

**ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES FOR  
ROGER BROTHERS SEED COMPANY SITE  
COLFAX, WASHINGTON  
EPA COOPERATIVE AGREEMENT NUMBER BF-02J49301**

by  
Haley & Aldrich, Inc.  
Spokane, Washington

for  
Port of Whitman County  
Colfax, Washington

File No. 0209334-002  
January 2026

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January 15, 2026  
File No. 0209334-002

Port of Whitman County  
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Colfax, Washington 99111

Attention: Kara Riebold, Executive Director

Subject: Analysis of Brownfield Cleanup Alternatives for Roger Brothers Seed Company Site  
Colfax, Washington  
EPA Cooperative Agreement Number BF-02J49301

Dear Kara:

Haley & Aldrich, Inc. (Haley & Aldrich) is pleased to provide the Port of Whitman County (Port) with this Analysis of Brownfield Cleanup Alternatives (ABCA) to assess remedial alternatives for the Roger Brothers Seed Company Site (Site). The Site is located at 308 East 3rd Street in Colfax, Washington, and includes two Whitman County Parcels (Whitman County Parcel Numbers 801950000000368 and 801950000000371).

Haley & Aldrich prepared this ABCA in accordance with our June 3, 2024 service agreement and in general accordance with the Port's EPA Brownfield Community-Wide Assessment Grant Implementation (EPA Cooperative Agreement Number BF-02J49301-0). Haley & Aldrich also prepared this report in accordance with generally accepted professional consulting services. The findings, opinions, conclusions, and information contained in this report are limited to, and solely based upon, information reasonable ascertainable by Haley & Aldrich at the time the ABCA was prepared.

We appreciate the opportunity to provide environmental consulting services on this project. Please do not hesitate to call if you have any questions or comments.

Sincerely yours,  
**HALEY & ALDRICH, INC.**

Ward McDonald, L.G.  
Senior Project Manager | Geologist

Julie K. Wilson Wukelic, C.E.M.  
Environmental Principal

Enclosures

[https://haleyaldrich.sharepoint.com/sites/PortofWhitmanCounty/Shared Documents/0209334.POW 2024 EPA Assessment Grant/Deliverables In-basket/2026 RBSC ABCA Cleanup App/2026\\_0115\\_HAI\\_POW\\_ABCA-RBSC\\_D1.docx](https://haleyaldrich.sharepoint.com/sites/PortofWhitmanCounty/Shared Documents/0209334.POW 2024 EPA Assessment Grant/Deliverables In-basket/2026 RBSC ABCA Cleanup App/2026_0115_HAI_POW_ABCA-RBSC_D1.docx)

**SIGNATURE PAGE FOR**

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ROGER BROTHERS SEED COMPANY SITE  
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EPA COOPERATIVE AGREEMENT NUMBER BF-02J49301**

**PREPARED FOR  
PORT OF WHITMAN COUNTY  
COLFAX, WASHINGTON**

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## 1. Introduction and Background

In 2023, the United States Environmental Protection Agency (EPA) awarded the Port of Whitman County (Port) a \$500,000 Brownfields Grant to help identify and assess blighted properties throughout Whitman County and aid in potential future redevelopment. The Port's EPA Brownfield Community-Wide Assessment Grant Implementation operates under EPA Cooperative Agreement Number BF-02J49301-0 (Cooperative Agreement).

In June 2024, the Port notified Haley & Aldrich, Inc. (Haley & Aldrich) that they wished to pursue several potential properties for redevelopment. One of those properties is the 2.3-acre Brownfield Site known as the Roger Brothers Seed Company (RBSC) site (Site) located in Colfax, Washington, as shown on "Vicinity Map," Figure 1. The Port wishes to redevelop the Site for a potential childcare center and commissioned Haley & Aldrich to conduct a Phase I Environmental Site Assessment (ESA) on the Site in January 2025 to assess potential recognized environmental conditions (RECs) associated with the property. Initial results of the Phase I ESA indicated that potential pesticides, polycyclic aromatic hydrocarbons (PAHs), heavy metals, and petroleum contamination might exist in the subsurface below the Site, as well as potentially hazardous building materials within the buildings at the Site (Haley & Aldrich, 2026; see general Site infrastructure and historical Site and surrounding industrial uses on "Site Plan," Figure 2).

Based on the initial findings of the Phase I ESA, Haley & Aldrich conducted Phase II ESAs at the Site to assess if select pesticides, PAHs, heavy metals, and petroleum-related constituents still exist in soil below the Site above their respective screening levels listed in the Washington State Department of Ecology's (Ecology's) Model Toxics Control Act (MTCA; see a summary of the Phase II ESA activities on "Exploratory Locations," Figure 3). Analytical results from Phase II ESA activities confirmed the presence of these contaminants of concern (COCs) in soil, exceeding their respective MTCA screening levels, and Haley & Aldrich finalized the Phase I ESA on January 8, 2026, based on the data collected. Furthermore, Haley & Aldrich confirmed that the Site's vacant buildings contain asbestos-containing material (ACM) and lead-based paint; this data was collected by a Washington State-licensed subcontractor who conducted a good faith survey and paint chip analysis on behalf of Haley & Aldrich and the Port (Kyron Environmental Health & Safety Consultants [Kyron], 2025a-d). A universal waste inventory report was also completed by the subcontractor, which identified universal waste (i.e., mercury-containing light fixtures) that likely require specific disposal protocols during demolition and/or renovation (Kyron, 2025e).

Based on these findings, Haley & Aldrich prepared this Analysis of Brownfield Cleanup Alternatives (ABCA) on behalf of the Port to assess potential remedial action alternatives (RAAs) for the Site (see "Summary of Remedial Action Alternatives," Table 1) and to assist the Port with applying for an EPA Cleanup Grant during January 2026 to assist with funding for the proposed RAA (see "Proposed Remedial Action Alternative," Figure 4). The Site's general location, previous uses and background, findings, goals and objectives, regional and Site vulnerabilities, applicable regulations and cleanup standards, and cleanup alternatives are detailed below.

## 2. Site Location

The Site is generally located at 308 East 3rd Street in Colfax, Washington, and consists of two parcels (Whitman County Parcel Numbers 801950000000368 and 801950000000371), as shown on Figure 2. The Site contains four buildings: the RBSC Office and Processing Building (Processing Building), the Storage Building, and two ancillary sheds. The Processing Building is an 8,000 square feet (sq ft) building with corrugated iron siding and roofing. The Storage Building is a 14,000 sq ft building constructed of steel and corrugated iron. Both sheds are constructed of wood and are approximately 600 and 580 sq ft, respectively. The Site is bordered to the east by an abandoned section of the Union Pacific Railroad (UPRR) Tekoa line, which generally extends southwest to northeast along the eastern property boundary. A railroad spur also enters the Site from the northeast and runs southwest between the Processing Building and the Storage Building.

### 2.1 GEOGRAPHIC, GEOLOGIC, AND HYDROGEOLOGIC SETTING

The Site is located approximately 59 miles south of Spokane, Washington, in central Whitman County. The Site resides within a geologic setting of Quaternary alluvium (unconsolidated alluvial clay, silt, sand, gravel, and/or cobble deposits) and loess (windblown eolian silt and fine sand) deposits (Washington Department of Natural Resources [WADNR], 2025). The loess was deposited during the last ice age when the area's ice sheets receded and uncovered soils from the Cordilleran Ice Sheet. This sediment was transported by wind and deposited, creating the Palouse Formation (WADNR, 2025). Loess in the area is reported to be between 100 and 250 feet (ft) thick.

Native material consists of Narcisse silt loam, which generally contains moderately well-drained silty and sandy loam (Haley & Aldrich, 2025). Silt in this area is underlain by glacial fluvial deposits consisting of coarse sands with cobbles. Data collected from Phase II ESA field activities indicate that on-site soils consist of brown silt with occasional gravel from ground surface to approximately 10 ft below ground surface (bgs). These soils overlay brown, well-graded gravel to the bottom of explorations and/or refusal, which could be the surface of the underlying basalt bedrock (approximately 12 ft bgs; Haley & Aldrich, 2026).

The Palouse River is approximately 500 ft west-southwest of the Site and flows southwest through Colfax, Washington. The Palouse River is the primary drainage for the City of Colfax and, according to well installation logs from wells onsite, groundwater is located approximately between 5 and 10 ft bgs and varies seasonally. On March 31, 2025, Haley & Aldrich measured groundwater within existing monitoring wells and confirmed groundwater to be within historical ranges reported on the boring logs; groundwater ranged between 8 and 10 ft bgs during the Site visit (Haley & Aldrich, 2026). Topographical maps and information provided in previous reports indicate that groundwater flows to the southwest towards the Palouse River. Additionally, a riverine wetland habitat resides on the northern portion of the Site (U.S. Fish and Wildlife Service [USFWS], 2025).

### 2.2 PREVIOUS SITE USES, INVESTIGATIONS, AND REMEDIATION EFFORTS

Historical records indicate that UPRR once stored coal on the Site within the footprint of where the Storage Building currently resides (see Figure 2). Fire Insurance Maps (FIMs) indicate coal was stored at this location between approximately 1908 to 1912. Historical documentation also indicates that the railroad ballast was composed of mine tailings from the Silver Valley of Idaho (Haley & Aldrich, 2025).

From the 1940s to approximately 1980, the Site was owned by RBSC, a prominent American agricultural company founded in 1876 in Idaho Falls, Idaho. RBSC operated the Site as a pea seed processing and storage facility and was known for producing high-quality vegetable seeds, developing vegetable varieties like the 'Roma' bean and 'Sugar Snap' pea. In 1993, RBSC was consolidated under a larger brand known as Syngenta (Haley & Aldrich, 2026).

Pea seed processing at the Site originally took place in the Processing Building, where pesticides were applied to pea seed via a wet treatment system (treatment process) on the second floor of the building (CH2M Hill, Inc. [CH2M Hill], 1990). Pea seed processing involved the use of several pesticides, including dieldrin, lindane, captan, metalaxyl, and methoxychlor. The process produced pesticide rinsate water that was discharged through a conveyor chute directly onto the ground outside of the building (CH2M Hill, 1990). In 1979, the treatment system was upgraded and moved into the Storage Building, where the new treatment system conveyed process water through an underground feed line to an underground storage tank (UST) outside the Storage Building (see Figure 2). The UST was a modified 1,500-gallon concrete septic tank that had no drainfield installed, according to historical documentation (Haley & Aldrich, 2026).

RBSC ceased operations in the 1980s and retained ownership of the Site until it was purchased by Juaul, Inc. in 1994. Juaul, Inc. currently owns the Site and primarily uses the Site for storage of cars, boats, and other miscellaneous items.

### **2.2.1 Roger Brothers Seed Company Closure Plan | 1990**

In 1990, RBSC contracted CH2M Hill to assist in the closure of the facility so that the facility “would not require further maintenance or controls; to minimize threats to human health and the environment; and to inhibit the escape of hazardous waste, hazardous waste constituents, leachate, or waste decomposition products to the ground and surface waters, or to the atmosphere” (CH2M Hill, 1990). RBSC submitted a closure plan to Ecology on July 13, 1990. Following Ecology’s review and recommendations, the plan was revised to include a groundwater investigation and address Resource Conservation and Recovery Act (RCRA) regulated areas, reported as “Unit 1” and “Unit 2.” The two units were areas where surface contamination occurred due to pesticide rinsate release, as well as contamination from a demolished building (within Unit 1) and the area where a known UST was located onsite (within Unit 2). In October 1990, CH2M Hill excavated and removed the UST and associated feed line from Unit 2 (see Figure 2). During removal, CH2M Hill noted that both the UST and the feed line were leaking; based on this, CH2M Hill conducted an excavation and disposed of contaminated soil from the leaking area at a RCRA-permitted disposal facility (CH2M Hill, 1990). Following the excavation, CH2M Hill collected confirmation samples and submitted the samples for analytical testing to assess remaining pesticide concentrations in soil. Analytical results indicate that the pesticides lindane, methoxychlor, and captan remained at concentrations greater than laboratory reporting limits, and concentrations of lindane in soil exceeded MTCA Method A Soil Cleanup Levels for Unrestricted Land Uses (0.01 milligrams per kilogram [mg/kg]; MTCA Method A Soil Cleanup) screening levels. Following excavation, disposal, and confirmation sampling, CH2M Hill submitted a report to Ecology summarizing the analytical results and findings.

### **2.2.2 Initial Environmental Site Assessment | 1991**

Subsequently, Ecology requested that CH2M Hill conduct a groundwater investigation at the Site in January 1991. The investigation included the installation of six monitoring wells (MW-1 through MW-6) and subsequent groundwater sampling activities. During drilling and well installation, CH2M Hill

collected soil and groundwater samples and submitted the samples for analytical testing to assess for lindane, metalaxyl, captan, and methoxychlor concentrations in soil and groundwater. CH2M Hill reported, “that soil and water samples from well construction and monitoring wells contained no detectable quantities of COCs” (CH2M Hill, 1991). However, based on Haley & Aldrich’s review of the analytical reports, results indicate that lindane concentrations in groundwater below the excavated soil were present at a concentration of 2.9 micrograms per liter ( $\mu\text{g/L}$ ), exceeding the current MTCA Method A Cleanup Levels for Groundwater (MTCA Method A Groundwater Cleanup) screening level of 0.2  $\mu\text{g/L}$ . The report also concluded that, “the contamination of the soil from pesticides had not affected the local groundwater” (CH2M Hill, 1991).

RBSC subsequently conducted an internal inventory audit and contracted CH2M Hill to conduct additional investigations at the Site. During the internal audit, dieldrin and thiram were found to also be likely COCs. The Site characterization included additional sampling of contaminated soil and the installation of an additional groundwater monitoring well (MW-7). Dieldrin, lindane, methoxychlor, and captan concentrations were detected in soil samples above current applicable MTCA screening levels. Analytical results indicate that dieldrin was also reported at the laboratory quantitation limit of 0.1  $\mu\text{g/L}$  in groundwater collected from the new monitoring well. Based on the analytical results, metalaxyl was not detected at concentrations greater than the detection limit in soil or groundwater and was removed from the list of analytes for future sampling.

### 2.2.3 Interim Cleanup Action | April 1992

In 1992, CH2M Hill conducted an additional soil investigation, which included excavating additional areas containing contaminated soil within Units 1 and 2 and collecting 24 confirmation soil samples from the lateral and vertical extents of excavated areas. CH2M Hill submitted the samples to an analytical laboratory and directed the laboratory to analyze the soil confirmation samples to assess if COCs (including lindane, methoxychlor, captan, and dieldrin) were still present. Analytical results indicate that lindane, dieldrin, methoxychlor, and captan were present in soil at Unit 1 at concentrations ranging between 3  $\mu\text{g/kg}$  and 130  $\mu\text{g/kg}$ , 17  $\mu\text{g/kg}$  and 900  $\mu\text{g/kg}$ , 29  $\mu\text{g/kg}$  and 800  $\mu\text{g/kg}$ , and 11  $\mu\text{g/kg}$  and 740  $\mu\text{g/kg}$ , respectively. Analytical results generally indicate that COC concentrations in soil were below the laboratory’s method detection limits at most locations within Unit 2, excluding two sample locations that contained concentrations of dieldrin at 2  $\mu\text{g/kg}$  and 9  $\mu\text{g/kg}$ , respectively. In 1992, CH2M Hill and RBSC proposed closure of Unit 2 with no additional action and limited future action for Unit 1 to Ecology; however, Ecology requested that groundwater monitoring at the Site continue at each well location, with groundwater sampling for dieldrin analysis in at least three wells (including MW-7).

In 1993, Ecology considered Unit 2 to be sufficiently remediated and “clean closed” (Ecology, 1993). Ecology defines clean closure as, “closure activities that result in full removal of all waste and full removal or decontamination of all structures, equipment, debris, environmental media (i.e., soil and ground water), and other materials affected by releases from a unit” (Ecology, 2005). Following Ecology’s decision, RBSC and CH2M Hill submitted a Cleanup Action Plan (CAP) for Unit 1 in June 1994 and proposed using the Summer’s Fate and Transport Model (Summers et. al., 1980); the Model estimates the concentration of a contaminant in groundwater based on the hydraulic characteristics of the aquifer and on the concentration and volume of infiltration through the unsaturated zone. Based on this Model, CH2M Hill calculated and recommended a Site-specific cleanup level of 13  $\mu\text{g/kg}$  for dieldrin concentrations in soil to remain protective of groundwater in accordance with MTCA Method B standards at the time (CH2M Hill, 1994a). The CAP proposed additional removal of soils exceeding this cleanup level. However, Haley & Aldrich did not find documentation to indicate that additional soil was removed in accordance with the CAP.

In April 1994, CH2M Hill installed additional monitoring wells (MW-8 and MW-9) and collected groundwater samples from MW-7, -8, and -9 to assess if off-site COC migration was occurring. Analytical results indicate that dieldrin concentrations were detected in groundwater in MW-7 and MW-8 at 0.10 µg/L and 0.11 µg/L, respectively, and lindane concentrations were detected in MW-8 at 0.34 µg/L (above current MTCA Method A Groundwater Cleanup screening levels for lindane). Analytical results indicated that COCs in groundwater were not present at concentrations greater than the laboratory's reporting limits in MW-9 (see Figure 2). Based on this, CH2M Hill concluded that groundwater contamination had not migrated beyond the Site boundary (CH2M Hill, 1994b).

Additionally, CH2M Hill completed the final groundwater sampling event during May 1997, and analytical results identified dieldrin concentrations of 0.07 µg/L in MW-7. Analytical results also indicated that groundwater collected at MW-8 contained concentrations of lindane at 0.21 µg/L, exceeding current MTCA Method A Groundwater Cleanup screening levels. Analytical results of groundwater collected at MW-9 indicate that none of the COCs were detected at or greater than the laboratory reporting limits. Haley & Aldrich could not identify if further investigations occurred at the Site after 1997 based on readily available data.

### **2.3 PHASE I ENVIRONMENTAL SITE ASSESSMENT | 2025**

On behalf of the Port as part of the Cooperative Agreement, Haley & Aldrich conducted a Phase I ESA between January 2025 and January 2026. This Phase I ESA included a Site visit, interview with the key site manager, property background search, and submittal of record requests to public entities, including Ecology. The Ecology records request produced multiple historical documents for the Site that were stored in Ecology's archives located in Lacey, Washington. In general, Haley & Aldrich identified six RECs in connection with the Site, including: an aboveground storage tank (AST) used for heating oil (located in the Processing Building); historical coal storage; railroad ballast containing mine tailings; hazardous building materials; the release of pesticide rinsate; and a petroleum odor recorded in historical documents at MW-3 near a former oil warehouse, west of the Storage Building (see Figure 2). Based on the initial assessment of the Phase I ESA, Haley & Aldrich conducted a series of Phase II ESAs on behalf of the Port to assess if COCs were still present onsite.

### **2.4 PHASE II ENVIRONMENTAL SITE ASSESSMENT | 2025**

Between August and November 2025, Haley & Aldrich conducted three Phase II ESAs to investigate the Site for potential soil and groundwater contamination. The Phase II ESAs included subsurface drilling, near-surface soil sampling, and test pitting.

#### **2.4.1 Phase II ESA | August 2025**

The first Phase II ESA consisted of Haley & Aldrich and their subcontractor, Holocene Drilling (Holocene), advancing 15 soil borings using direct push techniques (see boring locations on Figure 3). We used four boring locations as temporary wells to collect groundwater samples, collected groundwater samples from four existing monitoring wells at the Site using low-flow/low-stress sampling techniques, and collected four grab surface samples along the rail line (see GS-1 through -4 on Figure 3). Select soil and groundwater samples were analyzed for the following:

- Total petroleum hydrocarbon identification (TPH-HCID) using Ecology's Northwest Method NWTPH-HCID. If analytical results indicated that petroleum hydrocarbons were present, additional analyses were activated based on MTCA Table 830-1;

- PAHs by EPA Method 8270;
- Target Analyte List (TAL) Metals (aluminum, antimony, arsenic, barium, beryllium, cadmium, calcium, chromium, cobalt, copper, iron, lead, lithium, magnesium, manganese, mercury, and zinc) by EPA Methods 6010, 6020, and 7471, as applicable;
- Organochlorine pesticides by EPA Method 8081;
- Captan by Modified EPA Method 8270D; and/or
- Volatile Organic Compounds (VOCs) by EPA Method 8260.

Analytical results from this first Phase II ESA indicated that the soil at the Site is contaminated with PAHs, select heavy metals, and organochlorine pesticides: mainly dieldrin (a listed discarded chemical according to Washington Administrative Code [WAC] 173-303-9903), as well as lindane. The results also indicated that groundwater below the Site is contaminated with similar metals and pesticides, as well as volatile petroleum products. However, captan was not detected above the laboratory reporting limits in either medium. Based on these results, Haley & Aldrich removed captan as a COC for the Site, but deemed additional investigations necessary to further understand the magnitude and extent of the metals, pesticides (excluding captan), and petroleum contamination at the Site.

#### 2.4.2 Phase II ESAs | November 2025

The second Phase II ESA consisted of Haley & Aldrich collecting near-surface soil samples via hand tools from 14 Decision Units (DUs) across the Site, as shown in Figure 3. Haley & Aldrich collected and homogenized five aliquot samples from each DU at 0.5 ft bgs and 1.5 ft bgs, yielding two composite samples from each DU for a total of 28 near-surface soil samples. Select composite samples were then analyzed for organochlorine pesticides and TAL metals. Analytical results from this second Phase II ESA indicated that the near-surface soils at select DUs contained dieldrin, lindane, and select heavy metal concentrations greater than the laboratory reporting limits. Analytical results also indicated that dieldrin concentrations in soil at 0.5 ft bgs (at DU-6; see Figure 3) were at 480 µg/kg, greater than the MTCA Method B Direct Contact-Cancerous (MTCA Method B Direct Contact) screening level of 63 mg/kg, while other DUs contained dieldrin concentrations in soil at 0.5 ft bgs above the MTCA Method B Soil Protection of Groundwater for Vadose Zone (MTCA Method B Protection of Groundwater) screening level of 2.8 mg/kg. Additionally, analytical results indicated that select metals (cobalt, iron, and manganese) also exceeded MTCA Method B Protection of Groundwater screening levels at select locations; lead concentrations at 0.5 ft bgs near MW-8 were also reported at concentrations of 350 mg/kg, greater than MTCA Method A Soil Cleanup screening levels.

The third Phase II ESA consisted of Haley & Aldrich excavating test pits with their remedial subcontractor Spokane Environmental Solutions, LLC (SES; see test pits on Figure 3). Haley & Aldrich selected these test pit locations to better assess the extent and magnitude of petroleum COCs in soils near the petroleum-impacted groundwater, to better assess the soils near the historical oil warehouse and oil tank (see Figure 3), and to better define the extent of dieldrin further in the subsurface (around 5 ft bgs) near the eastern property boundary, north of the two sheds (see Figure 3). SES excavated eight test pits across the Site up to 12 ft bgs and Haley & Aldrich collected intermittent subsurface soil samples during the test pit excavations (typically every 4 ft). Analytical results from this Phase II ESA indicated that petroleum-related constituents exist at concentrations greater than the MTCA Method A Soil Cleanup screening levels in soil between 4 and 9.75 ft bgs near the historical oil warehouse (west of the Storage Building; see Figure 3).

### 3. Project Goal

The project goal is for the Port is to redevelop the Site into a much-needed childcare center for the community of Colfax, Washington, an underserved community within Whitman County. To complete the project goal, the Site first requires remediation of pesticides, petroleum-related constituents, PAHs, and select metals in soil to concentrations that are deemed protective of human health and the environment based on MTCA screening levels. The Port will achieve this goal by applying for a Fiscal Year 2026 (FY2026) EPA Brownfield Cleanup Grant to fund \$4 million of the cleanup. Cleanup costs are expected to exceed \$4 million, and the Port will seek state Brownfield grants from Ecology and commit additional funding from the Port's budget as leverage.

Haley & Aldrich prepared this ABCA as an objective to achieve the project goal in accordance with the requirements of the EPA's Brownfield Cleanup Grants program. The regional and Site vulnerabilities, applicable regulatory requirements, and evaluation of cleanup alternatives are summarized in the following sections.

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## 4. Regional and Site Vulnerabilities

Regional vulnerabilities might include hydrologic downgradient receptors. The Site resides 500 ft east-northeast of the Palouse River, which is the primary drainage for the town of Colfax. Under current Site conditions, the presence of contamination beneath the Site might affect groundwater that infiltrates into the Palouse River, ecological receptors within the River, and/or human receptors with shallow residential and/or agricultural wells that exist hydrologically downgradient of the Site. Based on current data, it is unknown if this pathway from the Site to downgradient receptors exists under current Site conditions.

Site vulnerabilities might include current Site users, future construction workers (during development), and future building occupants and patrons of the future childcare center. WAC 173-340-740 (3)(C) indicates that the soil-to-vapor pathway shall be evaluated for “other” VOC compounds (Subsection III) whenever the concentration is “significantly higher” than a concentration derived for the protection of groundwater. Ecology’s 2022 *Guidance for Evaluating Vapor Intrusion in Washington State* further states that “Ecology generally considers benzene and TPH-Gx concentrations ‘not significant’ if they are less than three times the MTCA Method A Soil Cleanup screening level” (100 mg/kg without benzene and if total of ethylbenzene, toluene, and xylene concentrations are less than one percent of the gasoline mixture; Ecology, 2022). Since analytical results from the Site indicate that the maximum reported gasoline-range organics concentrations in soil (TP-2 at 4 ft bgs) are approximately 690 mg/kg (over three times the MTCA Method A Soil Cleanup screening levels), a potential soil-to-vapor pathway might be a risk to Site vulnerabilities. Analytical results indicate that benzene was not detected at concentrations greater than the laboratory reporting limit.

### 4.1 CLIMATE COMMITMENT ACT

Based on EPA grant funding requirements, the EPA requires a discussion of whether climate change could be impacted by the preferred alternative. In 2021, the Washington Legislature passed the Climate Commitment Act (CCA), a sweeping bill that directs Ecology to develop and implement a statewide cap-and-invest program to cut carbon pollution. The CCA is a market-based program, meaning that the law sets standards, but leaves it up to businesses to find the most efficient method to achieve those requirements. The CCA is one of a suite of laws intended to drive down greenhouse gas emissions in Washington to 45 percent below 1990 levels by 2030, 70 percent by 2040, and 95 percent by 2050.

Predicted climate changes in Washington include:

- Increased mean annual temperatures, with winter and spring temperatures increasing the most;
- Increased precipitation in winter, spring, and fall, and decreasing in summer;
- Decreased snowpack, with peak runoff occurring earlier;
- Increased frequency of flooding;
- Increased time of drought;
- Increased frequency and longer season of wildfires; and
- Decreased carbon-capturing forest.

The proposed cleanup would not significantly impact on the predicted climate changes detailed above. In actuality, the proposed selected RAA (detailed below) would decrease fossil fuel emissions related to transporting impacted soils offsite when compared to less feasible RAAs that require a greater amount of transportation for off-site disposal.

While the Site is located near a designated wetland, the preferred alternative would not increase the potential for flooding. Trees would likely not need to be removed during the cleanup because the on-site trees are located in areas that appear to be unimpacted; therefore, carbon capture would not be affected. It is recommended that equipment used for abatement be turned off when not in use to reduce carbon emissions during cleanup. If possible, potential electric equipment could also be used when feasible. While not a direct part of the cleanup, the follow-on redevelopment of the Site will include energy-efficient materials and potentially electric vehicle charging stations, as necessary.

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## 5. Applicable Regulations and Cleanup Standards

Ecology will be the Site's regulatory authority during the cleanup process. Since the Site's characteristics do not classify as an industrial property under WAC 173-340-745, "the most protective cleanup levels under residential land use conditions represent the reasonable maximum exposure scenario," as listed in WAC 173-340-740. Therefore, soil cleanup standards will follow MTCA Method A Soil Cleanup screening levels in accordance with WAC 173-340-740 and -900, as applicable to PAHs, select heavy metals, and petroleum-related constituents.

As soil cleanup standards for dieldrin are not defined by MTCA Method A, soil cleanup standards at the Site will follow MTCA Method B Direct Contact and MTCA Method B Protection of Groundwater screening levels in accordance with WAC 173-340-740 and -747. These MTCA Method B standards will also serve as the thresholds for dangerous waste designation as the Port petitions for a Contained-In Policy (CIP) determination from Ecology under the proposed RAA; details of an Ecology-permitted CIP determination is further detailed in the sections below.

Additionally, the Port will enroll the Brownfield Site into Ecology's Voluntary Cleanup Program (VCP) and work collaboratively with Ecology to remediate the Site and report findings in accordance with applicable MTCA regulations. Remediation efforts will follow applicable laws and policies, such as the Davis-Bacon Act, the Small Business Liability Relief, and the Brownfields Revitalization Act, as applicable.

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## 6. Evaluation of Cleanup Alternatives

Haley & Aldrich assessed various Site-specific characteristics when evaluating feasible remedial alternatives for the Site. The characteristics reviewed generally include: Site geologic and hydrogeologic characteristics (subsurface conditions); remedial alternatives feasible for subsurface conditions; and remedial alternative criteria (i.e., risk reduction, implementability, and cost-including climate change considerations; see Table 1). The remedial action objectives and alternatives considered are detailed below.

### 6.1 REMEDIAL ALTERNATIVES CONSIDERED

The remedial action objectives (RAOs) for the Site include:

- **RAO 1** - Reduce the potential risk of exposure to construction workers during redevelopment of the Site, and reduce the risk of exposure to future occupants and patrons of the future Colfax childcare center;
- **RAO 2** - Reduce the risk of vapor intrusion exposure from COCs in soil and/or groundwater to occupants (workers and patrons) after the Site is redeveloped into a childcare center; and
- **RAO 3** - Reduce the risk of exposure for hydrological downgradient receptors (e.g., ecological receptors) near the Palouse River and human receptors that might be exposed through residential or agricultural water supply wells.

The RAAs that will be assessed to achieve the RAOs are detailed below. The alternatives assume that demolition of the Site's Processing Building and two sheds will be completed as part of redevelopment; the Port plans to use the Storage Building for future Site operations. It should be noted that each alternative, except for RAA-1, includes off-site incineration of hazardous waste based on requirements detailed in Chapter 173-303 WAC and remedial planning discussions with Ecology that occurred during December 2025 and January 2026. Additionally, because the costs associated with off-site disposal of soil classified as dangerous waste under Chapter 173-303 WAC are substantial, alternatives RAA-2 and RAA-3 assume the Port will apply and be approved for an RBSC Site CIP determination from Ecology. This determination would help reduce disposal costs during remedial activities and allow management of select soil as nonhazardous waste. A general description of Ecology's CIP, application processes, and proposed remedial outcome are also detailed below.

#### 6.1.1 Hazardous Building Material Abatement

As previously discussed, the Port and Haley & Aldrich contracted a Washington State-licensed subcontractor to complete a good faith survey to assess ACM within the buildings at the Site and assess potential lead-based paint used on/in the buildings. Results of this assessment indicated that both ACM and lead-based paint exist within the infrastructures at the Site. Based on this, the Port plans to contract an abatement company certified in the State of Washington to remediate the building materials (as needed) prior to redevelopment and/or demolition of existing infrastructure. Each alternative discussed below includes abatement of the existing buildings (as needed) prior to redevelopment.

### 6.1.2 Ecology Contained-In Policy (CIP)

Ecology's CIP process originates from the EPA's process detailed in 40 Code of Federal Regulations (CFR) Part 268.50. According to Ecology's website, "since cleaning up or redeveloping a contaminated site can be costly, using the Ecology CIP process may be used to reduce disposal costs by testing contaminated soil and groundwater to show that it is below toxicity thresholds, and therefore manage it as solid (nonhazardous) waste" (Ecology, 2026). To do this, an applicant must email Ecology's regional contact site-specific information, including: general location and description of the site, location of sources of contamination and planned excavation extents, cleanup plan and schedule, contamination description and designation, and statistically adequate analytical data that indicates the level of contamination in soil and groundwater below the site. This data is then reviewed by Ecology for consideration.

Based on historical documentation and a notification from Ecology via electronic email dated December 29, 2025, the Site previously received a CIP determination during the 1990s for soil containing "dieldrin, lindane and/or methoxychlor, which are regarded as dangerous chemical products according to WAC 173-303-081 and -9903. According to the historical CIP, the Site's contaminated soils will designate as dangerous waste if they contain any pesticides in concentrations exceeding MTCA Method B soil for cleanup levels for soil exposure (i.e., direct contact)" (Ecology, 1994). The notification from Ecology also stated that the previous CIP suggested that "the remainder of soils that must be excavated, which contain pesticides in concentrations below the soil cleanup levels for soil exposure but above the MTCA Method B soil cleanup levels for groundwater protection, can be transported to a solid waste landfill permitted in accordance with the minimal functional standards for solid waste handling" (Ecology, 1994). However, although the Site previously had a CIP determination, Ecology notified the Port and Haley & Aldrich that the previous CIP determination is no longer valid for the Site and that applying for a new CIP determination is warranted.

Furthermore, the Port and Haley & Aldrich met with representatives from Ecology's VCP, Dangerous Waste, and Brownfields programs during December 2025 to assess whether pursuing a new CIP for the Site would be feasible to help reduce disposal costs for select on-site soils (i.e., soils with dieldrin concentrations less than the MTCA Method B Direct Contact screening levels but greater than the MTCA Method B Protection of Groundwater screening levels). Haley & Aldrich also presented the RAAs outlined in this ABCA to Ecology during a virtual meeting on January 6, 2026. Ecology generally had no recommended deviations from the remedial alternatives' approach. Therefore, select RAAs detailed below assume the Port will pursue a new Site CIP determination from Ecology (based on newer data) as part of the remedial alternative to reduce hazardous waste transport and disposal costs. Based on this, it is assumed that, if approved, the proposed CIP will designate on-site soils with dieldrin concentrations below MTCA Method B Direct Contact screening levels but above MTCA Method B Protection of Groundwater screening levels as nonhazardous solid waste.

### 6.1.3 RAA-1: No Action

RAA-1 requires no additional remedial assessments or alternatives. Under this alternative, the Site will remain in its current condition.

### 6.1.4 RAA-2: Nonhazardous Waste Consolidation in On-Site Repository with CIP Determination

RAA-2 includes remediation of impacted soil below the Site using a combination of on-site consolidation of soil designated as nonhazardous waste (partially included in the CIP designation) into a constructed on-site repository and off-site incineration of soil designated as hazardous waste. RAA-2 is further detailed below.

#### 6.1.4.1 *Off-Site Incineration of Soil with Dieldrin Concentrations*

Data collected from the Phase II ESAs indicates that select areas at the Site contain dieldrin concentrations in soil greater than the MTCA Method B Direct Contact screening level of 63 mg/kg, as shown in Figure 4. These select areas include DU-6 and DU-7, with dieldrin concentrations ranging between 77 and 640 mg/kg at depths between about 0.5 and 5 ft bgs. Since the soil within DU-6 and DU-7 contains dieldrin (a listed discarded chemical in Chapter 173-303 WAC) and exceeds the MTCA Method B Direct Contact screening level, the Port will contract a remedial subcontractor to excavate and transport soil from DU-6 and DU-7 offsite to Clean Harbor's Aragonite Incineration Facility (Aragonite Facility), a permitted hazardous waste disposal and treatment facility for incineration located in Dugway, Utah. The Port will complete this to reduce the risk associated with future construction workers, occupants, and patrons at the Site being potentially exposed (acutely or chronically) to elevated concentrations of dieldrin in soil at the Site. Based on the extent and magnitude of dieldrin in soil at DU-6 and DU-7, Haley & Aldrich estimates that approximately 1,050 cubic yards (cu yd) of soil designated as hazardous waste will require off-site incineration. This estimate assumes that the remedial subcontractor will be required to excavate from current ground surface to the depth of groundwater (approximately 8 ft bgs).

#### 6.1.4.2 *CIP Determination*

RAA-2 includes the Port petitioning Ecology for a CIP determination, as detailed above. To complete the application for the CIP determination, the Port will first submit the request in accordance with Ecology's guidance and wait for an approval notification before excavating or transporting on-site soil. Following receipt of this determination, the Port will contract an environmental earthworks subcontractor to excavate now-designated nonhazardous soils exceeding their respective MTCA screening levels (see Figure 4) for consolidation in an on-site repository.

#### 6.1.4.3 *Design and Construction of On-Site Repository for Select Soil Containment*

As part of RAA-2, the Port will contract a Qualified Environmental Professional (QEP) to design and engineer an on-site environmental repository in accordance with typical waste containment models. The repository would contain on-site soils designated as nonhazardous waste (including dieldrin containing soils under the CIP determination), thereby reducing the exposure pathways to potential receptors. The proposed area of the onsite repository will likely include areas of DU-1 through -4 (approximately 24,000 sq ft), as shown on Figure 4. The repository would be excavated to approximately 4 ft bgs, for a total excavation volume of approximately 3,500 cu yd.

During construction of the repository, the Port's remedial subcontractor will excavate and temporarily stockpile unimpacted soils from the repository. Once excavated, the remedial subcontractor will contract a qualified geomembrane lining subcontractor to install a 40-millimeter (mil) HDPE geomembrane liner along the bottom and sides of the repository. Following installation of this subwaste liner, the Port's earthworks subcontractor will fill the repository with the impacted soils designated as nonhazardous waste. The Port's lining subcontractor will then install a 40-mil HDPE geomembrane liner along the top of the repository, sealing the impacted soils inside the repository via hot-wedge and extrusion welding techniques. The geomembrane wrap encompassing the repository will total a surface area (top, bottom, and sides) of approximately 50,500 sq ft and would likely be capped with an additional paved parking lot, which would provide another level of protection and further reduce potential exposure risks to receptors.

#### 6.1.4.4 *On-Site Containment of Soil Containing COCs*

Data collected from the Phase II ESAs indicate that select areas at the Site contain remaining dieldrin-impacted soils exceeding the MTCA Method B Protection of Groundwater Vadose Zone screening level of 2.8 mg/kg, petroleum-impacted soils exceeding MTCA Method A Soil Cleanup screening levels, and soils impacted by historical railroad operations (i.e., heavy metals and PAHs), as shown in Figure 4. Under this alternative, the Port will contract a remedial subcontractor to excavate and stockpile the impacted, nonhazardous soils in a designated containment area as they await placement in the on-site repository.

Following excavation of contaminated areas, the Port's selected QEP will collect bottom and sidewall confirmation samples to confirm that excavation limits removed nonhazardous soils exceeding their respective MTCA screening levels. After excavation is complete, the subcontractor will then backfill the excavated areas with repository-derived and imported backfill to the approximate surrounding ground surface elevation until redevelopment of the Site occurs. Haley & Aldrich anticipates that the earthworks contractor will need to excavate approximately 3,225 cu yd of soil designated as nonhazardous waste for repository consolidation.

Following remedial activities, the Port will conduct routine inspections of the Site to assess the integrity of the protective cap, groundwater monitoring wells, and other institutional controls in accordance with MTCA regulations. These routine monitoring events will likely include conducting temporary groundwater monitoring events to confirm that the remedial action is working as designed.

#### 6.1.4.5 *Redevelopment*

After the remedial efforts are complete, the repository (containing the nonhazardous waste) is sealed, and the excavated areas are backfilled; the Port preliminarily plans to implement the construction of a paved parking surface over the proposed location of the constructed repository. If implemented, another protective boundary between potential receptors at the ground surface and the nonhazardous waste will be constructed. Additionally, the Port tentatively plans on implementing green-scape infrastructure that would likely act as an additional protective barrier for potential receptors at the Site.

### 6.1.5 **RAA-3: Hazardous and Nonhazardous Waste Disposal Offsite with CIP Determination**

RAA-3 includes the Port remediating the impacted soil below the Site through off-site disposal of soil designated as nonhazardous waste (partially included in the CIP designation) and off-site incineration of soil designated as hazardous waste. RAA-3 is further detailed below.

#### 6.1.5.1 *Off-Site Incineration of Soil with Dieldrin Concentrations*

Similar to RAA-2, the Port will contract a remedial subcontractor to excavate and transport approximately 1,050 cu yd of soil from DU-6 and DU-7 offsite to the Aragonite Facility for incineration. This will again be completed to reduce the risk associated with future construction workers, occupants, and patrons at the Site being exposed (acutely or chronically) to elevated concentrations of dieldrin in soil at the Site as detailed in RAA-2.

### 6.1.5.2 CIP Determination

Similar to RAA-2, RAA-3 includes the Port petitioning Ecology for a CIP determination as detailed above. To complete the application for the CIP determination, the Port will first submit the request in accordance with Ecology's guidance and wait for an approval notification before excavating or transporting on-site soil. Following receipt of this determination, the Port will contract an environmental earthworks subcontractor to excavate now designated nonhazardous soils exceeding their respective MTCA screening levels for off-site disposal.

### 6.1.5.3 Off-Site Disposal of Soil Containing COCs

Impacted soils designated as nonhazardous waste, as discussed in RAA-2, will be excavated and transported to Waste Management's Graham Road Landfill (Graham Road Landfill) for disposal. Following excavation of contaminated areas, the Port's selected QEP will collect bottom and sidewall confirmation samples to confirm that excavation limits removed nonhazardous soils exceeding their respective MTCA screening levels. After excavation is complete, the subcontractor will then backfill the excavated areas with imported backfill to the approximate surrounding ground surface elevation until redevelopment of the Site occurs. Haley & Aldrich anticipates that the earthworks contractor will need to excavate approximately 3,225 cu yd of soil designated as nonhazardous waste for off-site disposal.

## 6.1.6 RAA-4: Hazardous and Nonhazardous Waste Disposal Offsite with No CIP Determination

RAA-4 includes the Port remediating the impacted soil below the Site through disposal of soil designated as nonhazardous waste and off-site incineration of soil designated as hazardous waste. Note that this alternative does not include pursuing a CIP determination. RAA-4 is further detailed below.

### 6.1.6.1 Off-Site Incineration of Soil with Dieldrin Concentrations

Without a CIP determination, the Port will contract a remedial subcontractor to excavate and transport soil with dieldrin concentrations exceeding MTCA Method B Protection of Groundwater screening levels to the Aragonite Facility for incineration. Haley & Aldrich estimates approximately 3,550 cu yd of soil designated as hazardous waste will require off-site incineration under this alternative.

### 6.1.6.2 Off-Site Disposal of Soil Containing COCs

Impacted soils designated as nonhazardous waste (i.e., petroleum-related constituents, PAHs, and heavy metals) will be excavated and transported to the Graham Road Landfill for disposal. Following excavation of contaminated areas, the Port's selected QEP will collect bottom and sidewall confirmation samples to confirm that excavation limits removed nonhazardous soils exceeding their respective MTCA screening levels. After excavation is complete, the subcontractor will then backfill the excavated areas with imported backfill to the approximate surrounding ground surface elevation until redevelopment of the Site occurs. Haley & Aldrich anticipates that the earthworks subcontractor will need to excavate approximately 725 cu yd of soil designated as nonhazardous waste for off-site disposal.

## 6.2 EVALUATION OF REMEDIAL ACTION ALTERNATIVES

Haley & Aldrich evaluated the RAAs based on the following criteria: effectiveness of risk reduction; implementability of the remedial action; and costs associated with implementing the remedy. These criteria are detailed below and summarized in Table 1.

### 6.2.1 Effectiveness of Risk Reduction

Haley & Aldrich selected RAA-4 as the most effective remedial alternative for removing potential health and environmental risks from the Site and potential risks to downgradient receptors. This alternative removes soil with variable dieldrin concentrations from the Site and treats the soil using incineration at an approved facility, which eradicates the Site's dieldrin contamination. The second most effective remedial alternative is RAA-3. This remedial alternative similar removes the contaminated soils from the Site, but disposes a majority of the dieldrin contamination elsewhere rather than incinerating it. RAA-2 is the third most effective, as the soil designated as nondangerous waste is consolidated, contained, and protected from receptors in a geomembrane, environmental cap; however, this RAA still leaves soil containing COC concentrations onsite. RAA-1 has the least remedial effectiveness for health and environmental risks caused by the presence of COCs at the Site or to downgradient receptors, as it relies primarily on natural attenuation and the naturally occurring breakdown of the COCs within soil and groundwater.

### 6.2.2 Implementability

While each alternative is implementable, Haley & Aldrich selected RAA-1 as the most implementable followed by RAA-3, RAA-2, and RAA-4. RAA-1 is the most implementable, as it is a "no action" alternative. RAA-3 is implementable, but requires some remediation efforts and transportation logistics to remediate the on-site soils exceeding applicable MTCA screening levels, mostly with on-site soils being transported to a location local to Washington State. RAA-2 is similarly implementable, but requires additional materials logistics and design considerations for the on-site repository; however, this alternative reduces soils needing to be transported offsite. RAA-4 is the least implementable of the four alternatives, as it requires a massive transportation trucking system to dispose of the majority of the Site's dieldrin impacted soil for incineration in Utah.

### 6.2.3 Cost

RAA-1 does not have an associated cost with soil remediation and thus scores the highest in terms of cost, followed by RAA-2, RAA-3, and RAA-4. RAA-2 has an estimated cost between approximately \$4,882,000 and \$5,155,000, while RAA-3 has an estimated cost around \$400,000 greater than RAA-2, between \$5,238,000 and \$5,531,000. RAA-4 has an estimated cost approximately three times greater than the that of RAA-2 or RAA-3, between \$14,600,000 and \$15,410,000.

## 6.3 PUBLIC PARTICIPATION

The RAAs listed in this ABCA will be available to the public for comments and the comments will be addressed during selection of an RAA. Haley & Aldrich will include this ABCA in the Port's EPA grant application, which will be available for public review and comment in early January 2026. Additionally, the Port plans to advertise this ABCA in a Whitman County newspaper and on their website during early January 2026. The Port is also scheduled to present this ABCA and notify the town of Colfax, Washington, of its availability during a Colfax City Council meeting scheduled for January 20, 2025.

## 6.4 RECOMMENDED CLEANUP ALTERNATIVE

Haley & Aldrich excluded RAA-1 as the preferred cleanup alternative. The Site does not appear to be a risk to downgradient receptors, and COCs in the subsurface also do not appear to pose a risk to current Site uses. However, since the Site will be redeveloped and repurposed as a childcare facility, it is likely

that the subsurface soil will require reworking (e.g., installation of building foundations, excavation for basements, etc.), which will likely cause disturbance of the soils impacted by the COCs and promote the mobility of the contaminants below the Site, therefore increasing the potential risk for receptors. Based on this, RAA-1 is not proposed as the preferred cleanup alternative.

Haley & Aldrich excluded RAA-4 as the preferred cleanup alternative. While this alternative would eradicate the dieldrin contamination onsite, the cost associated with incinerating the additional dieldrin-impacted soil greatly increases costs far beyond practicality and feasibility. Based on this, RAA-4 is not proposed as the preferred cleanup alternative.

Haley & Aldrich excluded RAA-3 as the preferred cleanup alternative. While off-site disposal of soil containing dieldrin based on a CIP determination is more effective in terms of risk reduction to on-site receptors and implementability, the increased waste transportation increases risk offsite and provides benefits in these categories marginal to the steep increase in remediation costs compared to RAA-2. Based on this, RAA-3 is not proposed as the preferred cleanup alternative.

RAA-2, nonhazardous waste consolidation in on-site repository with CIP determination, is the proposed cleanup alternative (see Figure 4). Haley & Aldrich selected this alternative due to its sensible risk reduction, reasonable implementability, and lower anticipated cost. While keeping contaminated soils onsite is less risk-effective than off-site disposal, securing the soil in a protective geomembrane environmental cap still adequately protects both on-site and downstream receptors from possible exposure via direct contact, downward migration, and/or potential vapor intrusion pathways. As the construction of repositories for contaminated materials is common practice in environmental remediation, the additional complexities associated with an on-site repository will not impose a heavy burden on remediation. Additionally, final redevelopment plans will likely include a paved parking structure overlaying the on-site repository, adding another layer of separation from potential receptors at the surface. This alternative, in combination with an environmental protective covenant, will substantially reduce exposure risks to potential receptors.

## 7. Limitations

Haley & Aldrich prepared this ABCA in accordance with our June 3, 2024 service agreement and in accordance with the Port's EPA Brownfield Community-Wide Assessment Grant Implementation (EPA Cooperative Agreement Number BF-02J49301-0). Haley & Aldrich also prepared this report in accordance with generally accepted professional consulting services. The findings, opinions, conclusions, and information contained in this report are limited to, and solely based upon, information reasonable ascertainable by Haley & Aldrich at the time the ABCA was prepared. This report is solely for the use and information of the client and any reliance on this report by a third party is the sole risk of the third party.

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**TABLE**

**TABLE 1**  
**SUMMARY OF REMEDIAL ACTION ALTERNATIVES**  
 ROGER BROTHERS SEED TREATMENT  
 COLFAX, WASHINGTON  
 FILE NO. 0209334-002

| Alternative   | Alternative Criteria         |                                      |                          |
|---|------------------------------|--------------------------------------|--------------------------|
|   | Risk Reduction Effectiveness | Implementability                     | Anticipated Cost         |
| RAA-1: No Action  | None                         | Implementable                        | \$ -                     |
| RAA-2: Hazardous waste incineration; contained-in and non-hazardous waste consolidation in on-site repository | Effective                    | Implementable with Few Complexities  | <b>Low End Estimate</b>  |
|   |                              |                                      | <b>High End Estimate</b> |
| RAA-3: Hazardous waste incineration; contained-in and non-hazardous waste disposal offsite                    | Effective                    | Implementable with Few Complexities  | <b>Low End Estimate</b>  |
|   |                              |                                      | <b>High End Estimate</b> |
| RAA-4: Hazardous waste incineration with no contained-in determination; non-hazardous waste disposal offsite  | Very Effective               | Implementable with Some Complexities | <b>Low End Estimate</b>  |
|   |                              |                                      | <b>High End Estimate</b> |
|   |                              |                                      | \$ 4,882,448             |
|   |                              |                                      | \$ 5,155,421             |
|   |                              |                                      | \$ 5,238,298             |
|   |                              |                                      | \$ 5,531,166             |
|   |                              |                                      | \$ 14,598,748            |
|   |                              |                                      | \$ 15,414,951            |

**Notes:**

RAA: Remedial Action Alternative

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**FIGURES**

GIS: \\haleyaldrich.com\share\CF\Projects\0209334\GIS\209334 - PORT OF WHITMAN COUNTY - ROGER BROS PHASE I\_ABCA.aprx - ayabu - 12/24/2025 11:25 AM



MAP SOURCE: ESRI  
SITE COORDINATES:

**HALEY  
ALDRICH**

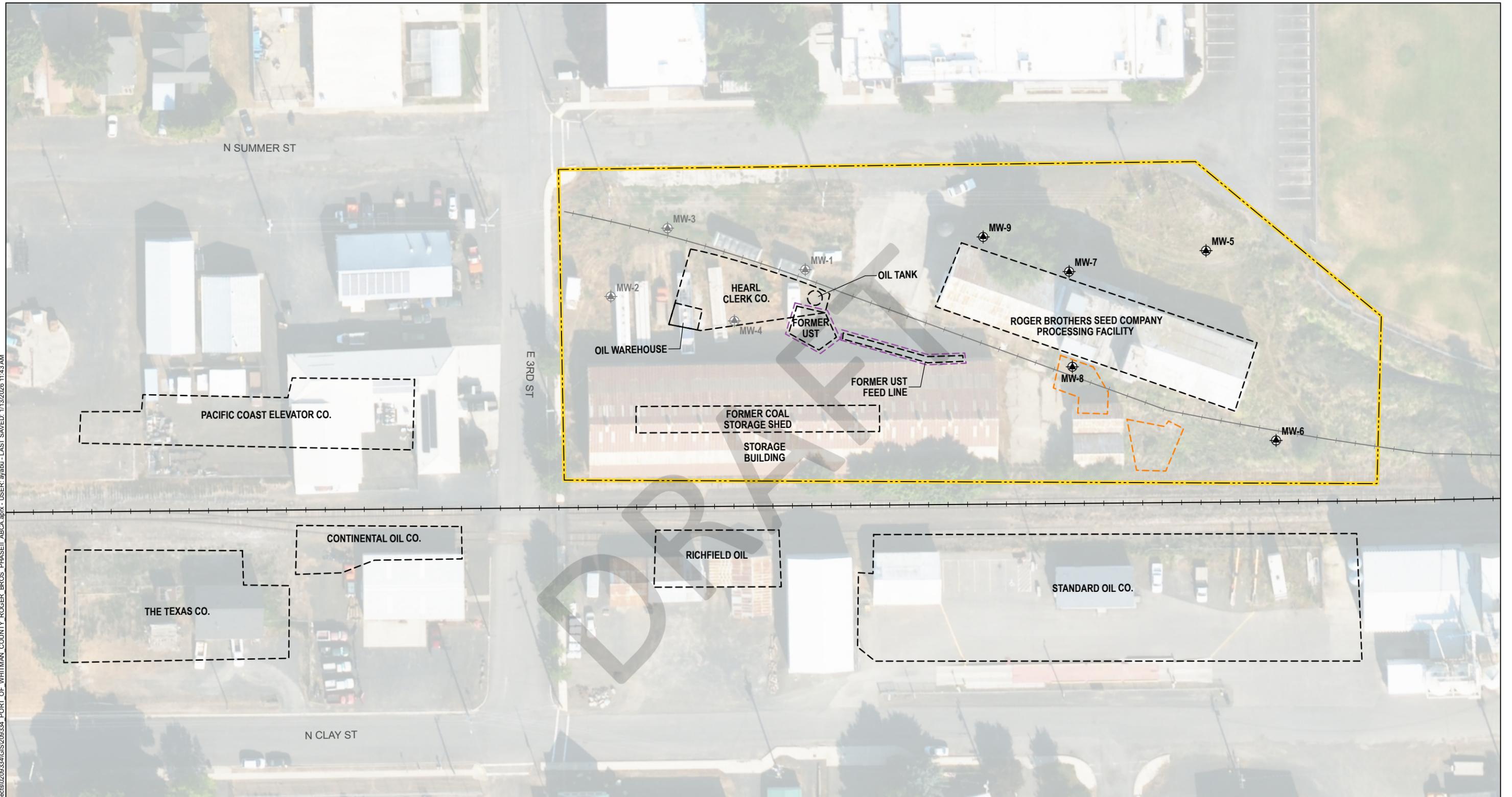
PORT OF WHITMAN COUNTY  
FORMER ROGER BROTHERS SEED COMPANY  
308 EAST 3RD STREET  
WHITMAN COUNTY, WASHINGTON

**VICINITY MAP**

APPROXIMATE SCALE: 1 IN = 2000 FEET  
JANUARY 2026

**FIGURE 1**

C:\GIS\FILE PATH: \\haleyaldrich.com\share\CFR\Projects\2020934\GIS\2020934\_PORF\_OF\_WHITMAN\_COUNTY\_ROGER\_BROS\_PHASEII\_ABCA.aprx - USER: ayabu - LAST SAVED: 1/13/2026 11:43 AM

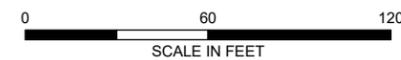


**LEGEND**

- HISTORICAL MONITORING WELL
- MISSING HISTORICAL MONITORING WELL
- EXISTING RAILROAD
- FORMER RAILROAD SPUR
- RCRA-REGULATED AREA UNIT 1
- RCRA-REGULATED AREA UNIT 2
- HISTORICAL USES AND FEATURE
- SITE BOUNDARAY

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: HEXAGON IMAGERY PROGRAM, JULY 1, 2023



**HALEY  
ALDRICH**

PORT OF WHITMAN COUNTY  
FORMER ROGER BROTHERS SEED COMPANY  
308 EAST 3RD STREET  
COLFAX, WASHINGTON

**SITE PLAN**

JANUARY 2026

**FIGURE 2**

GIS FILE PATH: \\haleyaldrich.com\share\CFR\Projects\2020934\GIS\208334\_PORT OF WHITMAN COUNTY ROGER BRCS PHASE II ABCA.aprx - USER: ayabu - LAST SAVED: 1/13/2026 3:27 PM

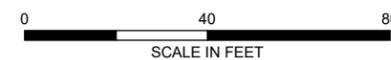


**LEGEND**

- |  |   |   |
|--|---|---|
| <ul style="list-style-type: none"> <li> DIRECT PUSH BORING</li> <li> DIRECT PUSH BORING / TEMPORARY WELL</li> <li> GRAB SOIL SAMPLE</li> <li> ALIQUOT SAMPLE</li> <li> TEST PIT</li> </ul> | <ul style="list-style-type: none"> <li> HISTORICAL MONITORING WELL</li> <li> MISSING HISTORICAL MONITORING WELL</li> <li> EXISTING RAILROAD</li> <li> FORMER RAILROAD SPUR</li> </ul> | <ul style="list-style-type: none"> <li> RCRA-REGULATED AREA UNIT 1</li> <li> RCRA-REGULATED AREA UNIT 2</li> <li> HISTORICAL USES AND FEATURE</li> <li> DECISION UNIT BOUNDARY</li> <li> SITE BOUNDARY</li> </ul> |
|--|---|---|

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: HEXAGON IMAGERY PROGRAM, JULY 1, 2023



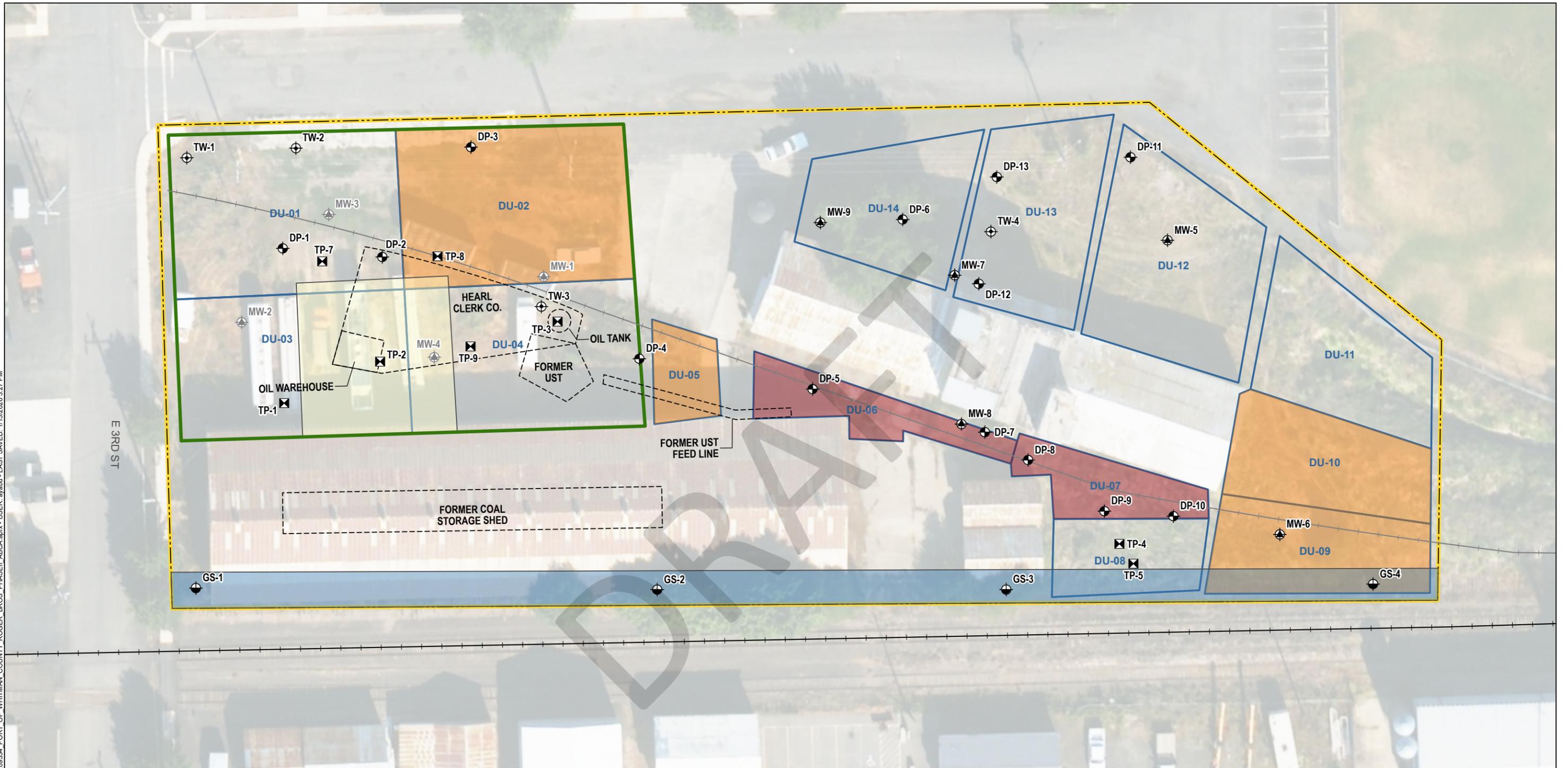
**HALEY ALDRICH** PORT OF WHITMAN COUNTY  
FORMER ROGER BROTHERS SEED COMPANY  
308 EAST 3RD STREET  
COLFAX, WASHINGTON

**EXPLORATION LOCATIONS**

JANUARY 2026

**FIGURE 3**

GIS FILE PATH: \\haleyaldrich.com\share\CP\Projects\20260324\GIS\260324\_PORT\_OF\_WHITMAN\_COUNTY\_ROGER\_BROS\_PHASEII\_ABCA.aprx - USER: ayabu - LAST SAVED: 1/13/2026 3:27 PM



**LEGEND**

- |   |  |  |
|---|--|--|
| <ul style="list-style-type: none"> <li> DIRECT PUSH BORING</li> <li> DIRECT PUSH BORING / TEMPORARY WELL</li> <li> GRAB SOIL SAMPLE</li> <li> TEST PIT</li> <li> HISTORICAL MONITORING WELL</li> <li> MISSING HISTORICAL MONITORING WELL</li> </ul> | <ul style="list-style-type: none"> <li> EXISTING RAILROAD</li> <li> FORMER RAILROAD SPUR</li> <li> HISTORICAL USES AND FEATURE</li> <li> DECISION UNIT BOUNDARY</li> <li> OFFSITE DISPOSAL OF DIELDRIN IMPACTED SOIL</li> <li> ONSITE REPOSITORY CONTAINMENT FOR DIELDRIN IMPACTED SOIL</li> </ul> | <ul style="list-style-type: none"> <li> ONSITE REPOSITORY CONTAINMENT FOR PETROLEUM IMPACTED SOIL</li> <li> ONSITE REPOSITORY CONTAINMENT FOR SOIL IMPACTED BY HISTORICAL RAILROAD OPERATIONS</li> <li> GENERAL LOCATION OF PROPOSED REPOSITORY</li> <li> SITE BOUNDARY</li> </ul> |
|---|--|--|

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. COBALT, IRON, MANGANESE, ZINC GENERALLY GREATER THAN SCREENING LEVELS ACROSS SITE AND DEPTH.
3. AERIAL IMAGERY SOURCE: HEXAGON IMAGERY PROGRAM, JULY 1, 2023



**HALEY ALDRICH**

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**PROPOSED REMEDIAL ACTION ALTERNATIVE**

JANUARY 2026

**FIGURE 4**