360) 352-9835 Fax (360) 352-8164
Figure 3 – Groundwater Potentiometric Map March 2007
Former Brumfield-Twidwell
301 E. Pioneer Ave.
MONTESANO, WA.
PROJECT: 05-200
Date: 03/15/07

6.7 2006 – 2011 Annual Groundwater Monitoring: Groundwater Monitoring Well Locations, Groundwater Sample Results, and Groundwater Level Contour Maps




MONTESANO FIRE DEPARTMENT
PIONEER AVENUE
CLINIC
ELWA BLDG
FORMER BRUMFIELD-TWIDWELL
SYLVIA ST
MW-STEMAN
MW-STEMAN
BTMW-1
BTMW-2
BTMW-3
BTMW-4
BTMW-5
BTMW-6
25.5
25.5
23
Test trench
LEGEND
Groundwater flow direction
Groundwater monitoring well locations
Notes: (a) The locations of all features shown are approximate.
(b) This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.
Reference: Drawing created from sketch provided by AEGs' personnel.
ASSOCIATED ENVIRONMENTAL GROUP, LLC
Environmental Consulting and Contracting
Figure 3 - Groundwater Potentiometric Map March 2007
Former Brumfield-Twidwell
301 E. Pioneer Ave.
MONTESANO, WA
Project: 05-200
Date: 03/15/07


MONTESANO FIRE DEPARTMENT
PIONEER AVENUE
MW-STEMAN
MW-STEMAN
MW-2
MW-1
TP-1
TP-2
ELMA CLINC BLDG
27
27
TP-6
B-WW-10
B-SW-11
MW-6
B-E-12
TP-5
TP-8
SYLVIA ST
FORMER BRUMFIELD-TWIDWELL
B-EW-10
B-SEW-11
TP-4
22
TP-7
TP-3
Test trench
MW-3
MW-5
MW-4
Groundwater monitoring well locations
Approximate limit of PCS excavation
N
(b) This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.
Reference: Drawing created from sketch provided by AEGs' personnel.
ASSOCIATED ENVIRONMENTAL GROUP, LLC
Environmental Consulting and Contracting
1728 State Avenue NE, Suite 101
Olympia, WA 98506
(360) 352-9155 Fax (360) 352-9164
Figure 3 - Ground Water
Former Brumfield-Twidwell
Kolb/Twidwell
301 E. Pioneer Ave.
MONTESANO, WA
Project: 05-200
Date: 4/3/13

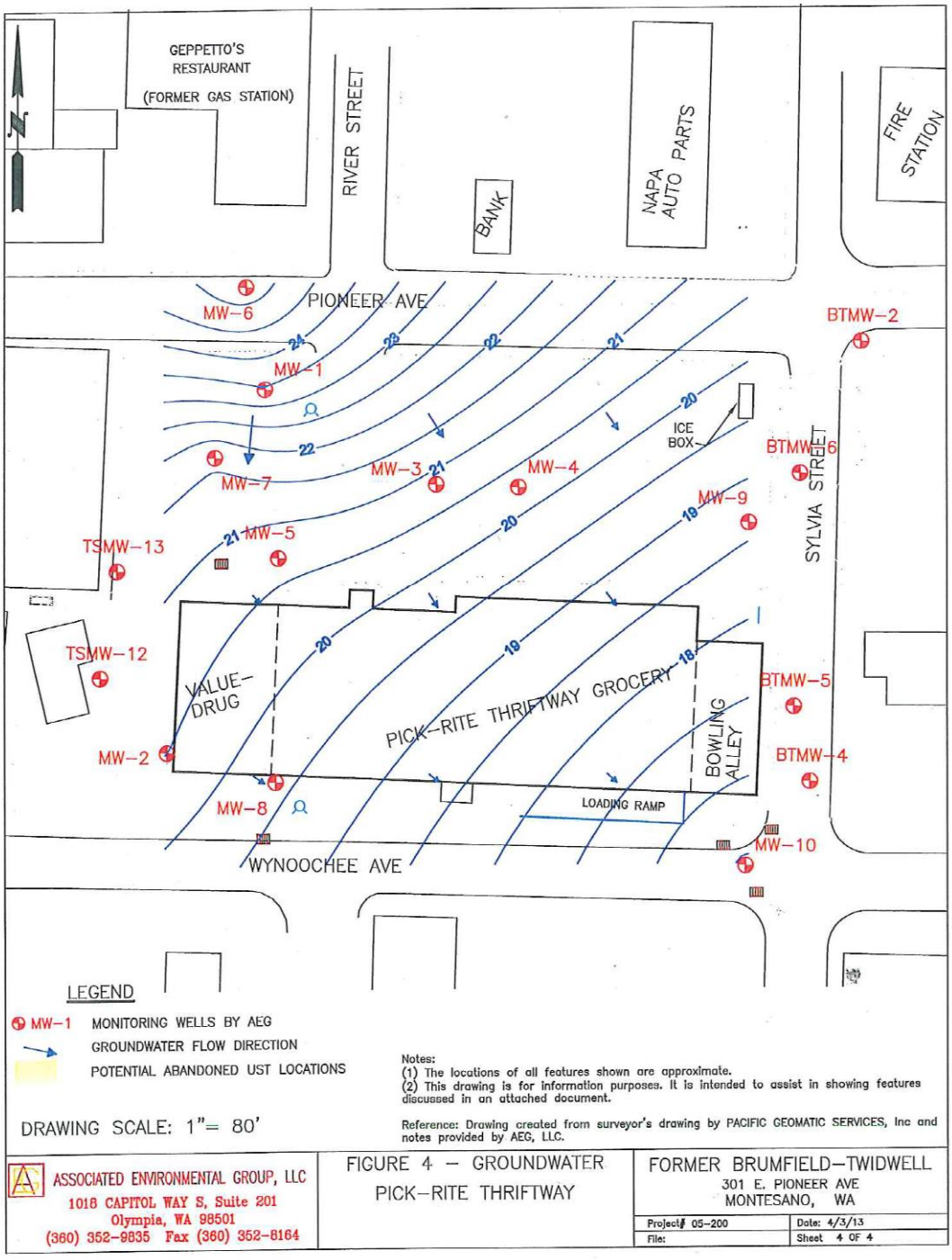

GEPPETTO'S RESTAURANT
(FORMER GAS STATION)
RIVER STREET
BANK
NAPA AUTO PARTS
FIRE STATION
PIONEER AVE
MW-6
MW-1
MW-7
MW-3
MW-4
MW-5
MW-9
MW-2
MW-8
MW-10
TSMW-13
TSMW-12
BTMW-2
BTMW-6
BTMW-5
BTMW-4
ICE BOX
SYLVIA STREET
VALUE-DRUG
PICK-RITE THRIFTWAY GROCERY
BOWLING ALLEY
LOADING RAMP
WYNOOCHEE AVE
24
23
22
21
20
19
18
LEGEND
MW-1 MONITORING WELLS BY AEG
GROUNDWATER FLOW DIRECTION
POTENTIAL ABANDONED UST LOCATIONS
Notes:
(1) The locations of all features shown are approximate.
(2) This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.
DRAWING SCALE: 1"= 80'
Reference: Drawing created from surveyor's drawing by PACIFIC GEOMATIC SERVICES, Inc and notes provided by AEG, LLC.
ASSOCIATED ENVIRONMENTAL GROUP, LLC
1018 CAPITOL WAY S, Suite 201
Olympia, WA 98501
(360) 352-9835 Fax (360) 352-8164
FIGURE 4 – GROUNDWATER
PICK-RITE THRIFTWAY
FORMER BRUMFIELD-TWIDWELL
301 E. PIONEER AVE
MONTESANO, WA
Project# 05-200
Date: 4/3/13
File:
Sheet 4 OF 4

Table 1 Summary of Quarterly Groundwater Analytical Results - Former Brumfield-Twidwell & Partial Pick-Rite
Former Brumfield-Twidwell Property & Off-Property Monitoring Wells
Montesano, WA

Sample Number[1]	Date	BTEX[2] (µg/L)				Gasoline[3] (µg/L)	Table 830-1 Constituents[4] (µg/L)				
		Benzene	Toluene	Ethylbenzene	Total Xylenes		1,2-Dichloroethane (EDC)	1,2-Dibromoethane (EDB)	Total Naphthalenes	MTBE	Total Lead[4]
BTMW-1*	2/8/2006	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
	8/17/2006	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	1/9/2007	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
BTMW-2	2/8/2006	589	810	1,280	10,100	58,000	--	--	--	--	--
	8/17/2006	136	176	323	1,570	1,970	<1.0	<0.01	101	<5.0	21
	1/9/2007	357	482	1,430	9,400	7,830	<1.0	<0.01	88.5	<5.0	9
	3/15/2007	355	495	828	4,970	24,600	--	--	--	--	--
	4/1/2008	12.8	211	503	4,040	7,730	<1.0	<0.01	73.5	<5.0	7.3
	4/9/2009	LNAPL present									
	5/13/2010	<1.0	<1.0	<1.0	6.4	160	<1.0	<0.01	<5.0	<5.0	<5.0
	5/13/2011	1.1	5.8	36.5	477	2,650	<1.0	<0.01	11.6	<5.0	<5.0
	4/11/2012	<1.0	<1.0	7.2	99.1	1,860	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	10/31/2012	<1.0	1.11	8.49	105	1,510	<1.0	<0.01	<5.0	<5.0	<5.0
	1/31/2013	<1.0	<1.0	4.4	52.4	871	<1.0	<0.01	<5.0	<5.0	<5.0
BTMW-3*	2/8/2006	<1.0	<1.0	2.7	24	120	--	--	--	--	--
	8/17/2006	<1.0	<1.0	4.4	17	175	<1.0	<0.01	<5.0	<5.0	<1.0
	1/9/2007	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
BTMW-4*	2/8/2006	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
	8/17/2006	<1.0	<1.0	2.1	12	100	<1.0	<0.01	<5.0	<5.0	10
	1/9/2007	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
BTMW-5	4/26/2006	4.0	10.2	5.3	25	1,100	--	--	--	--	--
	8/17/2006	<1.0	<1.0	1.3	20	101	<1.0	<0.01	<5.0	<5.0	<1.0
	1/9/2007	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
	4/1/2008	1.2	12.3	33.2	284	1,040	<1.0	<0.01	<5.0	<5.0	6.0
	4/8/2009	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	5/13/2010	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	5/13/2011	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	5.4
	4/11/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	10/31/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	23
	1/31/2013	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	--
BTMW-6	4/26/2006	45	41	170	365	3,390	--	--	--	--	--
	8/17/2006	7.1	7.9	1.5	116	611	<1.0	<0.01	8.0	<5.0	13
	1/9/2007	4.0	3.9	37	107	380	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	4.99	7.3	33	70	450	--	--	--	--	--
	4/1/2008	1.8	8.5	143	211	1,500	<1.0	<0.01	8.2	<5.0	<1.0
	4/8/2009	1.3	4.1	168	120	2,060	<1.0	<0.01	55.5	<5.0	<5.0
	5/12/2010	<1.0	<1.0	11.5	16.3	320	<1.0	<0.01	16.3	<5.0	<5.0
	5/12/2011	<1.0	<1.0	<1.0	1.8	498	<1.0	<0.01	14	<5.0	<5.0
	4/11/2012	<1.0	<1.0	<1.0	<1.0	340	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	2.1
	10/31/2012	<1.0	<1.0	<1.0	1.43	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	1/31/2013	<1.0	<1.0	<1.0	<1.0	253	<1.0	<0.01	<5.0	<5.0	<5.0
PRMW-9[5]	12/1/2010	43.6	75.8	232	413	4,133	--	--	--	--	--
	3/8/2011	35.8	63.2	500	13,300	5,180	--	--	--	--	--
	6/9/2011	<1.0	34.4	450	1,460	9,240	--	--	--	--	--
	4/11/2012	<1.0	<1.0	13.9	45	1,430	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	9.1	41.8	894	<1.0	<0.01	16.5	<5.0	<5.0
	10/31/2012	<1.0	<1.0	6.02	28.7	1,130	<1.0	<0.01	39.8	<5.0	<5.0
	1/31/2013	<1.0	<1.0	2.0	9.4	482	<1.0	<0.01	9.2	<5.0	<5.0
PRMW-10[5]	12/1/2010	<1.0	<2.0	<1.0	<3.0	<100	--	--	--	--	--
	3/8/2011	<1.0	<2.0	<1.0	<3.0	<100	--	--	--	--	--
	6/9/2011	<1.0	<2.0	<1.0	<3.0	<100	--	--	--	--	--
	4/11/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	10/31/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	1/31/2013	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
PQL		1.0	1.0 or 2.0	1.0	1.0 or 3.0	100	1.0	0.01	5.0	5.0	1.0 or 5.0
Method A Cleanup Levels		5	1,000	700	1,000	800[6]	5	0.01	160	20	15

Notes:
[1] Approximate monitoring well locations are shown in Figure 1
[2] Analyzed by EPA Method 8021B.
[3] Analyzed by Northwest Method NWTPH-Gx
[4] Analyzed by EPA Method 7421
[6] Cleanup level with presence of benzene
[5] PRMW-9 & PRMW-10: monitoring wells on Pick-Rite Thriftway and Wynoochee Ave. ROW

µg/L = micrograms per liter
"<" not detected above laboratory detection limits.
MTBE = methyl tertiary-butyl ether
-- = not analyzed for this constituent
Bold indicates the detected concentration exceeds MTCA Method A cleanup levels
* = ceased groundwater monitoring/sampling activities at this well

Table 2 Summary of Quarterly Groundwater Elevations
Former Brumfield-Twidwell Property & Off-Property Monitoring Wells
Montesano, WA

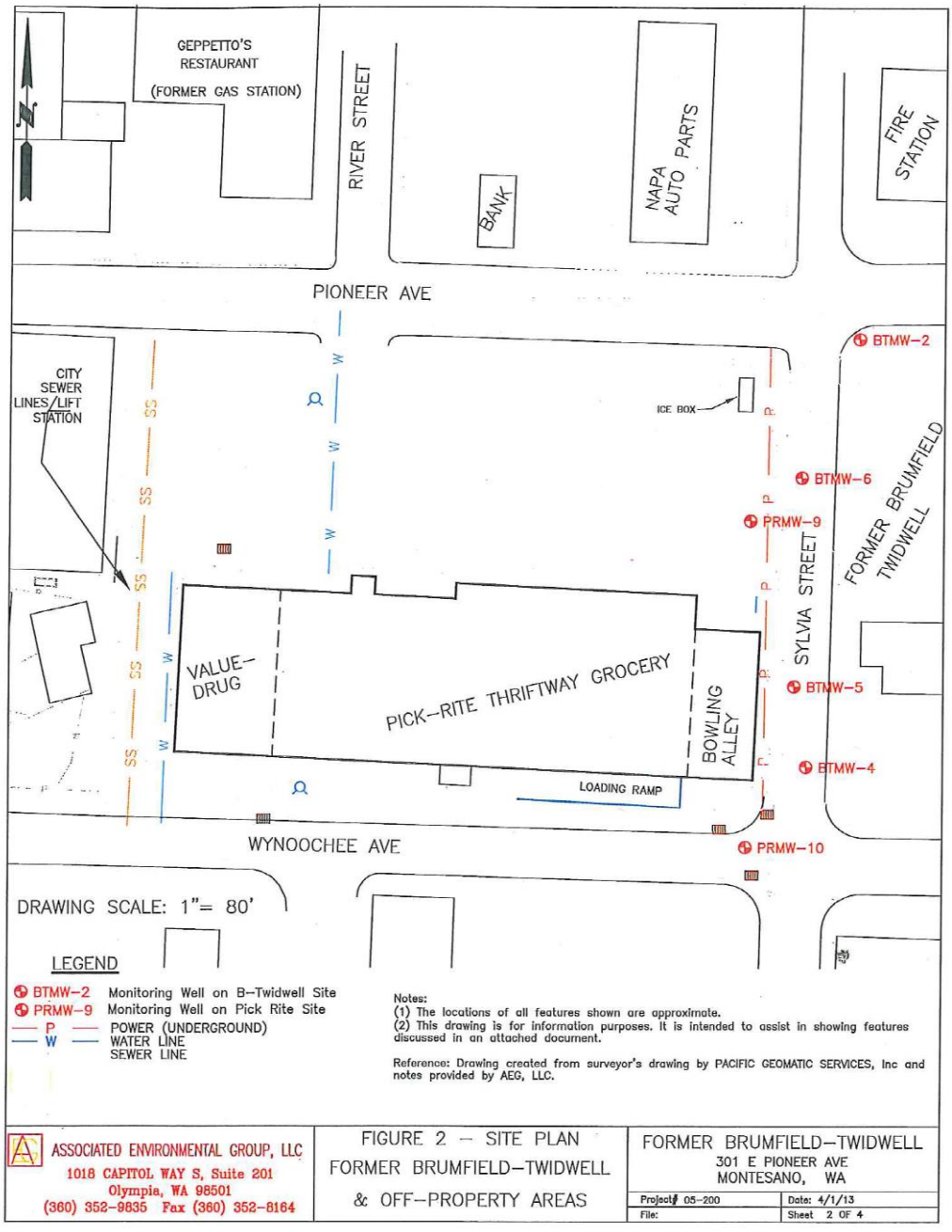
Well Number/ TOC Elevation (feet)	Date of Measurement	DTW (feet)	DT LPH (feet)	LPH (feet)	GW Elevation (feet)	Change in GW Elevation (feet)
BTMW-1* 37.39	2/7/2006	9.26			28.13	--
	8/17/2006	15.05			22.34	-5.79
	1/9/2007	8.65			28.74	6.40
	3/15/2007	9.70			27.69	-1.05
BTMW-2 37.44	2/7/2006	9.73			27.71	--
	8/17/2006	15.09			22.35	-5.36
	1/9/2007	9.10			28.34	5.99
	3/15/2007	10.16			27.28	-1.06
	4/1/2007	11.44			26.00	-1.28
	4/8/2009	12.59	12.57	0.02	24.87	-1.13
	5/12/2010	11.89			25.55	0.68
	5/12/2011	11.46			25.98	0.43
	4/11/2012	10.49			26.95	0.97
	8/16/2012	12.68			24.76	-2.19
	10//31/2012	9.00			28.44	3.68
	1/31/2012	10.87			26.57	-1.87
BTMW-3* 30.08	2/7/2006	10.78			19.30	--
	8/17/2006	12.68			17.40	-1.90
	1/9/2007	8.59			21.49	4.09
	3/15/2007	9.62			20.46	-1.03
	4/1/2007	--			--	--
	4/8/2009	11.02			19.06	-1.40
BTMW-4* 29.31	2/7/2006	9.15			20.16	--
	8/17/2006	13.61			15.70	-4.46
	1/9/2007	10.78			18.53	2.83
	3/15/2007	11.20			18.11	-0.42
BTMW-5 30.34	4/26/2006	13.20			17.14	--
	8/17/2006	13.91			16.43	-0.71
	1/9/2007	13.27			17.07	0.64
	3/15/2007	13.50			16.84	-0.23
	4/1/2007	13.62			16.72	-0.12
	4/8/2009	13.68			16.66	-0.06
	5/12/2010	13.93			16.41	-0.25
	5/12/2011	13.90			16.44	0.03
	4/11/2012	11.45			18.89	2.45
	8/16/2012	14.03			16.31	-2.58
	10/31/2012	13.67			16.67	0.36
	1/31/2012	10.98			19.36	2.69
BTMW-6 34.04	4/26/2006	11.70			22.34	--
	8/17/2006	13.60			20.44	-1.90
	1/9/2007	9.59			24.45	4.01
	3/15/2007	10.32			23.72	-0.73
	4/1/2007	11.03			23.01	-0.71
	4/8/2009	11.60			22.44	-0.57
	5/12/2010	11.99			22.05	-0.39
	5/12/2011	11.35			22.69	0.64
	4/11/2012	11.78			22.26	-0.43
	8/11/2012	12.02			22.02	-0.24
	10/31/2012	12.12			21.92	-0.10
	1/31/2012	13.18			20.86	-1.06
PRMW-9 33.93	4/11/2012	11.11			22.82	--
	8/16/2012	12.71			21.22	-1.60
	10/31/2012	11.42			22.51	1.29
	1/31/2012	11.31			22.62	0.11
PRMW-10 24.85	4/11/2012	9.09			15.76	--
	8/16/2012	9.51			15.34	-0.42
	10/31/2012	7.26			17.59	2.25
	1/31/2012	8.59			16.26	-1.33

TOC = Top of casing elevation relative to NAVD88
DTW = Depth to water below top of casing.
DT LPH = Depth to liquid phase hydrocarbons (i.e., free product)
LPH = Liquid phase hydrocarbons thickness.
GW Elevation = Groundwater Elevation
* = ceased groundwater monitoring/sampling activities at this well

Kolb GW Elevations

Associated Environmental Group, LLC

6.8 In-Situ Bioremediation: Approximate Locations of Oxygen Releasing Compound Injection Points



6.9 Post-Remedial Action Groundwater Monitoring: Locations of Groundwater Monitoring Wells, Groundwater Level Contour Map, and Groundwater Sample Results

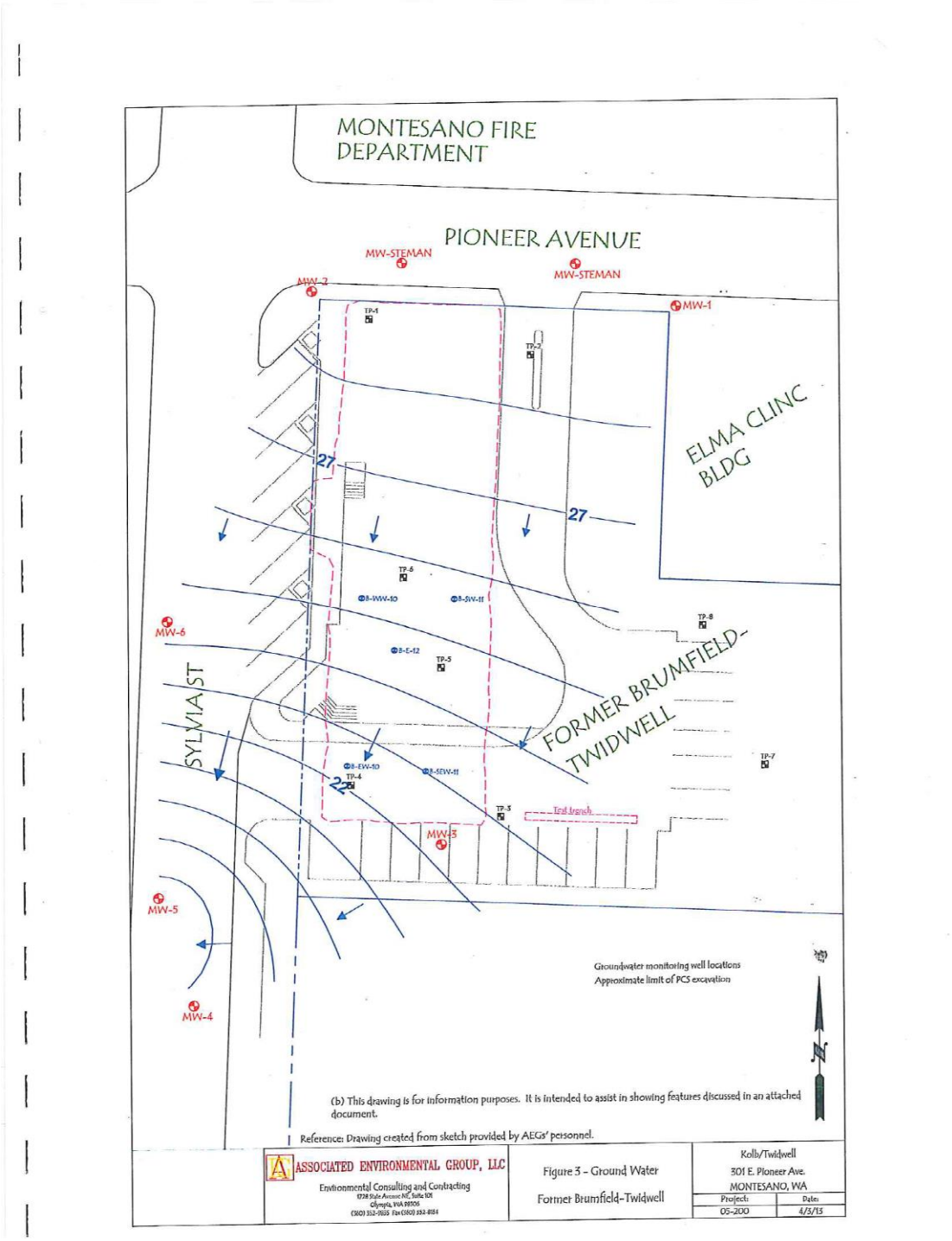


Table 1 Summary of Quarterly Groundwater Analytical Results - Former Brumfield-Twidwell & Partial Pick-Rite
Former Brumfield-Twidwell Property & Off-Property Monitoring Wells
Montesano, WA

Sample Number[1]	Date	BTEX[2] (µg/L)				Gasoline[3] (µg/L)	Table 830-1 Constituents[2] (µg/L)				
		Benzene	Toluene	Ethylbenzene	Total Xylenes		1,2-Dichloroethane (EDC)	1,2-Dibromoethane (EDB)	Total Naphthalenes	MTBE	Total Lead [4]
BTMW-1*	2/8/2006	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
	8/17/2006	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	1/9/2007	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
BTMW-2	2/8/2006	550	810	1,280	10,100	58,000	--	--	--	--	--
	8/17/2006	136	176	323	1,570	1,970	<1.0	<0.01	101	<5.0	21
	1/9/2007	357	482	1,430	9,400	7,820	<1.0	<0.01	88.5	<5.0	9
	3/15/2007	355	495	828	4,970	24,600	--	--	--	--	--
	4/1/2008	12.8	211	503	4,040	7,730	<1.0	<0.01	73.5	<5.0	7.3
	4/9/2009	LNAPL present									
	5/12/2010	<1.0	<1.0	<1.0	6.4	160	<1.0	<0.01	<5.0	<5.0	<5.0
	5/13/2011	1.1	5.8	36.5	477	2,650	<1.0	<0.01	11.6	<5.0	<5.0
	4/11/2012	<1.0	<1.0	7.2	99.1	1,960	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	10/31/2012	<1.0	1.11	8.49	105	1,510	<1.0	<0.01	<5.0	<5.0	<5.0
	1/31/2013	<1.0	<1.0	4.4	52.4	871	<1.0	<0.01	<5.0	<5.0	<5.0
BTMW-3*	2/8/2006	<1.0	<1.0	7.7	24	120	--	--	--	--	--
	8/17/2006	<1.0	<1.0	4.4	17	175	<1.0	<0.01	<5.0	<5.0	<1.0
	1/9/2007	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
BTMW-4*	2/8/2006	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
	8/17/2006	<1.0	<1.0	2.1	12	100	<1.0	<0.01	<5.0	<5.0	10
	1/9/2007	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
BTMW-5	4/26/2006	4.0	10.2	5.3	25	1,100	--	--	--	--	--
	8/17/2006	<1.0	<1.0	1.3	20	101	<1.0	<0.01	<5.0	<5.0	<1.0
	1/9/2007	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	<1.0	<1.0	<1.0	<1.0	<100	--	--	--	--	--
	4/1/2008	1.2	12.3	33.2	284	1,010	<1.0	<0.01	<5.0	<5.0	6.0
	4/8/2009	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	5/12/2010	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	5/12/2011	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	4/11/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	5.4
	8/16/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	10/31/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	1/31/2013	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	23
BTMW-6	4/26/2006	45	41	170	365	3,390	--	--	--	--	--
	8/17/2006	7.1	7.9	1.5	116	611	<1.0	<0.01	8.0	<5.0	13
	1/9/2007	4.0	3.9	37	107	380	<1.0	<0.01	<5.0	<5.0	<1.0
	3/15/2007	4.99	7.3	33	70	450	--	--	--	--	--
	4/1/2008	1.8	8.5	143	211	1,500	<1.0	<0.01	8.2	<5.0	<1.0
	4/8/2009	1.3	4.1	168	120	2,060	<1.0	<0.01	55.5	<5.0	<5.0
	5/12/2010	<1.0	<1.0	11.5	16.3	320	<1.0	<0.01	16.3	<5.0	<5.0
	5/12/2011	<1.0	<1.0	<1.0	1.8	498	<1.0	<0.01	14	<5.0	<5.0
	4/11/2012	<1.0	<1.0	<1.0	<1.0	510	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	5.1
	10/31/2012	<1.0	<1.0	<1.0	1.43	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	1/31/2013	<1.0	<1.0	<1.0	<1.0	353	<1.0	<0.01	<5.0	<5.0	<5.0
PRMW-9*	12/1/2010	43.6	75.8	232	413	4,133	--	--	--	--	--
	3/8/2011	35.8	63.2	500	13,300	5,180	--	--	--	--	--
	6/9/2011	<1.0	34.4	450	1,460	9,240	--	--	--	--	--
	4/11/2012	<1.0	<1.0	13.9	45	1,430	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	9.1	41.8	894	<1.0	<0.01	16.5	<5.0	<5.0
	10/31/2012	<1.0	<1.0	6.02	28.7	1,120	<1.0	<0.01	29.8	<5.0	<5.0
	1/31/2013	<1.0	<1.0	2.0	9.4	482	<1.0	<0.01	9.2	<5.0	<5.0
PRMW-10*	12/1/2010	<1.0	<2.0	<1.0	<3.0	<100	--	--	--	--	--
	3/8/2011	<1.0	<2.0	<1.0	<3.0	<100	--	--	--	--	--
	6/9/2011	<1.0	<2.0	<1.0	<3.0	<100	--	--	--	--	--
	4/11/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	8/16/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	10/31/2012	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
	1/31/2013	<1.0	<1.0	<1.0	<1.0	<100	<1.0	<0.01	<5.0	<5.0	<5.0
PQL		1.0	1.0 or 2.0	1.0	1.0 or 3.0	100	1.0	0.01	5.0	5.0	1.0 or 5.0
Method A Cleanup Levels		5	1,000	700	1,000	800[5]	5	0.01	160	20	15

Notes:
[1] Approximate monitoring well locations are shown in Figure 1
[2] Analyzed by EPA Method 8021B.
[3] Analyzed by Northwest Method NWTPH-Gx
[4] Analyzed by EPA Method 7421
[5] Cleanup level with presence of benzene
[6] PRMW-9 & PRMW-10: monitoring wells on Pick-Rite Thriftway and Wynoochee Ave. ROW

µg/L = micrograms per liter
"<" not detected above laboratory detection limits.
MTBE = methyl tertiary-butyl ether
-- = not analyzed for this constituent
Bold indicates the detected concentration exceeds MTCA Method A cleanup levels
* = ceased groundwater monitoring/sampling activities at this well

6.10 Restrictive Covenant

After Recording Return to:
Marv Coleman
Department of Ecology
Southwest Regional Office
P. O. Box 47775
Lacy, WA 98504

Restrictive Covenant

Grantor: Bryan and Kathleen Kolb
Grantee: State of Washington, Department of Ecology
Legal: Ptn Lts 1 & 2, Blk 4, Zenor Carlile & Luarks Addn and all Lt 1 and Ptn Lts 2, 8, 9, Blk 4, Mace, Talbert and Magill's Addn
Tax Parcel Nos.: 079000400100, 075300400100, 075300400801

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by Bryan M. and Kathleen R. Kolb, husband and wife (hereafter "Kolb"), their successors and assigns, and the State of Washington, Department of Ecology, its successors and assigns (hereafter "Ecology").

A remedial action occurred at the Property that is the subject of this Restrictive Covenant. The Remedial Action conducted at the Property is described in the following document[s]:

- Phase I Environmental Site Assessment Survey, Associated Environmental Group, Inc., August 1998.

1

2006-06160114
Page: 1 of 9
06/16/2006 03:13P
Grays Harbor Co
CUSHMAN LAW OFFICE 40.00 COV

- Phase I and II Environmental Site Assessment - Montesano Ford, KD & S Environmental Support Services, May 2000.
- Interim Cleanup Work Plan – Twidwell/Kolb Property, Associated Environmental Group, LLC, December 2005.
- Site Remediation Conducted On Brumfield-Twidwell/Kolb Property, Associated Environmental Group, LLC, December 2005.
- Remedial Investigation Work Plan – Brumfield-Twidwell/Kolb Property, Associated Environmental Group, LLC, February 2006.
- Remedial Investigation Report Conducted on Brumfield-Twidwell Property, Associated Environmental Group, LLC, May, 2006.

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

This Restrictive Covenant is required because the Remedial Action resulted in residual concentrations of Gasoline Range Petroleum Hydrocarbons (GRPH) which exceed the Model Toxics Control Act Method A Residential Cleanup levels for soils and groundwater, established under WAC 173-340-740 and WAC 173-340-720, respectively.

The undersigned, Kolb, is the fee owner of real property (hereafter "Property") in the County of Grays Harbor, State of Washington, which is subject to this Restrictive Covenant. The Property is legally described in Exhibit A.

2

Kolb 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.

A. No groundwater may be taken for domestic agricultural, commercial or industrial uses from the Property.

B. A portion of the Property contains GRPH contaminated soil located under sidewalks and street rights-of-way adjacent to the site. Owner shall not alter, modify, or remove these existing structures 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.

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.

A. The six monitoring wells installed to assess the ongoing status of groundwater that has been affected by the historical releases of GRPH, shall be sampled in the locations, in the manner and according to the schedule provided in Exhibit B, at the sole cost of Owner. Upon

3

2006-06160114
Page: 3 of 9
06/16/2006 03:13P
CUSHMAN LAW OFFICE 40.00 COV Grays Harbor Co

completion of the sampling schedule set forth in Exhibit B, Ecology will then determine whether additional monitoring is needed, based on the first round of data. If such additional monitoring is required by Ecology, Ecology and Owner shall meet to discuss the appropriate extent and schedule of such additional monitoring. Such additional sampling shall also be at the sole cost of Owner. Samples will be analyzed for gasoline and gasoline constituents in accordance with the Remedial Investigation Work Plan, AEG, LLC, February 2006, a copy of which is on file with Ecology.

B. The integrity of monitoring wells placed on or adjacent to the Property for the purpose of groundwater monitoring shall be maintained by Owner for a minimum of three years from the date the monitoring wells are constructed and commence operation, or for a longer period if required by Ecology, if deemed necessary as a consequence of monitoring results. In the event future construction activities on the Property require abandonment or removal of monitoring wells on the Property, such removal or abandonment shall not occur without the prior written approval of Ecology. If groundwater monitoring wells are constructed on the Property but later need to be replaced, the monitoring wells shall be replaced in a manner approved by Ecology.

Section 4.

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.

4

Section 5.

Owner of the Property must give thirty (30) days advance written notice to Ecology of 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 Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 6.

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 7.

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

Section 8.

Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the Property, and to inspect records that are related to the Remedial Action.

Section 9.

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.

Section 10.

Pursuant to WAC 173-340-440(11), Owner shall maintain an adequate financial assurance mechanism to cover all costs associated with institutional controls, such as compliance monitoring and corrective measures at the Site.

Within sixty (60) days of the effective date of this Restrictive Covenant, Owner shall submit to Ecology for review and approval an estimate of the costs that it will incur in carrying out the terms of this Restrictive Covenant. Within sixty (60) days after Ecology approves the aforementioned cost estimate, Owner shall provide proof of financial assurances sufficient to cover all such costs in a form acceptable to Ecology.

Owner shall adjust the financial assurance coverage and provide Ecology's project coordinator with documentation of the updated financial assurance for inflation, annually, within thirty (30) days of the anniversary date of the entry of this Restrictive Covenant or if applicable, ninety (90) days after the close of Owner's fiscal year if the financial test or corporate guarantee is used.

OWNER

Bryan M. Kolb
Date: 6-14-06

Kathleen R. Kolb
Date: 6/14/06

6

2006-06160114
Page: 6 of 9
06/16/2006 03:13P
Grays Harbor Co
CUSHMAN LAW OFFICE 40.00 COV

STATE OF WASHINGTON)
)
COUNTY OF Thurston)

On this day personally appeared before me Brian Kirkendall,
to me known to be the individual described in and who executed the within and foregoing instrument and acknowledged that **he/she/they** signed the same as **his/her/their** free and voluntary act and deed for the uses and purposes therein mentioned.

Given under my hand and official seal this 14 day of June, 2016.

Notary Public in and for the State of Washington, residing at Olympia.

7

2006-06160114
Page: 7 of 9
06/16/2006 03:13P
Grays Harbor Co
CUSHMAN LAW OFFICE 40.00 COV

Exhibit A
Legal Description

PARCEL A:

Lots 1 and 2, EXCEPT the Eat 19.58 feet thereof, Block 4, Zenor, Carlile and Luarks Addition to C. N. Byles Plat of the Town of Montesano, as per plat recorded in Volume C or 3 of Plats, page 593, records of Grays Harbor County;
Situate in the County of Grays Harbor, State of Washington.

PARCEL B:

Lots 1 and 9, Block 4, Mace, Talber and Magill's Addition to C. N. Byles Plat of Montesano, as per plat recorded in Volume 1 of Plats, page 10, records of Grays Harbor County;

AND,

The North 29 feet of Lot 2, AND the North 29 feet of Lot 8, Block 4, Mace, Talbert and Magill's Addition to C. N. Byles Plat of Montesano, as per plat recorded in Volume 1 of Plats, page 10, records of Grays Harbor County;

ALL Situate in the County of Grays Harbor, State of Washington.

EXCEPT FROM PARCEL B ABOVE THE FOLLOWING DESCRIBED PARCEL:

The East 83.00 feet of Lot 9;
AND the East 83.00 feet of the North 29.00 feet of Lot 8 in Block 4 of Mace, Talbert and Magill's Addition to C. N. Byles Plat of Montesano, as per plat recorded in Volume 1 of Plats, page 10, records of Grays Harbor County;
Situate in the County of Grays Harbor, State of Washington.

8

2006-06160114
Page: 8 of 9
06/16/2006 03:13P
Grays Harbor Co
CUSHMAN LAW OFFICE 40.00 COV

Exhibit B

6.0SELECTION OF REMEDIAL ALTERNATIVE

On the basis of the analysis of the four alternatives and their comparison to the MTCA criteria of WAC 173-340-360, alternative 4; Soil Source Removal with Disposal, Groundwater Treatment, and Monitoring was selected for implementation at the site. This alternative is protective of both human health and the environment, is consistent with current and anticipated future use of the site, and is cost-effective. The primary exposure pathways at the site will be eliminated or substantially reduced (i.e., direct soil contact will be eliminated and groundwater deed restriction will be placed on the property deed). The remedial components of this alternative are technically implementable, are expected to meet administrative (agency) requirements, and can be constructed in a reasonable time frame at a reasonable cost.

Residual COCs in the groundwater are expected to be reduced over time through natural attenuation. Quarterly groundwater monitoring will further enhance this alternative's protectiveness. MW-1 to MW-6 will be sampled on quarterly bases for four consecutive quarters (twelve calendar months) and corresponding quarterly status report will be generated and submitted to Ecology for review. Upon completion of the fourth quarter groundwater monitoring sample analysis, Ecology will be contacted to review the data and to discus any future sampling requirements.

The top of the well casings for each of the groundwater monitoring wells will be surveyed from the top of the PVC casing and referenced to NAVD 88 vertical datum reference point to construct a relative groundwater flow direction model. Prior to collecting the sample, the static groundwater levels will be measured and three times the well casing volume will be purged from each well. The groundwater samples will be collected in laboratory supplied and labeled 40-milliliter glass vials and submitted to an independent laboratory to be analyzed for gasoline (NWTPH-Gx) and gasoline constituents; benzene, toluene, ethylbenzene, and xylenes (BTEX by EPA method 8021b)

9

6.11 Photo Log

Photo 1: Current 1st Security Bank Building/Former Brumfield Twidwell – From the West.

Photo 2: Current 1st Security Bank Building/Former Brumfield Twidwell – from the Southwest.

Photo 3: Current 1st Security Bank Building/Former Brumfield Twidwell and Pioneer Avenue – from the Northeast.

Photo 4: Current 1st Security Bank Building/Former Brumfield Twidwell and City of Montesano Fire Station (red building) and Sylvia Street – From the Southwest.

Photo 5: Abandoned Soil Boring and Groundwater Monitoring Well Locations on Sylvia Street – from the Southwest.

Photo 6: Groundwater Monitoring Well on Sylvia Street.