



PERIODIC REVIEW

**Pacific Car & Foundry Co
Facility Site ID#: 2065
Cleanup Site ID#: 788
EPA ID#: WAD009249210**

**1400 North 4th Street,
Renton, Washington**

Northwest Regional Office

TOXICS CLEANUP PROGRAM

November 29, 2021

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1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of the long-term implementation of a Cleanup Action Plan and monitoring data to ensure that human health and the environment are being protected at Pacific Car & Foundry Co (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). The Site is also on the U.S. Environmental Protection Agency (EPA) National Priorities List (NPL) as a Federal Superfund Site.

Cleanup activities at this Site were completed under a Consent Decree No. 91 2 25053 7. The cleanup actions resulted in concentrations of arsenic, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), chromium, lead, petroleum, and vinyl chloride remaining at the Site which exceed MTCA cleanup levels (CULs). The MTCA CULs for soil are established under WAC 173-340-740. The MTCA CULs for groundwater are established under WAC 173-340-720. When contamination remains at a site after remediation, WAC 173-340-420 (2) requires that Ecology conduct a periodic review every 5 years under the following conditions:

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

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

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

Ecology shall publish a notice of all periodic reviews in the site register and provide an opportunity for public comment.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site Description and History

The Pacific Car & Foundry Co property is located in the City of Renton, Washington, about 1/2-mile northeast of the downtown area (see Figure in Appendix 6.1). Roadways bounding the property include Garden Avenue North on the west, Houser Way North on the east, North 4th Street on the south, and North 8th Street on the north. The property is approximately 82 acres in size. The northern 40 acres were initially remediated to allow construction of the Kenworth Truck Plant. The truck plant began operations in 1993. Since that time, the R&D Building was built in 2004 and the Parts Distribution Center was built in 2016. Active USA, which provides truck transport services for truck manufacturers, is an additional business that operates on the property.

The Cedar River is located about 2,000 to 3,000 feet to the southwest and west. John's Creek and Lake Washington are about 2,500 to 3,000 feet to the north and northwest. Both John's Creek and Cedar River flow into Lake Washington.

PACCAR, Inc., formerly PACCAR Defense Systems, is a Fortune 500 Company. The company makes Peterbilt and Kenworth trucks, and formerly owned Al's Auto Parts. The company began on the Renton Site in 1907 as Pacific Car & Foundry, making rail cars. They made Sherman Tanks in World War II, and fabricated the legs of the Space Needle. When the rail car business declined, they started making military vehicles. PACCAR decommissioned that facility in 1988. The company name changed to PACCAR, Inc. in 1972.

The Site was placed on the NPL on February 21, 1990. Ecology is responsible for the oversight management of the Site as stipulated by an agreement with EPA Region 10. The cleanup is managed by Ecology under the authority of MTCA (Chapter 70A.305 RCW), the Water Pollution Control Act (Chapter 90.48 RCW), and other applicable state and federal laws.

Site Chronology:

1907 - 1988	Industrial Operations
June 24, 1989	Proposed NPL Listing
1989	Remedial Investigation Completed
February 21, 1990	Final NPL Listing
1990	Feasibility Study Completed
1991	Consent Decree Finalized including the Cleanup Action Plan (CAP)
1993	Kenworth Truck Plant Begins Operations
1994	Consent Decree Amendment
1995	Excavation and Stabilization of Soil Completed
1997	Bioremediation of Soil Completed
1997	Confirmational Monitoring Plan Issued
1998 - present	Confirmational Monitoring

Activities at the Site which have caused environmental concern included:

- Industrial fill on north half of the Site containing heavy metals;
- Diesel fuel in above-ground tanks within the southwestern portion of the Site;
- Diesel fuel pipeline system which powered the plant until natural gas was installed in 1955, generally within the southern half of the Site;
- Fuels and solvents stored in both above- and below-ground tanks;
- Paint-spraying operations;
- Galvanizing operation; and
- Transformers containing polychlorinated biphenyls (PCBs).

The regulatory history is described as follows:

- PACCAR approached Ecology and requested a consent decree for conducting a Remedial Investigation/Feasibility Study (RI/FS);
- The EPA put the Site on the Superfund list due to concerns about the City of Renton public water supply well field, located south of the Site;
- The Site became a state-led Superfund Site;
- The RI/FS was completed;
- Ecology prepared the Cleanup Action Plan (CAP, equivalent to a Record of Decision, or ROD), and PACCAR and Ecology entered into a consent decree to implement the CAP in November 1991; and
- Cleanup actions completed by November 1997, after which long-term monitoring began.

2.2 Site Investigations and Cleanup Actions

The RI/FS found there was no immediate threat to human health or the Renton well field. The Site was found to be a low, long-term risk to human health and the environment. The primary risks to human health were from direct contact with contaminated soil and from blowing dust.

Constituents of concern (COCs) and CULs are defined in the CAP for soil, groundwater, and surface water (Ecology, September 6, 1991). The CAP also includes hot spot action levels (HSALs) for soil and groundwater. Arsenic, lead, vinyl chloride, and benzene were identified as the groundwater COCs. Chromium VI (hexavalent chromium), lead, copper, nickel, and zinc were identified as the surface water COCs.

The following interim actions were completed between 1979 and 1991:

- Removal of underground storage tanks (USTs) between 1985 and 1988;
- Removal of electrical equipment containing PCBs between 1979 and 1990;
- Removal of about 2,000 cubic yards of soil containing high concentrations of total petroleum hydrocarbons (TPH) and 10 cubic yards of soil containing lead during the Fall of 1987;

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- Removal of approximately 2,500 cubic yards of soil containing high concentrations of TPH, 5 cubic yards of soil containing arsenic, and 5 cubic yards of soil containing lead in the summer and fall of 1990;
 - Removal of asbestos-containing materials from structures prior to their demolition;
 - Steam cleaning of pits and sumps to remove residual TPH; and
 - Removal of source of hazardous materials and wastes from the manufacturing operations.

The CAP was approved by Ecology in September 1991. The cleanup actions identified in the CAP include the following:

- Excavation and biotreatment of soils containing TPH concentration greater than HSALs to protect groundwater quality;
- Excavation and immobilization (stabilization) of soils containing lead, chromium, arsenic, and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) concentrations greater than their respective HSALs to prevent direct contact and protect groundwater quality;
- Excavation and off-site disposal of soil containing PCBs above HSALs;
- Containment of soils with cPAHs, TPH, or metals concentrations above the CUL with a protective soil cover to prevent direct contact;
- Implementation of institutional controls and monitoring to ensure that the integrity of the cover is maintained;
- Implementation of site access restrictions to prevent public contact with soils containing low levels of contamination, and health and safety protocols to protect workers installing or repairing underground utilities;
- Groundwater monitoring to ensure groundwater quality at the point of compliance reaches and remains within regulatory limits; and
- Monitoring of surface water to ensure that the quality of surface water is within regulatory limits at the point of compliance.

While the CAP was being written, PACCAR approached Ecology about constructing a new Kenworth Assembly Plant on the north half of the property. Ecology and PACCAR reached agreement on the CAP, and excavation began. The excavated contaminated soil was placed on the southern portion of the property. The Kenworth plant began operations in May 1993. A truck forwarding company (Dallas and Mavis) began operating on a corner of the southern half of the property in 1996, ceasing operations there in 2008.

Approximately 105,000 cubic yards of TPH-contaminated soil were biotreated, 30,000 cubic yards of metals-contaminated soil was solidified, less than 5,000 cubic yards of PCB- and cPAH-contaminated soil were disposed of off-Site, and 105,000 cubic yards of soil with contamination at levels between CULs and HSALs were moved by grading and ultimately placed beneath structural fill as cover. The stabilized soil cells were placed in multiple locations on the property (see Figures in Appendices 6.4 and 6.5).

2.3 Cleanup Standards

COCs and CULs are defined in the 1991 CAP for soil, groundwater, and surface water. Arsenic, lead, vinyl chloride, and benzene were identified as the groundwater COCs. Chromium VI, lead, copper, nickel, and zinc were identified as the surface water COCs. CULs for soil, groundwater, and surface water were developed based on the results of a risk assessment (Hart Crowser, 1989). The CAP also includes HSALs for soil and groundwater. Groundwater and surface water samples collected for analysis of metals are not filtered and therefore represent total metals. Groundwater CULs were set based on procedures and requirements of MTCA Method B. In addition to the groundwater COCs, several other constituents were included in the monitoring program because they were present in remaining Site soils, treated soils, or detected above MTCA CULs. HSALs for groundwater are based on drinking water standards Maximum Contaminant Levels (MCLs) set by the Federal Safe Drinking Water Act, which are generally higher than the MTCA Method B CULs for the COCs.

The Site has conditional points of compliance where CULs must be met. The conditional point of compliance for groundwater is the property boundary. The conditional point of compliance for surface water is the point or points where surface water collected from the Site is discharged across the property boundary, whether through surface ditches or storm drains.

2.4 Monitoring Plan

Groundwater and surface water monitoring is performed in accordance with the 1991 CAP and the Confirmational Monitoring and Inspection Plan (CMIP), prepared by Dalton, Olmstead & Fuglevand (1997). The compliance well data is evaluated to determine whether the remedy is functioning as intended with respect to groundwater quality. Although groundwater monitoring has been conducted at the Site since 1984, confirmational groundwater monitoring began in 1997. Water quality in storm sewer manholes is evaluated to determine whether the remedy is functioning as intended with respect to stormwater runoff.

Both the MTCA CULs and HSALs/MCLs are used to evaluate groundwater quality at the conditional point of compliance. The CAP and CMIP describe which actions are required based on exceedances to CULs vs. HSALs/MCLs (further discussed in Section 2.5).

The CAP indicates that remediation of groundwater contamination to concentrations below MCLs was anticipated to be primarily accomplished via soil remediation. However, the cleanup action is considered an interim action until MTCA CULs are met at the conditional point of compliance (WAC 173-340-355). The CAP indicates that monitoring will continue as long as contaminants are present above CULs in all media. The CAP also indicates that if contaminant concentrations were not below regulatory levels after 5 years of monitoring, a groundwater treatment system may be required.

2.5 Contingency Plan

The Contingency Plan in the CMIP indicates that if groundwater exceeds HSALs (MCLs), the available data will be evaluated with regard to whether or not human health and the environment are adequately protected. If the evaluation indicates additional protection of human health and the environment may be warranted, the following actions will be taken:

- Additional testing to assess the cause of the exceedance will be completed if warranted. Whether such testing will be conducted will depend on the type and location of the exceedance and a judgment whether such testing would be successful in identifying the cause of the exceedance. A sampling and analysis plan and schedule will be submitted to Ecology for review and approval, if such testing is deemed necessary.
- Additional remedial actions, such as source control, pump and treat, or other actions, will be evaluated. The need for and type of remedial actions will be discussed with Ecology. After a remedial approach is selected, a plan and schedule will be prepared to design and implement the selected remedial action which will likely require public comment. This plan may include collection of additional data necessary to complete the design.

The Contingency Plan in the CMIP indicates that if surface water exceeds CULs, the following actions will be taken:

- Additional testing to assess the cause of the exceedance will be completed if warranted. Whether such testing will be conducted will depend on the type and location of the exceedance and a judgment whether such testing would be successful in identifying the cause of the exceedance. Prior to any testing, a sampling and analysis plan and schedule will be submitted to Ecology for review and approval.
- Additional remedial actions will be evaluated. The need and type of remedial actions will be discussed with Ecology. After a remedial approach is selected, a plan and schedule will be prepared to design and implement the selected remedial action which will likely require public comment.
- To complete development of the south portion of the Site, stormwater discharge permits (Storm Water Pollution Prevention Plan under National Pollutant Discharge Elimination System [NPDES]) will likely be necessary. The monitoring program will be revised, as appropriate, to be consistent with these permits.

2.6 Recent Monitoring Data and Compliance with Cleanup Standards

Groundwater monitoring wells along the property boundaries are used to evaluate compliance with groundwater cleanup standards. Stormwater samples are collected from storm sewer manholes to evaluate compliance with surface water cleanup standards.

The 2020 annual monitoring report indicates that arsenic exceeds the groundwater CUL of 5 micrograms per liter ($\mu\text{g/L}$) in all of the monitoring wells that were sampled at the conditional point of compliance (the property boundary). The concentrations ranged from 5.39 to 16.3 $\mu\text{g/L}$ in 2020. Arsenic concentrations have been as high as 19.2 $\mu\text{g/L}$ since the last periodic review in 2014.

The groundwater HSALs are based on MCLs, which is currently 10 $\mu\text{g/L}$ for arsenic (further discussed in Section 3.3). Two of the monitoring wells that were sampled (LW-9S and MW-3I) have exceeded the MCL during the period since the last periodic review in 2014 (see Figures in Appendices 6.6 and 6.7). Well LW-9S has exceeded the arsenic MCL intermittently during that time period. Well MW-3I has consistently exceeded the arsenic MCL.

Vinyl chloride also has intermittently exceeded the groundwater CUL of 0.4 $\mu\text{g/L}$ in two of the monitoring wells (LW-9D and CW-1S) during the period since the last periodic review in 2014. Concentrations were up to 0.52 $\mu\text{g/L}$. The concentrations were below the groundwater HSAL/MCL of 2 $\mu\text{g/L}$.

The 2020 annual monitoring report indicates that copper, hexavalent chromium, lead, and zinc have intermittently exceeded surface water CULs at the locations that were sampled at the conditional points of compliance (SW-3, SW-5, and SW-6) since the last periodic review in 2014 (see Figure in Appendix 6.8). Concentrations were up to 0.0126 milligrams per liter (mg/L) for copper (CUL is 0.007 mg/L), 0.015 mg/L for hexavalent chromium (CUL is 0.011 mg/L), 0.0052 mg/L for lead (CUL is 0.001 mg/L), and 0.0131 mg/L for zinc (CUL is 0.047 mg/L) during that time period.

Stormwater sampling locations SW-MH and SW-DP are used for information purposes only, and not for compliance purposes, per the 1997 CMIP. These are not discharge points at the conditional point of compliance (see figure in Appendix 6.8). Sampling location SW-MH is upstream in the municipal storm drain line with respect to the PACCAR Site and is therefore representative of off-property stormwater. Sampling location SW-DP is the discharge from the north treatment facility, which ultimately flows to North Discharge Point SW-3 at the property boundary (used for compliance). Sample SW-MD is a duplicate sample of SW-MH.

Hart Crowser indicated during the 2021 site visit that they believe stormwater sampling location SW-3 should not be used for compliance purposes because it does not contain stormwater from the Site. This would need to be confirmed and documented (by PACCAR Inc.) prior to Ecology's consideration of alterations to the monitoring points, if appropriate. For example, it would need to be confirmed that there are no current or old catch basins or drain lines that contribute Site stormwater to SW-3. Sufficient data/evidence would need to be provided showing that the proposed change would still adequately evaluate compliance with cleanup standards.

The cause of surface water CUL exceedances over time would need to be evaluated as well. For example, zinc appears to have increased in concentration between SW-MH (the upstream stormwater sampling location) and compliance point SW-3 during the 2020 monitoring event. However, Figure 2-1 in the 2020 monitoring report (Appendix 6.8) appears to indicate that there

are existing on-Site catch basins that contribute to stormwater that discharges at SW-3, so SW-3 should likely remain a compliance point.

The groundwater monitoring plan described in the 1997 CMIP indicates that an assessment of concentration trends over time will be made using time series plots for individual wells, as well as an assessment of the monitoring results relative to cleanup standards. This has not been provided in recent annual monitoring reports. Trend analysis should be incorporated into future monitoring events, including a detailed discussion in the report. Additional detail regarding data interpretation, compliance with cleanup standards, historical stormwater data, conclusions, and any recommendations should also be incorporated in future monitoring reports.

2.7 Recent Monitoring Changes

The last periodic review in 2014 approved the reduction in monitoring to eight wells: LW-6D, LW-9D, CW-1S, CW-1D, LW-9S, MW-3I, SC-1S, and SC-2S. These wells were continuing to exceed cleanup levels for arsenic or vinyl chloride or were sentinel wells for the stabilized soil cells. Concentrations of the contaminants of concern in other groundwater monitoring wells at the Site had stabilized below CULs for multiple years.

The exception was arsenic concentrations in wells OSP-4D and MW-10, which are located off the property to the southeast (see figures in Appendices 6.2 and 6.3). The elevated arsenic levels in these wells were attributed to (1) location-specific conditions based on the observation that high arsenic levels had been consistently elevated throughout the monitoring history and (2) groundwater monitoring wells upgradient of these two wells and down gradient of the Site were below CULs for the contaminants of concern. Consequently, elevated arsenic in wells OSP-4D and MW-10 were not believed to originate from the Site.

The periodic review in 2014 indicated that wells LW-6D, LW-9D, CW-1S, CW-1D, LW-9S, and MW-3I are to be sampled annually (in March) for arsenic. In addition, CW-1S and LW-9D are to be sampled annually for vinyl chloride.

2.8 Stormwater Discharge Permits

The Site has multiple stormwater discharge permits (NPDES permits) or permit related determinations, which are administered by Ecology's Water Quality Program.

Kenworth Truck Plant on the Site has active permit coverage under the Industrial Stormwater General Permit (permit number WAR000858). Kenworth Truck Plant monitors their stormwater discharge for copper, zinc, pH, turbidity, oil and grease, diesel-range TPH, E. coli, and fecal coliform.

Active USA on the Site has active permit coverage under the Industrial Stormwater General Permit (permit number WAR124959). Active USA monitors their stormwater discharge for copper, zinc, pH, turbidity, oil and grease, and diesel-range TPH.

PACCAR Parts on the Site has a Conditional No Exposure determination (number CNE305152) due to their operations being indoors and not exposed to stormwater. They do not have coverage under a stormwater discharge permit and therefore do not have any associated monitoring.

The Water Quality Program recently determined that permit coverage under the Industrial Stormwater General Permit was also needed at Kenworth R&D (also located on the Site). Kenworth R&D has since submitted a permit application and is awaiting their permit. They are anticipated to have similar monitoring requirements as Kenworth Truck Plant and Active USA.

The benchmarks for copper and zinc under the Industrial Stormwater General Permit are 14 µg/L (0.014 mg/L) and 117 µg/L (0.117 mg/L), respectively. There have been intermittent copper and zinc exceedances of the permit benchmarks at the Site during the time period since the last periodic review in 2014.

These benchmark values are greater than the MTCA CULs for surface water, which are 0.007 mg/L for copper and 0.047 mg/L for zinc. It should be noted that the monitoring locations for the stormwater permits are different than the monitoring locations per the CAP and CMIP.

Lead and hexavalent chromium are not monitored as part of these stormwater permits. General stormwater discharge permits typically do not take into account whether the property where the business is located has remaining contamination above MTCA CULs, and typically does not consider the consent decree, CAP, or CMIP when determining monitoring requirements. General permit requirements are based on the general category of current industrial activities.

2.9 Restrictive Covenant and Amendment

Based on the Site use, types of ground surface coverage, and calculated cleanup levels, it was determined that the Site required a Restrictive Covenant to be recorded for the property. A Restrictive Covenant was recorded for the Site in 1991 which imposed the following limitations:

- 1. At least 30 days prior to conveyance of any real property interest in any portion of the Property the grantor shall give written notice to Ecology of such contemplated conveyance describing the particulars thereof.*
- 2. Any conveyance of any real property interest in any portion of the Property is hereby expressly made subject to the provisions of the CAP, including without limitation any provision thereof for continued operation and maintenance, monitoring, containment, or other measures necessary to assure the integrity of the cleanup action. A copy of the Consent Decrees, RI/FS, and CAP shall be furnished to any transferee of any real property interest in any portion of the Property prior to conveyance thereof to such transferee.*
- 3. No wells for the extraction of potable water for human ingestion shall be hereafter installed in the Property without Ecology approval.*

4. *No redevelopment of the property other than for industrial use shall hereafter be undertaken unless 30 days prior notice has been given to Ecology. For purposes of this restriction, "industrial use" means and includes any use permitted pursuant to the provisions of Renton Municipal Code 4-713 (Heavy Industry District (H-I)), 4-712 (Light Industry District (L-I)), 4-730 (Manufacturing Park (M-P) District), Business District (B-I), and 4-748 (Conditional Use Permit) as in effect on the date hereof, and any substantially similar uses hereafter permitted under successor Renton zoning ordinances. The property shall not be used for a day care center without Ecology approval.*

5. *Ecology and its designated representatives are hereby given the right to enter the property at reasonable times, upon 48 hours prior notice, for the purpose of evaluating compliance with the cleanup action plan, including the right to take samples, inspect the operation of cleanup action measures, and inspect cleanup records.*

6. *This Declaration of Restrictive Covenants may be amended by the agreement of Declarant and Ecology after public notice and comment.*

7. *Notices given to Ecology pursuant to this Declaration of Restrictive Covenants shall be deemed effectively given if delivered by hand or mailed by U.S. certified Mail, return receipt requested, to Washington Department of Ecology, Northwest Regional Office, Attn: Section Head, Toxics Cleanup Program, or to any successor agency or officer thereof having substantially comparable functions.*

8. *Declarant, and Ecology by its approval of this Declaration as endorsed hereon, agree that any dispute concerning the interpretation, duration, or applicability of the foregoing restrictive covenants shall, failing agreement between the parties, be submitted for determination to the Superior Court for King County, Washington, having jurisdiction over the Consent Decrees.*

9. *The foregoing Restrictive Covenants shall no longer limit uses of the site or be of any further force or effect upon recordation by Declarant, or its grantees, successors, or assigns of an instrument terminating this Declaration of Restrictive Covenants pursuant to the terms of the 1991 Consent Decree.*

The foregoing restrictive covenants shall henceforth burden and run with the Property, and bind Declarant, its grantees, successors, and assigns, and shall insure to the benefit of and be enforceable by Ecology and its successors and assigns. Except only as limited by the express provisions of the foregoing restrictive covenants, Declarant expressly reserves all right of ownership, use, and enjoyment of the Property.

The Restrictive Covenant is attached as Appendix 6.9.

The consent decree was amended in 1994. The consent decree included a modification to the Restrictive Covenant, which added property owned by the City of Renton to the subject Site, and therefore amended the legal description in the Restrictive Covenant. The consent decree required PACCAR Inc. to record the amended Restrictive Covenant with the King County

Recorder's Office. However, a recorded copy could not be found, and therefore it may not have been recorded. PACCAR Inc. should provide Ecology with a recorded copy of the amended Restrictive Covenant. The additional area appears to be to the west of the PACCAR property (potentially including the current King County tax parcel number 7223000115 and the adjacent right of way, at least in part – other areas are likely also included). The exact areas will need to be confirmed by PACCAR Inc.

3.0 PERIODIC REVIEW

3.1 Effectiveness of Completed Cleanup Actions

The Restrictive Covenant for the Site was recorded in 1991 and is in place. This Restrictive Covenant prohibits certain activities and uses of the property, unless approved by Ecology. This Restrictive Covenant serves to ensure that the remaining contamination is isolated, contained, and controlled and ensures the long term integrity of the remedy. However, the 1994 amended Restrictive Covenant may not have been recorded with the King County Recorder's Office. The Restrictive Covenant only applies to the properties noted therein, and is not protective of any additional properties.

Soils with cPAHs, TPH, and metals concentrations higher than MTCA CULs are still present at the Site. Based upon the Site visit conducted by Ecology on July 28, 2021, the various covers and stabilization remedy at the Site continue to eliminate exposure to contaminated soils by ingestion and direct contact. The soil cover and asphalt surfaces appear in satisfactory condition and no repair, maintenance, or contingency actions have been required. The Site is still operating as a truck manufacturer. A photo log is available as Appendix 6.10.

Stormwater at the Site either infiltrates or is discharged to the City of Renton storm sewer system, which discharges to Lake Washington. There is a concrete-lined stormwater detention pond located north of the Parts Distribution Center. The property also includes swales, a rain garden, and unpaved grassy areas. While the stormwater infiltration areas are best management practices (BMPs) for stormwater management, a potential concern is stormwater infiltration to groundwater in areas where there is remaining contaminated soils or stabilized soil cells that are not covered by pavement or buildings. This could potentially increase leaching of soil contaminants into groundwater in those areas, and should be evaluated. The primary areas of stabilized soil cells (which include a minimum of 1 foot of structural fill on top) are in the parking lot to the east of the Kenworth Truck Plant, as well as to the northwest of the Parts Distribution Center, next to a stormwater detention pond (see figure in Appendix 6.5).

The remedy (which focused on soil remediation) has significantly reduced impacts to groundwater, but groundwater CULs for arsenic and vinyl chloride have not been achieved in all compliance wells. Therefore, monitoring must continue per the CAP.

Vinyl chloride has been below the groundwater HSAL (MCL) for almost 20 years. Therefore, additional remedial actions with respect to vinyl chloride do not appear to be required at this time per the Contingency Plan in the CMIP. However, trend analysis should be incorporated into future monitoring reports in order to evaluate the performance of the remedy over time, since the ultimate goal is to meet the groundwater CUL at the conditional point of compliance.

Arsenic exceeds the groundwater HSAL (MCL) in compliance wells LW-9S and MW-3I. Arsenic-contaminated soil remains at the Site, with materials containing arsenic above 100 mg/kg placed in stabilized soil cells. It has previously been postulated that the presence of

arsenic in groundwater may be caused, in whole, or in part, by natural conditions, but this has not been confirmed.

There may be reducing conditions in groundwater in the vicinity of the Site, or it may be reducing conditions on the Site itself related to Site contaminants. However, the CAP indicates that the highest metals in soils are associated with industrial fill materials (which have an irregular, intermittent distribution at the Site), and that arsenic in groundwater above 10 µg/L is considered to reflect groundwater affected by industrial fill. Therefore, the cause of the elevated arsenic in groundwater should be evaluated per the Contingency Plan in the CMIP, including documentation of the effort.

The primary current receptor of concern with respect to arsenic migration is the City of Renton well field located south of the Site. A conservative risk assessment (RA) performed during completion of the RI concluded that the risks from migration of arsenic to the well field were minimal based on conditions present in the late 1980s. A transport analysis completed for the RA estimated arsenic concentrations in the Renton wells would range between 0.04 µg/L (average) and 0.18 µg/L (95% UCL). The 95% upper confidence limit (UCL) concentration assumed an “input” arsenic concentration of 100 µg/L.

The City of Renton regularly monitors the water supply for over 120 compounds and reports the results in the annual Drinking Water Quality report. Data is available since 2002 and show that the COCs or other constituents which have been monitored as part of the PACCAR's compliance monitoring program have either not been detected or were detected at concentrations less than the applicable state and federal water quality standards. Therefore, arsenic in groundwater attributable to the Site does not appear to be a threat to the City of Renton well field at this time.

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

There is no new scientific information for the contaminants related to the Site.

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

The cleanup at the site was governed by Chapter 173-340 WAC (1991 ed.). WAC 173-340-702(12) (c) [2001 ed.] provides that,

“A release cleaned up under the cleanup levels determined in (a) or (b) of this subsection shall not be subject to further cleanup action due solely to subsequent amendments to the provision in this chapter on cleanup levels, unless the department determines, on a case-by-case basis, that the previous cleanup action is no longer sufficiently protective of human health and the environment.”

The MTCA Cleanup Regulation (Chapter 173-340 WAC), which was used to establish cleanup requirements for the Site, has undergone several amendments (including January 1996, February

2001, and October 2007) since the cleanup action was completed. Over this time period, there have been several changes in federal requirements and calculated CULs for specific primary constituents of concern, including the following:

- **Arsenic.** The MCL established under the Federal Safe Drinking Water Act (published under 40 CFR 141) was revised from 0.05 to 0.01 mg/L (50 µg/L to 10 µg/L). The MCL of 50 µg/L was used as the HSAL to determine whether “active” remedial actions (e.g., pump and treat) were required. The updated MCL should now be used as the HSAL since the purpose of the HSAL was to be protective of current and potential drinking water receptors and sources. Groundwater concentrations below the HSAL but above the CUL require long-term monitoring. Groundwater concentrations above the HSAL require contingency actions per the CMIP.
- **Vinyl Chloride.** The MCL established for vinyl chloride is 0.002 mg/L (2 µg/L) and has not changed. Therefore, the HSAL remains the same.
- **Lead.** The MCL established for lead was revised from 0.05 to 0.015 mg/L (50 µg/L to 15 µg/L). The MCL of 50 µg/L was used as the HSAL for lead to determine whether “active” remedial actions (e.g., pump and treat) were required. The updated MCL should now be used as the HSAL since the purpose of the HSAL was to be protective of current and potential drinking water receptors.

Appropriate, relevant, and applicable requirements and calculated MTCA groundwater CULs for several of the supplemental constituents including chromium, cPAHs, and TPH have been revised since the remedial action was implemented. However, these chemicals were not originally considered as COCs in groundwater, and were primarily added to the CMIP because they were present in Site soils following implementation of the cleanup action. These constituents have generally not been detected in groundwater at concentrations exceeding MTCA CULs (during past compliance monitoring events). It should be noted that these contaminants have not been analyzed for in groundwater during the time period since the last periodic review in 2014.

An element that was not addressed in the original CAP was the consideration of risk to ecological receptors as required under the current MTCA regulations. However, the heavily urbanized PACCAR Renton Site qualifies for an exclusion from having to perform a terrestrial ecological evaluation under the criteria outlined in WAC 173-340-7491. If a site meets any one of the four criteria, it does not need to undergo an ecological evaluation. This Site meets the second exclusion, which is that buildings, pavement, or other barrier covers all contaminated soils and an institutional control is in place. Therefore, an ecological risk assessment is not applicable at the Site.

3.4 Current and Projected Site or Resource Use

The Site is currently used for industrial purposes. There have been no changes in current or projected future site or resource uses.

3.5 Availability and Practicability of More Permanent Remedies

The remedy implemented included containment of hazardous substances, groundwater monitoring, contingent groundwater remediation (which has not been performed), and institutional controls. The remedy continues to be protective of human health and the environment with regards to preventing exposure to contaminated soils via ingestion and direct contact.

It is unknown at this time if more permanent remedies are practicable with regards to groundwater or surface water. The Contingency Plan must be followed to first assess the cause of the exceedances.

3.6 Availability of Improved Analytical Techniques to Evaluate Compliance with Cleanup Levels

The analytical methods used at the time of the remedial action were capable of detection below selected site cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

However, it should be noted that the laboratory detection limit for the hexavalent chromium analysis was 0.013 mg/L, according to the 2020 annual monitoring report. The surface water CUL for hexavalent chromium is slightly less than this detection limit, at 0.011 mg/L.

4.0 CONCLUSIONS

The following conclusions have been made as a result of this periodic review:

- The remedy (which focused on soil remediation) appears to have significantly reduced impacts to groundwater, but groundwater cleanup levels (CULs) for arsenic and vinyl chloride have not been achieved in all compliance wells at the conditional points of compliance. Monitoring must continue as long as contaminants are present above MTCA CULs in all media, per the Cleanup Action Plan (CAP). The cleanup action is considered an interim action until CULs are met at the conditional point of compliance. Therefore, the remedy is not protective of human health and the environment at this time. The remedy is expected to be protective of human health and the environment upon completion (once groundwater and surface water CULs are met).
- Vinyl chloride has been below the groundwater hot spot action level (HSAL), which is set at the Maximum Contaminant Level (MCL), for almost 20 years. Therefore, additional remedial actions do not appear to be required at this time per the Contingency Plan in the Confirmational Monitoring and Inspection Plan (CMIP). However, trend analysis should be incorporated into future monitoring reports in order to evaluate the performance of the remedy over time, since the ultimate goal is to meet the groundwater CUL at the conditional point of compliance (the property boundary).
- The MCL for arsenic was revised from 50 µg/L to 10 µg/L. The MCL for lead was revised from 50 µg/L to 15 µg/L. These updated MCLs should now be used as the HSALs since the purpose was to be protective of current and potential drinking water sources.
- Arsenic exceeds the groundwater HSAL/MCL in compliance wells LW-9S and MW-3I. Therefore, the cause of the elevated arsenic in groundwater must be evaluated per the Contingency Plan in the CMIP. An assessment of the cause of the exceedances, a trend analysis, and the extent of contaminated groundwater, as well as the resulting conclusions and any recommendations, must be presented in a report by PACCAR Inc. and provided to Ecology for review. The addition of dissolved arsenic to the laboratory analysis is recommended, to facilitate comparison of total and dissolved concentrations and possible data variance due to sample turbidity. Other parameters may also be needed for demonstrating lines of evidence of the cause of the elevated arsenic.
- Surface water CULs for copper, hexavalent chromium, lead, and zinc have not been consistently achieved in stormwater sampling locations SW-3, SW-5, and SW-6 at the conditional point of compliance (which are the points where stormwater discharges across the property boundary). Monitoring must continue as long as contaminants are present above MTCA CULs in all media, per the CAP. The cause of the elevated metals in stormwater must be evaluated per the Contingency Plan in the CMIP (including trend analysis). This assessment needs to include conclusions and any recommendations, and be presented in a report by PACCAR Inc. and provided to Ecology for review.

-
- The Restrictive Covenant is in place and appears to be effective in protecting public health and the environment from exposure to hazardous substances by direct contact on the properties included in the Restrictive Covenant. However, the 1994 amended consent decree required PACCAR Inc. to record an amended Restrictive Covenant with the King County Recorder's Office. A recorded copy of the amended Restrictive Covenant could not be found. PACCAR Inc. must provide Ecology with a recorded copy of the amended Restrictive Covenant. The Restrictive Covenant only applies to the properties noted therein, and is not protective of any other properties unless they are recorded with the King County Recorder's Office.
 - The CMIP indicates that an assessment of concentration trends over time will be made using time-series plots for individual wells, as well as an assessment of the monitoring results relative to cleanup standards. This has not been provided in recent annual monitoring reports. Trend analysis needs to be incorporated into future monitoring events, including a detailed discussion of results in the annual report. Additional detail regarding data interpretation, compliance with cleanup standards, historical stormwater data, conclusions, and any recommendations should also be incorporated in future monitoring reports.
 - The Site includes swales, rain gardens, and unpaved grassy areas. While the stormwater infiltration areas are best management practices (BMPs) for stormwater management, a potential concern is stormwater infiltration to groundwater in areas where there is remaining contaminated soils or stabilized soil cells that are not covered by pavement or buildings. This could potentially increase leaching of soil contaminants into groundwater in those areas, which should be evaluated and mitigated.
 - The property owner should take the aforementioned actions and provide associated reports/documentation to Ecology within 1 year of this periodic review.
 - The cleanup action has been determined to comply with soil cleanup standards since the long-term integrity of the containment system is ensured, and the requirements for containment technologies are being met. The remedy continues to be protective of human health and the environment with regards to preventing exposure to contaminated soils via ingestion and direct contact.
 - It is the property owner's responsibility to continue to inspect the property to assure that the integrity of the remedy is maintained.

4.1 Next Periodic Review

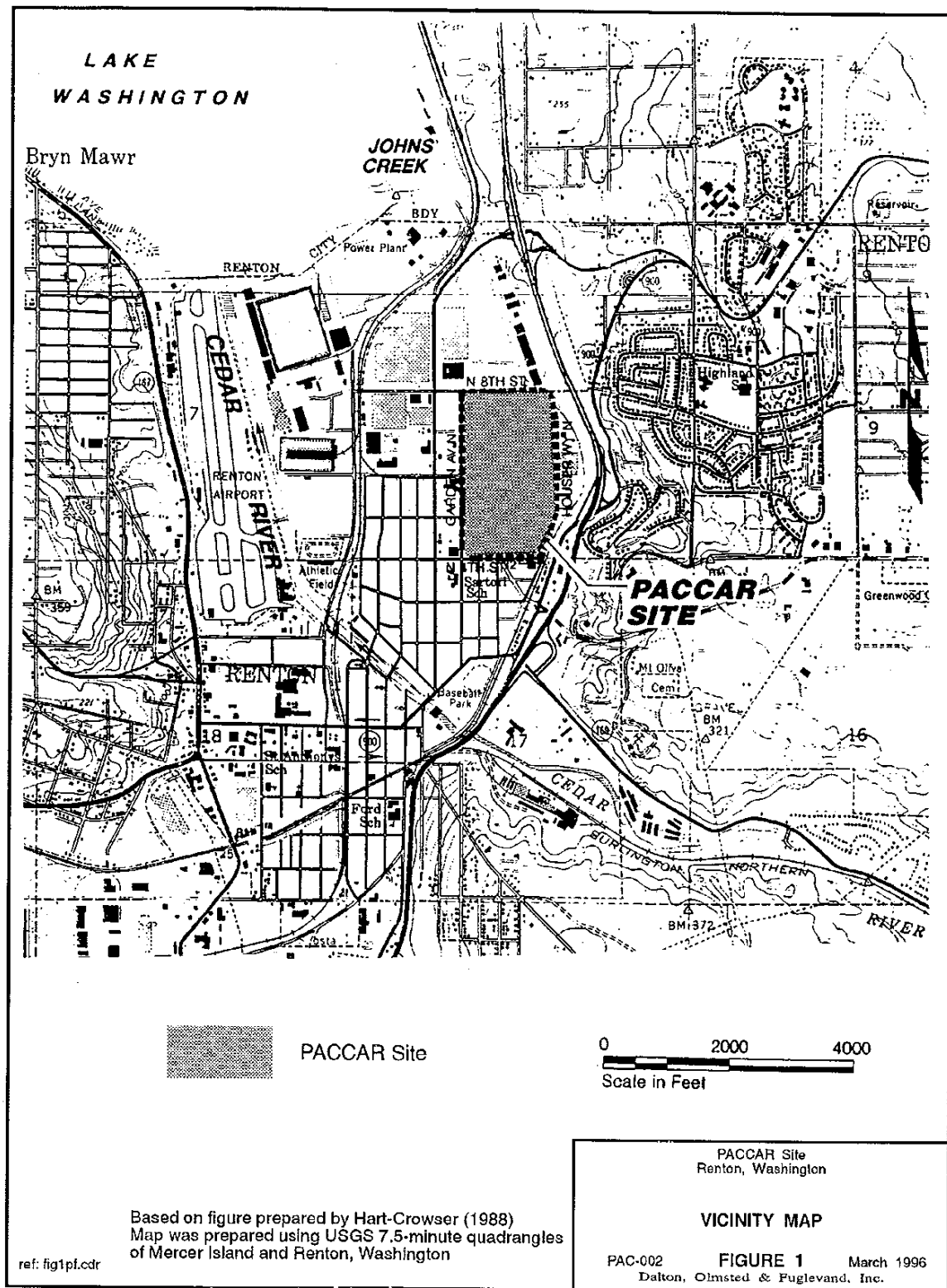
The next periodic review for the Site will be scheduled 5 years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled 5 years from the completion of those activities.

5.0 REFERENCES

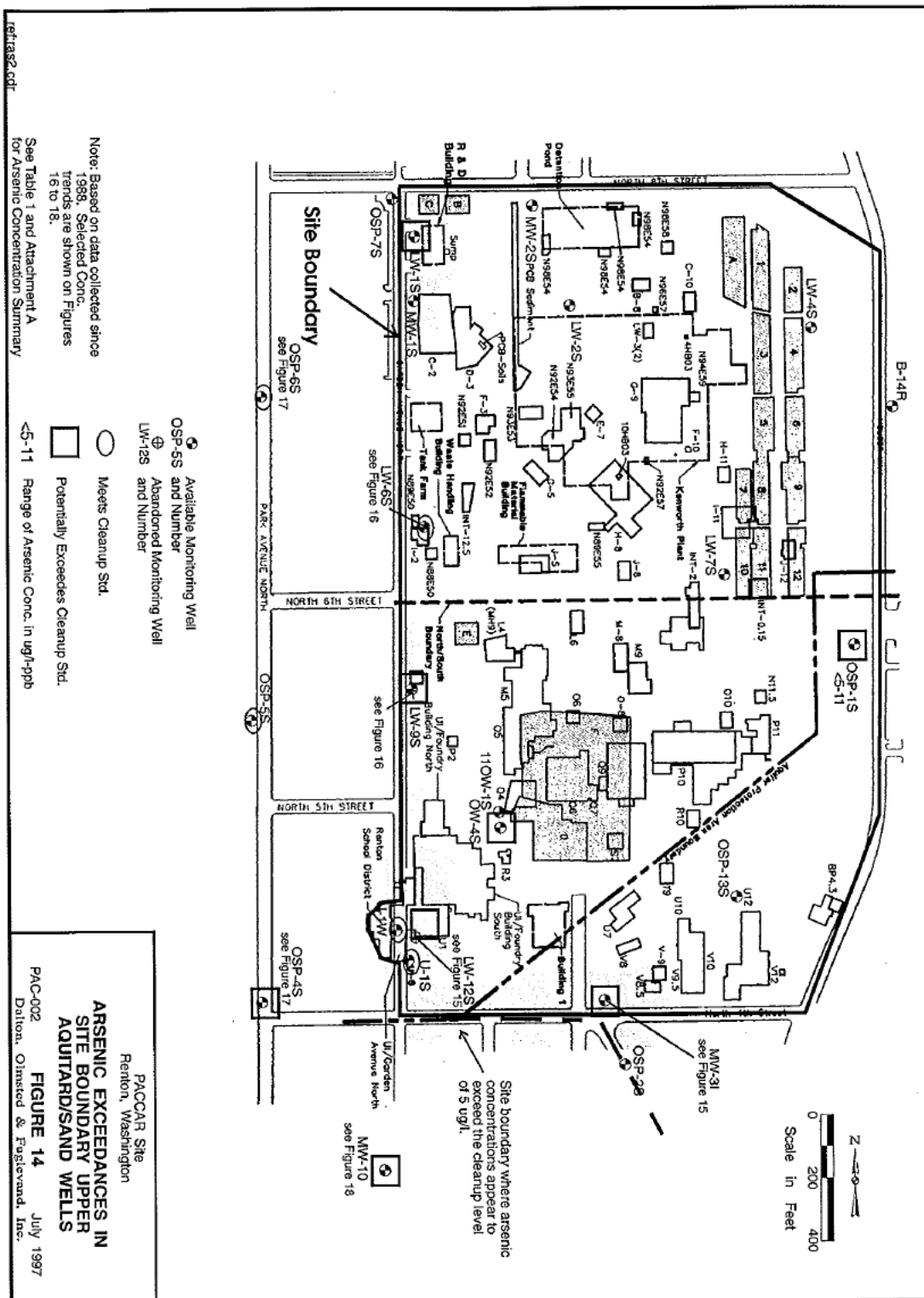
- Dalton, Olmstead & Fuglevand. November 1997. Confirmational Monitoring and Inspections Plans, Former PACCAR Defense Systems Site, Renton, Washington.
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- Hart Crowser. January 4, 1995. Independent Remedial Action Report, Renton School District, Soil Excavation.
- Hart Crowser. January 5, 1995. Summary Report on Remediation Activities: U-1 Hot Spot in Garden Avenue North.
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- Hart Crowser. 1998 – 2020. Annual Groundwater and Surface Water Monitoring, PACCAR Renton Site, Renton, Washington.

6.0 APPENDICES

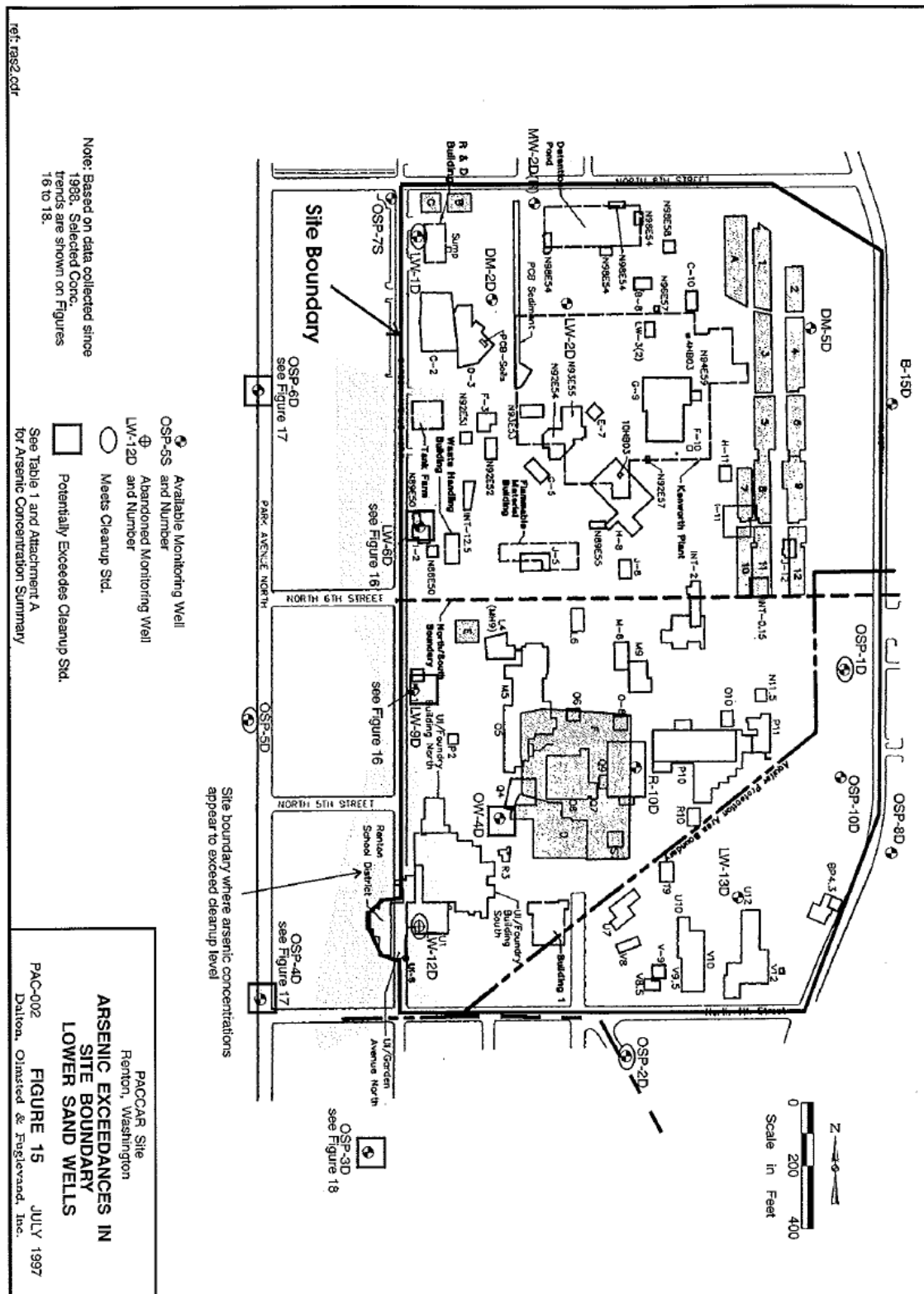
6.1 Vicinity Map, 1996



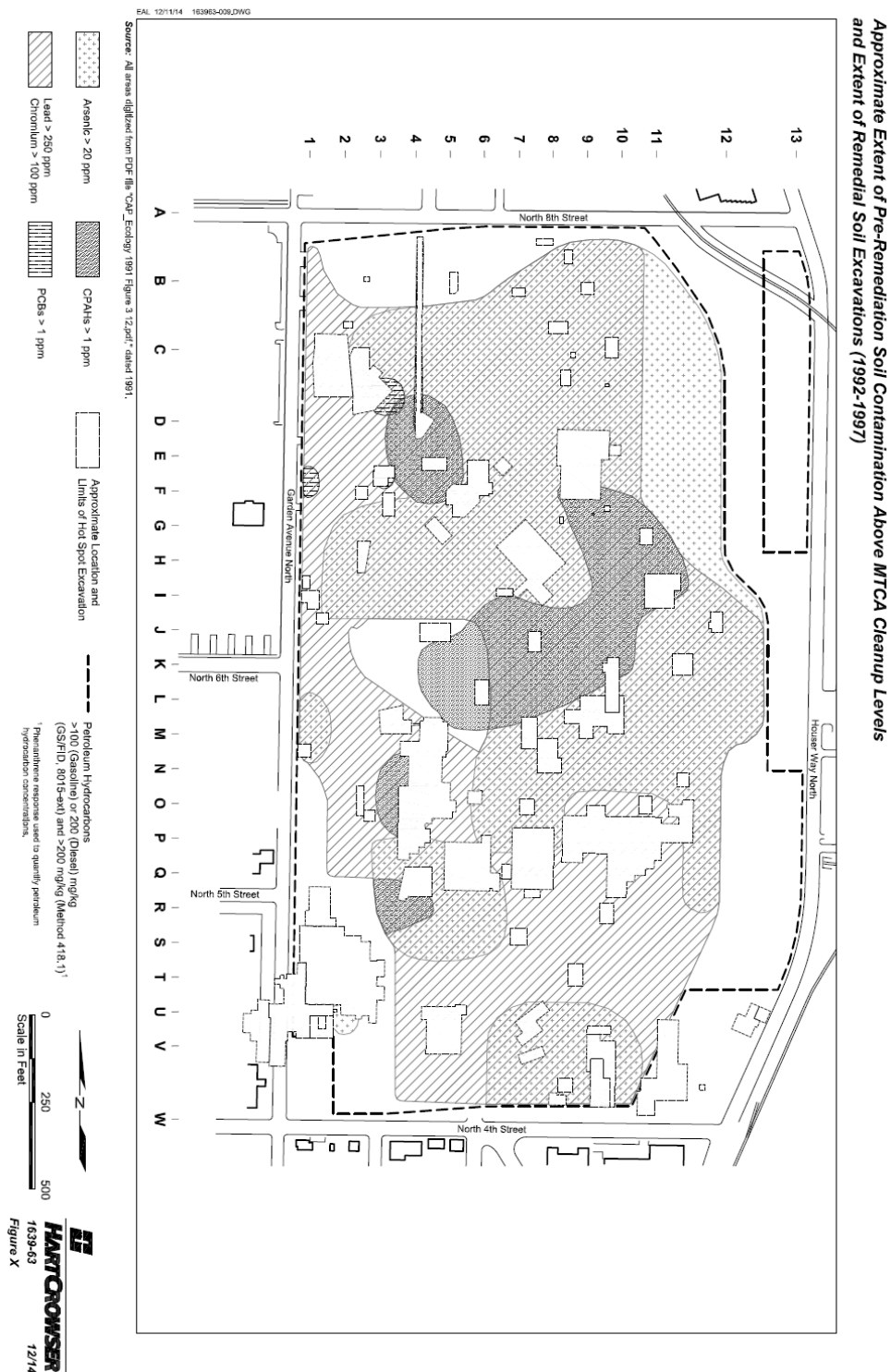
6.2 Arsenic Exceedances in Site Boundary Upper Aquitard/Sand Wells, 1997



6.3 Arsenic Exceedances in Site Boundary Lower Sand Wells, 1997



6.4 Approximate Extent of Pre-Remediation Soil Contamination Above MTCA Cleanup Levels and Extent of Remedial Soil Excavations (1992-1997), 2014

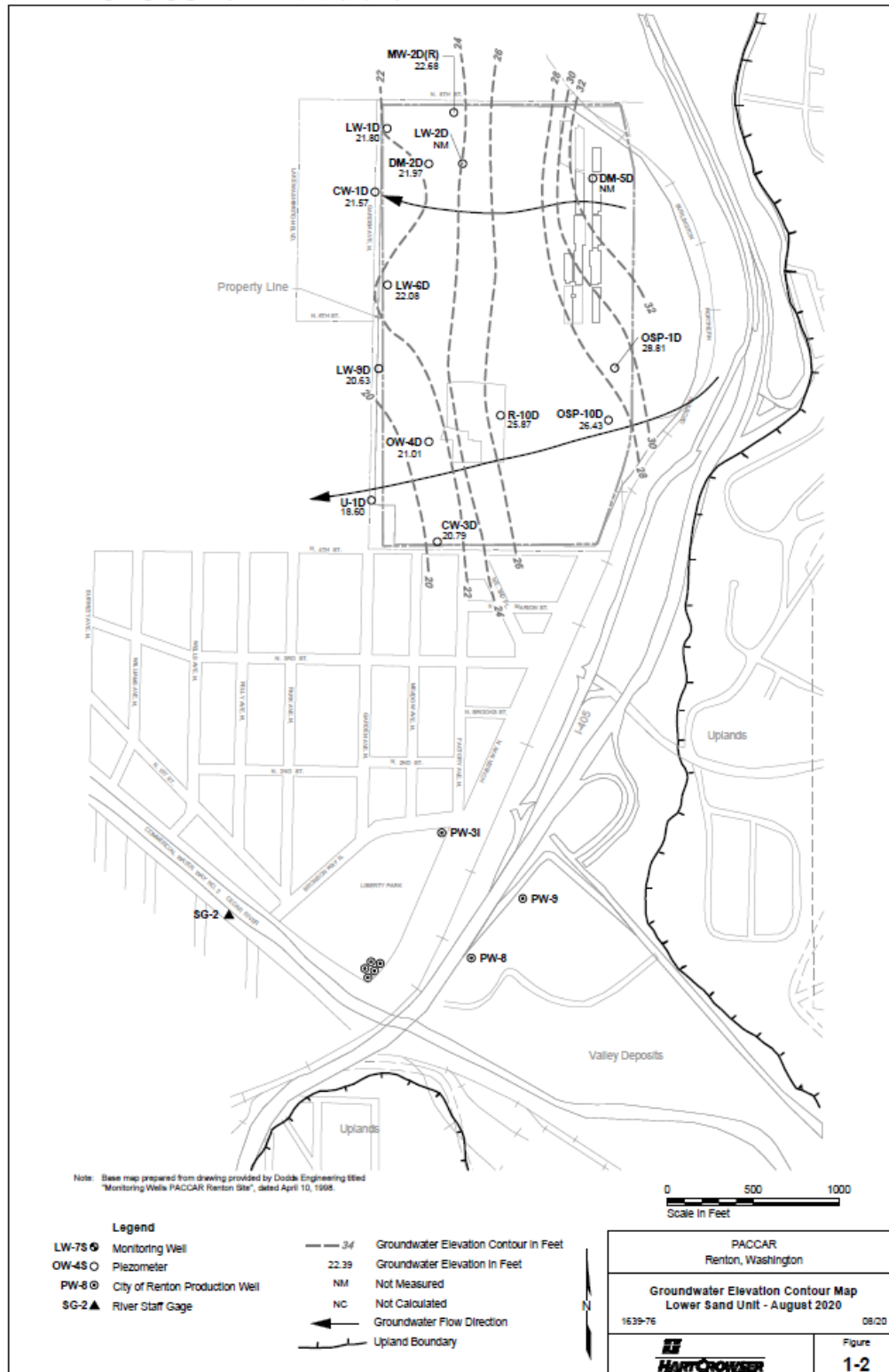


6.5 Location of Solidified Soil Cells, Asphalt Paving, and Structural Soil Cover (as of December 2014), 2015



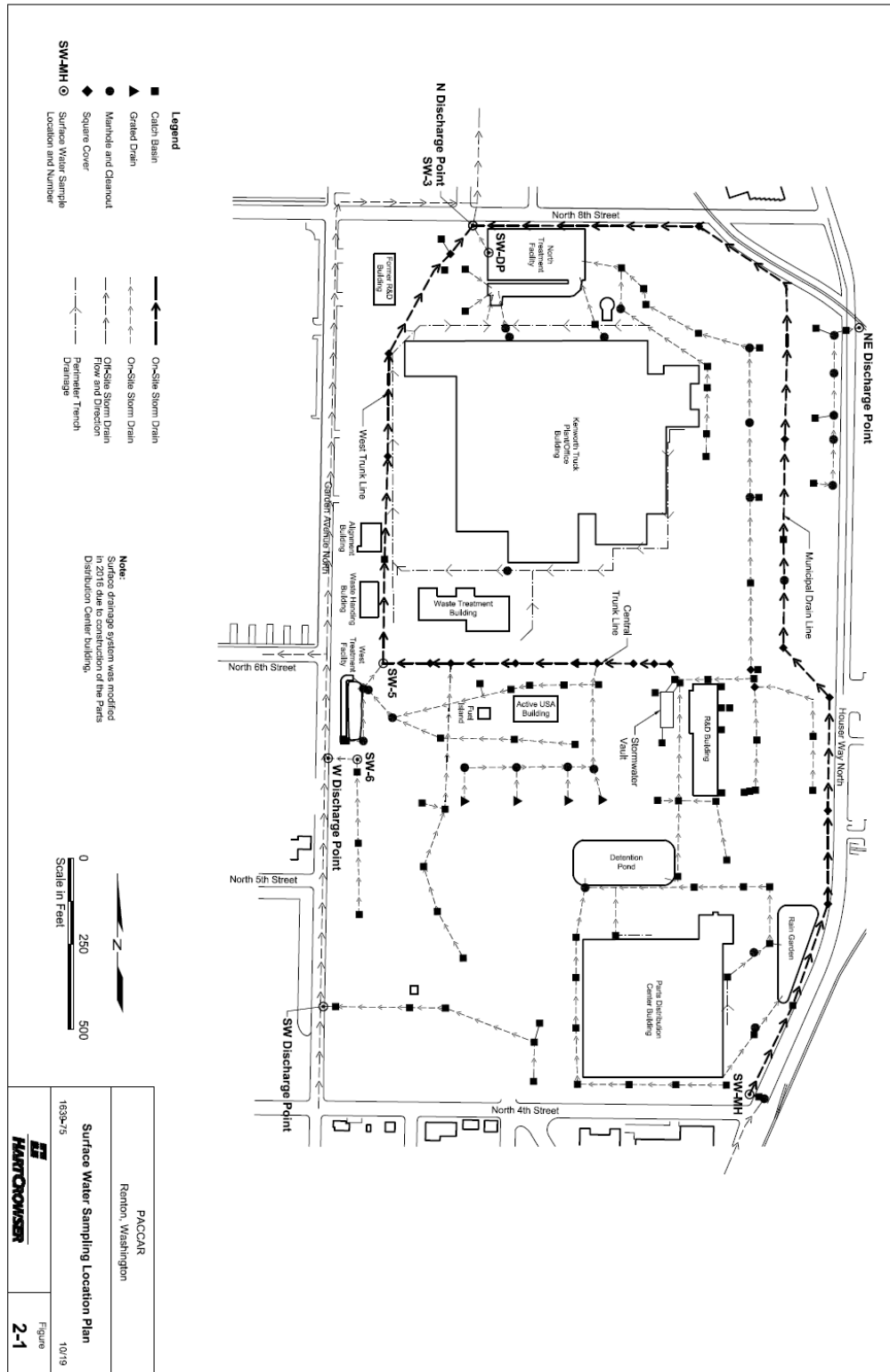
6.7 Groundwater Elevation Contour Map, Lower Sand Unit, 2020

File: L:\Notes\153976_PACCAR_2020_GW_Monitoring\CAD\153976-002 (GWD).dwg Layout: Aug2020 Date: 08-24-2020 Author: ewinfeirchild



6.8 Surface Water Sampling Location Plan, 2019

File: L:\Notebooks\163975_PACCAR_2019_GW_SW_Monitoring\CAD\163975-003 (SPlan).dwg Layout: SurfWatSamp Date: 10-17-2019 Author: melissaschweitzer



6.9 Environmental Covenant, 1991

EXHIBIT C
Declaration of Restrictive Covenants
on the PACCAR Property, Renton, Washington

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PERMITS SECTION

PACCAR Inc., a Delaware corporation ("Declarant") is current owner of the real estate (the "Property") described in Exhibit A attached hereto and made part hereof. Pursuant to Consent Decrees entered in February 1989¹, and October 1991², in King County Superior Court, Said Property became the subject of a remedial investigation and feasibility study (as from time to time amended, the "RI/FS") and a cleanup action plan (as from time to time amended, the "CAP"), conducted under Washington Department of Ecology ("Ecology") supervision to identify and remediate certain environmental contamination of the Property as more particularly described in said Consent Decrees and RI/FS and CAP.

Pursuant to said Consent Decrees, Declarant hereby subjects the Property to the following restrictive covenants:

1. At least 30 days prior to conveyance of any real property interest in any portion of the Property the grantor shall give written notice to Ecology of such contemplated conveyance describing the particulars thereof.
2. Any conveyance of any real property interest in any portion of the Property is hereby expressly made subject to the provisions of the CAP, including without limitation any provision thereof for continued operation and maintenance, monitoring, containment, or other measures necessary to assure the integrity of the cleanup action. A copy of the Consent Decrees, RI/FS, and CAP shall be furnished to any transferee of any real property interest in any portion of the Property prior to conveyance thereof to such transferee.
3. No wells for the extraction of potable water for human ingestion shall be hereafter installed in the Property without Ecology approval.
4. No redevelopment of the Property other than for industrial use shall hereafter be undertaken unless 30 days prior notice has been given to Ecology. For purposes of this restriction, "industrial use" means and includes any use permitted pursuant to the provisions of Renton Municipal Code 4-713 (Heavy Industry District (H-1)), 4-712 (Light Industry District (L-1)), 4-730 (Manufacturing Park (M-P) District), Business District (B-1), and 4-748 (Conditional Use Permit) as in effect on the date hereof, and any substantially similar uses hereafter permitted under

Page 1 of 3

*Cause No. 88-222080-8
+Cause No. 91-255053-7

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successor Renton zoning ordinances. The Property shall not be used for a day care center without Ecology approval.

5. Ecology and its designated representatives are hereby given the right to enter the property at reasonable times, upon 48 hours prior notice, for the purpose of evaluating compliance with the cleanup action plan, including the right to take samples, inspect the operation of cleanup action measures, and inspect cleanup records.
6. This Declaration of Restrictive Covenants may be amended by the agreement of Declarant and Ecology after public notice and comment.
7. Notices given to Ecology pursuant to this Declaration of Restrictive Covenants shall be deemed effectively given if delivered by hand or mailed by U.S. certified Mail, return receipt requested, to Washington Department of Ecology, Northwest Regional Office, Attn: Section Head, Toxics Cleanup Program, or to any successor agency or officer thereof having substantially comparable functions.
8. Declarant, and Ecology by its approval of this Declaration as endorsed hereon, agree that any dispute concerning the interpretation, duration, or applicability of the foregoing restrictive covenants shall, failing agreement between the parties, be submitted for determination to the Superior Court for King County, Washington, having jurisdiction over the Consent Decrees.
9. The foregoing Restrictive Covenants shall no longer limit uses of the Site or be of any further force or effect upon recordation by Declarant, or its grantees, successors, or assigns of an instrument terminating this Declaration of Restrictive Covenants pursuant to the terms of the 1991 Consent Decree.

The foregoing restrictive covenants shall henceforth burden and run with the Property and bind Declarant, its grantees, successors, and assigns, and shall insure to the benefit of and be enforceable by Ecology and its successors and assigns. Except only as limited by the express provisions of the foregoing restrictive covenants, Declarant expressly reserves all right of ownership, use, and enjoyment of the Property.

Executed this 7th day of October, 1991.

PACCAR Inc.



By [Signature]
Its President

Attest:

By: Bruce N. Holliday
Its: Assistant Secretary

Approved:

State of Washington
Department of Ecology
Kenneth O. Eikenberry
Attorney General

By: [Signature]
Assistant Attorney General
Attorneys for State

[Signature] for Carol L. Fleskes
Carol Fleskes
Program Manager, Toxics
Cleanup Program, Washington
Department of Ecology

STATE OF WASHINGTON
COUNTY OF King } ss.

On this 7th day of October, 1991
before me, the undersigned, a Notary Public in and for the State of Wash-
ington, duly commissioned and sworn, personally appeared Joseph
M. Dunn

and Bruce N. Holliday

to me known to be the President and Assistant Secretary,
respectively, of PACCAR Inc
the corporation that executed the foregoing instrument, and acknowledged
the said instrument to be the free and voluntary act and deed of said corpora-
tion, for the uses and purposes therein mentioned, and on oath stated that
They are authorized to execute the said instrument and that the seal
affixed is the corporate seal of said corporation.

Witness my hand and official seal hereto affixed the day and year first
above written.

Nancy J. Duehn

Notary Public in and for the State of Washington,

residing at [Signature]

My appointment expires: 12-31-93

EXHIBIT A

DODDS ENGINEERS, INC.
BELLEVUE, WA 98007

PACCAR
DEI Project No. 85123
May 8, 1986
Revised November 30, 1987
Revised June 13, 1991

PARCEL A

All those portions of the south half of Section 8, Township 23 North, Range 5 East, W.M., in the City of Renton, King County, Washington, and of Renton Farm Acreage, as recorded in Volume 12 of Plats, page 37, records of said county, including vacated streets and avenues as would attach by operation of law, and of Car Works Addition to the City of Renton, as recorded in Volume 15 of Plats, page 47, records of said county, including vacated streets, avenues, and alleys as would attach by operation of law, described as follows:

Commencing at the east quarter corner of said Section 8, from which point the northeast corner of said section bears N01°02'09"E; thence N89°27'25"W, along the north line of said south half, 2647.56 feet to an existing center of section monument; thence S01°02'40"W, along the north-south center of section line of said Section 8, a distance of 60.00 feet to the southerly margin of North 8th Street, said point being on the south line of the north 30.00 feet of Block 1 of said Renton Farm Acreage, and the TRUE POINT OF BEGINNING; thence N89°27'25"W, along the south line of the north 30.00 feet of said Block 1 and its westerly prolongation, 986.13 feet to a point on the west line of Block 2 of said plat; thence S01°05'34"W, along said west line and its southerly prolongation, 1235.01 feet to the southwest corner of Block 5 of said plat, said point being on the easterly margin of Garden Avenue North; thence S01°05'34"W, along said easterly margin, 1099.75 feet to the northwest corner of Lot 1, Block 4, of aforesaid Car Works Addition to the City of Renton; thence S89°23'14"E, along the north line of said Lot 1 and its easterly prolongation 119.00 feet to the northwest corner of Lot 10 of said Block 4; thence S01°05'51"W, along the west line of Lots 6, 7, 8, 9, and 10 of said Block 4; a distance of 226.95 feet to the southerly line of said Block 4; thence S89°23'14"E, along the southerly line of said Block 4 and its easterly prolongation, 869.30 feet to a point on the north-south center of section line of said Section 8; thence S89°23'14"E, along the south line of Block 13 and its easterly prolongation (if any) of said plat, 248.21 feet to the westerly margin of vacated Houser Way North (a.k.a. Railroad Avenue); thence N23°50'20"E, along the westerly margin of said vacated Houser Way North, 414.23 feet to a point of tangency with a 789.02 foot radius circular curve to the left; thence northerly along said curve and said westerly margin through a central angle of 22°50'00" an arc distance of 314.44 feet to a point of tangency;

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Printed - 06/13/1991

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EXHIBIT A

DODDS ENGINEERS, INC.
BELLEVUE, WA 98007

PACCAR
DEI Project No. 85123
May 8, 1986
Revised November 30, 1987
Revised June 13, 1991
Page 2 of 2

911262431

thence N01°00'20"E, along said westerly margin 1621.58 feet to a point of tangency with a 543.69 foot radius circular curve to the left; thence northerly, along said curve and said westerly margin, through a central angle of 00°07'54", an arc distance of 1.25 feet to a point on the southwesterly margin of the Burlington Northern Railroad right-of-way, said point being on a 691.78 foot radius circular curve to the left, from which point the center bears S39°27'38"W; thence northwesterly, along said curve and said margin, through a central angle of 08°27'46", an arc distance of 102.18 feet; thence continuing along said margin N59°00'08"W 151.23 feet to a point of tangency with a 757.01 foot radius circular curve to the right; thence northwesterly, along said curve and said margin, through a central angle of 14°46'33", an arc distance of 195.22 feet to the south line of the north 60.00 feet of the south half of said Section 8; thence N89°27'25"W, along said south line, 98.96 feet to the TRUE POINT OF BEGINNING.

Containing approximately 3,596,945 square feet or 82.5745 acres, more or less.



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Printed - 06/17/1991

EXHIBIT A

DODDS ENGINEERS, INC.
BELLEVUE, WA 98007

PACCAR
DEI Project No. 85123
May 8, 1986

PARCEL A-1

All that portion of the south half of Section 8, Township 23 North, Range 5 East, W.M., in the City of Renton, King County, Washington, described as follows:

Commencing at the east quarter corner of said Section 8, from which the northeast corner of said section bears N01°02'09"E; thence N89°27'25"W, along the north line of said south half, 2647.56 feet to an existing center of section monument; thence S01°02'40"W, along the north-south center of section line of said Section 8, a distance of 60.00 feet to the southerly margin of North 8th Street, said point being on the south line of the north 60.00 feet of said south half; thence S89°27'25"E, along said south line, 187.07 feet to a point on the northeasterly margin of the Burlington Northern Railroad right-of-way and the TRUE POINT OF BEGINNING; thence continuing S89°27'25"E, along said south line, 225.49 feet to a point on the westerly margin of Houser Way North (aka Railroad Avenue); thence S18°00'40"E, along said westerly margin, 82.32 feet to a point of tangency with a 543.68 foot radius curcular curve to the right; thence southerly, along said curve and said westerly margin, through a central angle of 09°49'26", an arc distance of 93.22 feet to a point on the northeasterly margin of said railroad right-of-way; thence N57°49'50"W, along said northeasterly margin, 321.37 feet to the TRUE POINT OF BEGINNING.

Containing approximately 19,452 square feet or 0.4465 acres more or less.

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6.10 Photo log

Photo 1: View of the Kenworth Truck Plant on the right and the associated parking lot on the left in the northeast portion of the property, looking east. Stabilized soil cells are located beneath this parking lot, as seen in this photo at a higher elevation than the Kenworth Truck Plant.



Photo 2: View of the parking lot on the east side of the Kenworth Truck Plant, which covers the stabilized soil cells. The parking lot consists of asphalt paving, stormwater catch basins in the paved surfaces, unpaved grassy areas and stormwater swales, and stormwater drainage piping between the grassy areas.



Photo 3: View of the PACCAR Parts Distribution Center in the southeast corner of the property, looking south.



Photo 4: View of a stormwater detention pond on the right and an elevated grassy area beyond (where trucks are being stored temporarily). Stabilized soil cells are located beneath the elevated grassy area.



Photo 5: View of stormwater sampling location SW-3 with the north stormwater treatment facility beyond, looking southeast.



Photo 6: View of groundwater monitoring well LW-9D at the western property boundary, looking east.

