CLEANUP ACTION PLAN

Vista Field Properties–Lot 31
6737 West Azure Drive
Kennewick, Washington

January 12, 2026

Prepared for

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6737 West Azure Drive
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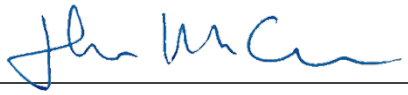
Document reviewed by:  John McCorkle, CEP
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LIST OF ABBREVIATIONS AND ACRONYMS

µg/kg	micrograms per kilogram
AFFF	aqueous film-forming foam
ARAR	applicable or relevant and appropriate requirements
bgs	below ground surface
BMEC	Blue Mountain Environmental Consulting Company, Inc.
CAP	Cleanup Action Plan
CUL	cleanup level
Ecology	Washington State Department of Ecology
EPA	Environmental Protection Agency
ERTS	Environmental Report Tracking System
ESA	environmental site assessment
ft	feet, foot
Landau	Landau Associates, Inc.
Lot 31	6737 West Azure Drive
MRL	method reporting limit
MTCA	Model Toxics Control Act
NFA	no further action
PFAS	per- and polyfluoroalkyl substances
PFAS Investigation Report	Landau's PFAS Investigation Report
PFDA	perfluorodecanoic acid
PFOA	perfluorooctanic acid
POC	point of compliance
Port	Port of Kennewick
Properties	6600 West Deschutes Avenue in Kennewick, Washington
RL	reporting limit
SAP/QAPP	sampling and analysis plan and quality assurance project plan
WAC	Washington Administrative Code

1.0 INTRODUCTION AND SITE BACKGROUND

This Cleanup Action Plan (CAP)[1] has been prepared by Landau Associates, Inc. (Landau) on behalf of the Port of Kennewick (Port) and describes Landau's proposed cleanup action for the Lot 31 property, located at 6737 West Azure Drive in Kennewick, Washington (Benton County Tax Parcel Number 132991BP5674031). Lot 31 is one of the Vista Field properties, which are located at 6600 West Deschutes Avenue in Kennewick, Washington (Properties) and are shown on Figure 1. This CAP has been prepared to meet the applicable requirements for a CAP in accordance with the Model Toxics Control Act (MTCA) Washington Administrative Code (WAC) 173-340-380.

Since June 2025, several soil investigations have been completed at the Vista Field Properties, including at Lot 31. Landau has confirmed the presence of per- and polyfluoroalkyl substances (PFAS) in shallow soil on the property line of Lot 31 in excess of Washington State regulatory limits (Site). This CAP describes Landau's proposed remedial measures to address the identified PFAS contamination and includes the following required elements:

- Section 1 includes the location, description, and background of the Vista Field Properties.
- Section 2 summarizes previous environmental investigations completed at the Vista Field Properties, including Lot 31.
- Section 3 discusses the applicable cleanup standards and point of compliance for Lot 31.
- Section 4 describes the selected remedy. It discusses Landau's analysis of alternatives, presents the approach to completing the design of specific elements of the selected remedy and confirmation monitoring, and provides an approximate timeframe and schedule for the implementation of the remedy and site restoration to meet applicable standards.
- Section 5 presents Landau's conclusions.

Implementation of the CAP will not require implementation of either institutional controls or onsite containment elements because levels of PFAS contamination remaining on site will be below cleanup standards and therefore, neither of these approaches are discussed in this CAP. Additional details regarding past investigation activities at Lot 31 are detailed in Landau's PFAS Investigation Report (PFAS Investigation Report; Landau 2025a), which has been submitted to the Washington State Department of Ecology (Ecology) on October 17, 2025.

[1] This Cleanup Action Plan has been prepared for the exclusive use of the Port of Kennewick and applicable regulatory agencies for specific application to the Properties. No other party is entitled to rely on the information, conclusions, and recommendations included in this document without the express written consent of Landau. Further, the reuse of information, conclusions, and recommendations provided herein for extensions of the project or for any other project, without review and authorization by Landau, shall be at the user's sole risk. Landau warrants that within the limitations of scope, schedule, and budget, our services have been provided in a manner consistent with that level of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions as this project. Landau makes no other warranty, either express or implied.

1.1 Lot 31 Location and Description

Lot 31 is one of the Vista Field Properties located at 6737 West Azure Drive in Kennewick, Washington (Figure 2). Lot 31 is currently partially developed with concrete footings and stem walls for a planned structure. Construction at Lot 31 has been on hold since June 2025. The area surrounding Lot 31 is developed with roadways, sidewalks, and a parking lot, and several properties in the immediate vicinity of Lot 31 are awaiting construction.

1.2 Vista Field Properties Background

The Vista Field Properties are currently being redeveloped by the Port on a lot-by-lot basis into an urban town center with commercial, residential, and public spaces. Based on Landau's review of an environmental audit report (ESI 1991) and a Phase I environmental site assessment (ESA) report (BMEC 2014), Landau understands that Vista Field was developed as an airfield between 1942 and 1944. From early 1942 until April 1947, the U.S. Navy leased the airfield to train naval aviators during the war effort. The Kennewick Irrigation District, the City of Kennewick, and later the Port operated Vista Field as a municipal airfield for small, fixed-wing aircraft until 2013. A 2014 ESA reviewed by Landau did not identify the presence of any releases at Vista Field that would warrant additional characterization; however, a Phase I ESA specific to Lot 31 prepared by Blue Mountain Environmental Consulting Company, Inc. (BMEC) dated May 23, 2025 (BMEC 2025a) identified PFAS as a potential environmental concern. Landau believes that this BMEC Phase I ESA identified PFAS as a potential environmental concern due to an erroneous identification of continued military operations at the airfield from 1944 through 2013 (BMEC 2025a).

The Port is currently redeveloping the lots within Vista Field as a multi-use community with residential, commercial, and public areas in partnership with private landowners who have purchased or are purchasing properties from the Port. A portion of the infrastructure, including roads and utilities in public rights-of-way, were constructed prior to 2025. To date, several lots have been sold, and commercial buildings are under construction on those lots. During earthwork activities at Lot 31, BMEC conducted a Limited Phase II ESA at Lot 31 for the Lot 31 lender in June 2025.

The BMEC Lot 31 Phase II ESA included the sampling and analysis of three soil samples (BMEC 2025b) collected approximately 4 feet (ft) below ground surface (bgs) on Lot 31. The approximate sampling locations are shown on Figure 2. These soil samples were analyzed for PFAS, and the draft results indicated potential detections for select PFAS compounds. Many of the analytical results were reported in the draft document provided to Ecology as actual values; however, a review of the laboratory report indicates that those values should have been flagged as estimates because they were below the laboratory method reporting limits (MRLs) and should not have been compared with MTCA cleanup standards.

Landau was unable to confirm that samples collected during the BMEC Lot 31 Phase II ESA were obtained in accordance with either a sampling and analysis plan or a quality assurance project plan (SAP/QAPP). The purpose of the SAP/QAPP is to specify the sampling methodology, quality assurance,

and quality control procedures necessary to demonstrate the lack of contamination of the samples from sampling equipment or other sources, which is a frequent concern encountered during PFAS sampling.

Based on the detection of PFAS in the BMEC Lot 31 Limited Phase II ESA, and uncertainty that the BMEC sampling results were valid, the Port decided to conduct an independent review of Lot 31 and contracted with Landau to initiate the additional investigation presented in this CAP. Previous investigations completed at Vista Field and Lot 31 are described in Landau's PFAS Investigation Report (Landau 2025a) and in Section 2.0 of this CAP.

1.3 Regulatory Status

Landau first contacted Ecology on July 22, 2025 and has been in communication with Ecology on a regular basis since that time. On September 23, 2025 Landau submitted an incident report to Ecology's Environmental Report Tracking System (ERTS) documenting the identified concentration of PFAS in shallow soil at Lot 31 above MTCA Method B cleanup levels (CULs) in accordance with MTCA (WAC 173-340-300).

Landau's PFAS Investigation Report (Landau 2025a) was submitted to Ecology on October 17, 2025 and detailed the results of investigation activities. It is summarized in Section 2.0 of this CAP. Based on Landau's conversations with Ecology following that submittal it was agreed that additional sampling data would be useful in supporting the Conceptual Site Model described in the PFAS Investigation Report and to determine if the Phase II ESA data was valid. Landau completed this additional sampling on December 9, 2025 and provided the initial draft results (as described in Section 2.1 of this report) to Ecology on December 17, 2025.

This CAP is intended to provide Ecology with additional information regarding the reasonable basis to believe that the release of a hazardous substance had taken place on Lot 31 (WAC 173-340-310 (1)(d) and (2)(c)), and to describe the planned cleanup action to remedy the release (WAC 173-340-310 (5)(b)). Ecology's initial investigation of Lot 31 may be informed by this CAP, Landau's earlier investigation of Lot 31 and the Vista Field properties, and the resulting anticipated Cleanup Action Report, in order to provide a No Further Action determination (NFA). WAC 173-340-310 (3).

2.0 PREVIOUS INVESTIGATIONS

Environmental investigations were completed at and in the immediate vicinity of Lot 31 by BMEC in June 2025. A subsequent additional property-wide investigation was completed by Landau in August 2025. Following its initial review of these activities, Ecology indicated that supplemental sampling at and adjacent to Lot 31 could be useful in supporting the conclusions of the PFAS Investigation Report. The Port directed Landau to perform supplemental sampling at Lot 31 in December 2025 and these activities are summarized below.

2.1 Historic Document Review and August 2025 Vista Field Properties Sampling

BMEC's investigation identified the presence of PFAS compounds in shallow soil at Lot 31; however, as described in Section 1.2 of this CAP, the BMEC data were considered by Landau and Ecology to require additional characterization to determine the validity of these results.

Landau conducted a review of available public records and historical information, including documents obtained through public records requests to the City of Kennewick fire department, as well as the results of interviews with legacy operators conducted by Port personnel. The results of this review indicated that there is no evidence to indicate that a substantial release of PFAS through aqueous film-forming foam (AFFF) or other significant PFAS-containing material has occurred at the Properties. Details regarding this review were presented in the PFAS Investigation Report.

Two additional rounds of soil sampling were conducted by Landau in August 2025, and the results of 47 discrete soil samples were used to define the nature and extent of PFAS contamination at the site and to develop a conceptual site model. This conceptual site model then was used to determine CULs for the Properties (detailed in Section 3.0 of this CAP). Details regarding these activities and the results of this assessment were presented in the PFAS Investigation Report, which included evidence supporting the conclusion that there was no indication that PFAS had migrated to groundwater at the Properties.

Analytical data collected during Landau's August 2025 investigations indicate that a single soil sample (SB-01-[1.5-20]), located at the perimeter of Lot 31, had concentrations of a single PFAS compound, perfluorodecanoic acid (PFDA) at 0.268 micrograms per kilogram (µg/kg). This one sample was the only PFAS result in excess of laboratory MRLs and Ecology MTCA Method B screening levels (0.16 µg/kg for PFDA) for direct contact. The results of this investigation also indicated that the soil contamination appeared to be limited in extent to an area less than lateral 20 ft from the soil sample and less than 4 ft deep. This area is shown on Figure 3.

Additional PFAS compounds have been detected in shallow soils at various points on the Properties, though at levels below the site-specific CULs, suggesting that background concentrations of PFAS in shallow soils are present in an area-wide fashion, potentially from bulk atmospheric deposition.

2.2 December 2025 Lot 31 Supplemental Sampling

Following initial review of the PFAS Investigation Report, Ecology indicated that two additional elements should be assessed as part of future work. These elements were:

- Determine the validity of the June 2025 BMEC Lot 31 sampling event. While it appeared that the initial soil samples collected in June 2025 by BMEC were not collected in accordance with best practices and the data was invalid, soils in the vicinity of one of the samples (sample location #3) were reported to contain a quantifiable PFAS detection (perfluorooctanic acid [PFOA] at 0.13 nanograms per gram) at a level exceeding an applicable cleanup level. Ecology suggested that this area should be re-sampled to either confirm the detected concentration or empirically show it to have been a false positive.
- Conduct additional shallow soil sampling on Lot 31. Soil samples collected in August 2025 were from at least 1 ft bgs. A set of shallower samples (from 0 to 1 ft bgs) would be useful to determine conditions in the upper foot of soil at the Properties.

In response to Ecology's suggestions, on December 9, 2025 Landau returned to Lot 31 to assess soils at the location of the June 2025 BMEC sample (sample location #3). Landau observed a soil boring being advanced using direct-push drilling technology immediately adjacent to that sample location. Samples were collected from the surface (from 0 to 1 ft bgs) as well as from the same depth as sample #3 (from 4 to 4.5 ft bgs); additionally, another deeper sample was collected from 8 to 8.5 ft bgs.

Landau also collected shallow soil samples (from 0 to 1 ft bgs) using hand tools to assess conditions in the upper foot of soil at the Properties. Soils collected from each discrete location were individually homogenized per the procedures described in Landau's SAP (Landau 2025b) and as recommended by Ecology. Landau collected a total of 10 soil samples from the area around soil boring SB-01 (5 at an approximate radius of 10 ft from SB-01 and 5 at an approximate 20-ft radius from SB-01). Samples collected from the 20-ft radius were placed on hold pending results of the first sample set from the 10-ft radius. All soil samples were submitted to Enthalpy Analytical of El Dorado Hills, California to be analyzed for PFAS by U.S. Environmental Protection Agency (EPA) Method 1633.

A review of the laboratory analytical results of this testing confirmed that no PFAS compounds were detected above laboratory reporting limits (RLs) in any of the submitted samples, and it appears that the BMEC samples were not valid.

3.0 CLEANUP STANDARDS

Landau evaluated Lot 31 CULs and developed a conceptual site model, which is presented in Section 4.0 of the PFAS Investigation Report (Landau 2025a). This section of Landau's PFAS Investigation Report also included an evaluation of applicable, relevant, and appropriate requirements (ARARs) as defined by WAC 173-340-710. A summary of this analysis is presented below.

Based on the data available and the proposed use of Lot 31, direct contact with contaminated soil represents the greatest potential risk associated with the contamination at the Properties, and the use of MTCA Method B direct contact soil CULs is appropriate, as is the use of the ecological receptor CULs. For the Properties, the CUL for each PFAS compound is the lowest of:

- The direct contact cancer Method B CUL
- The direct contact non-cancer Method B CUL
- The CUL based on total protection for uplands ecological receptors.

In cases where the Method B CUL is below the MRL, the MRL will be used as the CUL in accordance with WAC 173-340-707.

3.1 Points of Compliance

The points of compliance (POCs) are the locations where CULs must be met. The POCs presented in this report will consist of the standard POCs for all media, as established under MTCA.

The standard POC for soil is determined by the exposure pathway upon which the soil CUL is based (direct contact or protection of groundwater), as follows [WAC 173-340-740(6)]:

- The POC is the point or points where the soil CULs shall be attained.
- For soil CULs based on the protection of groundwater, the POC shall be established in the soils throughout the site.
- For soil CULs based on human exposure via direct contact or other exposure pathways where contact with the soil is required to complete the pathway, the POC shall be established in the soils throughout the site from the ground surface to 15 ft bgs. This represents a reasonable estimate of the depth soil could be excavated to and distributed at the soil surface as a result of site development activities.

The POC is throughout the Properties, from the ground surface to 15 ft bgs.

4.0 SELECTED CLEANUP ACTION

Following collection of analytical data described in Section 2.0 of this CAP, Landau recommended and the Port selected direct excavation as the preferred remedy for the shallow soil contamination identified at Lot 31. Landau advised the Port of the alternatives such as capping contamination in place and implementing in-place remediation techniques. Landau informed the Port that there are currently very limited reliable remediation technologies to remediate PFAS contamination in place, and the area of contamination requiring remediation appears to be accessible.

The Port's selected cleanup action will result in a complete removal of PFAS contamination at levels in excess of the applicable cleanup levels from the affected area at Lot 31 and is considered to be permanent. Following implementation of the selected cleanup action, Landau will submit a report on the Port's behalf summarizing the results of the removal action with a request that Ecology incorporate it into their Initial Investigation, and Landau will request that Ecology issue a NFA determination for the Site.

4.1 Description of Selected Cleanup Action

The remedial excavation for Lot 31 will be completed using a track-mounted excavator or backhoe and will be observed by Landau. The initial excavation will be completed to a depth of 3 ft bgs in the location of soil boring SB-01 and tapered to 2 ft bgs at the sidewalls, anticipated to be generally a radius of 10 ft from boring SB-01, or approximately 27 cubic yards of contaminated soil. Concrete footings are currently in place on Lot 31 approximately 4 ft northwest of boring SB-01. In this direction, the excavation will extend to the footings and confirmation soil samples will be collected at the base of the footings.

Following completion of the excavation, Landau will collect confirmation soil samples as described above and in Section 4.3. If PFAS compounds are identified above CULs in the confirmation soil samples, the excavation will be widened and/or deepened in the desired direction. If the CULs are exceeded at the area of the concrete footing walls, the concrete footings may be demolished in order to extend the excavation and replaced at a later time.

All excavated soil will be stockpiled on and covered with PFAS-free plastic sheeting pending receipt of analytical results from confirmation samples. Once analytical results are received, validated, and confirmed to be below laboratory RLs and/or CULs, the stockpiled soil will be loaded into trucks and will be transported to Chemical Waste Management of Arlington, Oregon for disposal under an approved waste profile. The excavation area will then be backfilled using imported material and compacted so that construction at Lot 31 can resume. Landau will not oversee the backfill or compaction of the excavation and will not confirm if fill material is appropriately compacted to Lot 31's project specifications.

Excavation operators and equipment will use decontamination and PFAS-free personal protective equipment consistent with the procedures outlined in Landau's SAP (Landau 2025b).

4.2 Areas Subject to Cleanup

The approximate location of the proposed excavation is shown on Figure 2 and will include the upper 2 to 3 ft of soil from an approximate 10-ft radius of soil boring SB-01. The excavation may be widened or deepened depending on confirmation sampling results for samples collected at intervals described in Section 4.3 of this CAP.

4.3 Confirmation Monitoring Approach

To demonstrate that the cleanup requirements have been met, Landau will collect confirmation samples from the margins of the remedial excavation, in a frequency consistent with Section 6.8.3 of Ecology's 2016 Guidance for Remediation of Petroleum Contaminated Sites (Ecology 2016) and in accordance with Landau's SAP/QAPP. At a minimum, one sidewall confirmation soil sample will be collected for every 20 horizontal feet of sidewall and three base confirmation soil samples will be collected, consistent with or in excess of Ecology's guidance.

Samples will be collected and submitted for laboratory analysis for PFAS by EPA Method 1633 from depth interval(s) at or below where contamination was identified during previous sampling. Landau will request that laboratory reporting limits be below applicable CULs. All laboratory analytical data will undergo EPA Level IIB-equivalent validation and verification.

4.4 Cleanup and Restoration Time Frame and Schedule

It is anticipated that excavation of the area shown on Figure 3 will occur as an independent remedial action (WAC 173-340-510) during the first quarter of 2026.

Site restoration will be completed upon receipt and validation of confirmation sampling results showing that all PFAS contamination in excess of applicable cleanup levels has been removed from the site and that the site can be considered fully restored and protective of human health and the environment in accordance with MTCA. No institutional or engineering controls are anticipated to be part of the cleanup action.

5.0 CONCLUSIONS

Currently no model remedies are in place for cleanups of PFAS contamination; however, the selected cleanup action described in this report is consistent with model remedies for petroleum-contaminated or lead-and-arsenic-contaminated sites for removal of all media contaminated at levels in excess of applicable cleanup standards and disposal of this media at a licensed facility. Such actions are generally considered to be permanent to the maximum extent practicable.

Following completion of the cleanup action described in this CAP, on behalf of the Port Landau will submit a report summarizing the remedial action for Ecology review through its Initial Investigation process. It is likely that because the proposed remedial action will leave no PFAS contamination in place that exceed cleanup standards, no engineering or institutional controls, further monitoring, site inspections, reviews, or investigations will be necessary. Therefore, it is Landau's expectation that the results of this cleanup action will present sufficient information for Ecology to issue an NFA determination the release proximate to Lot 31 at the Vista Field Properties through its Initial Investigation process.

6.0 REFERENCES

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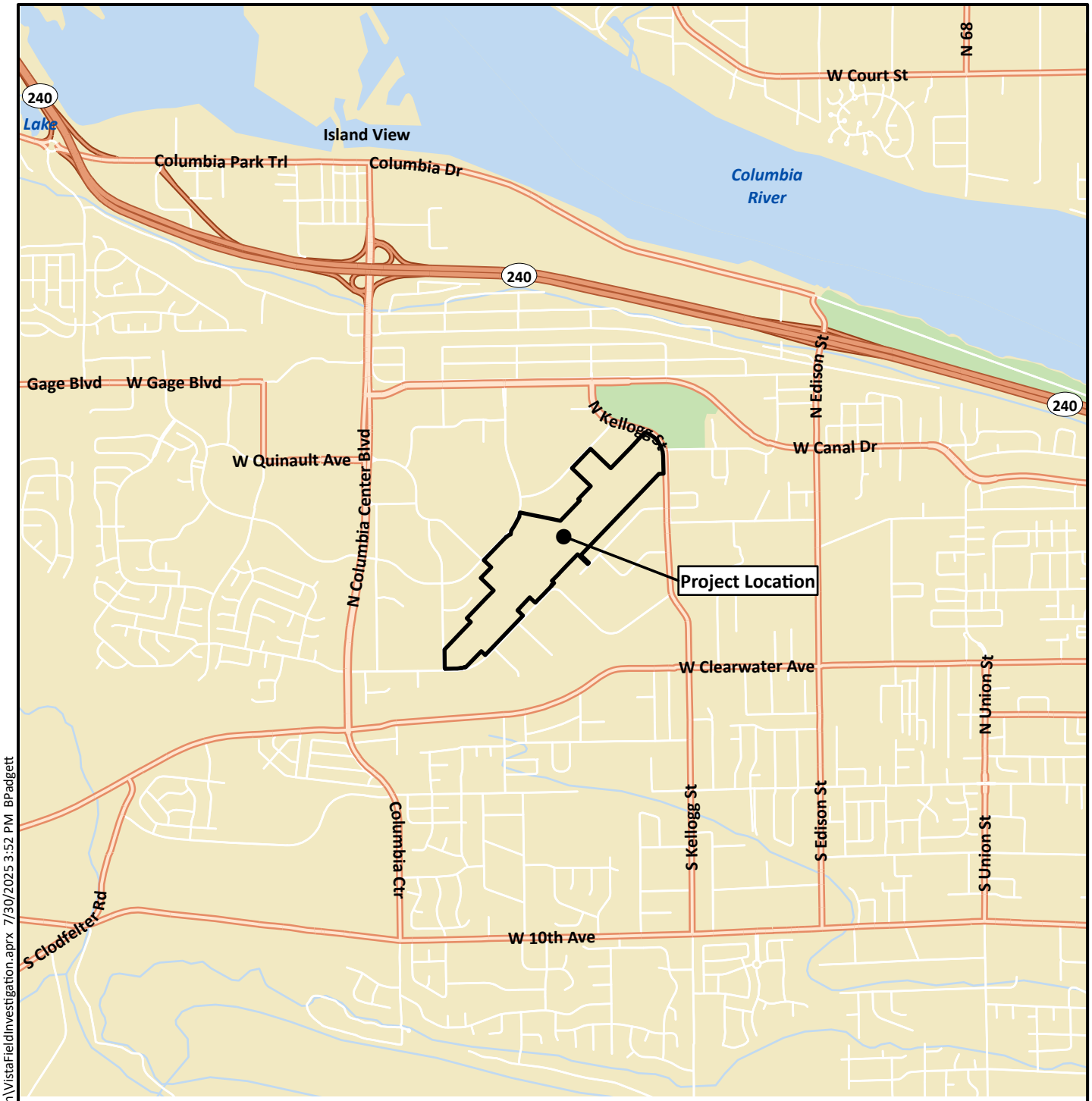

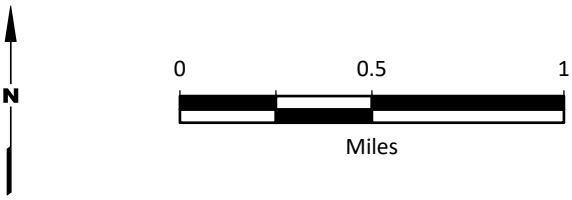

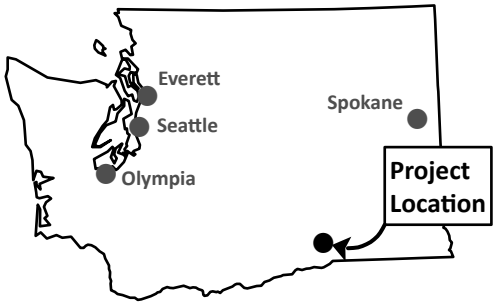

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LANDAU ASSOCIATES

Vista Field Development CONFIDENTIAL Kennewick, Washington	**Vicinity Map**	Figure 1

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Legend

- Vicinity of Lot 31 as Shown on Figure 3
- Tax Parcel

Note

1. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

Data Source: Benton County; Blue Mountain Environmental Consulting.
Base Map Source: Google Aerial Imagery, 2025.

0 330 660

Scale in Feet

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Vista Field Development CONFIDENTIAL Kennewick, Washington	**Location of Lot 31**	Figure 2

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SB-01	
1.5-2 ft bgs	
Analyte	*Concentration (ng/g)*
PFDA	**0.268**
PFOS	**0.113**

SB-08	
1-1.5 ft bgs	
Analyte	*Concentration (ng/g)*
PFBA	**0.108**

Note

1. MTCA = Model Toxics Control Act
   PFAS = Per- and Polyfluoroalkyl Substances
2. **Bolded** concentrations indicate analyte detected at concentration above laboratory reporting limits
3. **Highlighted** concentrations indicate analyte detected at concentration above any applicable Ecology MTCA Method B screening level.
4. Only investigation locations with analytical results are displayed.
5. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

Legend

- SB-01 ● Soil Boring Location (Landau 2025)
- TP-01 ■ Test Pit Location (Landau 2025)
- SS-01 ⊙ Shallow Soil Sample Location (Landau 2025)
- 1 ⊕ Soil Sampling Location (Blue Mountain 2025)
- Lot 31
- Tax Parcel
- PFAS Compounds Detected Above Any Applicable Ecology MTCA Method B Screening Level

Data Source: Benton County; Blue Mountain Environmental Consulting.
Base Map Source: Google Aerial Imagery, 2025.

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0 35 70
Scale in Feet

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Lot 31 Proposed Excavation Extent

Figure 3