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TANK CLOSURE REPORT

FORMER CUMMINGS OIL LEASE SITE
908 NORTHWEST KERRON AVENUE
WINLOCK, WASHINGTON
VCP NO. SW0775
SITE IDENTIFICATION NO. 3151688

Submitted by:
Farallon Consulting, L.L.C.
975 5th Avenue Northwest
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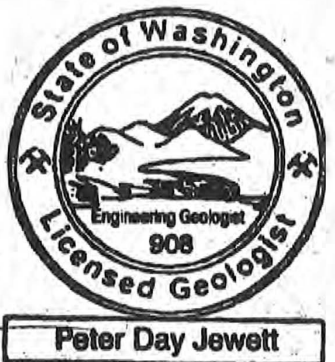
Farallon PN: 683-009

For:

BNSF RAILWAY

2454 Occidental Avenue South, Suite 1A
Seattle, Washington

March 11, 2010



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ACRONYMS AND ABBREVIATIONS

ACM	asbestos-containing materials
AST	aboveground storage tank
bgs	below ground surface
BNSF	BNSF Railway Company
BTEX	benzene, toluene, ethylbenzene, and xylenes
COCs	constituents of concern
Coppel	Wayne M. Coppel
cPAHs	carcinogenic polycyclic aromatic hydrocarbons
DRO	total petroleum hydrocarbons as diesel-range organics
Ecology	Washington State Department of Ecology
EMR	EMR Incorporated
EPA	U.S. Environmental Protection Agency
Farallon	Farallon Consulting, L.L.C.
GEC	Green Earthworks Construction, Inc. of Tacoma, Washington
GRO	total petroleum hydrocarbons as gasoline-range organics
mg/kg	milligrams per kilogram
µg/l	micrograms per liter
mg/l	milligrams per liter
MTCA	Washington State Model Toxics Control Act Cleanup Regulation
ORO	total petroleum hydrocarbons as oil-range organics
ORP	oxidation-reduction potential
PID	photoionization detector
PQLs	practical quantitation limits
SEPA	State Environmental Policy Act
Site	908 Northwest Kerron Avenue in Winlock, Washington
TPH	total petroleum hydrocarbons
USCS	Unified Soil Classification System
UST	underground storage tank
VCP	Voluntary Cleanup Program
WAC	Washington Administrative Code

Work Plan *Cleanup Action Work Plan, Former Cummings Oil Lease Site, 908 Northwest Kerron Avenue, Winlock, Washington* dated December 18, 2008, prepared by Farallon Consulting, L.L.C.

1.0 INTRODUCTION

This Tank Closure Report has been prepared on behalf of BNSF Railway Company (BNSF) to document the tank closure activities conducted between March 10 and August 1, 2008 at the Former Cummings Oil Lease Site at 908 Northwest Kerron Avenue in Winlock, Lewis County, Washington (herein referred to as the Site) (Figure 1). The tank closure activities included removal of two underground storage tanks (USTs) and four aboveground storage tanks (ASTs); excavation and off-Site disposal of soil with concentrations of total petroleum hydrocarbons (TPH) above Washington State Model Toxics Control Act Cleanup Regulation (MTCA) levels, as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340); and installation of monitoring wells to delineate the nature and extent of TPH in groundwater and assess groundwater cleanup by natural attenuation. The tank closure activities were conducted under the Washington State Department of Ecology (Ecology) Voluntary Cleanup Program (VCP) in accordance with the *Cleanup Action Work Plan, Former Cummings Oil Lease Site, 908 Northwest Kerron Avenue, Winlock, Washington* dated December 18, 2008, prepared by Farallon Consulting, L.L.C. (Farallon) (Work Plan) (Farallon 2008); MTCA; and the Ecology (1991) *Guidance for Site Checks and Site Assessments for Underground Storage Tanks*. The Site has been assigned VCP No. SW0775 and Ecology Site Identification No. 3151688. The Work Plan included demolition plans and specifications prepared in accordance with standard engineering practices under the direction of a Professional Engineer licensed in the State of Washington.

Subsurface investigations conducted at the Site identified a 1,000-gallon capacity UST, a 5,000-gallon capacity UST, three 13,000-gallon capacity ASTs, and a 25,000-gallon capacity AST used to store fuel oils on the Site (Farallon 2006, 2008). Concentrations of TPH above MTCA Method A cleanup levels were detected in soil and groundwater samples collected in proximity to the USTs and/or ASTs. The tank closure activities defined in the Work Plan included delineating the nature and extent of TPH in groundwater, assessing monitored natural attenuation in groundwater, and excavation and off-Site disposal of soil with concentrations of TPH as diesel-range organics (DRO), as gasoline-range organics (GRO), and as oil-range organics (ORO); benzene, toluene, ethylbenzene, and xylenes (BTEX); naphthalenes; and carcinogenic polycyclic aromatic hydrocarbons (cPAHs), collectively referred to as the constituents of concern (COCs), above the MTCA Method A cleanup level.

1.1 PURPOSE AND OBJECTIVES

The purpose of the tank closure activities was to remove the USTs, ASTs, associated aboveground piping, overhead fuel racks, warehouse building, and pump house; remove soil with concentrations of one or more of the COCs exceeding the MTCA Method A cleanup level to the maximum extent practicable; and monitor groundwater quality to assess whether monitored natural attenuation will remediate TPH in groundwater. The overall objectives of the tank closure activities are to meet the threshold requirements of WAC 173-340-360 to protect human health and the environment; comply with cleanup standards; comply with applicable state and federal laws; and provide for compliance monitoring.

1.2 REPORT ORGANIZATION

This Tank Closure Report summarizes previous subsurface investigations conducted at the Site, discusses the demolition activities that were performed at the Site in March 2008, and presents the results of the tank closure, monitoring well installation, and soil and groundwater sampling activities conducted from July 28 to August 7, 2008. The report is organized into the following sections:

- **Section 1—Introduction:** This section presents the purpose and objectives of the tank closure and the report organization.
- **Section 2—Project Background:** This section presents the Site description and history, geology and hydrogeology, and a summary of previous investigations conducted at the Site.
- **Section 3—Cleanup Action:** This section presents the elements of the selected cleanup action and the cleanup standards for the Site.
- **Section 4—Tank Closure Activities**: This section describes the scope of work for the preparation and tank closure activities conducted at the Site.
- **Section 5—Confirmation Soil Sampling Results:** This section presents the results of the soil sampling conducted during the tank closure at the Site.
- **Section 6—Waste Characterization:** This section presents the waste characterization sampling results and discusses the facilities to which waste materials generated during the tank closure were transported for disposal and/or recycling.
- **Section 7—Groundwater Performance Monitoring:** This section describes the installation and sampling of the additional point of compliance monitoring well and discusses the analytical results for the groundwater sampling event completed in August 2008.
- **Section 8—Conclusions:** This section provides Farallon's conclusions from the tank closure activities conducted at the Site.
- **Section 9—References:** This section presents a list of the documents cited in this report.

2.0 PROJECT BACKGROUND

The following section includes a description of the project Site and history, a brief description of the area geology and hydrogeology, and the results of previous investigations.

2.1 SITE DESCRIPTION AND HISTORY

The Site is located in Section 28, Township 12 North, and Range 2 West of the Willamette Meridian in Lewis County, Washington (Figure 1). The Site occupies a triangular parcel approximately 0.5 acre in size located west of a BNSF rail line near Railroad Milepost 71.4 in Winlock, Washington (Figure 2). The Site is relatively flat, with a slight slope to the west-southwest, toward Olequa Creek, located approximately 660 feet west of the Site. Surface water is captured by two catch basins located on the western side of the Site and by a drainage ditch located on the northern portion of the Site. The ditch conveys surface water discharged from a catch basin located next to the railroad tracks to a catch basin located on the northwestern corner of the Site. The ditch is approximately 3 feet deep and is uncontained until it flows into an underground pipe and drains to the catch basin. An approximately 12-inch-diameter underground stormwater line is located approximately 18 inches below ground surface (bgs) on the western side of the Site (Figure 2).

Features on the Site identified during the subsurface investigation conducted by Farallon in 2006 included an abandoned warehouse, a pump house, overhead fuel racks, three 13,000-gallon-capacity ASTs and one 25,000-gallon-capacity AST that were situated on concrete pads, one 1,000-gallon-capacity UST, and one 5,000-gallon-capacity UST (Figure 2). The USTs and ASTs were connected to the overhead fuel racks through aboveground piping set approximately 6 inches above ground surface. The pump house contained the mechanical equipment for unloading fuel from rail cars and for transporting fuel from the ASTs to the overhead fuel racks.

The Site has been developed since approximately 1925, when Shell Oil Company leased the Site from BNSF for use as a bulk fuel storage plant. In 1970, the lease was transferred from Shell Oil Company to Cummings Oil Company (2000), who continued to operate the bulk fuel plant until approximately 1976. The Site currently is unoccupied.

2.2 GEOLOGY AND HYDROGEOLOGY

The Site is underlain by silt extending from the ground surface to approximately 5 to 8 feet bgs. The silt is underlain by gravel to depths ranging from 5 to 11 feet bgs, and the gravel is underlain by sand to the maximum depth drilled of 12 feet bgs (Farallon 2006).

The depth to groundwater measured at the Site in December 2005 ranged from 0.5 foot to 2.5 feet bgs. The apparent direction of groundwater flow beneath the Site is east to west toward Olequa Creek under an average hydraulic gradient of 0.03 foot per foot. A more detailed summary of the soil and groundwater conditions at the Site are provided in the Supplemental Subsurface Investigation Report (Farallon 2006).

2.3 PREVIOUS INVESTIGATIONS

Environmental Management Resources Incorporated (1999) conducted a property inspection at the Site in 1999 and observed surface soil staining near the overhead fueling racks and in the vicinity of the ASTs (Figure 2). In July 2000, Mr. Wayne M. Coppel of Petroleum Hazardous and Solid Waste Management (Coppel) conducted a Level II Site Assessment at the Site for Cummings Oil Company in anticipating of ending their lease with BNSF and removing the bulk plant operations. The Level II Site Assessment included collecting soil samples from six test pits located in areas where staining was observed and/or historical operations had been conducted (Coppel 2000). The analytical results of three soil samples collected by Coppel (2000) detected concentrations of DRO below the MTCA Method A cleanup level. Concentrations of GRO and ORO were not detected above the laboratory reporting limits in the soil samples analyzed. Shallow groundwater was observed in one of the test pits at a depth of approximately 9 feet bgs; however, groundwater samples were not collected.

Farallon (2006) completed a subsurface investigation at the Site that included advancing 11 direct-push soil borings completed to depths ranging from 7 to 12 feet bgs. Soil samples were collected from the borings in 4-foot intervals and submitted for laboratory analysis. Groundwater reconnaissance samples were collected from the borings using a temporary well screen. Groundwater samples were collected from four monitoring wells installed at the Site in December 2005 (Figure 2).

The laboratory analytical results for the soil samples collected from four borings at depths ranging from the ground surface to 8 feet bgs indicated concentrations of GRO, benzene, ethylbenzene, total xylenes, and total naphthalenes that exceeded applicable MTCA Method A cleanup levels. The area of contaminated soil was west of the UST fill ports and former overhead fueling racks (Farallon 2006).

Concentrations of GRO, DRO, ORO, benzene, ethylbenzene, and/or total xylenes above applicable MTCA cleanup levels were detected in reconnaissance groundwater samples and in a groundwater sample collected from monitoring well MW-2, located west of the USTs and the former overhead fueling racks (Figure 2). The analytical results indicated that groundwater with concentrations of TPH, benzene, ethylbenzene, and/or total xylenes exceeding applicable MTCA cleanup levels have migrated off the Site toward the west-southwest and Northwest Kerron Avenue.

Cherokee General Construction of Portland, Oregon gauged the amount of residual fuel oil contained in the ASTs in October 2006, summarized as follows:

- The three 13,000-gallon ASTs contained a combined total of approximately 1,700 to 1,800 gallons of residual fuel-water mixture;
- The 25,000-gallon AST contained approximately 3,300 gallons of residual fuel;
- The 1,000-gallon UST contained approximately 140 gallons of residual fuel; and
- The 5,000-gallon UST contained approximately 650 gallons of residual fuel.

Farallon (2006) collected samples from the residual fuel-water mixture in the ASTs and USTs for laboratory analysis by Northwest Method NWTPH-HCID. Analytical results indicated the following:

- The three 13,000-gallon ASTs contained gasoline, diesel, and oil;
- The 25,000-gallon AST contained diesel and oil;
- The 1,000-gallon UST contained diesel; and
- The 5,000-gallon UST contained gasoline, diesel, and oil.

3.0 CLEANUP ACTION

Technically feasible cleanup action alternatives were developed as part of the tank closure activities. The alternatives were screened against the threshold requirements for cleanup actions set forth in WAC 173-340-360, which include protection of human health and the environment, compliance with cleanup standards, compliance with applicable state and federal laws, and the provision for compliance monitoring established in the Work Plan. Among the requirements considered were implementing permanent solutions to the maximum extent practicable, providing for a reasonable restoration time frame, and taking public concerns into consideration.

3.1 SELECTED CLEANUP ACTION

The cleanup action selected by BNSF for implementation in conjunction with the tank closure activities at the Site consisted of:

- Removal and off-Site disposal of residual fuel oil in the USTs and ASTs.
- Excavation and off-Site disposal of soil with concentrations of one or more of the COCs above the applicable cleanup level, to the extent practicable.
- Delineation of the down-gradient extent of concentrations of COCs above the applicable cleanup level in groundwater.
- Collection of sufficient data to evaluate whether monitored natural attenuation is an applicable cleanup methodology for groundwater at the Site.
- Continuation of ongoing groundwater monitoring for evaluation of natural attenuation processes.

The selected cleanup action was implemented as part of the tank closure activities at the Site.

3.2 CLEANUP STANDARDS

The cleanup levels applicable to the Site for GRO, DRO, ORO, BTEX, naphthalenes, and cPAHs in soil are the MTCA Method A cleanup levels for unrestricted land use. Based on the current use of the Site and the City of Winlock zoning designation for the Site and surrounding area as Commercial/Industrial, the MTCA Method A soil cleanup levels used to demonstrate compliance with MTCA are as follows:

- GRO—30 milligrams per kilogram (mg/kg)
- DRO—2,000 mg/kg
- ORO—2,000 mg/kg
- Benzene—0.03 mg/kg
- Toluene—7 mg/kg
- Ethylbenzene—6 mg/kg

- Xylenes—9 mg/kg
- Naphthalenes—5 mg/kg
- cPAHs—0.1 mg/kg.

The cleanup levels for groundwater are the MTCA Method A cleanup levels for groundwater. The MTCA Method A groundwater cleanup levels used to demonstrate compliance with MTCA are as follows:

- GRO—800 micrograms per liter (µg/l)
- DRO—500 µg/l
- ORO—500 µg/l
- Benzene—5 µg/l
- Toluene—1,000 µg/l
- Ethylbenzene—700 µg/l
- Xylenes—1,000 µg/l
- Naphthalenes—160 µg/l
- cPAHs—0.1 µg/l.

4.0 TANK CLOSURE ACTIVITIES

The following sections describe the tank closure activities conducted by Farallon at the Site. Farallon engaged Green Earthworks Construction, Inc. of Tacoma, Washington (GEC) to provide general construction and UST and AST decommissioning services at the Site. A Farallon Scientist registered as a Washington State Site Assessor performed the site assessment services.

4.1 SCOPE OF WORK

The Work Plan defined the scope of work for the tank closure activities at the Site. The final scope of work conducted for the tank closure activities was consistent with the Work Plan and accommodated the conditions encountered in the field. The tank closure activities completed at the Site included:

- Obtaining of local permits for excavation and tank decommissioning;
- Implementation of erosion control and Site security measures;
- Removal of residual fuel oil from the USTs and ASTs;
- Demolition and removal of all aboveground structures on the Site;
- Removal of all USTs and ASTs from the Site;
- Excavation of soil with concentrations of one or more of the COCs above applicable cleanup levels for off-Site disposal;
- Collection of performance and confirmation soil samples from the bottom and sidewalls of the excavation for laboratory analysis;
- Backfilling of the excavation with clean imported fill material;
- Installation of a monitoring well down-gradient (west) of the Site after the soil excavation had been completed;
- Collection of sufficient data to evaluate whether natural attenuation processes will reduce concentrations of COCs in groundwater to below applicable cleanup levels by intrinsic bioremediation; and
- Monitoring and sampling of groundwater to demonstrate that natural attenuation processes are occurring and to confirm that the cleanup levels for groundwater have been met at the point of compliance monitoring wells.

A detailed description of the preparation and tank closure activities is provided in the following sections.

4.2 PERMITTING

A State Environmental Policy Act (SEPA) checklist was provided to the City of Winlock, Washington prior to commencement of work at the Site. The City of Winlock issued a *Notice of*

SEPA Threshold Determination of Mitigated Non-Significance dated December 18, 2007, which required the following activities for the tank closure at the Site:

- Preparation and submittal of a Stormwater and Erosion Control Plan to the City of Winlock for review and approval;
- Implementation of erosion-control measures on the portion of the Site affected by the construction, prior to initiation of any activity;
- Installation of stormwater best management practices approved by the City of Winlock prior to initiation of construction activities;
- Assignment of specific erosion-control responsibilities and record-keeping requirements to the construction contractor during the tank-closure field activities;
- Documentation of the fill material to be used as backfill for approval by the City of Winlock Building Department;
- Submittal of soil compaction testing results to the City of Winlock Building Department prior to issuance of a building permit for construction of any future structure;
- Submittal of copies of all soil reports to the City of Winlock Building Department;
- Compliance with all state and federal guidelines and applicable safety measures in the demolition of all structures and removal of USTs, ASTs, and contaminated soil;
- Treatment of all wastewater to meet the discharge limits for all city, county, state, and U.S. Environmental Protection Agency (EPA) water quality standards, prior to discharge to the sanitary sewer;
- Submittal of analytical results of waste water samples to the City of Winlock Wastewater Treatment Plant Operator prior to discharge;
- Capping of the sanitary sewer, and inspection by the City of Winlock Public Works Department before final grade; and
- Re-vegetation of the Site following construction to reduce stormwater runoff, where possible.

A copy of the *Notice of SEPA Threshold Determination of Mitigated Non-Significance* is provided in Appendix A. Because wastewater was not generated by the tank closure activities, wastewater was not discharged to the City of Winlock sewer system and documentation was not required. All other requirements of the Determination of Mitigated Non-Significance for the tank closure activities were met.

The Underground Storage Tank 30 Day Notice was submitted to Ecology prior to removal of the USTs. A copy of the Underground Storage Tank 30 Day Notice is provided in Appendix B.

4.3 EROSION CONTROL

A temporary fence was installed around the perimeter of the Site for security during the tank closure activities. A locking gate that provided access to the Site remained open during normal

business hours on work days and was locked evenings and weekends. Traffic control was implemented as necessary to provide for safe Site entry and exit for trucks. A graveled construction driveway was constructed and maintained throughout the tank closure activities to reduce tracking of debris, dust, mud, and soil onto Northwest Kerron Avenue. A sweeper was used periodically to clean Northwest Kerron Avenue adjacent to the Site.

Erosion control was implemented as described in the Demolition Plans and Specifications provided in the Work Plan. Erosion control measures included a silt fence with wire backing set in a gravel trench and staked for stability. The fence was left in-place throughout the tank closure activities. Inserts were placed into storm drain inlets to protect against entry of sediment, construction debris, or other unwarranted substances into public storm drains or adjacent water systems.

A public utility locate request was submitted to the One-Call Utility Locate Center. MRP Services of Portland, Oregon located the Site sewer line on July 24, 2008. Applied Professional Services of North Bend, Washington performed a private utility locate at the Site on August 1, 2008. With the exception of the Site sewer line, all utilities were disconnected prior to demolition of Site features. The Site sewer was cut and capped at the property line upon completion of the tank closure activities. The Site monitoring wells were protected during the work for use after completion of tank closure activities.

4.4 SITE STRUCTURE DEMOLITION

An asbestos building survey and sampling was conducted at the Site warehouse by EMR Incorporated (EMR) in October 2007 prior to commencement of demolition activities. The results of the asbestos survey confirmed the presence of asbestos-containing materials (ACM) in the Site building (Appendix C). ACM was identified in the bathroom and office floor tiles and in the Transite insulation in the loading dock roof. EMR was contracted by GEC to abate the ACM prior to building demolition. EMR disposed of the ACM at the Waste Management Hillsboro Landfill in Hillsboro, Oregon.

Demolition activities were performed at the Site in March 2008. The warehouse was demolished, and metal siding from the building was transported to Hand-in-Hand Recycling in Chehalis, Washington. Wood flooring in the warehouse was salvaged by a private party. The pump house on the Site was demolished. The overhead fuel rack and above- and below-ground petroleum piping were rinsed, disassembled, and cut into sections. Scrap metal was collected and recycled at Schnitzer Steel in Tacoma, Washington. Demolition debris was transported to the Waste Management Hillsboro Landfill in Hillsboro, Oregon.

4.5 SOIL EXCAVATION AND TANK CLOSURE

Soil excavation activities were conducted in conjunction with the UST and AST removal in two distinct areas of the Site (herein referred to as the AST Excavation and the UST Excavation) (Figure 3). Test pits were excavated in each of the areas to investigate subsurface soil conditions prior conducting the excavation. Test Pit 1 was excavated east of and adjoining the former ASTs to determine whether a release of petroleum products occurred near the ASTs. Test Pit 2 was

excavated on the southeast sidewall of the UST Excavation to guide the excavation activities. The details pertaining to the tank closure and the soil sampling in both areas are summarized below.

4.5.1 AST Decommissioning

AST decommissioning activities at the Site were performed under the direction of the GEC Field Supervisor. The ASTs are located on the eastern portion of the Site and are denoted as AST #1 through AST #4 (Figure 2). AST #1 was 25,000 gallons in capacity, and AST #2, AST #3, and AST #4 each were 13,000 gallons in capacity.

Residual fuel in the four ASTs and associated piping was pumped and/or vacuumed out. A total of 2,400 gallons of residual fuel oil and rinsate water were removed from the ASTs and associated piping. The piping was cut into sections and transported to Schnitzer Steel in Tacoma, Washington. The AST interiors were pressure-washed and triple-rinsed. A Marine Chemist from Sound Testing Incorporated of Seattle, Washington certified that the tanks were inert and safe for removal. AST #1 and AST #4 were cut into sections and transported to Schnitzer Steel in Tacoma, Washington for disposal. AST #2 and AST #3 were transported to Golden Valley Farms in Hermiston, Oregon for re-use.

Wastewater and rinsate generated by the decommissioning of the ASTs were collected and disposed of by Marine Vacuum Service of Seattle, Washington, dba MarVac. The concrete foundation pads were cut into sections and transported to the Waste Management Hillsboro Landfill in Hillsboro, Oregon. Tank decommissioning documentation is provided in Appendix D. Waste disposal documentation pertaining to the AST decommissioning is provided in Appendix E.

4.5.2 AST Excavation Soil Sampling

GEC excavated an area approximately 10 by 10 feet wide and 8 feet deep on July 30, 2008 (Figure 3). Approximately 30 cubic yards of soil with concentrations of one or more of the COCs above the cleanup level was removed from the AST Excavation and stockpiled on plastic sheeting. Three composite soil samples were collected from the stockpiled soil for laboratory analysis to determine whether the soil was suitable for use as backfill or required off-Site disposal. The soil was disposed of off-Site, as discussed in Section 6, Waste Characterization.

Soils encountered within the excavation included sandy silts to a depth of 6 feet bgs, underlain by gravels and sands to the total depth of the excavation of 8 feet bgs. Four sidewall samples and one bottom soil sample were collected from the limits of the AST Excavation on July 30, 2008. The soil samples were submitted for laboratory analysis for DRO and ORO by Northwest Method NWTPH-Dx, GRO by Northwest Method NWTPH-Gx, and BTEX by EPA Method 8021B. COCs were not detected at concentrations above the laboratory practical quantitation limits (PQLs) or MTCA Method A cleanup levels. The area was backfilled with imported fill and graded to match the surrounding area.

4.5.3 UST Decommissioning

The tops of the two USTs located in the northwestern portion of the Site were approximately 12 to 20 inches bgs (Figure 2). The USTs were aligned from east to west and were contained in a common excavation. Both of the USTs were secured to concrete deadmen with a steel strap.

The USTs located on the northern portion of the Site are denoted as UST #1 and UST #2 (Figure 2). UST #1 measured approximately 10 feet in length and 4.5 feet in diameter and was determined to be a 1,700-gallon-capacity single-walled steel UST. UST #2 measured approximately 18.5 feet in length and 7 feet in diameter and was determined to be a 7,000-gallon-capacity single-walled steel UST. At the time of closure, the USTs contained a combined total of approximately 470 gallons of residual fuel oil and approximately 30 gallons of sludge.

The interiors of the USTs were visually inspected after rinsing. Upon removal of the USTs from the excavation, Farallon documented the condition of the USTs. UST #1 appeared to be in poor condition, with rusting and spalling observed throughout the bottom of the tank. No holes were observed in the bottom of UST #1. UST #2 appeared to be in poor condition, with metal rusting, spalling, and chipping observed throughout the bottom of the UST. One hole approximately 1 centimeter in diameter was observed in the bottom of UST#2, through which groundwater was observed to be infiltrating the tank.

The UST decommissioning activities at the Site were performed under the direction of the GEC Field Supervisor and a Washington State-registered UST Decommissioner. The overburden removed to expose the tanks was stockpiled on the Site. Residual fuel oil and sludge in the tanks were vacuumed out, and the tanks were inerted and certified by a Marine Chemist from Sound Testing Incorporated as safe for removal. The tanks were triple-rinsed and removed from the tank hold. Following removal, the tanks were disposed of at Schnitzer Steel in Tacoma, Washington. Wastewater and the rinsate generated by the decommissioning were collected and disposed of by MarVac.

The Underground Storage Tank 30 Day Notice is provided in Appendix B; the UST Closure and Site Assessment Notice, and the UST Site Check/Site Assessment Checklists are provided in Appendix D. Waste disposal documentation pertaining to the UST decommissioning is provided in Appendix E.

4.5.4 UST Excavation Soil Sampling

Approximately 300 cubic yards of soil with concentrations of one or more of the COCs above the cleanup level was excavated from the UST Excavation and disposed of at the Waste Management Hillsboro Landfill in Hillsboro, Oregon. The final extent of the L-shaped UST Excavation measured approximately 20 by 40 feet and 10 by 20 feet to a total depth of 8 feet deep (Figure 3). Waste characterization is discussed in Section 6, and waste documentation is provided in Appendix E.

A total of 15 confirmation and performance soil samples were collected from the limits of the excavation to confirm that soil with concentrations of one or more of the COCs above the

cleanup level had been removed (Figure 3). The soil samples were collected between July 29 and July 31, 2008 under the direct supervision of the Farallon Site Assessor. The soil samples were submitted under standard chain-of-custody protocols to an on-Site mobile laboratory owned and operated by Libby Environmental of Olympia, Washington. The soil samples were submitted for laboratory analysis for DRO and ORO by Northwest Method NWTPH-Dx, GRO by Northwest Method NWTPH-Gx, and BTEX by EPA Method 8021. Select soil samples were analyzed for cPAHs and naphthalenes by EPA Method 8270C at the Libby Environmental fixed-base laboratory facility in Olympia, Washington.

Soil samples were collected by hand using a hand auger, stainless steel spoons, or a trowel. All soil samples were placed directly into laboratory-prepared sample containers. Non-disposable implements used to collect soil samples were decontaminated between uses to minimize the possibility of cross-contamination. Soil samples were analyzed immediately by the on-Site mobile laboratory, Libby Environmental. The results of the compliance sampling are discussed in Section 5, Confirmation Soil Sampling Results.

4.6 SITE RESTORATION

The AST and UST Excavations were backfilled after tank closure excavation activities had been completed. Quarry spalls were placed in the base of the excavation from 7 to 8 feet bgs using the excavator bucket. An imported structural fill material was used to backfill the remaining excavation. The fill was compacted in 1-foot lifts from 3 feet bgs to the surface using a vibratory compactor. The Site was graded to convey surface water to existing catch basins, and the construction fencing was removed. Grass seeding was placed in the areas of the Site not completed as gravel parking.

5.0 CONFIRMATION SOIL SAMPLING RESULTS

This section presents the results of the soil samples collected from the excavations on the Site during the tank closure activities. The analytical results for the excavation soil samples are summarized in Table 1. The results for the soil samples analyzed for GRO, DRO, ORO, BTEX, naphthalene, and cPAHs are presented in comparison to the MTCA Method A soil cleanup levels for unrestricted land use. The laboratory analytical reports are provided in Appendix F.

5.1 SOIL SAMPLES COLLECTED FROM TEST PITS

Test Pit 1 was excavated to a depth of 7 feet bgs proximate to the location of the former ASTs on the eastern portion of the Site. Test Pit 2 was excavated to a depth of 8 feet bgs adjacent to the southeast sidewall of the UST Excavation (Figure 3). Concentrations of benzene above the MTCA Method A cleanup level were detected in a soil sample collected from Test Pit 1 at 7 feet bgs. Concentrations of COCs were below the laboratory PQLs in the soil sample collected from Test Pit 2 at 8 feet bgs (Table 1).

5.2 SOIL SAMPLES COLLECTED FROM THE AST EXCAVATION

Six soil samples were collected from the base and sidewalls of the AST Excavation and submitted for laboratory analysis for DRO, ORO, GRO, and BTEX at the on-Site mobile laboratory (Table 1). Concentrations of COCs were not detected above the laboratory PQLs or MTCA Method A cleanup level in any of the soil samples analyzed (Table 1). The AST Excavation was backfilled with imported fill and graded to match the surrounding area.

5.3 SOIL SAMPLES COLLECTED FROM THE UST EXCAVATION

Fifteen soil samples were collected from the base and sidewalls of the UST Excavation and submitted for laboratory analysis for DRO, ORO, GRO, and BTEX at the on-Site mobile laboratory (Table 1). If the analytical results detected concentrations of one or more of the COCs above the cleanup level, the soil samples were considered performance soil samples, and additional excavation was conducted to remove petroleum-contaminated soil. Once the analytical results did not detect concentrations of COCs above the cleanup level, the soil samples were considered confirmation samples, and the excavation was complete.

The analytical results did not detect concentrations of DRO, ORO, GRO, or BTEX above the cleanup level in 11 of the 15 soil samples collected from the sidewalls and base of the excavation (Figure 3; Table 1). Select soil samples collected from the final limits of the UST Excavation were submitted for laboratory analysis for cPAHs and total naphthalenes. The laboratory analytical results for soil samples collected at the final limits of the excavation did not detect cPAHs or total naphthalenes exceeding MTCA Method A cleanup levels.

The analytical results for soil samples EX1-NSD1-6 and EX1-NSD3-6 collected at 6 feet bgs from the final northern limits of the excavation, and soil samples EX1-WSD2-6 and EX1-WSD4-6 collected at 6 feet bgs from the final western limits of the excavation identified concentrations of benzene and GRO above the MTCA Method A cleanup level, indicating that a

small amount of soil above the cleanup level was left in-place in the northern and western corners of the excavation (Figure 3; Table 1). Additional excavation and soil removal adjacent to the drainage ditch and Northwest Kerron Avenue was not practicable. Engineering controls including shoring and additional excavation design would have been required to determine whether the petroleum-contaminated soil left in-place could be safely removed without adversely affecting the drainage ditch, Northwest Kerron Avenue, and/or underground utilities located along Northwest Kerron Avenue.

5.3.1 Quality Assurance/Quality Control Samples

One field duplicate soil sample was collected from the UST Excavation during the tank closure sampling activities. The analytical results for the field duplicate were compared against the parent sample to determine the relative percent difference between the samples. The relative percent difference limits established in the Work Plan were +/-35 percent. The relative percent difference for all of the compounds analyzed for was less than 35 percent, with the exception of benzene, which had a relative percent difference of 38 percent. Upon reviewing all other analytical quality control samples, Farallon determined that the relative percent difference of 38 percent for benzene does not affect the overall precision of the data.

6.0 WASTE CHARACTERIZATION

This section presents the waste-handling, reuse, and disposal procedures that were part of the Tank closure activities. Waste disposal documentation is included in Appendix E.

6.1 STOCKPILED SOIL

6.1.1 Test Pits

Approximately 15 cubic yards of soil excavated from Test Pit 1 and 10 cubic yards of soil excavated from Test Pit 2 was stockpiled pending disposal. Three soil samples were collected from each stockpile to characterize the soil for possible reuse as backfill material in the excavations at the Site. The stockpile soil samples were analyzed for DRO, GRO, ORO, and BTEX. The laboratory analytical results for the stockpile soil samples detected concentrations of one or more of the COCs above the cleanup level. Based on the *Guidance for Remediation of Petroleum-Contaminated Soils* (Ecology 1995), the stockpiled soil was determined to be unsuitable for backfill at the Site and was transported as petroleum-impacted soil to the Waste Management Hillsboro Landfill in Hillsboro, Oregon for disposal.

6.1.2 AST and UST Excavations

Soil with concentrations of one or more of the COCs exceeding the MTCA Method A cleanup level was removed from the AST and UST Excavations depicted on Figure 3 and disposed of as nonhazardous waste at the Waste Management Hillsboro Landfill in Hillsboro, Oregon. The soil waste was characterized using analytical data collected from previous subsurface investigations, from performance samples collected from the excavation, and from stockpile soil samples. A total of 452.91 tons of petroleum-contaminated soil was transported off the Site for disposal.

6.2 LIQUID WASTE REMOVAL

A total of 2,000 gallons of wastewater and 400 gallons of sludge were removed from the ASTs and USTs prior to demolition and decommissioning activities. The wastewater, rinsate, and sludge were disposed of by MarVac at their Seattle, Washington facility.

7.0 GROUNDWATER MONITORING

Groundwater monitoring was conducted at the Site following completion of the soil excavation activities. The Work Plan called for installation of two monitoring wells west of the former overhead fuel racks and west of Northwest Kerron Avenue. However, because further analysis of the Site indicated that existing monitoring well MW-2 provided sufficient information, only one monitoring well (MW-5) was installed as an additional point-of-compliance sampling location (Figure 4). Following installation of monitoring well MW-5, groundwater samples were collected from monitoring wells MW-1 through MW-5 (Figure 4).

7.1 MONITORING WELL INSTALLATION

Monitoring well MW-5 was installed on August 4, 2008 under the supervision of a Farallon Scientist. Cascade Drilling Inc. of Woodinville, Washington performed the drilling activities using a hollow-stem auger drill rig. The log of boring for the monitoring well is provided in Appendix G.

7.1.1 Soil Sampling

Soil samples were collected every 2.5 feet to the maximum depth of 12 feet bgs using a Dames & Moore split-spoon sampler driven by a percussion auto-hammer. Soil samples were collected from the boring in accordance with ASTM International and EPA standard protocols and were classified in accordance with the Unified Soil Classification System (USCS). Field-screening included noting indications of visual or olfactory evidence of contamination and conducting headspace analysis for the presence of volatile organic vapors using a photoionization detector (PID). Headspace analysis was conducted by placing a portion of soil from each sample interval into a resealable plastic bag and allowing the sample to warm for several minutes. The probe of the PID was then inserted into the bag, and the highest PID reading obtained over an approximately 30-second interval was recorded. The USCS classification, visual and olfactory notations regarding the samples, and PID readings were recorded on boring log forms (Appendix G).

Three soil samples were collected for potential laboratory analysis. The soil samples were placed into laboratory-prepared glass sample containers, fitted with Teflon lids, placed on ice in a cooler, and transported under standard chain-of-custody protocols to TestAmerica, Inc. in Bothell, Washington for laboratory analysis. Concentrations of GRO, DRO, ORO, BTEX, and cPAHs were not detected above the laboratory detection limit in the soil sample collected at 5 feet bgs that was submitted for laboratory analysis (Table 1).

7.1.2 Well Installation

Monitoring well MW-5 is constructed of 2-inch-diameter blank polyvinyl chloride casing flush-threaded to 5 feet of 0.010-inch slotted well screen. The monitoring well is screened from 5 to 10 feet bgs. The bottom of the monitoring well was fitted with a threaded polyvinyl chloride bottom cap, and the top with a locking compression-fit well cap. The annulus of each monitoring well was filled with #2/12 silica sand to a minimum height of 1 foot above the top of

the screened interval. A bentonite seal was installed above the sand pack. The monitoring wells were completed at the surface with a flush-mounted traffic-rated well box set in concrete. The monitoring well construction is noted on the Log of Boring form (Appendix G).

Following installation, the monitoring well was developed with the use of a submersible pump. Soil cuttings, purge water, and decontamination water generated during well installation and development were placed into labeled 55-gallon U.S. Department of Transportation-approved drums and temporarily stored at the Site pending receipt of analytical data and proper disposal.

The top of the monitoring well casing was surveyed relative to an arbitrary datum established at the Site to an accuracy of 0.01 foot to facilitate estimation of the direction of groundwater gradient and flow.

7.2 GROUNDWATER MONITORING AND SAMPLING

Groundwater monitoring and sampling was conducted at the Site on August 18, 2008. Groundwater monitoring was performed in accordance with the *Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures* (Puls and Barcelona 1996). Upon Farallon's arrival at the Site, all of the monitoring wells were opened, and the water level was permitted to equilibrate with atmospheric pressure for a minimum of 15 minutes prior to the obtaining of groundwater level measurements in the wells. Groundwater levels were measured to an accuracy of 0.01 foot using an electric water-level meter.

Purging and sampling of each monitoring well was performed using a peristaltic pump and dedicated polyethylene tubing at flow rates ranging from 100 to 300 milliliters per minute. The tubing intake was placed at approximately mid-screen in each monitoring well. During purging, water quality was monitored using a Yellow Springs Instrument 600XL water quality system equipped with a flow-through cell. Water quality parameters, including temperature, pH, specific conductance, dissolved oxygen, and oxidation-reduction potential, were monitored and recorded. Each monitoring well was purged until the water quality parameters stabilized.

Following purging, groundwater samples were collected from the pump outlet tubing upstream of the flow-through cell and placed directly into laboratory-prepared sample containers. The containers were placed on ice in a cooler and transported under standard chain-of-custody protocols to TestAmerica Laboratories, Inc. for laboratory analysis. The groundwater samples were submitted for analysis for GRO by Northwest Method NWTPH-Gx, DRO, and ORO by Northwest Method NWTPH-Dx, and BTEX by EPA Method 8021B.

Purge water generated during the monitoring events was placed into a labeled 55-gallon steel drum and temporarily stored on the Site pending receipt of analytical data and proper disposal.

7.3 GROUNDWATER SAMPLING RESULTS

Groundwater levels measured on August 18, 2008 ranged from 4.51 feet in monitoring well MW-3 to 5.39 feet in monitoring well MW-5 below the top of the monitoring well casings (Table 2). The groundwater elevations calculated for the August 2008 sampling event are

presented in Table 2. The groundwater elevation contours derived for this event are presented on Figure 5. The groundwater elevations measured during the sampling event indicate that the groundwater flow direction at the Site is to the west-southwest. Laboratory analytical reports are provided in Appendix F.

The laboratory analytical results for the soil sample collected from monitoring well MW-5 did not indicate concentrations of COCs exceeding the MTCA Method A cleanup level (Table 1). Concentrations of COCs above the laboratory reporting limits were not detected in the groundwater sample collected, with the exception of DRO, which was detected at a concentration of 433 µg/l. The laboratory analytical results did not indicate concentrations of GRO, DRO, ORO, or BTEX in groundwater exceeding MTCA Method A cleanup levels in the samples collected from up-gradient monitoring well MW-4 (Table 3).

The concentrations of DRO and ORO in the groundwater samples collected from monitoring wells MW-1, MW-2, and MW-3 were above the MTCA Method A cleanup level. In addition, a concentration of benzene above the MTCA Method A cleanup level was detected in the groundwater sample collected from monitoring well MW-2. The concentrations of DRO and ORO detected in monitoring wells MW-1, MW-2, and MW-3 are higher than the concentrations measured in those wells in December 2005. This increase in concentration likely is a result of disturbance of the soil during the cleanup action. It is likely that the concentration of COCs in the wells will decrease within the next four quarters. COCs were not detected above the laboratory reporting limits in monitoring well MW-4.

7.4 MONITORED NATURAL ATTENUATION

An assessment of the potential for natural attenuation via biodegradation processes to reduce concentrations of residual TPH and BTEX in groundwater was conducted during the August 2008 groundwater monitoring event. The natural attenuation parameters were selected as recommended in the Ecology (2005) *Guidance on Remediation of Petroleum-Contaminated Ground Water by Natural Attenuation.* The assessment included measurement and analysis of parameters that provide data indicating whether biodegradation is occurring, and if so, by what processes. Measurement and laboratory analysis for the assessment included the following:

- Primary electron receptors that are potential energy sources for native bacteria capable of biodegrading petroleum compounds and indicators of groundwater geochemistry, which included dissolved oxygen and sulfate;
- Metabolic by-products of biodegradation and indicators of groundwater geochemistry, which included methane; and
- Additional geochemical indicators of whether the subsurface environment is amenable to biodegrading petroleum compounds, which consisted of oxidation-reduction potential (ORP), temperature, and pH.

The natural attenuation parameters and geochemical indicators are summarized in Table 4. The results of the assessment are as follows:

Dissolved Oxygen—Measurements of dissolved oxygen in groundwater greater than 1 milligram per liter (mg/l) indicate that available oxygen in the subsurface environment is trending toward more aerobic conditions, while measurements less than 1 mg/l indicate that available oxygen is trending toward more anaerobic conditions. Concentrations of dissolved oxygen in groundwater measured during the August 2008 groundwater monitoring event were less than 1 mg/l in monitoring wells MW-1, MW-2, and MW-4; slightly above 1 mg/l in monitoring well MW-3; and 1.45 mg/l in monitoring well MW-5.

Sulfate—Concentrations of sulfate greater than 1 mg/l indicate a favorable environment for sulfate-reducing conditions. Concentrations of sulfate in groundwater samples collected from monitoring wells MW-2, MW-4, and MW-5 during the four monitoring events were moderate, ranging from 0.42 to 16.70 mg/l during the August 2008 monitoring event.

Methane—A concentration of methane greater than 0.2 mg/l indicates that carbon dioxide possibly is being used as an electron receptor. Concentrations of methane in groundwater samples collected from monitoring wells MW-2, MW-4, and MW-5 ranged from 0.228 to 1.660 mg/l during the August 2008 monitoring event.

ORP—ORP measured at the five monitoring wells in August 2008 ranged from -7.70 to -77.20 millivolts, which is within a range typically considered indicative of moderately anaerobic conditions where manganese and ferric- and sulfate-reducing conditions occur within the subsurface environment.

Temperature—The groundwater temperature measured at the five monitoring wells ranged from 13.78 to 17.65 degrees Celsius during the August 2008 groundwater monitoring event. Biodegradation processes occur at these temperatures, but typically are accelerated at temperatures approaching 20 degrees Celsius or higher.

pH—The values for pH measured at the five monitoring wells ranged from 6.03 to 6.75, with 7 being a neutral value. These pH values are within a range amenable to bacteria capable of biodegrading petroleum hydrocarbons.

The current rate of biodegradation of TPH and BTEX compounds in groundwater at the Site is unknown. The results of the assessment of natural attenuation of TPH and BTEX compounds in groundwater indicate that biodegradation of petroleum hydrocarbons is occurring under anaerobic conditions. Dissolved oxygen, an electron receptor, appears to be depleted at three of the monitoring wells, indicating that available oxygen is being used as an energy source for biodegradation. Concentrations of the metabolic by-product indicators sulfate and methane present indicate that biodegradation of petroleum hydrocarbons is occurring. The majority of the ORP measurements indicate moderately anaerobic conditions in the subsurface environment.

8.0 CONCLUSIONS

Tank closure activities at the Site included decommissioning by removal of four ASTs ranging in size from 13,000 to 25,000 gallons, removal and disposal of all aboveground Site structures, decommissioning by removal of one 7,000-gallon UST and one 1,200-gallon UST, and excavation and off-Site disposal of 452.91 tons of petroleum-contaminated soil. The analytical results for the 16 confirmation soil samples collected from the AST and UST Excavations confirmed that petroleum-contaminated soil was removed from the Site to the maximum extent practicable. A limited volume of petroleum-contaminated soil was left in-place in the UST Excavation because the practicable limits of excavation were reached at the drainage ditch on the northern edge of the Site and because of the presence of utilities and Northwest Kerron Avenue to the west. The UST and AST Excavations were backfilled with clean imported structural fill and covered in gravel or seeded.

Following completion of the soil excavation activities, groundwater monitoring was conducted in August 2008 to evaluate the effectiveness of the removal of petroleum-contaminated soil and collect monitored natural attenuation parameters in groundwater. The analytical results for the groundwater samples collected from monitoring wells MW1 through MW-5 indicated concentrations of GRO, ORO, DRO, and/or benzene in groundwater exceeding the MTCA Method A cleanup level in samples collected from monitoring wells MW-1, MW-2, and MW-3, located immediately down-gradient of the UST and AST Excavations. Concentrations of GRO, ORO, DRO, or BTEX exceeding the MTCA Method A cleanup level were not detected in groundwater samples collected from up-gradient monitoring well MW-4 or from furthest down-gradient monitoring well MW-5.

The analytical results for the soil samples collected from the UST and AST Excavation confirm that petroleum-contaminated soil has been removed from the Site, with the exception of a limited area in the UST Excavation. The extent of concentrations of COCs above the cleanup level in groundwater is limited to the area proximate to the former USTs and ASTs and does not extend off the Site.

The preliminary results for evaluation of natural attenuation processes indicate that the groundwater chemistry is amenable to natural attenuation. Additional quarterly groundwater monitoring at the Site will be performed to determine whether natural attenuation is a viable remedial alternative for groundwater at the Site.

9.0 REFERENCES

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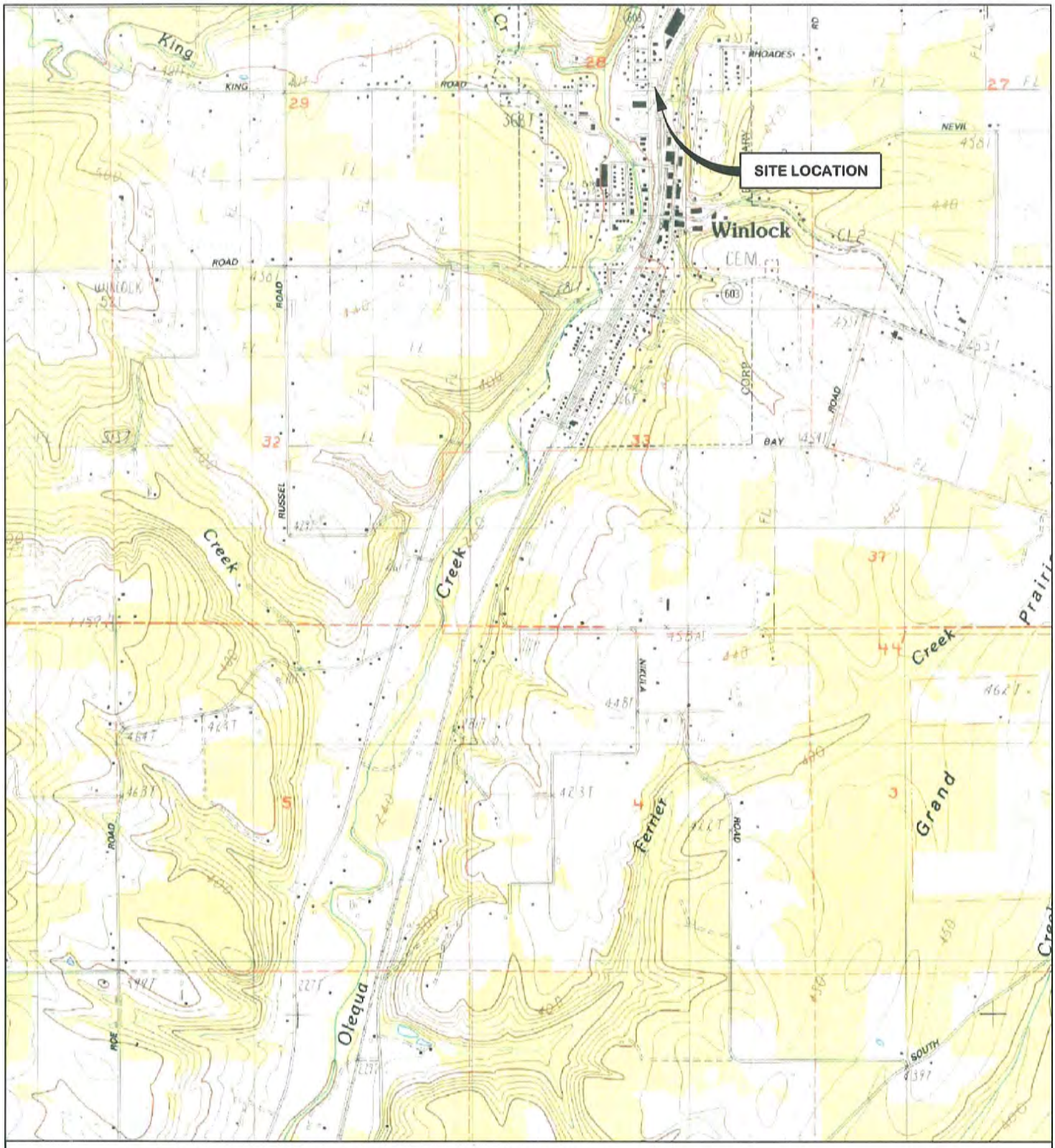
———. 2005. *Guidance on Remediation of Petroleum-Contaminated Ground Water by Natural Attenuation.* Publication No. 05-09-091. July.

FIGURES

TANK CLOSURE REPORT
Former Cummings Oil Lease Site
908 Northwest Kerron Avenue
Winlock, Washington

Farallon PN: 683-009



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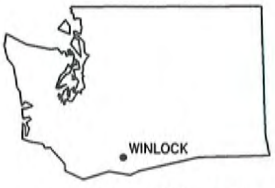

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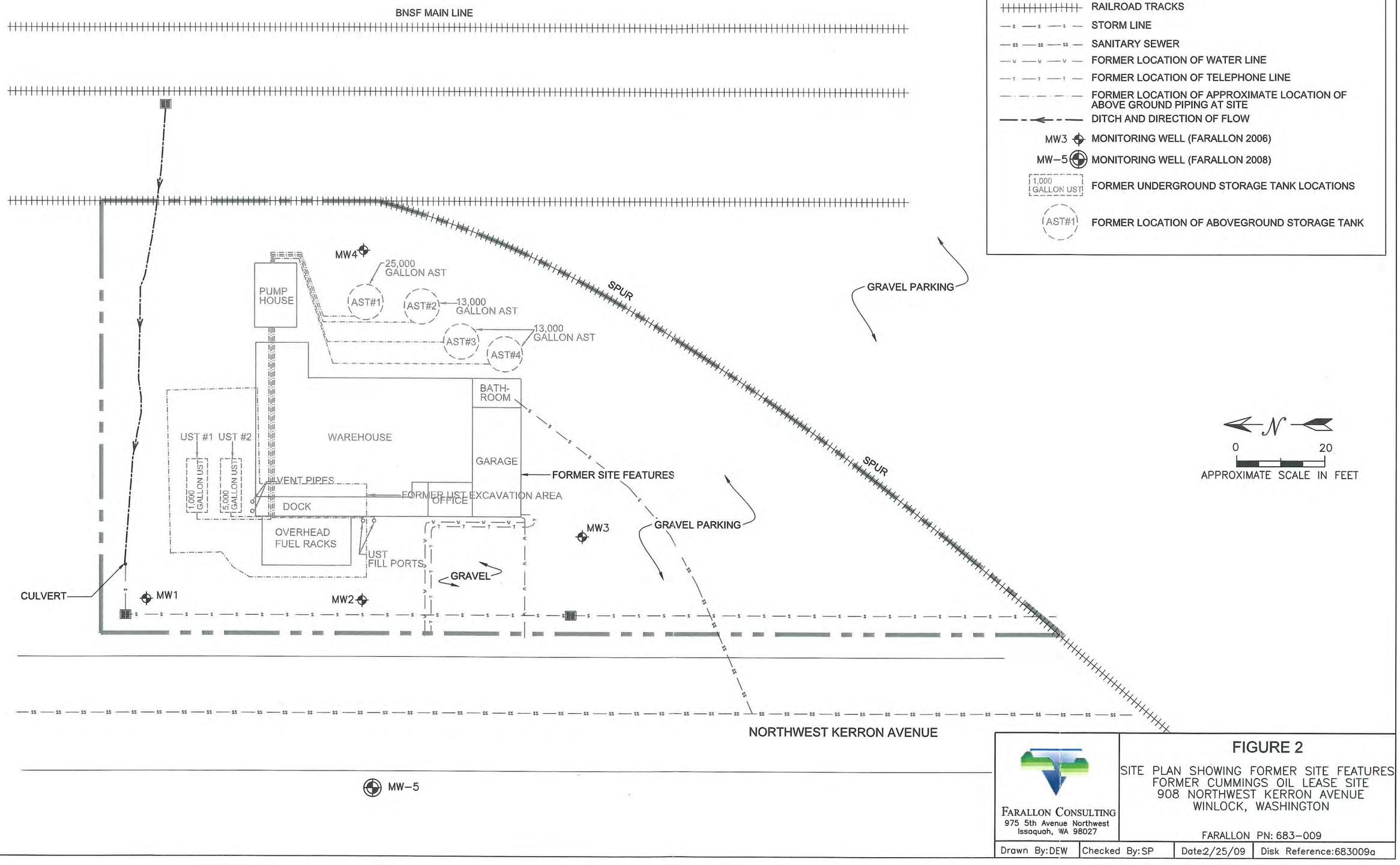
FIGURE 1

SITE VICINITY MAP
FORMER CUMMINGS OIL LEASE SITE
908 NORTHWEST KERRON AVENUE
WINLOCK, WASHINGTON

FARALLON PN: 683-009

Drawn By: DEW	Checked By: SP	Date: 2/25/09	Disk Reference: 683009



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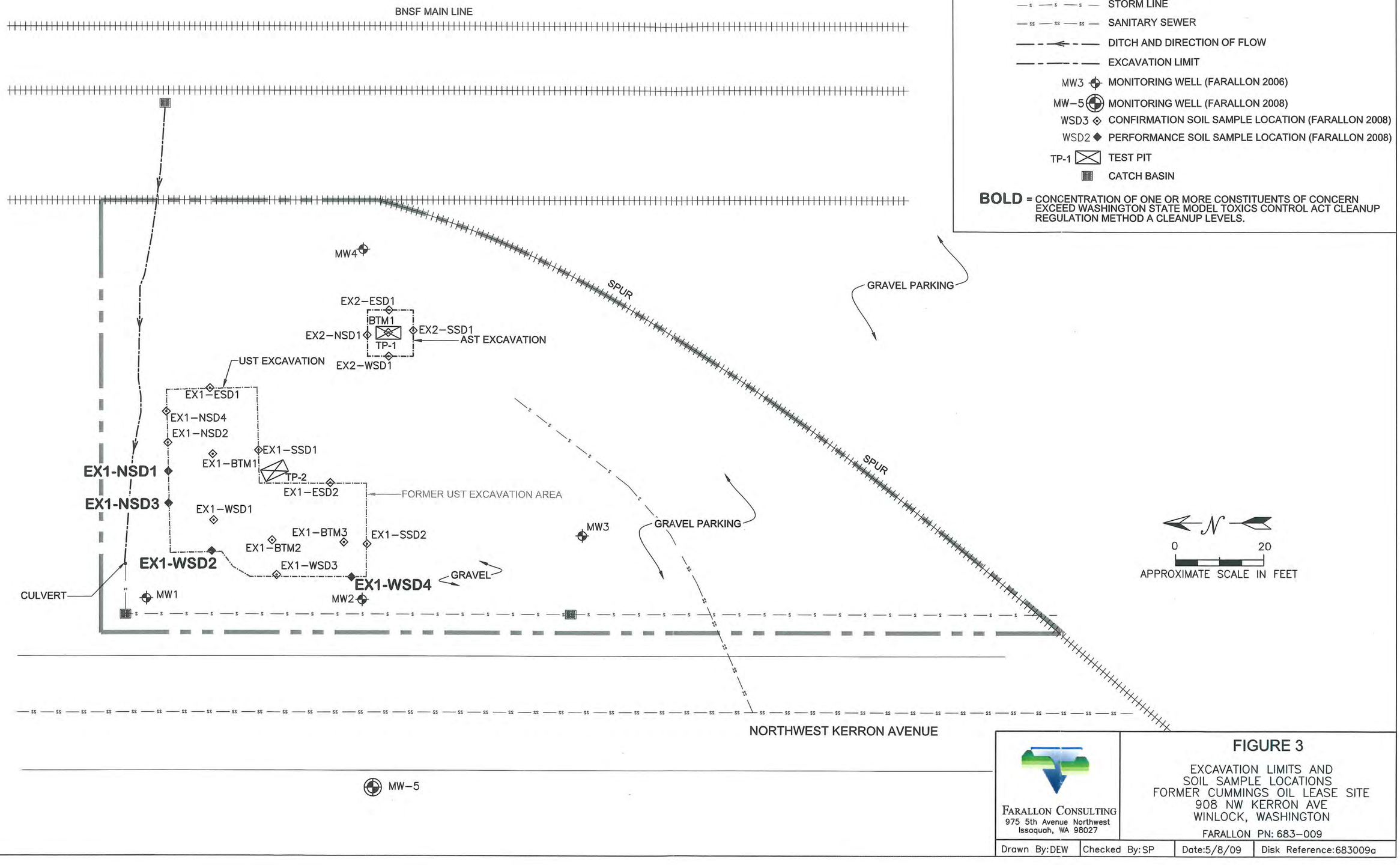
Issaquah, WA 98027

FIGURE 2

SITE PLAN SHOWING FORMER SITE FEATURES
FORMER CUMMINGS OIL LEASE SITE
908 NORTHWEST KERRON AVENUE
WINLOCK, WASHINGTON

FARALLON PN: 683-009

Drawn By: DEW	Checked By: SP	Date: 2/25/09	Disk Reference: 683009a



LEGEND

- PROPERTY BOUNDARY
- RAILROAD TRACKS
- STORM LINE
- SANITARY SEWER
- DITCH AND DIRECTION OF FLOW
- EXCAVATION LIMIT
- MW3 — MONITORING WELL (FARALLON 2006)
- MW–5 — MONITORING WELL (FARALLON 2008)
- WSD3 — CONFIRMATION SOIL SAMPLE LOCATION (FARALLON 2008)
- WSD2 — PERFORMANCE SOIL SAMPLE LOCATION (FARALLON 2008)
- TP-1 — TEST PIT
- CATCH BASIN

BOLD = CONCENTRATION OF ONE OR MORE CONSTITUENTS OF CONCERN EXCEED WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION METHOD A CLEANUP LEVELS.

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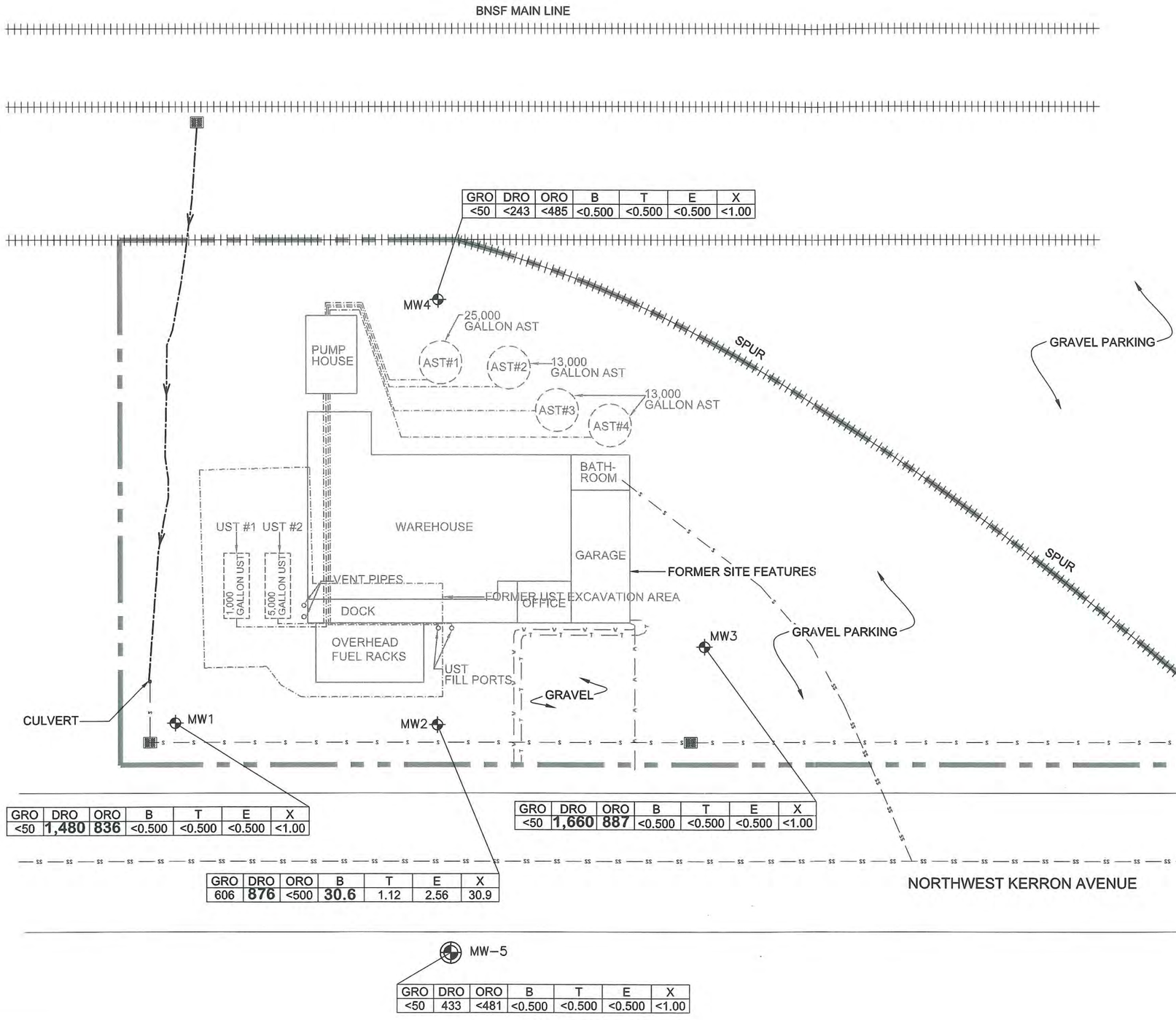
FIGURE 3

EXCAVATION LIMITS AND
SOIL SAMPLE LOCATIONS
FORMER CUMMINGS OIL LEASE SITE
908 NW KERRON AVE
WINLOCK, WASHINGTON

FARALLON PN: 683–009

Drawn By: DEW	Checked By: SP	Date: 5/8/09	Disk Reference: 683009a



GRO	DRO	ORO	B	T	E	X
<50	<243	<485	<0.500	<0.500	<0.500	<1.00

GRO	DRO	ORO	B	T	E	X
<50	**1,480**	**836**	<0.500	<0.500	<0.500	<1.00

GRO	DRO	ORO	B	T	E	X
<50	**1,660**	**887**	<0.500	<0.500	<0.500	<1.00

GRO	DRO	ORO	B	T	E	X
606	**876**	<500	**30.6**	1.12	2.56	30.9

GRO	DRO	ORO	B	T	E	X
<50	433	<481	<0.500	<0.500	<0.500	<1.00

LEGEND

- PROPERTY BOUNDARY
- RAILROAD TRACKS
- STORM LINE
- SANITARY SEWER
- FORMER LOCATION OF WATER LINE
- FORMER LOCATION OF TELEPHONE LINE
- FORMER LOCATION OF APPROXIMATE LOCATION OF ABOVE GROUND PIPING AT SITE
- DITCH AND DIRECTION OF FLOW
- MW3 — MONITORING WELL (FARALLON 2006)
- MW-5 — MONITORING WELL (FARALLON 2008)
- 1,000 GALLON UST — FORMER UNDERGROUND STORAGE TANK LOCATIONS
- AST#1 — FORMER LOCATION OF ABOVEGROUND STORAGE TANK
- CATCH BASIN

ALL RESULTS IN MICROGRAMS PER LITER

GRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS GASOLINE-RANGE ORGANICS
B = BENZENE
T = TOLUENE
E = ETHYLBENZENE
X = TOTAL XYLENES
BOLD = INDICATES CONCENTRATIONS EXCEED WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION METHOD A CLEANUP LEVELS
< = INDICATES CONCENTRATIONS NOT DETECTED ABOVE THE STATED LABORATORY PRACTICAL QUANTITATION LIMIT

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FIGURE 4

POINT OF COMPLIANCE MONITORING WELLS AND AUGUST 18, 2008 GROUNDWATER ANALYTICAL DATA
FORMER CUMMINGS OIL LEASE SITE
908 NW KERRON AVE WINLOCK, WA

FARALLON PN: 683-009

Drawn By: DEW	Checked By: SP	Date: 2/25/09	Disk Reference: 683009a

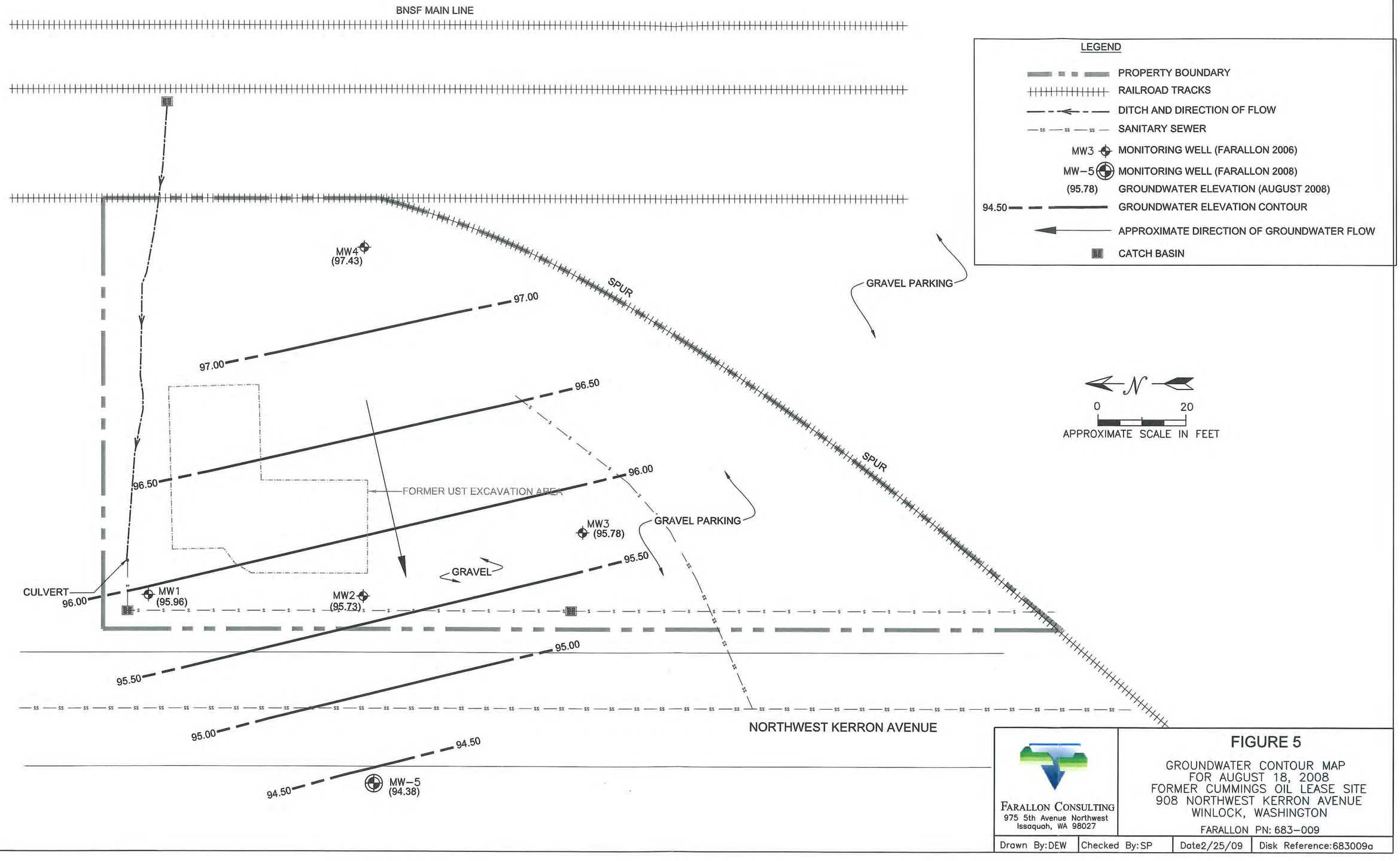

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FIGURE 5

GROUNDWATER CONTOUR MAP
FOR AUGUST 18, 2008
FORMER CUMMINGS OIL LEASE SITE
908 NORTHWEST KERRON AVENUE
WINLOCK, WASHINGTON

FARALLON PN: 683-009

Drawn By: DEW	Checked By: SP	Date 2/25/09	Disk Reference: 683009a

TABLES

TANK CLOSURE REPORT
Former Cummings Oil Lease Site
908 Northwest Kerron Avenue
Winlock, Washington

Farallon PN: 683-009

Table 1
Summary of Soil Analytical Results
Former Cummings Oil Lease Site Tank Closure
Winlock, Washington
Farallon PN: 683-009

Sample Number	Depth (feet bgs)	Date Collected	Soil Analytical Results (milligrams per kilogram)								
			GRO[1]	DRO[2]	ORO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]	Total Naphthalenes[4]	cPAHs[5]
Performance Soil Samples - UST Excavation											
EX1-NSD1-6	6	7/29/2008	**160**	<25	<40	<0.02	0.52	1.05	1.16	—	—
EX1-NSD3-6	6	7/30/2008	**295**	<25	<40	**0.84**	3.62	1.61	6.20	—	—
EX1-WSD2-6	6	7/29/2008	**222**	1860	<40	**0.93**	0.54	3.23	2.54	—	—
EX1-WSD4-6	6	7/30/2008	**276**	119	<40	**1.53**	1.6	3.2	5.31	2.30	<0.01
FD-072908[6]	6	7/29/2008	**230**	760	<40	**0.44**	0.52	2.82	2.73	—	—
Confirmation Soil Samples - UST Excavation											
EX1-NSD2-6	6	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-NSD4-6	6	7/31/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-ESD1-6	6	7/29/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-ESD2-6	6	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	0.11	—	—
EX1-SSD1-6	6	7/29/2008	15	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-SSD2-6	6	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	<0.20	—
EX1-WSD1-6	6	7/29/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-WSD3-7	7	7/29/2008	10	<25	<40	<0.02	<0.10	<0.05	<0.15	<0.20	—
EX1-BTM1-8	8	7/29/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-BTM2-8	8	7/29/2008	11	<25	<40	<0.02	<0.10	<0.05	<0.15	<0.20	<0.01
EX1-BTM3-8	8	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	<0.20	—
Confirmation Soil Samples - AST Excavation											
EX2-NSD1-6	6	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX2-ESD1-6	6	7/30/2008	<10	130	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX2-SSD1-6	6	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX2-WSD1-6	6	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX2-BTM1-8	8	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
MTCA Method A Soil Cleanup Level [7]			**30**	**2,000**	**2,000**	**0.03**	**7**	**6**	**9**	**5**	**0.1**

Table 1
Summary of Soil Analytical Results
Former Cummings Oil Lease Site Tank Closure
Winlock, Washington
Farallon PN: 683-009

Sample Number	Depth (feet bgs)	Date Collected	Soil Analytical Results (milligrams per kilogram)								
			GRO[1]	DRO[2]	ORO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]	Total Naphthalenes[4]	cPAHs[5]
Stockpile Samples											
EX1-SP1	NA	7/28/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-SP2	NA	7/28/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-SP3	NA	7/28/2008	<10	<25	990	<0.02	<0.10	<0.05	<0.15	—	—
EX2-SP1	NA	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX2-SP2	NA	7/30/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX2-SP3	NA	7/30/2008	65	<25	<40	0.099	0.88	0.49	2.28	—	—
Test Pit Samples											
EX1-TP1-4	3	7/28/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
EX1-TP1-7	7	7/28/2008	15	<25	<40	0.18	0.16	0.39	0.53	—	—
EX1-TP2-8	8	7/29/2008	<10	<25	<40	<0.02	<0.10	<0.05	<0.15	—	—
Monitoring Well Sample											
MW-5-5	NA	8/4/2008	<6.32	<12.6	<31.6	<0.0379	<0.0632	<0.0632	<0.126	<0.0128	<0.0128
MTCA Method A Soil Cleanup Level [7]			30	2,000	2,000	0.03	7	6	9	5	0.1

NOTES

— denotes sample not analyzed.

< denotes analyte not detected at or above the reporting limit listed.

[1]Analyzed by Northwest Method NWTPH-Gx.

[2]Analyzed by Northwest Method NWTPH-Dx.

[3]Analyzed by U.S. Environmental Protection Agency (EPA) Method 8021B.

[4]Analyzed by EPA Method 8260B.

[5]Analyzed by EPA Method 8270C.

[6]Quality Assurance/Quality Control duplicate sample. FD-072908 is a duplicate of EX1-WSD2-6.

[7]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised November 2007.

AST = aboveground storage tank

bgs = below ground surface

cPAHs = benzo (a) anthracene, benzo (a) pyrene, benzo (b) fluoranthene, benzo (k) fluoranthene, chrysene, dibenz(a,h)anthracene, indeno (1,2,3-cd) pyrene

DRO = total petroleum hydrocarbons (TPH) as diesel-range organics

GRO = TPH as gasoline-range organics

NA = not applicable

ORO = TPH as oil-range organics

UST = underground storage tank

Table 2
Summary of Groundwater Elevation Data
Former Cummings Oil Lease Site Tank Closure
Winlock, Washington
Farallon PN: 683-009

Well Identification	Monitoring Date	Depth of Monitoring Well (feet)	Monitoring Well Screened Interval (feet bgs)	Wellhead Elevation [1] (feet)[2]	Depth to Water (feet bgs)	Groundwater Elevation (feet)
MW-1	12/23/2005	12	5-12	100.46	2.13	98.33
	8/18/2008				4.50	95.96
MW-2	12/23/2005	11	5-11	100.4	2.50	97.90
MW-2	8/18/2008				4.67	95.73
MW-3	12/23/2005	10	5-10	100.18	2.21	97.97
MW-3	8/18/2008				4.40	95.78
MW-4	12/23/2005	12	5-12	102.45	0.50	101.95
MW-4	8/18/2008				5.02	97.43
MW-5	8/18/2008	10	5-10	99.92	5.54	94.38

NOTES

[1]Elevations based on survey conducted by Farallon Consulting, L.L.C. to a benchmark of 105.59.

bgs = below ground surface

[2]In feet below top of well casing.

Table 3
Summary of Groundwater Analytical Results
Former Cummings Oil Lease Site Tank Closure
Winlock, Washington
Farallon PN: 683-009

Sample Identification	Well Identification	Sample Date	Analytical Results (micrograms per liter)						
			GRO[1]	DRO[2]	ORO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
MW1-122305	MW-1	12/23/2005	<50.0	<238	<476	<0.500	<0.500	<0.500	<1.00
MW1-081808		8/18/2008	<50	**1,480**	**836**	<0.500	<0.500	<0.500	<1.00
MW2-122305	MW-2	12/23/2005	465	<238	<476	**55.2**	2.84	3.46	35.6
MW2-081808		8/18/2008	606	**876**	<500	**30.6**	1.12	2.56	30.9
MW3-122305	MW-3	12/23/2005	<50.0	<238	<476	<0.500	<0.500	<0.500	<1.00
MW3-081808		8/18/2008	<50	**1,660**	**887**	<0.500	<0.500	<0.500	<1.00
MW4-122305	MW-4	12/23/2005	<50.0	<238	<476	<0.500	<0.500	<0.500	<1.00
MW4-081808		8/18/2008	<50	<243	<485	<0.500	<0.500	<0.500	<1.00
MW5-081808	MW-5	8/18/2008	<50	433	<481	<0.500	<0.500	<0.500	<1.00
MTCA Method A Cleanup Levels[5]			**800/1,000 [6]**	**500**	**500**	**5**	**1,000**	**700**	**1,000**

NOTES

Results in **bold** denotes concentrations above applicable cleanup levels.

< denotes analyte not detected at or above the reporting limit listed.

[1]Analyzed by Northwest Method NWTPH-Gx.

[2]Analyzed by Northwest Method NWTPH-Dx.

[3]Analyzed by U.S. Environmental Protection Agency (EPA) Method 8260B.

[4]Laboratory analytical report indicates gasoline results are being influenced by the presence of diesel.

[5]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised November 2007.

[6]The cleanup level for GRO is with/without the presence of benzene.

DRO = total petroleum hydrocarbons (TPH) as diesel-range organics

GRO = TPH as gasoline-range organics

NA = not applicable

ORO = TPH as oil-range organics

Table 4
Summary of Groundwater Geochemical Parameters
Former Cummings Oil Lease Site Tank Closure
Winlock, Washington
Farallon PN: 683-009

Well Identification	Sample Date	Geochemical Results									
		Temperature (°C)	Specific Conductance (mS/cm)	pH (pH units)	Dissolved Oxygen (mg/l)	Oxidation-Reduction Potential (mV)	Sulfate (mg/l)	Nitrate (mg/l as Nitrogen)	Methane (µg/l)	Ethane (µg/l)	Ethene (µg/l)
MW-1	8/18/2008	17.60	0.221	6.03	0.92	-7.70	—	—	—	—	—
MW-2	8/18/2008	17.65	0.316	6.64	0.99	-77.20	0.420	<0.200	1660	<10.0	<10.0
MW-3	8/18/2008	17.38	0.382	6.34	1.08	-75.60	—	—	—	—	—
MW-4	8/18/2008	13.78	0.241	6.75	0.97	-74.90	16.7	<0.200	22.8	<10.0	<10.0
MW-5	8/18/2008	17.57	0.466	6.62	1.45	-31.60	8.03	<0.200	40.6	<10.0	<10.0

NOTES

— = not measured/analyzed

°C = degrees Celsius

µg/l = micrograms per liter

mg/l = milligrams per liter

mS/cm = millisiemens per centimeter

mV = millivolts

APPENDIX A
NOTICE OF SEPA THRESHOLD DETERMINATION OF MITIGATED NON-SIGNIFICANCE

TANK CLOSURE REPORT
Former Cummings Oil Lease Site
908 Northwest Kerron Avenue
Winlock, Washington

Farallon PN: 683-009

NOTICE OF
SEPA THRESHOLD DETERMINATION OF MITIGATED NON-SIGNIFICANCE (MDNS)

323 NE First St. ♦ PO Box 777
Winlock, WA 98596
360-785-3811

Public Comment Period Ends:
December 31, 2007

Application:
Applicant proposes to excavate contaminated soil and backfill to existing grade with imported structural fill. Proposed excavation extends 2' to 4' below ground level. Total approximate amount of cut and fill is 2,000 cubic yards. Additionally, applicant proposes to demolish all existing structures including an existing 19,725 square foot building, as well as removal of Underground Storage Tanks and Aboveground Storage Tanks. 40,000 gallons of discharge water from remedial excavation will be stored in banker tanks, treated with carbon, and discharged to the sanitary sewer on site.

Applicant:
Green Earthworks Construction
Contact: Jayson Stevens
3419 N. Madison St.
Tacoma, WA 98407
(253) 606-8787

Applicant's Representative:
Farallon Consulting, LLC
Contact: Thomas Cammarata
957 5th Avenue, NW
Issaquah, WA 98027
(425) 295-0800

Location of Property:
The property is located at 908 NW Kerron Avenue, within the corporate limits of the City Winlock, Washington. Access to the site is by way of NW Kerron Avenue. The site is defined as tax lot 039140000000 Sec. 28, T12N, R62W, Blocks 7 & 8 Kerron Addition in Winlock.

Lead Agency:
City of Winlock, Washington

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement is not required under RCW 43.21C.030(2)(c). The decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public upon request.

SEPA Threshold Determination: The City of Winlock, acting as lead agency has determined that this proposal does not have a probable significant adverse impact on the environment. This MDNS is issued under WAC 197-11-340(2). The lead agency will not act on this proposal for fourteen (14) calendar days from the issuance date of December 18, 2007.

APPEAL:
An appeal of this determination must be submitted to the City of Winlock within fourteen (14) calendar days from the date issued. This appeal must be written and make specific factual objections to the City's Threshold Determination. Any required fees pursuant to the Winlock Development Code shall be paid at time of appeal submittal.

Responsible Official:
Cy Meyers, Mayor

Cy Meyers
Mayor, City of Winlock

Staff Contact:
Tammy Hamilton
Planning/Community Development
City of Winlock
PO Box 777
Winlock, WA 98596
360-785-381

MITIGATED DETERMINATION OF NONSIGNIFICANCE (MDNS)

BNSF Railway Company Type II Grading Permit

DESCRIPTION OF PROPOSAL: The proposal is to excavate contaminated soil and backfill to existing grade with imported structural fill. Proposed excavation extends 2' to 4' below ground level. Total approximate amount of cut and fill is 2,000 cubic yards. Additionally, applicant proposes to demolish all existing structures including an existing 19,725 square foot building, as well as removal of Underground Storage Tanks and Aboveground Storage Tanks. 40,000 gallons of discharge water from remedial excavation will be stored in banker tanks, treated with carbon, and discharged to the sanitary sewer on site.

LOCATION OF PROPOSAL, including street address, if any: The property is located at 908 NW Kerron Avenue, within the corporate limits of the City Winlock, Washington. Access to the site is by way of NW Kerron Avenue. The site is defined as tax lot 039140000000 Sec. 28, T12N, R62W, Blocks 7 & 8 Kerron Addition in Winlock.

OWNER
BNSF Railway Company
2454 Occidental Ave S.
Seattle, WA 98134

APPLICANT
Green Earthworks Construction,
Contact: Jayson Stevens
3419 N Madison St.
Tacoma, WA 98407
(253) 606.8787 (tel)

APPLICANT'S REPRESENTATIVE
Farallon Consulting, LLC
Contact: Thomas Cammarata
957 5th Avenue, NW
Issaquah, WA 98027
(425) 295.0800 (tel)
tcammarata@farallonconsulting.com

LEAD AGENCY:
City of Winlock, Washington.

The Lead Agency has reviewed the applicant's submitted materials and has determined that the proposal will not have a significant adverse impact on the environment PROVIDED the applicant complies with the SEPA mitigations listed below.

This determination was made based upon the lead agency's review of the applicant's checklist; and is based on the conclusion that the requirements of the City of Winlock building and land development codes and applicable state and federal regulations will serve to mitigate impacts of this proposal and other information on file with the lead agency. This information is available to the public on request. This issuance of an MDNS is done pursuant to WAC 197-11-600 and 197-11-340.

This MDNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below. **Comments must be submitted no later than Monday December 31, 2007.**

APPEALS: Any agency or person may appeal the city's issuance of a final MDNS. Substantive appeals of the MDNS refer to conditioning or denial of, or failure to condition or deny a proposal under the authority of SEPA by a non-elected city official, city planning commission or city council. Appeal application packets are available at Winlock City Hall.

The complete file is available for public review during normal business hours at Winlock City Hall.

Responsible Official:	Cy Meyers
Position/title:	Mayor
Address:	Winlock City Hall 323 NE First Street Winlock, WA 98596
Phone:	(360) 785-3811
Date:	December 17, 2007

Signature: Cy Meyers

Cy Meyers, Mayor

SEPA Mitigations

1. Approved stormwater and erosion control plans in accordance with the City of Winlock standards will be required prior to any construction activity. The portion of the site involved in construction will be secured with erosion controls prior to beginning activity. Where possible, the site will be (re)vegetated soon after construction activity to reduce runoff. Specific erosion control responsibilities and record-keeping requirements shall be assigned to the construction contractor.

2. The source of fill will be approved by the Winlock Building Department. Before any future structures are allowed a soil compaction test will be required before building permit approval.

3. A copy of all soils reports shall be submitted to the Winlock Building Department.

4. Applicant shall follow all state and federal guidelines in demolition of all structures, removal of UST/AST and contaminated soils removal and shall ensure all safety measures are adhered to.

5. ALL water discharged to Winlock's sanitary sewer shall be treated with carbon before discharge.

6. All water to be discharged shall be through the existing sewer lateral on site.

7. All water discharged shall meet all City, County, State, and Federal EPA quality standards before discharge to sanitary sewer.

8. Applicant shall provide the City of Winlock Wastewater Treatment Plant Operator with a copy of all water tests before discharge to sanitary sewer.

9. Applicant shall install erosion control Best Management Practices approved by the City of Winlock prior to construction activity.

10. Sanitary sewer shall be capped and inspected by Winlock Public Works before final grade.

LEAD AGENCY ENVIRONMENTAL REVIEW
(RCW 43.21C, WAC 197-11)
BNSF Railway Company Type II Grading Permit

December 10, 2007

BACKGROUND

Proposal:
The proposal is to excavate contaminated soil and backfill to existing grade with imported structural fill. Proposed excavation extends 2' to 4' below ground level. Total approximate amount of cut and fill is 2,000 cubic yards. Additionally, applicant proposes to demolish all existing structures including an existing 19,725 square foot building, as well as removal of Underground Storage Tanks and Aboveground Storage Tanks. 40,000 gallons of discharge water from remedial excavation will be stored in banker tanks, treated with carbon, and discharged to the sanitary sewer on site.

Location:
The property is located at 908 NW Kerron Avenue, within the corporate limits of the City Winlock, Washington. Access to the site is by way of NW Kerron Avenue. The site is defined as tax lot 039140000000 Sec. 28, T12N, R62W, Blocks 7 & 8 Kerron Addition in Winlock.

Property Owner(s):
BNSF Railway Company
2454 Occidental Ave S.
Seattle, WA 98134

Applicant:
Green Earthworks Construction,
Contact: Jayson Stevens
3419 N Madison St.
Tacoma, WA 98407
(253) 606.8787 (tel)

Applicant's Representative:
Farallon Consulting, LLC
Contact: Thomas Cammarata
957 5th Avenue, NW
Issaquah, WA 98027
(425) 295.0800 (tel)
tcammarata@farallonconsulting.com

Summary: Upon review, staff recommends issuing a Mitigated Determination of Non-Significance (MDNS). Mitigation measures incorporated in this MDNS shall be deemed conditions of the permit decision and may be enforced in the same manner as any term or condition of the permit, or enforced in any manner specifically prescribed by the city.

1. Approved stormwater and erosion control plans in accordance with the City of Winlock standards will be required prior to any construction activity. The portion of the site involved in construction will be secured with erosion controls prior to beginning activity. Where possible, the site will be (re)vegetated soon after construction activity to reduce runoff. Specific erosion control responsibilities and record-keeping requirements shall be assigned to the construction contractor.

2. The source of fill will be approved by the Winlock Building Department. Before any future structures are allowed a soil compaction test shall be required before building permit approval.

3. A copy of all soils reports shall be submitted to the Winlock Building Department.

2. AIR

a. *What types of emissions to the air would result from the proposal (i.e. Dust, automobile odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.*

Volatile petroleum hydrocarbons related to the removal of petroleum contaminated soil.

b. Are there any off site sources of emissions or odor that may affect your proposal? If so, generally describe:

No known off-site sources of emissions or odors exist that would adversely affect the proposal.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

The applicant will be required to comply with existing state and federal laws as well as the City of Winlock municipal code.

Proposed Mitigation:

4. Applicant shall follow all state and federal guidelines in demolition of all structures, removal of UST/AST and contaminated soils removal and shall ensure all safety measures are adhered to.

3. WATER

a. SURFACE:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

1) *Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities if known). Where will this water flow? Will this water flow into other waters? If so, describe:*

None.

2) *Could waste materials enter ground or surface waters? If so, describe.*

No

d. *Proposed measures to reduce or control surface, ground, and runoff water impacts, if any*

Approved Best management Practices will be in place prior to construction activity.

Proposed Mitigation
5. ALL water discharged to Winlock's sanitary sewer shall be treated with carbon before discharge.
6. All water to be discharged shall be through the existing sewer lateral on site.
7. All water discharged shall meet all City, County, State, and Federal EPA quality standards before discharge to sanitary sewer.
8. Applicant shall provide the City of Winlock Wastewater Treatment Plant Operator with a copy of all water tests before discharge to sanitary sewer.
9. Applicant shall install erosion control Best Management Practices approved by the City of Winlock prior to construction activity.

4. PLANTS

a. *Check or circle types of vegetation found on the site:*

Found vegetation is in **BOLD.**

Deciduous tree: alder, maple, aspen, other: misc
Evergreen tree: fir, cedar, pine, other: fir, cedar
Shrubs: Blackberry.
Grass: misc.
Crop or grain:
Wet soils plants: cattail, buttercup, bullbrush, skunk cabbage, other:
Water plants: water lily, eelgrass, milfoil, other:
Other types of vegetation:

b. *What kind and amount of vegetation will be removed or altered?*

Approximately 300 cubic feet of blackberries and grass will be removed.

c. *List threatened or endangered species known to be on or near the site:*

None

d. *Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:*

Proposed Mitigation:

None.

Proposed Mitigation
No mitigation measures are warranted or proposed.

7. ENVIRONMENTAL HEALTH

a. *Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe:*

Yes. Petroleum contaminated soil and groundwater.

1) Describe special emergency services that might be required:

Fire, police and ambulance.

2) Proposed measures to reduce or control environmental health hazards, if any:

Project specific Health and Safety Plan and the use of personal protective equipment..

b. Noise

1) What types of noise exist in the area which may affect your project (For example: traffic, equipment, operation, other)?

None.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Short-term noise from trucks and excavators. No long- term noise is anticipated.

3) Proposed measures to reduce or control noise impacts, if any:

Construction activities will not occur after 8 PM or before 7 AM.

Proposed Mitigation:
No mitigation measures are warranted or proposed.

8. LAND AND SHORELINE USE:

a. What is the current use of the site and adjacent properties?

The site has previously been utilized as a warehouse; however, the site has been vacant for several years. Residential and commercial uses surround the site.

b. Has the site been used for agriculture? If so, describe:

No

None proposed.

Proposed Mitigation:

No mitigation measures are warranted or proposed.

11. LIGHT AND GLARE

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No.

c. What existing off-site sources of light or glare may affect your proposal?

None known

d. Proposed measures to reduce or control light and glare impacts, if any:

None.

Proposed Mitigation:

No mitigation measures are warranted or proposed.

12. RECREATION

a. What designated and informal recreational opportunities are in the immediate vicinity?

None

b. Would the proposed project displace any existing recreational uses? If so, describe:

No

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None

Proposed Mitigation:

No mitigation measures are warranted or proposed

13. HISTORIC AND CULTURAL PRESERVATION

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

None.

a. *Would the project result in an increased need for public services (for example: Fire protection, police protection, health care, schools, other)? If so, generally describe:*

No

b. *Proposed measures to reduce or control direct impacts on public services, if any.*

NA

No proposed Mitigation

16. UTILITIES

a. *Circle utilities currently available at the site:* **electricity**, *natural gas,* **water**, *refuse service, telephone,* **sanitary sewer**, *septic system, other:*

b. *Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity, which might be needed.*

None

Proposed Mitigation:

Proposed Mitigation
10. Sanitary sewer shall be capped and inspected by Winlock Public Works.

REVIEWING OFFICIAL

Tammy Hamilton
Administrator, Planning/Community Development
323 NE First St.
PO Box 777
Winlock, WA 98596
(360) 785.3811
wincomdev@toledotel.com

ADMINISTRATION COMMENTS ONLY

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal: If yes, explain:

☒ *No* ☐ *Yes:* _____

_____

8. List any environmental information you know about that has been prepared or will be prepared directly related to this proposal:

☐ *None* ☒ *Specific:* *Supplemental Subsurface Investigation Report Prepared by Farallon Consulting L.L.C. and dated May 31, 2006*

_____

9. Are any applications pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

☐ *No* ☒ *Yes:* *A 30 day Notice to remove the USTs at the property has been submitted to the Washington State Department of Ecology. Demolition, discharge, and grading permits have been applied for at the City of Winlock.*

10. List any governmental approvals or permits that will be needed for your proposal.

☐ *None* ☐ *Unknown (agency decision*

☒ *Specific:* *30 day Notice to the Washington State Department of Ecology to remove USTs and a demolition, discharge, and grading permit with City of Winlock.*

11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site (There are several questions later in this checklist which ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.)

Demolition of all existing structures, removal of USTs and ASTs, and cleanup of petroleum contaminated soil and groundwater

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including street address. Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. ☒ *See attached civil/site plan*

Address: *908 Northwest Kerron Avenue Winlock, Washington*

_____

B. ENVIRONMENTAL ELEMENTS

1. EARTH

a. General description of the site circle (bold): *Flat, rolling, hilly, steep slopes, mountainous, other:* Flat

b. What is the steepest slope on the site (approximate percent slope)?

< 1 %

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Silt from the surface to 7 feet below ground surface; gravel 7 to 13 feet below ground surface

d Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe

☒ *No* ☐ *Yes:* _____

ADMINISTRATION COMMENTS ONLY

θ *See attached*

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities, if known.
X *No* θ *Yes:* _____

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
X *No* θ *Yes – see attached civil/site plan.*

6) Does the proposal involve any discharges of water materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.
X *No* θ *Yes:* _____

b. Ground:

1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities of withdrawals or discharges, if known.
θ *No* X *Yes* 40,000 gallons of discharge water from the remedial excavation will stored in banker tanks, treated with carbon, and discharged to the sanitary sewer.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals; agricultural; etc.) Show on site/civil plan.
X *None* θ *See attached civil/site plan.*
θ *Other:* _____

c. Water Runoff (including storm water):

1) Describe the source of runoff (including storm water) and show on the attached civil/site plan the method of collection and disposal.
X *None* θ *See attached.*

2) Will this project generate waste materials which, if not handled properly could enter ground or surface waters? If so, generally describe.
X *No* θ *Yes:* _____

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:
θ *N/A* θ *None* X *See attached*
Other: Filter Fabric Fence and Covering and placing a berm around soil stockpiles (see attached erosion control design drawing)

☒ N/A

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

☒ No ☐ Yes: _____

c. What kinds of energy conservation features are included in the plans for this proposal? List other proposed measures to reduce or control energy impacts, if any:

☒ None ☐ WA State Energy Code

☐ Other: _____

7. ENVIRONMENTAL HEALTH

a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.**

☐ No ☒ Yes: *Petroleum contaminated soil and groundwater*

1) Describe special emergency services that might be required (for example, chemical spills or explosions).

☐ None ☒ Specific: *Fire*

2) Proposed measures to reduce or control environmental health hazards, if any.

☐ None ☒ Other: *Project Specific Health and Safety Plan and the use of personal protective equipment*

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, construction, or production equipment, other)?

☒ None ☐ Specific: _____

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction or production equipment, other)? Indicate what hours noise would come from the site.

☐ None ☒ Specific: *Noise from trucks and excavators*

3) Proposed measures to reduce or control noise impacts, if any:

☒ None ☐ Other: _____

8. LAND AND SHORELINE USE

a. What is the current use of the site and adjacent properties?

☐ Residential ☐ Commercial ☒ Industrial

Specific: _____

b. Has the site been used for agriculture? If so, describe.

ADMINISTRATION
COMMENTS ONLY

c. Proposed measures to reduce or control housing impacts, in any:

θ *None* (X) *N/A* θ *See Attached.*

10. **AESTHETICS**

a. What is the tallest height of any proposed structure(s), not including antennas or chimneys; what is the principal exterior building material(s) proposed?

(X) *N/A* *Feet* _____

Materials: _____

b. What views in the immediate vicinity would be altered or obstructed?

θ *None* θ *Specific:* N/A _____

_____

c. Proposed measures to reduce or control aesthetic impacts, if any:

θ *None* (X) *N/A* θ *See Attached.*

θ *Other:* _____

_____

11. **LIGHT AND GLARE**

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

(X) *None* θ *Specific:* _____

_____

b. Could light or glare from the finished project be a safety hazard or interfere with views or affect wildlife?

(X) *No* θ *Yes:* _____

_____

c. Will existing off-site sources of light or glare affect your proposal?

(X) *No* θ *Yes:* _____

d. Proposed measures to reduce or control light and glare impacts, if any:

(X) *None* θ *N/A* θ *See Attached.*

12. **RECREATION**

a. What designated and informal recreational opportunities are in the immediate vicinity?

(X) *None* θ *(Don't know)* θ *Specific:* _____

_____

b. Would the proposed project displace any existing recreational uses? If so, describe.

(X) *No* θ *Yes:* _____

_____

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

θ *None* (X) *N/A* θ *See Attached.*

θ *Other:* _____

_____

ADMINISTRATION
COMMENTS ONLY

15. PUBLIC SERVICES

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

X *No* θ *Yes:* _____

_____

b. Proposed measures to reduce or control direct impacts on public services, if any.

X *None* θ *See attached.*

θ *Other:* _____

_____

16. UTILITIES

a. Circle (bold) utilities currently available at the site: *electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other* _____

b. Describe the utilities that are proposed for the project and the utility providing the service.

X *None* θ *Specific:* _____

_____

c. Does the proposal require extension of any utility to serve the site?

X *No* θ *Yes:* _____

_____

C. SIGNATURE

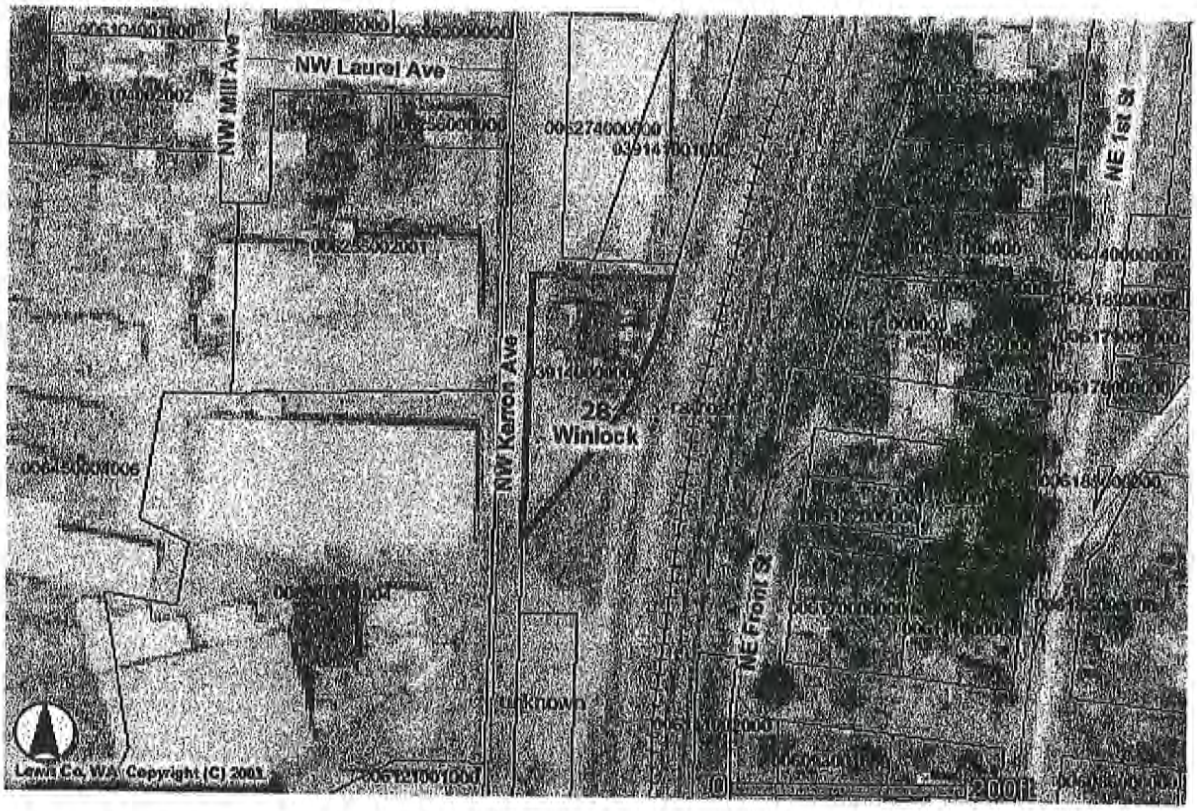
The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision, and will review this information for consistency with the applicable regulations.

_____

Signature (Applicant/Agent)

10/29/02

Submittal Date



I acknowledge and agree to the prohibitions listed in RCW 42.17.260(9) against releasing and/or using lists of individuals for commercial purposes. Neither Lewis County nor the Assessor-Treasurer warrants the accuracy, reliability or timeliness of any information in this system, and shall not be held liable for losses caused by using this information. Portions of this information may not be current or accurate. Any person or entity who relies on any information obtained from this system, does so at his or her own risk. All critical information should be independently verified.

CITY OF WINLOCK
DEPARTMENT OF BUILDING AND PLANNING

+II/grading/0'

APPLICATION FOR EXCAVATION AND GRADING

Permits Required - Except as specified below, no person shall do any grading without first having obtained a grading permit from the building official.

Exempted Work – A grading permit is not required for the following:

1. *When approved by the building official*, grading in an isolated, self-contained area, provided there is no danger to the public, and that such grading will not adversely affect adjoining properties.
2. An excavation below finished grade for basements and footings of a building, retaining wall or other structure authorized by a valid building permit. This shall not exempt any fill made with the material from such excavation or exempt any excavation having an unsupported height greater than 5 feet (1524 mm) after the completion of such structure.
3. Cemetery graves.
4. Refuse disposal sites controlled by other regulations.
5. Excavations for wells, or trenches for utilities.
6. Mining, quarrying, excavating, processing or stockpiling of rock, sand, gravel, aggregate, or clay controlled by other regulations, provided such operations do not affect the lateral support of, or significantly increase the stresses in or pressure upon any soil on adjacent or contiguous property.
7. Exploratory excavations performed under the direction of a registered design professional.
8. An excavation that 1) is less than 2 feet (610 mm) in depth or 2) does not create a cut slope greater than 5 feet (1524 mm) in height and steeper than one (1) unit vertical in 1-1/2 units horizontal (66.7% slope).
9. A fill less than one (1) foot (305 mm) in depth and placed on natural terrain with a slope flatter than one (1) unit vertical in five (5) units horizontal (20% slope), or less than three (3) feet (914 mm) in depth, not intended to support structures that does not exceed 50 cubic yards (38.3 M3) on any one lot and does not obstruct a drainage course.

NOTE: Exemption from a permit shall not be deemed to grant authorization for any work to be done in any manner in violation of the provisions of the International Building Code or any other laws or ordinances of this jurisdiction or any other permits required by the state of Washington.

If you feel your project is exempt from permit please circle the appropriate items above. Even if you feel your project is exempt from permits, please provide the drawings required on page two and the following information:

How much total volume of material is involved in the excavation and grading activity? *Be sure to include cuts, fills, and/or road building. (27 cubic feet = 1 cubic yard)* 1,000 cy. 2,000 SEE NEXT PAGE #8

Grading in excess of 5,000 cubic yards ($382m^3$) shall be performed in accordance with the approved grading plans prepared by a civil engineer, and shall be designated as "Engineered Grading".

Grading involving less than 5,000 cubic yards ($382m^3$) shall be designated "Regular Grading", unless the applicant chooses to have the grading performed as Engineered Grading, or the Building Official determines

Describe impacts of runoff after filling and/or finish grading (If you answered yes to any of the above items, please explain):

FILL TO EXISTING GRADE. DRAINAGE CHARACTERISTICS WILL NOT CHANGE.

What measures will be implemented for erosion control? CB INSERTS AND SILT FENCE SURROUNDING PROJECT.

NOTE: You may be required by Washington State Department of Ecology to obtain a Construction Stormwater General Permit. Please read the following:

CONSTRUCTION STORMWATER GENERAL PERMIT

Who Needs Construction Stormwater Permit Coverage?

Please answer the following questions:

1. Does your construction project disturb one or more acres of land through clearing, grading, excavating, or stockpiling of fill material? Remember to count the cumulative acreage of the entire project whether in a single or in a multiphase project. This applies even if you are responsible for only a small portion [less than one acre] of the larger project planned over time. NO

2. Is there any possibility that stormwater could run off your site during construction and into surface waters or conveyance systems leading to surface waters of the state? In almost every case, the answer to this question is yes. However, if the topography and location of your site is such that there is no possibility that rainfall or snowmelt could leave the site or enter a waterway, you do not need permit coverage. N/A

If you answered "yes" to both of these questions, your construction site needs a permit. Construction site operators must apply for a permit 60 days prior to discharging stormwater.

Stormwater website: http://www.ecy.wa.gov/programs/wq/stormwater/construction/

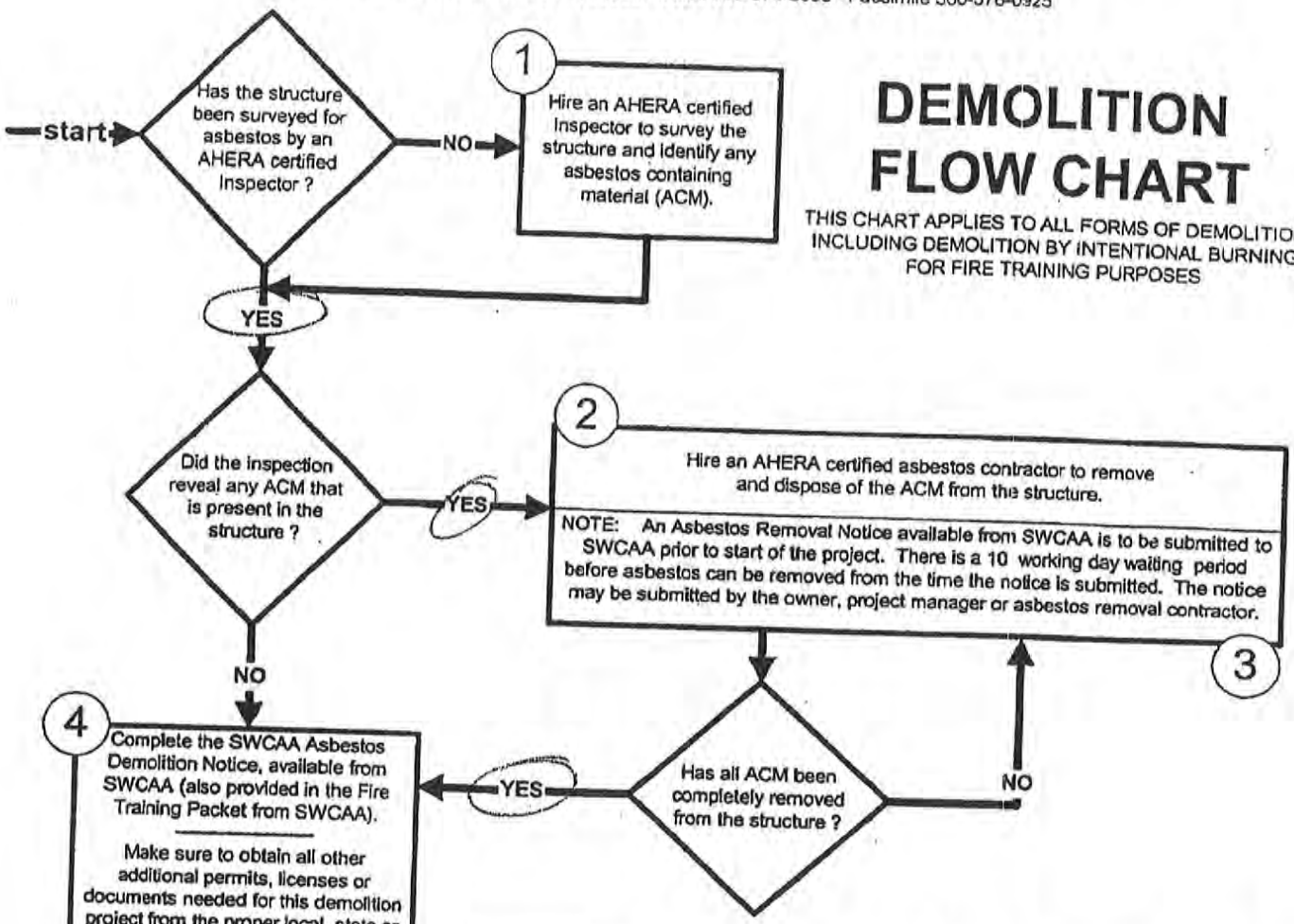
If you have questions or need further information please contact:

Joyce Smith
360-407-6858
josm461@ecy.wa.gov

SOUTHWEST CLEAN AIR AGENCY
1308 NE 134th Street, Vancouver, WA 98685 - Voice 360-574-3058 - Facsimile 360-576-0925

DEMOLITION FLOW CHART

THIS CHART APPLIES TO ALL FORMS OF DEMOLITION INCLUDING DEMOLITION BY INTENTIONAL BURNING FOR FIRE TRAINING PURPOSES



Fire Training Structure Approval

Please follow these steps when demolishing a structure.

1. Have the fire training structure inspected for any ACM by a certified AHERA inspector (if no ACM is found skip to step #4).
2. If ACM is found have an AHERA certified contractor submit an Asbestos Removal Notice to the Southwest Clean Air Agency (SWCAA).
3. After the 10 work day waiting period, have the AHERA certified contractor remove all of the ACM identified during the certified AHERA inspection.
4. Complete the Asbestos Demolition Notice contained in the Fire Training packet.
   Obtain all additional permits, licenses or documents needed for this demolition project from all other local, state and federal agencies.
5. If this demolition is for fire training, obtain a completed Fire Dept. Training Request Form from the Fire Dept that will be performing the training.
6. Take a copy of the AHERA inspection report with proof of asbestos removal (if applicable), a $50.00 fee and the completed Fire Dept. Training Request Form to SWCAA.
7. The fire training may take place 10 working days after SWCAA has received and reviewed all required documentation.

ALL DEMOLITION AND FIRE TRAINING FORMS MAY BE COPIED AS NEEDED OR ARE AVAILABLE FROM THE SOUTHWEST CLEAN AIR AGENCY

APPENDIX B
UNDERGROUND STORAGE TANK 30 DAY NOTICE

TANK CLOSURE REPORT
Former Cummings Oil Lease Site
908 Northwest Kerron Avenue
Winlock, Washington

Farallon PN: 683-009

WASHINGTON STATE DEPARTMENT OF ECOLOGY

UNDERGROUND STORAGE TANK

30 DAY NOTICE

See back of form for instructions

FOR OFFICE USE ONLY
Site ID #:
FS ID #:

Please ✓ the appropriate box: ☐ Intent to Install ☑ Intent to Close ☐ Both

Site Information

UBI Number unknown.

Site/Business Name Cummings Oil Co., Inc.

Site Address 908 NW. Kerron Ave.

City/State Winlock, Washington

Zip Code 98596 Telephone ( ) None

Owner Information

(This form will be returned to this address)

UST Owner/Operator BNSF Railway Company

Mailing Address 2454 Occidental Ave S. Suite 1A

City/State Seattle, WA

Zip Code 98199 Telephone (206) 625-6035

Tank Installation Company (if known). Fill out this section ONLY if tanks are being installed.

Service Company _____ Contact Name _____

Address _____ (Street / P.O. Box)

_____ Telephone ( ) _____ (City / State / Zip Code)

Tank Permanent Closure Company (if known). Fill out this section ONLY if tanks are being closed.

Service Company Green Earthworks Contact Name Mr. Jayson W. Stevens

Address 3419 North Madison St. (Street / P.O. Box)

Tacoma WA 98047 Telephone (253) 606-8787 (City / State / Zip Code)

Tank Closure Information

Fill out this section ONLY if tanks are being closed.

Tank ID	Projected Closure Date	Tank Capacity	Substance Stored	Date Tank Last Used	Is There Product In the Tank (Yes/No)	If No, Date Tank Was Pumped
2000	12/17/07	unknown	unknown	1976	yes	
4000	12/17/07	unknown	unknown	1976	yes	

Tank Installation Information

Fill out this section ONLY if tanks are being installed.

Tank ID	Approx. Install Date

To receive this document in an alternate format, contact the TOXICS CLEANUP PROGRAM at 360-407-7170 (VOICE) or 1-800-833-6388 or 711 (TTY)

APPENDIX C
PRE-DEMOLITION ASBESTOS NESHAP REPORT

TANK CLOSURE REPORT
Former Cummings Oil Lease Site
908 Northwest Kerron Avenue
Winlock, Washington

Farallon PN: 683-009

PRE-DEMOLITION ASBESTOS NESHAP REPORT

EMR PROJECT NO. 8125.001

Former Shell Oil Lease Site
908 Kerron Avenue
Winlock, WA 98596

For

BNSF Railway Company
Environmental Operations Department
2600 Lou Menk Drive
Fort Worth, Texas 76131

EMR
INCORPORATED

PRE-DEMOLITION ASBESTOS NESHAP REPORT

EMR PROJECT NO: 8125.001

Former Shell Oil Lease Site
908 Kerron Avenue
Winlock, WA 98596

For

BNSF Railway Company
Environmental Operations Department
2600 Lou Menk Drive
Fort Worth, Texas 76131

Prepared by:

EMR, Inc.
2635 151st Place NE
Redmond, WA 98052
(425) 861-4561

Inspected by:
Michael McKay
AHERA Asbestos Inspector

Prepared for EMR by:
Shannon K. Adamson
AHERA Project Designer

October 2007

TABLE OF CONTENTS

LIST OF APPENDICES

INDEX OF ASBESTOS BUILDING INSPECTION DATA (APPENDIX C)

Asbestos-Containing Materials Summary

1.0 INTRODUCTION

The BNSF Railway Company (BNSF) retained EMR, Inc. (EMR) to conduct a pre-demolition asbestos building survey for the Former Shell Oil Lease Site in Winlock, Washington. This report describes the inspection procedures and presents the findings of the inspection.

1.1 General Information

Site Address:	908 Kerron Avenue Winlock, WA 98596
Inspected by:	Mr. Michael McKay, AHERA Building Inspector Certificate #10267136, expires 7/17/08
Program Manager:	Mr. Ric Cook EMR, Inc. 3200 Haskell Avenue, Suite 140 Lawrence, KS 66046 (785) 842-9013, ext. 137
Laboratory:	Seattle Asbestos Test, LLC 19711 Scriber Lake Rd, Suite D Lynnwood, WA 98036 (425) 673-9850
Date (s) of Inspection:	August 27, 2007

1.2 Pertinent Regulations

In the event of a planned asbestos removal project in the State of Washington, all applicable asbestos regulations should be consulted. These should include, but are not limited to, the local air pollution authority regulations, and state Occupational Health and Safety (OSHA) regulations. These standards should also be consulted regarding planned demolition projects. Typically, certified and licensed asbestos abatement contractors will prepare the required notifications prior to a planned asbestos abatement project. No specific local regulations apply regarding asbestos building inspections.

2.0 PURPOSE AND PROCEDURES

EMR was directed by BNSF to inspect the Former Shell Oil Lease Site for the purpose of identifying asbestos containing materials (ACM) that will be disturbed during planned demolition activities. This report identifies ACM present in the building as well as quantifying and determining the condition of all ACM at the site.

2.1 Building Inspection

The survey began with a field description of the building (building information report), including facility, building name, city, building number, construction date, original owner, building construction type, floor construction material, building status, number of floors, approximate floor area, floor covering materials, roof materials, roof construction, ceiling materials, exterior wall construction/materials, interior wall construction/materials, HVAC type, HVAC insulation, building uses, building renovations, building owners, inspection history and homogenous areas.

The abandoned Former Shell Oil Lease Site was constructed in 1940s and is approximately 3,120 square feet on one floor. The building is constructed of wood on a wood floor. The roof is constructed with wood and metal and is covered with metal. The exterior walls are constructed of metal and wood, and the interior walls have metal, wood and sheetrock. The building is not heated but has fiberglass insulation. Floor coverings include 9" floor tile and carpet, and the ceiling has 1'x1' tongue and groove ceiling tile.

Suspect materials were sampled and analyzed following the EPA "Asbestos Hazard Emergency Response Act" (AHERA) sampling protocol. Samples were submitted to a National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory and analyzed using Polarized Light Microscopy (PLM) to determine asbestos content.

Material Categories and Conditions can be found in Appendix A. Appendix B is the section covering the Table 1 Definitions. Appendix C presents the building inspection data for each structure and contains the following information for the buildings:

1. Photos
2. Asbestos Containing Materials Summary
3. Building Information Sheet
4. Laboratory Reports
5. Chain-of-Custody

2.2 Sample Collection and Analysis

Suspect materials were sampled and analyzed following the EPA "Asbestos Hazard Emergency Response Act" (AHERA) and State of California sampling protocol. Samples were submitted to a National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory and analyzed using Polarized Light Microscopy (PLM) to determine asbestos content.

The analytical procedure followed is that described in the "Interim Method for the Determination of Asbestos in Bulk Insulation Samples," recommended by the EPA in Appendix A to Sub-part F

of 40 CFR Part 763, (REF 1). Based on these guidelines, suspect material was considered not to contain asbestos only if the results of all samples required to be collected from the homogeneous area were determined to have no detectable concentrations of asbestos by PLM. Those materials analyzed and determined to contain greater than 1% asbestos were considered ACM.

The laboratory provided written verification of each sample submitted and analyzed with appropriate chain-of-custody documentation. The laboratory certificates are located in Appendix C of this report.

Upon collection all samples were assigned a unique sample number consisting of four letters followed by three letters and then a number. The first four letters identify the state and city where the site is located. The second set of letters identifies the building name or number where the sample was collected. The number identifies the specific sample collected from that building.

2.3 Inventory of Asbestos-Containing Materials

Asbestos-containing materials were found at the Former Shell Oil Lease Site. Materials found to contain asbestos combined with materials assumed to contain asbestos are segregated into three material classes (friable, non-friable category II and non-friable category I) that are recognized for any given survey.

All friable ACM shall be maintained in good condition with no damage present. Friable ACM are materials containing more than 1% asbestos, which can be crumbled, pulverized or reduced to powder by hand pressure when dry.

Category I non-friable ACM includes any resilient material containing more than 1% asbestos, that when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure, and as such should not release fibers when in good condition.

Conversely, category II non-friable ACM includes any non-resilient material containing more than 1% asbestos, that when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure, and as such should not release fibers when in good condition.

2.4 Summary of Analytical Findings

The "Asbestos-Containing Materials Summary," includes sample number, material description, general area, material category, material class, quantity, material condition, asbestos type and asbestos percentage for all suspect materials identified and sampled in the course of the building survey (see APPENDIX C-Building Inspection Data).

A total of twelve (12) samples were collected and analyzed by PLM for asbestos content.

- Three (3) samples contained asbestos:
  - **WLWA-SSL-001** – Red 9" Non-ACM Floor Tile and ACM Mastic
    - (Tile = Non-ACM, Mastic = 3% Chrysotile)
  - **WLA-SSL-003** – ACM 12" Floor Tile and Non-ACM Mastic
    - (Tile = 2% Chrysotile, Mastic = Non-ACM)
  - **WLWA-SSL-004** – Transite on Dock Extension Roof (19% Chrysotile)

- Non-asbestos-containing materials include the following:
  - 1'x1' Ceiling Tile
  - Silver Paint
  - Vermiculite Insulation
  - Sheetrock, Tape & Mud
  - 9" Floor Tile
  - Brown Mastic

3.0 PROJECT SPECIFIC RECOMMENDATIONS

EMR recommends all asbestos-containing materials be removed by an approved and certified asbestos abatement contractor, prior to demolition. After abatement procedures have been conducted, EMR recommends the chosen demolition contractor follow all required regulations during building demolition. A Southwest Clean Air Agency demolition notification form can be found in Appendix D.

4.0 INSPECTION LIMITATIONS

This assessment was completed following generally accepted engineering, investigative and analytical practices of other consultants undertaking similar studies at the same time and in the same geographical area. The findings and conclusions stated herein are based on scientific evaluation of material samples and represent professional opinions concerning the significance of the limited data gathered during the assessment. No other warranty, express or implied, is made. Reuse of this report for any other purpose without EMR's written authorization shall be at the Client's risk. The Client agrees to indemnify and hold harmless EMR from all actions, claims, damages, and expense, including attorney fees, arising out of any unauthorized reuse.

EMR, Inc.

Prepared for the Company By:

Shannon K. Adamson
AHERA Project Designer

Reviewed for the Company By:

Thomas J. Patnode
Executive Vice President

APPENDIX A - ASBESTOS MATERIAL CONDITIONS/CLASSIFICATIONS

CONDITIONS/CLASSIFICATIONS

Surfacing and Miscellaneous Materials

Significantly Damaged Condition - Material with one or more of the following characteristics:

1. Surface crumbling or blistered over at least one tenth of the surface if the damage is evenly distributed (one quarter, if the damage is localized).
2. One tenth (one quarter, if localized) of material hanging from surface, deteriorated, or showing adhesive failure.
3. Water stains, gouges, or mars over at least one tenth of the surface if the damage is evenly distributed (one quarter if the damage is localized). Accumulation of powder, dust, or debris similar in appearance to the suspect material on surfaces beneath the material can be used as confirmatory evidence.

Damaged Condition (poor condition) - material with the following characteristics:

1. The surface crumbling, blistered, water-stained, gouged, marred or otherwise abraded over less than one tenth of the surface if the damage is evenly distributed, (one quarter, if the damage is localized). Accumulation of powder, dust, or debris similar in appearance to the suspect material on the surfaces beneath the material can be used as confirmatory evidence.

Good Condition - material with no visible damage or deterioration, or showing only very little damage or deterioration.

Thermal System Insulation

Significantly damaged condition - material with one or more of the following:

1. Missing jackets on at least on tenth of the piping or equipment.
2. Crushed or heavily gouged or punctured insulation an at least on tenth of pipe runs/risers, boilers, tank, duct, etc. if the damage is evenly distributed (one quarter, if the damage is localized). Accumulation of powder, dust, or debris similar in appearance to the suspect material on surfaces beneath the pipe/boiler, etc., can be used as confirmatory evidence.

Damaged Condition (poor condition) - material with one or more of the following characteristics:

1. A few water stains or less than one tenth of the insulations with missing jackets.
2. Crushed insulation or water stains, gouges, punctures, or mars on up to one tenth of the insulation if the damage is evenly distributed (or up to one quarter, if the damage is localized). Accumulation of powder, dust, or debris similar in appearance to the suspect material on surfaces beneath the pipe/boiler/tank, etc. can be used as confirmatory evidence.

CONDITIONS/CLASSIFICATIONS (CONT.)

Good Condition - material with no visible damage, deterioration, or showing only very limited damage or deterioration.

Potential for Damage to Asbestos Containing Materials

Potential for Significant Damage - The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility.

1. The ACM is in an area regularly used by building occupants and there is a reasonable likelihood that the material or it's cover will become significantly damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

Potential for Damage - The material is subject to disturbance or damage, due to factors including but not limited to accessibility.

1. The Asbestos Containing Material is in an area regularly used by building occupants and there is a reasonable likelihood that the material or it's cover will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

APPENDIX B - GLOSSARY

GLOSSARY

Amount
The estimate of asbestos-containing material based on field measurements.

Asbestos Type
Includes the type of asbestos (chrysotile, amosite, etc.).

Category
Asbestos containing materials and presumed asbestos containing materials are categorized into three categories:

- Miscellaneous Material: Interior building material on structural components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.
- Thermal System Insulation (TSI): Material in a facility applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes.
- Surfacing Material: Surfacing material that is ACM. Surfacing material means material in a building that is sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or the materials on surfaces for acoustical, fireproofing, or other purposes.

Class
Asbestos containing materials and presumed asbestos containing materials are categorized into three categories:

- Friable: Materials containing more than 1% asbestos that when dry can be crumbled, pulverized, or reduced to powder by hand pressure.
- Non-friable category I: Any resilient material containing more than 1% asbestos that when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure.
- Non-friable category II: Any non-resilient material containing more than 1% asbestos that when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Condition
Ranking of materials: good, damaged or significantly damaged.

Description
Material inspected and sampled (i.e. 9" floor tile, sheetrock, transite shingle, etc.).

General Area
The homogeneous material as it exists throughout the facility.

GLOSSARY (CONT.)

Percent
Percent by volume of the type of asbestos contained in the material.
Sample Number
Identifies the facility, state/city and the number assigned.

Units
The units of the quantity are given as square feet (S.F.) or linear feet (L.F.).

APPENDIX C - ASBESTOS BUILDING INSPECTION DATA

Photograph Log
Former Shell Oil Lease Site
EMR Project No: 8125.001

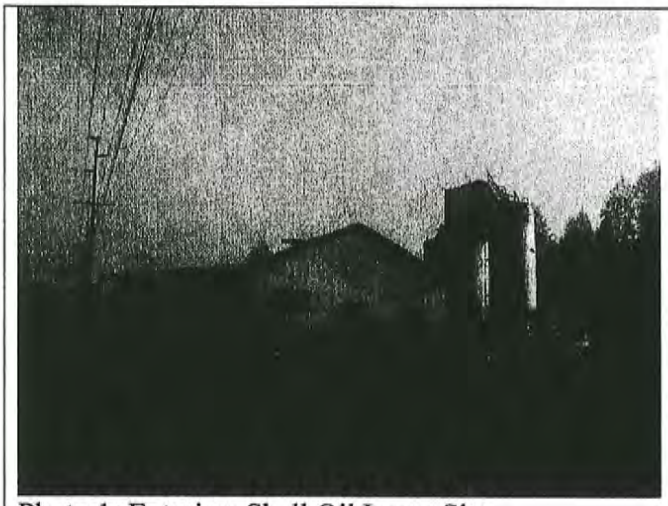


Photo 1: Exterior: Shell Oil Lease Site

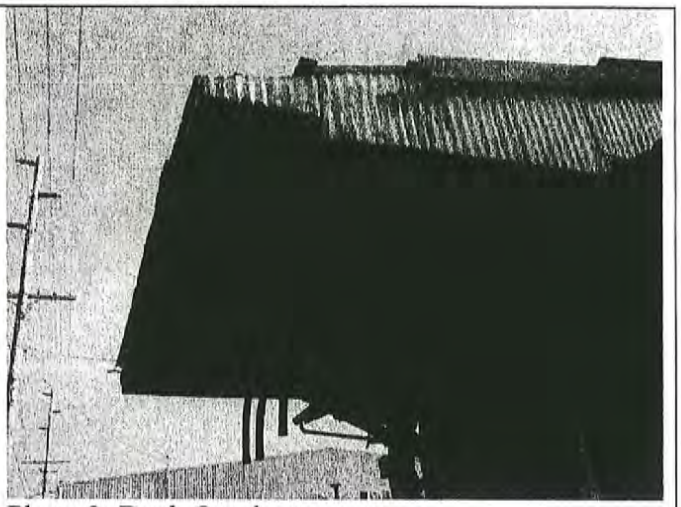


Photo 2: Dock Overhang

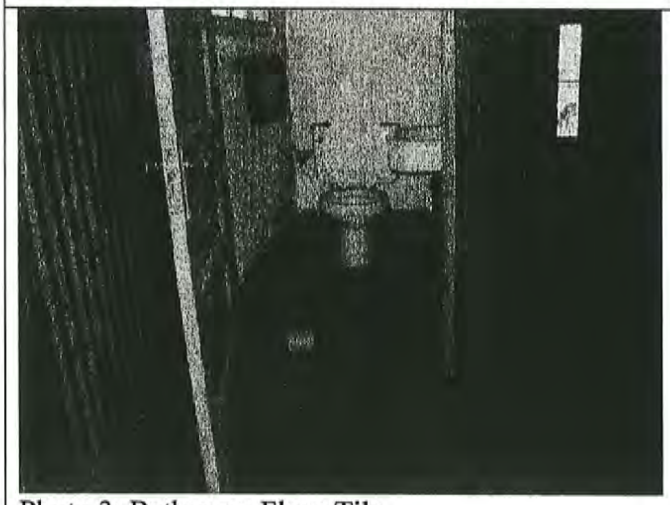


Photo 3: Bathroom Floor Tile

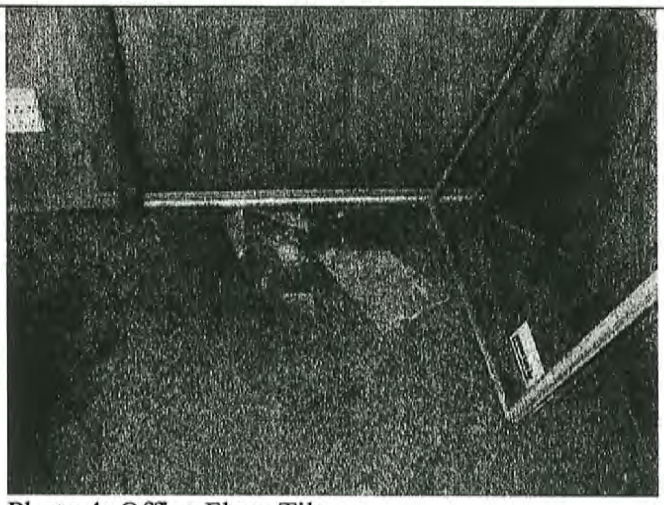


Photo 4: Office Floor Tile

BUILDING INFORMATION SHEET

Inspector: Michael C. McKay
Date: 8/27/2007
Building Name (s): Shell Oil Lease Site
Proj. #: 8125-001
Address: 908 Kerron Ave, Winlock, WA
Building No: NA
Bldg. Sq. Ft: 3,120
Construction Date: 1940s
Latitude: N/A (degrees)
Number of Floors: 1
Longitude: N/A (degrees)

BUILDING STRUCTURE (check all that apply)

- Wood Frame ☒
- Steel Frame ☐
- Masonry ☐
- Brick ☐
- Concrete Block ☐
- Other ☐ _____

ROOFING STRUCTURE (check all that apply)

- Metal ☒
- Wood ☐
- Other ☐ _____

FLOOR CONSTRUCTION (check all that apply)

- Wood ☒
- Steel ☐
- Concrete ☐
- Earth ☐
- Other ☐ _____

CEILING MATERIAL (check all that apply)

- 1'X1' Ceiling Tile ☒
- 2'x2' Ceiling Tile ☐
- 2'x4' Ceiling Tile ☐
- Transite Board ☐
- Metal ☐
- Wood ☐
- Sheetrock ☐
- Other ☐ _____

FLOOR COVERING (check all that apply)

- 12" Floor Tile ☒
- 9" Floor Tile ☐
- Vinyl Floor Covering ☐
- Ceramic Tile ☐
- Wood ☐
- Carpet ☒
- None ☐
- Other ☐ _____

EXTERIOR WALL (check all that apply)

- Wood ☒
- Metal ☒
- Transite Board ☐
- Brick ☐
- Block ☐
- Stucco ☐
- Other ☐ _____

ROOFING MATERIAL (check all that apply

- Asphalt Shingle ☐
- Metal ☒
- Transite Shingle ☐
- Asphalt Sheeting ☐
- Asphalt Flashing ☐
- Tar & Gravel ☐
- Roofing Felt ☐
- Other ☐ _____

INTERIOR WALL (check all that apply)

- Wood ☒
- Metal ☒
- Transite Board ☐
- Sheetrock ☒
- Plaster ☐
- Wall Texturing ☐
- Masonry ☐
- Brick ☐
- Block ☐
- Other ☐ _____

USE

- Offices 10 %
- Storage 90 %
- Break/Locker Room N/A %
- Shop N/A %

HVAC SYSTEM

- Boiler Steam ☐
- Boiler Ht. Water ☐
- Forced Air ☐
- Space Heater ☐
- Radiant Heat ☐
- Electric ☐
- None ☒

HVAC INSULATION

- Aircell ☐
- Fiberglass ☒
- Calc. Silicate ☐
- Mudded Joints ☐
- Mineral Wool ☐
- None ☐
- Other ☐ _____

TABLE 1-SUMMARY OF ASBESTOS CONTAINING MATERIALS

Project Name: Former Shell Oil Lease Site
Client: BNSF

Project No: 8125.001
Inspection Date: 8/27/2007

Sample No.	Description	General Area	Category	Class	Quantity	Units	Condition	ACM Type & %
WLWA-SSL-001	**9-inch Floor Tile/Mastic**	**Bathroom**	**Miscellaneous**	**N.F. I**	**35**	**SF**	**Signigicantly Damaged**	**Tile = Non ACM; Mastic = 3% Chrysotile**
WLWA-SSL-002	1x1 Ceiling Tile	Office	No asbestos detected					
WLWA-SSL-003	**12-inch Floor Tile/Mastic**	**Office**	**Miscellaneous**	**N.F. I**	**200**	**SF**	**Signigicantly Damaged**	**Tile = 2% Chrysotile; Mastic = Non-ACM**
WLWA-SSL-004	**Transite**	**Dock Extension**	**Miscellaneous**	**N.F.II**	**200**	**SF**	**Signigicantly Damaged**	**19% Chrysotile**
WLWA-SSL-005	Silver Paint	Exterior Walls	No asbestos detected					
WLWA-SSL-006	Vermiculite	Office Attic	No asbestos detected					
WLWA-SSL-007	Vermiculite	Office Attic	No asbestos detected					
WLWA-SSL-008	Vermiculite	Office Attic	No asbestos detected					
WLWA-SSL-009	Sheetrock	Bathroom Walls and Ceiling	No asbestos detected					
WLWA-SSL-010	Tape & Mud	Bathroom Walls and Ceiling	No asbestos detected					
WLWA-SSL-011	Sheetrock Composite	Bathroom Walls and Ceiling	No asbestos detected					
WLWA-SSL-012	Silver Paint	Tanks 1-4	No asbestos detected					

2007 91614

Seattle Asbestos Test, LLC

REQUEST FOR LABORATORY ANALYTICAL SERVICES/ CHAIN-OF-CUSTODY: ASBESTOS MANAGEMENT

Page: 1 OF 1

Lab Report No:	P.O. No:
Lab. Project Name:	
Lab. Project No.	

Project No.	Project/Client Name: EMR
8125.001	Building: Office/warehouse/Tanks
	City, State: Winlock, WA

Turn Around Time (Check one)

☐ 1 Hr. ☐ 2 Hr. ☐ 4 Hr. ☒ 24 Hr.
☐ 48 Hr. ☐ 3-5 Days ☐ other:(describe)

Send Lab Results to: Tom Patnode
2635 151st Place NE, Redmond, WA 98052
Tel: 425.861.4561; fax: 425.869.7620; tpatnode@emr-inc.com

Analysis Requested

ASBESTOS (Bulk) ☒ PLM ☐ PLM (EPA Point Ct.) ☐ PLM (EPA Gravimetry)
(EPA/600/R-93/116) ☐ SOILS ☐ TEM (Bulk)
ASBESTOS (Air) ☐ PCM ☐ TEM (NIOSH 7402) ☐ TEM (EPA Level II)

S.A.T. Lab ID #	EMR Sample #	Date	Time	Sample Description	Sample Location
	WLWA-SSL-001	8/27/07		9" FT/M	Bath Rm
	002			1X1 CT	Office
	003			12" FT/M	Office
	004			Transite	Dock extension
	005			Silver paint	Exterior Bldg. walls
	006, 007, 008			Vermiculite	Office attic
	009 010 011			Sheetrock T&mud, composite	Bath Rm - walls & ceiling
	012	↓		Silver paint	Tanks -1-4 exterior walls

	Print Below	Sign Below	Company	Date	Time
Sampled by:	Mike McKay	Mike McKay	EMR	8/27/07	08:00
Relinquished by:	Mike McKay	Mike McKay	EMR	8/27/07	13:00
Received by:					
Analyzed by:					
Results Faxed by;					

SPECIAL INSTRUCTIONS:

Ship To: 19711 Scriber Lake Road, Suite D
Lynnwood, WA 98036
Ph# 425.673.9850
Fax# 425.673.9810
ATTN: Steve Zhang

SEND INVOICE TO:

Name:	Tom Patnode
Company:	EMR, Inc.
Address:	2635 151st Place NE
City, State, Zip:	Redmond, WA 98052

Condition of Package upon Receipt: ☑ good ☐ damaged ☐ severe damage

APPENDIX D
UST CLOSURE AND SITE ASSESSMENT FORM AND SITE CHECK/SITE ASSESSMENT CHECKLIST

TANK CLOSURE REPORT
Former Cummings Oil Lease Site
908 Northwest Kerron Avenue
Winlock, Washington

Farallon PN: 683-009

UNDERGROUND STORAGE TANK
Site Check/Site Assessment Checklist

FOR OFFICE USE ONLY
Site #: _____
Owner #: _____

INSTRUCTIONS

When a release has not been confirmed and reported, this Site Check/Site Assessment Checklist must be completed and signed by a person certified by IFCI or a Washington registered professional engineer who is competent, by means of examination, experience, or education, to perform site assessments. **The results of the site check or site assessment must be included with this checklist.** This form must be submitted to Ecology at the address shown below within 30 days after completion of the site check/site assessment.

SITE INFORMATION: Include the Ecology site ID number if the tanks are registered with Ecology. This number may be found on the tank owner's invoice or tank permit.

TANK INFORMATION: Please list all tanks for which the site check or site assessment is being conducted. Use the owner's tank ID numbers if available, and indicate tank capacity and substance stored.

REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT: Please check the appropriate item.

CHECKLIST: Please initial each item in the appropriate box.

SITE ASSESSOR INFORMATION: This information must be signed by the registered site assessor who is responsible for conducting the site check/site assessment.

Underground Storage Tank Section
Department of Ecology
PO Box 47655
Olympia WA 98504-7655

SITE INFORMATION

Site ID Number (Available from Ecology if the tanks are registered): 10632
Site/Business Name: Cummings Oil Co., Inc.
Site Address: 908 NW Kerron Avenue (Street) Telephone: (___)_____
Winlock (City) Washington (State) 98596 (Zip Code)

TANK INFORMATION

Tank ID No.	Tank Capacity	Substance Stored
1	1,200 gallons	Diesel
2	7,000 gallons	Diesel

REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT

Check one:

_____ Investigate suspected release due to on-site environmental contamination.
_____ Investigate suspected release due to off-site environmental contamination.
_____ Extend temporary closure of UST system for more than 12 months.
_____ UST system undergoing change-in-service.
__X__ UST system permanently closed with tank removed.
_____ Abandoned tank containing product.
_____ Required by Ecology or delegated agency for UST system closed before 12/22/88.
_____ Other (describe): _____

CHECKLIST

Each item of the following checklist shall be initialed by the person registered with the Department of Ecology whose signature appears below.	YES	NO
1. The location of the UST site is shown on a vicinity map.	DC	
2. A brief summary of information obtained during the site inspection is provided. (see Section 3.2 in site assessment guidance)	DC	
3. A summary of UST system data is provided. (see Section 3.1.)	DC	
4. The soils characteristics at the UST site are described. (see Section 5.2)	DC	
5. Is there any apparent groundwater in the tank excavation?		DC
6. A brief description of the surrounding land use is provided. (see Section 3.1)	DC	
7. Information has been provided indicating the number and types of samples collected, methods used to collect and analyze the samples, and the name and address of the laboratory used to perform the analyses.	DC	
8. A sketch or sketches showing the following items is provided:		
- location and ID number for all field samples collected	DC	
- groundwater samples distinguished from soil samples (if applicable)	NA	
- samples collected from stockpiled excavated soil	DC	
- tank and piping locations and limits of excavation pit	DC	
- adjacent structures and streets	DC	
- approximate locations of any on-site and nearby utilities	DC	
9. If sampling procedures different from those specified in the guidance were used, has justification for using these alternative sampling procedures been provided? (see Section 3.4)		
10. A table is provided showing laboratory results for each sample collected including; sample ID number, constituents analyzed for and corresponding concentration, analytical method and detection limit for that method.	DC	
11. Any factors that may have compromised the quality of the data or validity of the results are described.	NA	

12. The results of this site check/site assessment indicate that a confirmed release of a regulated substance has occurred.	DC	

SITE ASSESSOR INFORMATION

Desiree Clement — Person registered with Ecology

Farallon Consulting, L.L.C. — Firm Affiliated with

Business Address: 975 5th Avenue Northwest — Street

Telephone: (425) 295-0843

Issaquah — City

Washington — State

98027 — Zip Code

I hereby certify that I have been in responsible charge of performing the site check/site assessment described above. Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

7/27/09 — Date

Signature of Person Registered with Ecology

WASHINGTON STATE DEPARTMENT OF ECOLOGY

UNDERGROUND STORAGE TANK
Closure and Site Assessment Notice

See back of form for instructions

FOR OFFICE USE ONLY
Site ID #_____
Owner ID #_____

Please X the appropriate box(es)
☐Temporary Tank Closure ☐Change-In-Service ☒Permanent Tank Closure ☒Site Check/Site Assessment

Site Information

Site ID Number 10632
(Available from Ecology if the tanks are registered)

Site Business Name Cummings Oil Co, Inc.

Site Address 908 Northwest Kerron Avenue

City/State Winlock, Washington

Zip Code 98596 Telephone _____

Owner's Signature B Sheppard

Owner Information

UST Owner/Operator BNSF Railway Company - Bruce Sheppard

Mailing Address 2454 Occidential Avenue Suite 1A

City/State Seattle, Washington

Zip Code 98134 Telephone (206) 625-6035

Tank Closure/Change-In-Service Company

Service Company Green Earthworks, Incorporated

Certified Supervisor Jayson Stevens

Decommissioning Certification No. 5322140-U210

Supervisor's Signature _____

Date 7/29/09

Address 3419 North Madison Street

City Tacoma State WA Zip 98407 Telephone (253) 606-8787

Site Check/Site Assessor

Certified Site Assessor Desiree Clement

Address 975 5th Avenue Northwest

City Issaquah State Washington Zip 98027 Telephone (425) 295-0843

Tank Information

Tank ID	Closure Date	Closure Method	Tank Capacity	Substance Stored
1	7/27/08	Removal	1,200	Diesel
2	7/27/08	Removal	7,000	Diesel

Contamination Present at the Time of Closure

☒ Yes ☐ No ☐ Unknown

Check unknown if no obvious contamination was observed and sample results have not yet been received from analytical lab.

☒ Yes ☐ No

If contamination is present, has the release been reported to the appropriate regional office?

To receive this document in an alternative format, contact the TOXICS CLEANUP PROGRAM at 1-800-833-6388 or 711 (TTY)

ECY 020-94 (Rev. 6-99)