

Compliant with U.S. EPA Final Rule: 40 CFR Part 312

---- and ----

ASTM E1527-21 Phase I Standard Practice

PHASE I

ENVIRONMENTAL SITE ASSESSMENT

Subject Property:

SUNSET POINTE DEVELOPMENT

214 - 23rd Street Place Southeast

2100 - 19th Avenue Southeast

Puyallup, Washington 98372

May 6, 2024

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Compliant with All Appropriate Inquiry
Final Rule: 40 CFR Part 312
— and —
ASTM E1572-21 *Phase I Standard Practice*

**PHASE I
ENVIRONMENTAL
SITE ASSESSMENT**

Subject Property:

SUNSET POINTE DEVELOPMENT
214 - 23rd Street Place Southeast (South Entrance)
2100 - 19th Avenue Southeast (North Entrance)
Puyallup, Washington 98372

May 6, 2024

Prepared by:
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PHASE I
ENVIRONMENTAL SITE ASSESSMENT

Compliant with
ASTM E1572-21 Phase I Standard Practice

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Point of Contact: Craig Deaver / Principal
C.E.S. NW, Inc.
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Puyallup, WA 98372
Office: (253) 848-4282 / cdeaver@cesnwinc.com

Subject Property: **SUNSET POINTE DEVELOPMENT**
2100 - 19th Avenue Southeast (North Entrance)
214 - 23rd Street Place Southeast (South Entrance)
Puyallup, Washington 98372

Pierce County Assessor: Parcel No.0420-35-3027 395,476 sqft / 9.08-acres
Parcel No.0420-35-7011 4,235 sqft / 0.10-acres

City of Puyallup: Development Permit No.P-18-0040
Preliminary Major Plat AMR E-18-0166

Key Site Manger: Dr. Peter Chen
Sunset Pointe Development

Site Knowledgeable: Mr. Craig Deaver
C.E.S. NW, Inc.

NAICS Classification: Code No: 236.117
Developers / Builders of single and multi family housing

Environmental Assessor: Alan T. Blotch
(360) 710-5899 / alan.blotch@earthlink.net

Project Number: No. 24 - 0246
Report Date: May 6, 2024

EXECUTIVE SUMMARY

The subject of this *Phase I Environmental Site Assessment* is an irregular-shaped approximate 9.08-acre residential Property located on the southeast side of Puyallup, Washington. The Property is bounded on the north by 19th Avenue Southeast and 23rd Street Place Southeast. One block south is 23rd Avenue Southeast; Shaw Road East is two-thirds of a mile; Pioneer Way East is one mile north; State Route 161 / 512 is one and one-third of a mile east; State Route WA-410 is one and one-quarter of a mile northeast.

The subject Property is a vacant, undeveloped Property that will be developed with a eighteen residential development lots known as *Sunset Pointe Development*.

The subject Property is level on the south side with residences adjoining to the south on 23rd Place southeast; to the west on 22nd Street Southeast; and 19th Avenue Southeast on the northwest. The southern portion is grassy with areas in the center and along the western fence line overgrown with native vegetation. The trees are second growth or even younger. The eastern Property is level with a slope to the east which defines the eastern development. In the south center of the Development is a small manmade lined plastic pond adjoining the east side of the pathway; which drains into a large Retention Pond defined on the north, east, and south sides. On the northeaster corner of the Retention Pond is beamed wall of non-native backfill which allows access to the surface of the Pond at 361 feet above sea level.

The future of the Property is the development is the *Sunset Pointe*, configured with eighteen residential lots. The Development will include a large wetlands area that divides the Property into a northern and section. The wetlands will include a larger detention pond the the center and two smaller wetlands ponds to the east; with an overall flow towards the southwestern corner of the Parcel. A fifty foot wetlands buffer will be created to the north and south. Adjoining the wetlands to the south is the stormwater discharge area. The northern section of the Development be eight lots. The southern portion will be developed with lots nine.

The subject Property was originally undeveloped wooded land; initially developed in the early 1920s with two small residences. In 1940, a detected garage and 10,000 square foot horse barn. In 1950, two approximately 4,000 square foot storage barns were constructed. In 2010, two arson fires destroyed the *Western Washington Pioneer Museum* building. In 2018, all of the remaining structures were demolished and removed from the Property, and a general cleanup was completed. In 2011, following the fire, the Washington Department of Ecology placed the Property as a *Confirm or Suspected Contaminated Site*. In 2018, all on-site buildings were demolished; the waste materials were removed in 2023.

The subject Property is a residential area. To the north is 19th Avenue and multifamily residences; to the south is the 23rd Street Place Southeast; to the east are residences; and to the west are residences.

■ **Recommendation: No Further Action.** As a result of the on-site Reconnaissance, records research, historical investigation, and review of Federally reported environmental information, this Assessment has revealed no obvious evidence of potential environmental risks or Recognized Environmental Conditions indicating the presence of hazardous or other conditions that could reasonably be expected to environmentally impact the Site. Based upon this Phase I Assessment, it is reasonable and prudent to believe that the risk of contamination at the Site is so minimal that no further investigation is recommended.

Upon the completion of this Assessment, no further investigation, remediation, or response actions are indicated, suggested, or recommended relative the potential environmental conditions at the subject Property other than those previously discussed. Based upon this Phase I Assessment, and with those discussed exceptions, it is reasonable and prudent for the Client to believe there is no other significant risk of contamination that has not been discussed.

ASTM PROTOCOL CONCLUSION

We have performed a *Phase I Environmental Site Assessment* in conformance with the scope and limitations of ASTM Practice 1527-21 for Pierce County Parcels 0420-35-3027 and 0420-35-7011, located in Puyallup, Washington the *property*. Any exceptions to, or deletions from, this practice are described in Possible Report Exceptions To All Appropriate Inquiry Rule Section¹ of this *report*.

This Assessment has not identified a *Recognized Environmental Condition*² in connection with the *property*,

This Assessment has not identified a *Historical Recognized Environmental Condition*³ in connection with the *property*.

This Assessment has not revealed evidence of a *Controlled Recognized Environmental Condition*⁴ in connection with the *property*.

¹ Refer to page 5 of this Assessment.

² *Recognized Environmental Condition* -recognized environmental conditions mean: (1) the presence of *hazardous substances* or *petroleum products* in, on, or at the subject Property due to release to the environment, (2) the likely presence of *hazardous substances* or *petroleum products* in, on, or at the subject Property, or (3) the presence of *hazardous substances* or *petroleum products* in, on, or at the subject Property under conditions that pose a *material threat* of a *future release* to the environment. *De minimis conditions* are not recognized environmental conditions". ASTM E1527-22 § 1.1.

³ *Historical Recognized Environmental Condition* – “a previously *recognized environmental condition* affecting the *subject property* that has been addressed to the satisfaction of the applicable regulatory authority of meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the *subject property* to any controls (property use limitations or activity and use limitations) A *historical recognized environmental condition* is not a *recognized environmental condition*. ASTM E1527-21 § 3.2.0. See Appendix X4.”

⁴ *Controlled Recognized Environmental Condition* — “a *recognized environmental condition* affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities, with *hazardous substances* or *petroleum products* allowed to remain in place subject to implementation of controls property use or activity and *use limitations*....Identification of a *controlled recognized environmental condition* is a multi-step process that must be reflected in the *report's Findings and Opinions* section(s), as described in 12.5 and 12.7, including the *environmental professional's rationale* for concluding that a finding is a *controlled recognized environmental condition*...’ ASTM E1527-21 § 3.2.17.

U.S EPA REGULATORY REVISIONS CERCLA “All Appropriate Inquiry”

Standard and Practices for All Appropriate Inquires:

On December 15, 2002, the U.S. Federal Register (“FR”) published a Rule promulgated by the U.S. Environmental Protection Agency effective February 13, 2023 entitled *Standards and Practices for All Appropriate Inquires* as delineated in 87 FR 76578.

Summary of All Appropriate Inquires Changes:

“Parties purchasing potentially contaminated properties may use the ASTM E1527-21 standard practice to comply with the all appropriate inquires requirements of the Comprehensive Environmental Response, Compensation, and Liability (CERCLA). This rule does not require any entity to use this standard. Any party who wants to claim protection from liability under one of CERCLA’s landowner liability protections may follow the regulatory requirements of the All Appropriate Inquires Rule at 40 CFR part 312, use the ASTM E1527-13 “Standard Practice for Phase I Environmental Site Assessments” for up to one year after this rule becomes effective [February 13, 2023] ... or use the standard recognized in this final rule, the ASTM E1527-21 standard to comply with the all appropriate inquires provision of CERCLA.” (*Standards and Practices for All Appropriate Inquires*, (US Environmental Protection Agency), Federal Register December 15, 2022, page 765812).

Rule Making Background:

“Commentators asserted that the updated standard now represents ‘good commercial and customary business practice,’ and therefore should replace the current ASTM E1527-13 Phase I Environmental Site Assessment standard referenced by EPA, rather than merely being added as an additional referenced standard.” (Ibid, p, 765813).

Rule Making Summary:

“The ASTM standard is not an EPA regulation, and use is not required to comply with the All Appropriate Inquires Rule or any other EPA regulations.” (Ibid, p765814).

“The Agency notes that this action does not require any party to use the ASTM E1527-21 standard. ... This action merely allows for the option of using ASTM International’s E1527-21 ... The Agency notes that there are no legally significant differences between the regulatory requirements and the ASTM E1527-21 standard. (Ibid, pp.765914-15).

If requested, a copy of the Federal Register referred to in the preceding is including in the *Phase I Assessment Appendix*, Section III, *Supplemental Documents*.

ASSESSMENT OVERVIEW

Purpose:

The purpose of this Assessment is to comply with selected sections of the standards and practices for “all appropriate inquiry” for the purposes of CERCLA sections 101(35)(B)(i)(I) and 101(35)(B)(ii) and (iii), as defined in *Standards and Practices for All Appropriate Inquiries; Final Rule*, U.S. EPA, 40 CFR Part 312 (70 FR 66070). Some of the requires contained in Part 312 are excluded from this Assessment, as delineated in the preceding Section entitled “Report Exceptions to All Appropriate Inquiry Rule.”

The business purpose of this Phase I Environmental Site Assessment was to investigate, review, assess, and evaluate – through historical research, document and record review, generally available environmental data, visual or physical observations, and inspection by a trained assessor – the presence or likely existence of:

- Contamination by hazardous materials, generally recognized environmental contaminants, visible pollutants, underground contaminants, and asbestos-containing materials.
- The possibility that these materials are or may have been introduced – by internal generation, external introduction, or unknown sources – into the structure or subject Property.
- A brief overview, evaluation, and assessment of the severity of the current potential environmental risk based upon known standards or applicable regulations.

Unless specifically noted within the text of this Report, this Phase I Environmental Site Assessment does not include or address groundwater, soil, or extraneous material contamination upon or under the surface soils, with respect to testing, coring, or sampling analysis.

Protocol:

The procedure for this Environmental Site Assessment was to perform in practical and reasonable steps-- employing currently available technology, existing regulations, and generally acceptable engineering practices – an investigation to ascertain the possibility, presence, or absence of environmental releases, threatened releases, or Recognized Environmental Conditions, as limited by the Scope of Work. As such, this Assessment was performed in substantial compliance with the ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E 1521-21¹).

Objectives:

- To attempt to accomplish all appropriate inquiry into ownership and uses of the Property consistent with good commercial or customary practice, in an effort to minimize liability.
- To conduct an investigation of the Property that will assist ownership's positioning within the "safe harbor" section of the Federal Superfund liability in 42 U.S.C. §9601(35), the Lender Liability Final Rule, and the CERCLA amendments enacted as part of the 2002 Brownfields Act.
- To provide environmental information that will assist in evaluating ownership's risk of potential loss or value impairment of the security interest due to environmental defects; and information for decisions and operational limitations concerning the National Pollution Contingency Plan.

While this Phase I Assessment cannot absolutely quantify and qualify every possible past and present environmental risk, the Assessment does provide a partial information basis for reasonable decision making regarding the potential for environmental liabilities and risk, based upon the current Site-specific situation, Assessment limitations, and methods of evaluation.

This Phase I Environmental
Site Assessment was performed in
**Compliance with the
All Appropriate Inquiry (AAI)
Final Rule: 40 CFR Part 312⁵**

* * * * *

POSSIBLE REPORT EXCEPTIONS TO ALL APPROPRIATE INQUIRY RULE:

§ 40 CFR Part 312.25 Searches for recorded environmental cleanup liens. (a) All appropriate inquiry must include a search for the existence of environmental cleanup liens against the subject property that are filed or recorded under federal, tribal, state, or local law.

§ 40 CFR Part 312.28 Specialized knowledge or experience on the part of the defendant. (a) Persons to whom this part is applicable per § 312.1(b)⁶ must take into account, their specialized knowledge of the subject property, the area surrounding the subject property, the conditions of adjoining properties, and any other experience relevant to the inquiry, for the purpose of identifying conditions indicative of releases or threatened releases at the subject property, as defined in § 312.1(c).

§ 40 CFR Part 312.29 The relationship of the purchase price to the value of the property, if the property were not contaminated. (a) Persons to whom this part is applicable per § 312.1(b) must consider whether the purchase price of the subject property reasonably reflects to fair market value of the property, if the property were not contaminated.

⁵ A copy of excerpts from the *Standards and Practices for All Appropriate Inquiries; Final Rule* U.S. EPA, 40 CFR Part 312, 70 FR 66070, November 1, 2005, may be included in the Appendix of this Report, in the Section entitled *Supplemental Documents*.

⁶ § 312.1(b). *Applicability*. The requirements of this part are applicable to: (1) Persons seeking to establish: (i) The innocent landowner defense pursuant to CERCLA sections 101(35) and 197(b)(3); (ii) The bona fide prospective purchaser liability protection pursuant to CERCLA sections 101(40) and 107(r); (iii) The contiguous property owner liability protection pursuant to CERCLA section 107(q); and (2) persons conducting site characterization and assessments with the use of a grant awarded under CERCLA section 104(k)(2)(B).

ASTM PHASE 1 REVISIONS ASTM E1527-21

Phase I (ASTM E1527-21) Environmental Site Assessment Defined

“The objective of this *Phase I Environmental Site Assessment* practice is to permit a *user* to satisfy one of the requirements to qualify for the *Innocent Landowner*, *Contiguous Property Owner*, or *Bona Fide Prospective Purchaser* limitations (“LLPs”). That is, this practice that constitutes *All Appropriate Inquiry* into the previous ownership and uses of the property consistent with good commercial and customary standards and practices as defined in 42 U.S.C. §9601(35)(B) that establishes a party as an Innocent Landowner. ASTM E1527-21 § 1.1. If a Property Owner qualifies for any one of these three defenses, that Owner will not be held liable for contamination discovered after the purchase.

“The objectives guiding the development of this practice are: (1) to synthesize and memorialize good and put in writing good commercial and customary standards and practices for Phase I environmental site assessments for commercial real estate; (2) to facilitate high quality, standardized environmental site assessments; and (3) to provide a practical and reasonable standard practice for conducting all appropriate inquiries; and (4) to clarify an industry standard for all appropriate inquiries in an effort to guide legal interpretation of the LLPs.

The scope of this practice includes research and reporting requirements that support the User’s ability to qualify for LLP. As such, sufficient documentation of all sources, records, and resources utilized in conducting the inquiry required by this practice must be provided in the written report.” ASTM E1527-21 § 1.2.

#1. Innocent Landowner Defense to CERCLA Liability:

“A person may qualify as one of three types of innocent landowners: (1) a person ‘did not know and had no reason to know’ that contamination existed on the subject property at the time the purchaser acquired the subject property, (ii) a government entity which acquired the subject property by escheat, or through any other involuntary transfer or acquisition, or through the exercise of eminent domain by purchase or condemnation; and (iii) a person who ‘acquired the facility by inheritance or bequest.’ To qualify for the innocent landowner defense, such person must have made all appropriate inquiries on or before the date of purchase. Furthermore, the all appropriate inquiries must not have resulted in knowledge of the contamination [i.e., *Recognized Environmental Condition*]. If it does, then such person did not ‘know’ or ‘had reason to know’ of contamination and would not be eligible for the innocent landowner defense.” ASTM E1527-21 § 3.2.42 In addition, an individual seeking the *Prospective Purchaser* protection must have purchased the Property after January 11, 2002, and completed all appropriate inquiry on or before the date of purchase.

#2. Contiguous Property Owner

As defined in 42 U.S.C. § 9607(q) “... a person may qualify for the contiguous property owner liability protection is. among other requirements, such person owns real property that is contiguous to, and that is or may be contaminated by hazardous substances from other real property that is not owned by that

person. Furthermore, such person conducted all appropriate inquiries at the time of acquisition [and not after acquisition] and did not know or have reason to know that the subject Property was or could be contaminated by a release or threatened release from the contiguous property. The All Appropriate Inquiries must not result in knowledge of contamination [i.e., a *Recognized Environmental Condition*]. If it does, then such person did 'know' or 'had reason to know' of contamination and would not be eligible for the continuous property liability protection [emphasis added]." ASTM E1527-21 § 3.2.16

#3 *Bona Fide Prospective Purchaser*

"An individual seeking the *Prospective Purchaser* protection must have purchased the Property after January 11, 2002, and completed all appropriate inquiry on or before the date of purchase." Which means a *Phase I Environmental Site Assessment*, compliant with the requirements of the ASTM 1527-21 Standard Practice, must have been conducted and did not identify a Recognized Environmental Condition.

What is a Recognized Environmental Condition?

As defined in the ASTM E1527-21 Standard Practice, "Recognized Environmental Conditions mean: (1) the presence of *hazardous substances* or *petroleum products* in, on, or at the subject Property due to release to the environment, (2) the likely presence of *hazardous substances* or *petroleum products* in, on, or at the subject Property, or (3) the presence of *hazardous substances* or *petroleum products* in, on, or at the subject Property under conditions that pose a *material threat* of a *future release* to the environment. *De minimis conditions* are not recognized environmental conditions". ASTM E1527-21 § 1.1.

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Phase I Environmental Site Assessment
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GENERAL SITE RECONNAISSANCE OVERVIEW

Dr. Peter Chen on behalf of the *Sunset Pointe Development* engaged Aerotech Environmental Consulting, Inc. ("Aerotech") to perform a Phase I Environmental Site Assessment on the subject Property. This Assessment was additionally performed as required by the U.S. Small Business Administration ("SBA") Environmental Policy Guidelines for Phase I Environmental Site Assessments (SOP 50 10 6⁷), and the "All Appropriate Inquiry" standard as promulgated by the U.S. Environmental Protection Agency in 40 CFR Part 312.

This Property consists of a large currently undeveloped Property in Puyallup, Washington. Mr. Ratzke identified Mr. Paulo Chavez as the *Key Site Manager*. The *Key Site Manager* is the person identified by the Client or the Owner of the Property as having the most reliable knowledge as to the previous uses and current condition of the subject Property and is in a position to provide accurate information to the Environmental Assessor. The Assessor performed the on-site Reconnaissance multiple times from January to April 5, 2024.

According to the information provided verbally by the Key Site Manager, two Phase I Assessments, Environmental Investigations or Site Assessments, or other environmentally-related activities or studies, have been performed at, or for, the subject Property. These Reports indicated the potential presence of environmental impact or a Recognized Environmental Condition.

The Reports available for this Assessment were: a *Phase "I" Environmental Audit* dated January 14, 2005 prepared by Environmental Associates, Incorporated; a *Critical Areas Assessment* dated January 19, 2018, Revised on September 21, 2018, prepared by Habitat Technologies; and *Phase I Environmental Site Assessment Sunset Point*, dated February 10, 2023 prepared by Earth Solutions NW, LLC.

All of the Recognized Environmental Conditions identified in the listed Reports have been addressed and mitigated.

SUBJECT PROPERTY SITE DESCRIPTION

Visual Description:

The subject of this *Phase I Environmental Site Assessment* is an irregular-shaped approximate 9.08-acre residential Property located on the southeast side of Puyallup, Washington, a vacant, undeveloped Property that will be developed with a eighteen residential development lots known as *Sunset Pointe Development*.

Adjoining and adjacent properties and landmarks include to the north 19th Avenue Southeast and 23rd Street Place Southeast; to the south is 23rd Avenue Southeast; to the east is Shaw Road East

⁷SOP effective October 10, 2020.

two-thirds; Pioneer Way East one mile north; State Route 161 / 512 one and one-third of a mile east; State Route WA-410 one and one-quarter of a mile northeast; and Wildwood Park one-third of a mile east. Significant bodies of water include *Wildwood Spring* one-third of a mile to the south; *Bradley Lake* one mile to the southwest; and the *Puyallup River* one and one-half of a mile to the north.

The subject Property is level on the south side with residences adjoining to the south on 23rd Place southeast; to the west on 22nd Street Southeast; and 19th Avenue Southeast on the northwest. The southern portion is grassy with areas (368 to 374 feet above mean sea level) in the center and along the western fence line overgrown with native vegetation including underbrush and weeds including Oregon grape, western sword fern, salal, trailing blackberry, red huckleberry, western bracken fern, violet, trillium, evergreen blackberry, rose, and salmonberry. The trees are second growth or even younger, including Douglas Fir, Western Cedar, Western Hemlock, Big Leaf Maple, and Red Alder with an understory of vine maple. The eastern Property is level with a slope to the east which defines the eastern development.

In the south center of the Development is a small manmade lined plastic pond adjoining the east side of the pathway; which drains into a large Retention Pond defined on the north, east, and south sides. On the northeaster corner of the Retention Pond is beamed wall of non-native backfill which allows access to the surface of the Pond at 361 feet above sea level. Adjoining the west side of the Pond is an apparent wetlands area. Remaining on the Development are to foundations of the former *Western Washington Pioneer Museum*, horse barn, main residence, storage / utility building, and barn. In the approximate center of the Property is small telephone switching building.

The future of the Property is the development is the *Sunset Pointe*, configured with eighteen residential lots. The Development will include a large wetlands area that divides the Property into a northern and section. The wetlands will include a larger detention pond the the center and two smaller wetlands ponds to the east; with an overall flow towards the southwestern corner of the Parcel. A fifty foot wetlands buffer will be created to the north and south. Adjoining the wetlands to the south is the Tract B, that will be the stormwater discharge area with two constructed ponds.

The northern section of the Development be lots one through eight, accessed from 19th Avenue Southwest or 23rd Street Place Southeast into the dead end Cul de Sac. The southern portion will be developed with lots nine through eighteen with the individual driveways facing the 23rd Street Place Southeast center dead end Cul de Sac.

During the course of the on-site observations, particular attention was directed towards (i) pools of liquid; (ii) roads and paths that might be used for unauthorized entry; (iii) drains and sumps; (iv) stressed vegetation; (v) pits, ponds, or lagoons; (vi) surface or soil staining; (vii) ditches, catch basins, or dry wells; (viii) unidentified substance containers; (ix) location of manholes, sewer grates, sewer outfalls; and (x) other subterranean accesses. All roads, driveways, paths, and other vehicular access areas were identified and evaluated for suspected use as an avenue for transport or disposal of hazardous materials, regulated substances, or petroleum products. Railroad tracks and previous right-of-ways are also identified if present on the subject Property. Potential wetland area indicators were considered during the on-site activities. These indicators include (i) wetland characteristic soil types; (ii) areas that appear permanently wet during most of the year; (iii) the presence of wetlands-related submergent or emergent plants; and (iv) wetland indicative wildlife.

The subject Property was originally undeveloped wooded land; initially developed in the early 1920s with two small residences. In 1940, a detached garage and 10,000 square foot horse barn. In 1950, two approximately 4,000 square foot storage barns were constructed. The current Retention Pond constructed in the early 1960s. In 2010, two arson fires destroyed the *Western Washington Pioneer Museum* building, and damaged oils and chemicals stored inside and adjoining the building. In 2018, all of the remaining structures were demolished and removed from the Property, and a general cleanup was completed. In 2011, following the fire, the Washington Department of Ecology placed the Property as a *Confirm or Suspected Contaminated Site* (ISIS No.11739 / FS ID.9490). In 2018, all on-site buildings were demolished; the waste materials were removed in 2023.

The subject Property is located in a residential area. To the north is 19th Avenue and multifamily residences; to the south is the 23rd Street Place Southeast; to the east are residences; and

USGS Topographical Map Data:

The precise subject Property location is Latitude 47° 1725387 and Longitude -122° 2653114. The Site is located within Universal Transverse Mercator Zone No.10T. The Property is approximate 428 feet above mean sea level. As observed during the Site visit and confirmed on the USGS topographic map, the subject Property exhibits Site Specific a surficial drainage towards the east based upon overall Site topography. The general local topographical gradient is northwest

During the course of the on-site observations, particular attention was directed towards (i) pools of liquid; (ii) roads and paths that might be used for unauthorized entry; (iii) drains and sumps; (iv) stressed vegetation; (v) pits, ponds, or lagoons; (vi) surface or soil staining; (vii) ditches, catch basins, or dry wells; (viii) unidentified substance containers; (ix) location of manholes, sewer grates, sewer outfalls; and (x) other subterranean accesses.

All roads, driveways, paths, and other vehicular access areas were identified and evaluated for suspected use as an avenue for transport or disposal of hazardous materials, regulated substances, or petroleum products. Railroad tracks and previous right-of-ways are also identified if present on the subject Property. Potential wetland area indicators were considered during the on-site activities. These indicators include (i) wetland characteristic soil types; (ii) areas that appear permanently wet during most of the year; (iii) the presence of wetlands-related submergent or emergent plants; and (iv) wetland indicative wildlife.

Cordilleran and Vashon Glaciation Effects:

The Cordilleran Ice Sheet was the last of seven glaciers to advance over northern Washington. It crossed into Washington more than 19,000 B.P. (ie, before present - defined as January 1, 1950) years ago. The Vashon Glacier⁸ was part of the *Cordilleran Ice Sheet*, which also include the *Puget Lobe* in the center and *Juan de Fuca Lobe* (on the east)⁹

⁸ Also known as the Puget Lobe.

⁹ *Deglaciation of the Puget Lowland*, Ralph A. Haugerud, April 7, 2021.

At the full extent, this Glacier extended south to Tenino, east to past Everett and Tacoma; to the east into Spokane, and to the west just north of Port Angeles¹⁰, extending to the Washington coast. The Glacier was over three times taller than the *Columbia Center* high-rise building (997 feet verses 3,600 feet) in Seattle to 1,200 feet thick at Olympia¹¹.

During the advance of the Vashon Glacier, meltwater flow underneath the ice sheet carved out Lake Washington, Lake Tapps, Lake Sammamish, Puget Sound, and the Hood Canal. This ice sheet exerted enormous pressure on the underlying land, but as the Glacier retreated marine water was replaced by freshwater in all of the troughs except the Duwamish Embayment. This was the extension of the current Puget Sound that reached the current Elliott Bay to Commencement Bay.

The progressive northward retreat from the Terminal Zone was accompanied by the development of ice-marginal streams and proglacial lakes the drained southward during the initial retreat, but northward during the late Vashon Period¹². The final destruction of the Puget Lobe occurred when ice retreated north of Admiralty Inlet, which allowed seawater to enter the Puget lowland. The earliest human beings known to be in Western Washington were present as of 13,800 B.P.¹³. A mastodon kill site from that time period was excavated in Sequim in 1977¹⁴.

Surficial and Subsurface Soil Characteristics:

The subject Property soils are dominated by soil that exhibits a silty loam texture and coloration typical of the *Kitsap Series*. The surficial soils in the graded areas is black to very dark gray to a depth of 8 to 20 inches below ground surface (“bgs”). The subsoil to a depth of 20 to 24 inches was very dark gray to gray and exhibited prominent redoximorphic (“RMF”) features¹⁵.

Aerotech conducted near-surface and subsurface testing of the Property soils to determine

¹⁰ The western extend stopped before reaching Quinault and Aberdene. See, *Patterns and Processes of Landscape Development by the Puget Lobe Ice Sheet*, Derek Booth and Barry Goldstein, University of Washington Press, 1991 .

¹¹ Map produced by State of Washington Department of Natural Resources, 2018 .

¹² Research Article, *Quaternary Research*, University of Washington Press. Volume 13, Issue 3, pp. 303-321, May, 1980 .

¹³ Welch, Craig (October 30, 2011). *WSU Prof was Right: Mastondon Weapon was Older Than Thought*, The Seattle Times .

¹⁴ *Ibid* .

¹⁵ Redoximorphic (“RMF”) features consist of color patterns in a soil that are caused by a loss (depletion) or gain (concentration) of pigment compared to the matrix color, formed by oxidation / reduction of iron and/or manganese – controlled by the presence of iron. The composition and responsible formation process for a soil color or pattern must be known or inferred before it can be described as an RMF

if an battery acid contamination was present on the Parcel. All of the ten soil sample analytical results were between 6.24 pH and 7.26 pH. Pierce County lists¹⁶ the criteria for “Class A Compost” as between 6.0 - 8.0 pH.

Surficial Water Flow:

The Site topography is generally level, with elevation decreases on the eastern edge and to the west into the Retention Pond and western adjoining wetlands area. Surficial drainage towards the west as partially influenced by previous Site grading activities. The General Topographic Gradient has been determined from the USGS 1 Degree Digital Elevation Model, which allows the inference of the general surficial groundwater flows.

Reported Ground Water Flows:

Hydrogeologic information was obtained from the reported ground water flows at wells in the immediate area. This inference, while accurate in the general sense, may not be an accurate predictor of groundwater flow between adjoining sites, or locations in close proximity to one another. Local gradient under the subject Property may be influenced naturally by zones of higher or lower permeability, or artificially by nearby pumping or recharge, and may deviate in any location for the overall regional trend. Groundwater is inferred to flow to the northwest.

The principal aquifers in the Puget Sound Region occur in glacial drift, that along with finer grained interglacial sediments, underlies the basin lowland to depths of more than 1,00 feet. The sand and gravel units in the glacial drift form the principle aquifers. These aquifers receive ample recharge from the typically heavy precipitation characteristic of western Washington. The glacial drift in the Puget Sound region varies greatly in composition and water yielding capacity.

Typically, wells in glacial drift that tap silt, clay, or till in the Region at approximately 75 to 100 feet below ground surface may have yields of 100 gallons or more per minute. Deeper wells tapping thick, saturated layers of highly permeable gravel and coarse sand, typically at depths greater than 250 feet below ground surface, can yield more than 1,000 gallons per minute. Ground is inferred at more than 30 feet below ground surface with a flow to the northwest.

HISTORICAL USAGE STANDARD INFORMATION SOURCES: LOCAL AND STATE

“The objective of compiling and analyzing historical property information is to develop a history of the previous uses of the subject and adjoining properties and the surrounding area, in order to help identify the likelihood of past uses having led to a recognized environmental concern in connection with the subject property.” ASTM E1527-21 § 8.3.1. “The term

¹⁶ Pierce County Development Engineering Inspection Team, *Development Engineering Handout 9, Soil Amendment*, May 28, 2015.

historical resources means any resource or resources other than [... aerial photographs, fire insurance maps, local city directories, and historical topographic maps...] that are credible to a reasonable person and that may identify past uses of the subject property or adjoining properties... Not all historical resources can be found in each listed source, nor is it always necessary to review every source [emphasis added]."

The *Historical Site milestones* can include (i) construction activities that involve structural, renovation, or remodeling at any location within the subject Property; (ii) major changes in the topography or grade of the Site; (iii) installation or construction of roads, utilities, water or sewer systems; (iv) installation, removal, or modification of permanent equipment; or (v) installation, removal, or modification of storage tanks.

Fifty-Year Complete Standard Historical Source Summary:

The subject Property was originally undeveloped wooded land; initially developed in the early 1920s with two small residences. In 1940, a detached garage and 10,000 square foot horse barn. In 1950, two approximately 4,000 square foot storage barns were constructed. The current Retention Pond constructed in the early 1960s. In 2010, two arson fires destroyed the *Western Washington Pioneer Museum* building, and damaged oils and chemicals stored inside and adjoining the building. In 2018, all of the remaining structures were demolished and removed from the Property, and a general cleanup was completed. In 2011, following the fire, the Washington Department of Ecology reclassified the Property as a *Confirm or Suspected Contaminated Site* (ISIS No.11739). All on-site buildings were demolished in 2018 and the waste materials removed in 2023.

Standard Historical Resources:

"The following historical resources shall be reviewed if, based upon local customary practice and the judgement of the environmental professional, they are reasonably ascertainable: (i) aerial photographs, (ii) fire insurance maps, (iii) local street directories, and (iv) historical topographic maps." ASTM E1527-21 § 8.3.2. "Data, imagery, documents, records, and other resources that typically provide useful information about the historical uses of properties. Standard Historical Resources include: aerial photographs, fire insurance maps, local street directories, building department records, interviews, topographic maps, and property tax files." ASTM E1527-21 § 3.2.89

Alternative Sources of Historical Information:

"Sources of historical information include, but are not limited to: i) libraries; ii) historical societies; iii) government agencies; iv) local building / inspection department records or planning department records; v) current *owners* and *occupants* of the *subject property* or surrounding *properties*; vi) records in the files of the *property owner(s)* and/or *occupants*; vii) local government officials or employees with knowledge of the *subject property*; viii) newspaper archives; ix) internet searches; x) community organizations; xi) private collections unique to a local area; xii) map preparation companies; xiii) private resellers of historical *property* information; and xiv) prior assessments (see 8.4)" ASTM E1527-21 § 8.3.3.

Historical Research Intervals:

“Review of historical resources at less than five year intervals, is not required by this Practice... If the specific use of the subject Property and adjoining properties appears unchanged over a period longer than 5 years, then is not required by this practice to research the use during that period (for example, if fire insurance maps show the same solely residential use building in 1940 and 1960, then the period between need not be researched).”

“As another example, if the *subject property* was reportedly not developed until 1960, it would still be necessary to attempt to confirm that is was undeveloped back to 1940. Such information may come from one or more of the *standard historical resources* specified in 8.3.4.1 through 8.3.4.8, or it may come from *other historical sources resources* (see 8.3.4.9). However, checking *other historical sources resources* is not required.” (ASTM E1527-21 § 8.3.8)

“Not all historical resources can be found in each listed source, nor is it always necessary to review every source.” ASTM E1527-21 § 8.3.2.1 & § 8.3.8.

Historical Sources – Reasonableness Attainability:

Availability of information varies from information source to information source, including governmental restrictions. The User or Environmental Professional is not obligated to identify, obtain, or review every possible record that might exist with respect to a property. Instead this practice identifies record information that shall be reviewed from standard sources, and the User or Environmental Professional is required to review only record information that is reasonably ascertainable from those standard sources. Record information that is reasonably ascertainable means: information that is publicly available; (2) information that is obtainable from its source within reasonable time and constraints, and; (3) information that is practically reviewable. ... Information that can only be reviewed by a visit to the source is reasonably ascertainable if the visit is permitted by the source within 20 days of the request. ASTM E1527-21 §§ 8.1.4 & 8.1.55.4.1.2.2.

All Appropriate Inquires Not Exhaustive:

“All Appropriate Inquiries does not mean an exhaustive assessment of the property. There is a point at which the cost of information obtained or the time required to gather it outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of transactions. One of the purposes of this practice is to identify a balance between the competing goals of limiting the costs and time demands inherent in conducting an environmental site assessment and the reduction of uncertainty about unknown conditions resulting from additional information.” ASTM E1527-21 § 4.5.2. “However, while some states maintain reasonably ascertainable IC / EC [Institutional Controls / Environmental Covenants] other states do not. The environmental professional should determine whether AULs are considered reasonably ascertainable records in the state in which the subject Property is located

Historical Research Data Gaps - Federal Definition:

As defined in the Standards and Practices for All Appropriate Inquiries; Final Rule (70 FR 66070) promulgated November 1, 2005, and effective November 1, 2006,

“*Data gap* means: a lack or inability to obtain information required by the standards and practices listed in subpart C of this part despite good faith efforts by the environmental professional or persons identified under § 312.1(b), as appropriate, to gather such information pursuant to §§ 312.20(e)(1) and 312.20(e)(2).” [§ 312.10 *Definitions*].

“To the extent there are data gaps (as defined in § 312.10) in the information developed as part of the inquiries in paragraph (e) of this section that affect the ability of persons (including the environmental professional) conducting the all appropriate inquiries to identify conditions indicative of releases or threatened releases in each area of inquiry under each standard and practice such persons should identify the sources of information consulted to address such data gaps, and comment upon the significance of such data gaps with regard to the ability to identify conditions indicative of releases or threatened releases of hazardous substances [and in the case of persons identified in § 312.1(b)(2), hazardous substances, pollutants, contaminants, petroleum and petroleum products, and controlled substances (as defined in 21 U.S.C. 802)] on, at, in, or to the subject property.” [§ 312.20(g)].

This Federal definition is supplemented in the 2021 *ASTM Phase I Standard Practice*, which includes additional explanations, details, and examples that can be used by the Environmental Professional to determine the both the reliability of the Historical Sources and the significance, if applicable, of any Historical Research *Data Gaps*.

Historical Research Data Gaps - ASTM Definition:

The ASTM Standard Practice defines a *Data Gap* as; : “[a] lack of or inability to obtain information required by this practice despite good faith efforts by the Environmental Professional to gather such information. *Data Gaps* may result incompleteness in any of the activities required by this practice, including but not limited to, site reconnaissance (for example, an inability to conduct the site visit) and interviews - (for example, an inability to interview the *key site manager*, regulatory officials, etc.). See Sec 12.7) [Opinions].” ASTM E1521-21 § 3.2.19. See Sec 12.7 [Opinions].”

“A lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. *Data Gaps* may result incompleteness in any of the activities required by this practice, including but not limited to, site reconnaissance (for example, an inability to conduct the site visit) and interviews - (for example, an inability to interview the *key site manager*, regulatory officials, etc.). See Sec 12.7) [Opinions].” ASTM E1521-22 § 3.2.19

A data gap is only significant if other information and/or professional experience raises reasonable concerns involving the effects of that data gap on the ability of the environmental professional to render an opinion regarding whether conditions exist that are indicative of a recognized environmental condition, controlled recognized environmental condition, or historical recognized environmental condition. For example, if a building on the subject property is inaccessible during the site reconnaissance, and the environmental professional’s experience indicates that the use of such a building often involves activity that leads to a recognized environmental condition, the inability to inspect the building would be a significant data gap...” ASTM 1527-21 § 12.7.

“A data gap that the environmental professional believes impacts their ability to conclude if a recognized environmental conditions of controlled environmental condition at the subject Property. The determination that a data gap is significant should be based on the environmental professional’s judgment, experience, and the sources consulted during completion of this practice and whether the missing information, if available, would likely allow the environmental professional to conclude if a recognized environmental conditions or controlled recognized environmental condition exists at the subject Property.” ASTM E1527-21 § 3.2.83.

Historical Research / Data Gap Summary:

The subject Property was originally undeveloped wooded land; initially developed in the early 1920s with two small residences. In 1940, a detached garage and 10,000 square foot horse barn. In 1950, two approximately 4,000 square foot storage barns were constructed. The current Retention Pond constructed in the early 1960s. In 2010, two arson fires destroyed the Western Washington Pioneer building, and damaged oils and chemicals stored inside and adjoining the building. In 2018, all of the remaining structures were demolished and removed from the Property, and a general cleanup was completed. In 2011, following the fire, the subject Property was classified as a Contaminated Site. All on-site buildings were demolished in 2018 and the waste materials removed in 2023.

In the opinion of the Environmental Profession¹⁷ preparer of this Assessment, no Significant Historical Data Gaps as defined above, were identified during the preparation of this Assessment. No further investigation relative to those issues is indicated or recommended.

Aerial Photograph Review:

Originally performed under government contracts, aerial photographs of the general area are available beginning with the 1940's. The scales for these aerials can range from 1"=1667' to 1"=2500' aerials taken by private contractors were generally taken at lower altitudes and provide a larger scale. Depending upon the resolution, the photographs can provide valuable information on land use and site development of both the subject and adjoining properties. Ultimately, the scale, clarity, and resolution serves as the limitations on visual interpretation. Aerial photographs for the subject Property were reviewed as available from numerous sources, including but not limited to, the Natural

¹⁷ The Aerotech Environmental Professional is Mr. Alan T. Blotch, whose qualifications include, but are not limited to: (i) environmental evaluation of residential, commercial, and industrial properties that spans 43 years; (2) State of California *Licensed Environmental Professional* from 1993 through 2012 when funding for this Program terminated; and (3) involvement with the ASTM *Environmental Section* continuous since 1990.

Resources Conservation Service District Offices (“DNR-WA”); NETOonline¹⁸ (“NETR”); U.S. Air Force (“USAF”); US Geological Service (“USGS”); King County Aerial Survey (“KCAS”); United States Army Corp of Engineers (“USACE”)

<i>Date:</i>	<i>Source:</i>	<i>Development:</i>
1941	USDA	The subject Property is developed with a small structure on the north end; substantially undeveloped wooded land. A roadway starts at the intersection of 19 th Avenue Southeast and 21 st Street Southeast and extends to the southeast past a small residence to the eastern ridge and then extends to the south to terminate at a residence with farm building. To the south 23 rd Avenue is not present.
1943	USDA	The subject Property is developed with a small structure on the north end; substantially undeveloped wooded land. A roadway starts at the intersection of 19 th Avenue Southeast and 21 st Street Southeast and extends to the southeast past a small residence to the eastern ridge and then extends to the south to terminate at a residence with farm building. To the south 23 rd Avenue is not present. A gravel pit is adjoining to the south and southwest.
1957	USDA	The subject Property is developed on the north side by two small residences; to the south are two residences, a small, and a large barn. To the south is an adjoining is a gravel pit. A roadway starts at the intersection of 19 th Avenue Southeast and 21 st Street Southeast and extends to the southeast past a small residence to the eastern ridge and then extends to the south to intersect 23 rd Avenue. A gravel pit is adjoining to the south and southwest.
1968	USDA	The subject Property is developed on the north side by two small residences; to the south are two residences, a small, and a large barn. To the south is an adjoining is a gravel pit. A roadway starts at the intersection of 19 th Avenue Southeast and 21 st Street Southeast and extends to the southeast past a small residence to the eastern ridge and then extends to the south to intersect 23 rd Avenue. A gravel pit is adjoining to the south and southwest.

¹⁸ The NETR library include photographic collections that vary by state, county, and locality, and are all cited as “NET”R sources without referenced to the particular source collection..

1980	USGS	The subject Property is developed on the north side by two small residences; to the south are two residences, a small, and a large barn. To the east is wooded land. To the south is an adjoining is a gravel pit. A roadway starts at the intersection of 19 th Avenue Southeast and 21 st Street Southeast and extends to the southeast past a small residence to the eastern ridge and then extends to the south to intersect 23 rd Avenue. A gravel pit is adjoining to the south and southwest.
1990	USGS	The subject Property is developed on the north side by two small residences; to the south are two residences, a small, and a large barn. The large pond is visible at the northern curve of the driveway. To the east is a large parcel of cleared and graded land. To the south is an adjoining is a gravel pit. A roadway starts at the intersection of 19th Avenue Southeast and 21st Street Southeast and extends to the southeast past a small residence to the eastern ridge and then extends to the south to intersect 23rd Avenue. A gravel pit is adjoining to the south and southwest.
2006	USGS	The subject Property is primarily wooded land developed on the north side by two small residences; to the south are two residences, a small, and a large barn. The large pond is visible at the northern curve of the driveway. To the south, east, and west are large residential developments. To the north is a long strip of undeveloped partially wooded land.

City and Telephone Directories:

Local directories based upon physical surveys of residents have been compiled since the late 1880's for use as city planning and marketing database tools. Commonly referred to as "reverse directories" or "city directories," these directories are generally maintained at public libraries. The historical reverse directories compiled by the Cole and Polk Companies were reviewed.

The northern portion of the subject Property is addressed as 2100 - 19th Avenue Southeast and 2102 - 23rd Street Place Southeast, Puyallup

<i>Date:</i>	<i>Address:</i>	<i>Occupant:</i>
2005	2104 - 23 rd St.PI.SE 2104 - 23 rd St.PI.SE	Starr, Ron Ottesen, Jeffrey L.

1998	2105 - 23 rd St.PI.SE	Ottensen Jeffrey
1998	2105 - 23 rd St.PI.SE	No listing

County Permit/Inspection Department - Permit Review:

The Property is located in Pierce County. All building activity is regulated by the Municipal Building. Due the time required to obtain building department records via Freedom of Information requests ("FOIA"), this method of research was deemed to be reasonably ascertainable². As such, documents were requested and reviewed at the offices of the Building Services Division. The following substantive information was available.

<i>Date:</i>	<i>Number:</i>	<i>Activity:</i>
1924		Construction of 912 square foot wood framed and sided one-story residence, with pitched composite shingles
1928		Construction of 1,104 square foot wood framed and sided one story residence, with pitched composite shingles.
1940		Construction of one-story, wood pole framed barn building, approximately 10,000 square feet.
1940		Construction of 1,092 square foot, concrete block two-story detached garage.
1950		Construction of 4,480 square foot wood pole framed "utility / storage" single-story barn
1950		Construction of 4,000 square foot wood pole framed single-story storage building

Historical (Standard) Resources: Credible Sources and Individuals:

Historical sources may include persons with documented knowledge of the subject or adjoining properties. "*Other historical resources* means any resource or resources other than those designated in 8.3.4.1 through 8.3.4.8 that are credible to a reasonable person and that may identify past uses of the *property*; such resources may also include information regarding *adjoining properties* or *surrounding properties*. This category includes, but is not limited to: ... news articles, books about the area being researched ... or records in the files and/or personal knowledge of the *owner* and / or *occupants* of the *properties*." ASTM 1527-21 § 8.3.4.9.

“Intervals – Review of standard historical resources at less than five-year intervals is not required by this practice. For example, if the *subject property* had one use in 1950 and another use in 1955, it is not required to check for a third use **in the intervening period**. As another example, **if the specific use of the *subject property* appears unchanged over a period longer than five years**, then it is not required by this practice to research the use of that period [emphasis added] (such as if *fire insurance maps* show the same solely residential use building in 1940 and 1960, then the period in between need not be researched). ASTM E1527-21 § 8.3.5.

Historical Information - Knowledgeable Individuals:

Historical sources may include persons with documented knowledge of the subject or adjoining properties. For the purposes of the interview, *Actual Knowledge* is defined as the knowledge actually possessed by an individual who is a real person, rather than an entity. Actual Knowledge is to be distinguished from *constructive knowledge* that is knowledge imputed to an individual or entity.” ASTM E1527-22 § 3.2.3. Additionally, the interviewer must determine the that information being provided is in *Good faith*, defined as the absence of any intention to seek an unfair advantage or to defraud another party, an honest sincere intention to fulfill one’s obligations in the conduct of transaction concerned.” ASTM E1527-22 § 3.2.36.

Sanborn Fire Insurance Maps:

In 1867, Massachusetts survey Daniel Sanborn began the began preparing detailed street maps of densely populated areas throughout the United States as the *Sanborn Map Company*. The purpose of the mapping process was to assist fire insurance agents in determining the degree of fire hazard associated with a particular area or property. This was accomplished by Sanborn personnel physically inspecting each property and preparing a map that shows the size, shape, and construction of all developments – including dwellings, commercial buildings, factories, or small storage structures, and other potentially hazard fixtures (such as above and underground storage tank)s – and their precise location. The maps also detailed descriptions of the surrounding land.. The maps used a sophisticated set of symbols that allowed complex information to be conveyed clearly. The symbols included building construction, fire walls, locations of windows and doors, sprinkler systems, and most importantly with industrial buildings, the occupancy or activity that occurred at the property. Especially Hazardous Risks were colored green with six dots representing the comparative danger from fire by occupancy.

Most of the Sanborn Maps were drawn at a scale of one inch to fifty feet (1:600) when expressed as a representative fraction. Depending upon the development or usage of the overall area, scales of (1:1,200) or one inch to two hundred feet and (1:4,800) used of one inch to one hundred feet were also used. For these reasons, the Sanborn maps were originally produced for populated or industrial areas.

Beginning in the 1920s, due to various development factors, Sanborn began updating the maps for its customers by issuing colored paste-on correction slips. This method of updating maps resulted in occasional mistakes, and for that reason Aerotech relies upon the set of Sanborn Maps

provided the Environmental Risk Information Services (“ERIS”). Complete Sanborn Maps were not reviewed for this Assessment due to the sufficiency of acceptable alternative historical sources.

Recorded Land Title Records:

“Real Estate transaction routinely involve the purchase of title insurance *title insurance*; inherent in which is an offer to provide title insurance generally referred to as a *Title Commitment* or preliminary *Title Report* provided by a *Title Company*. ... Such title insurance documentation reliably identifies an AUL, environment liens, usage controls, and environmental access and/or monitoring requirements.” ASTM E1527-21 § 5.4.1.1

In addition to environmental information found in a Title Insurance (or Preliminary Title Insurance), the Land Title records will broadly capture more specifically-named AULs, such as ‘– environmental covenants – ‘ or ‘Environmental easements’, ‘land use covenants, “declaration of use covenants [and/or] agreements’, or ‘declaration of land use restrictions’. ‘environmental land use controls’, and other similarly worded documents.” ASTM E1527-21 § 5.4.1.2.2.

Recorded land titles are records usually maintained by the municipal clerk or county recorder of deeds which detail ownership fees, leases, land contracts, easements, liens, deficiencies, and other encumbrances attached to or recorded against the subject property in the local jurisdiction having control for or reporting responsibility to the subject Property.

Due to state land trust regulations and laws, land title records will often only provide trust names, bank trust numbers, owner's names, or easement holders, and not information concerning previous uses or occupants of the subject Property. Additionally, environmental liens recorded against the subject Property are considered outside the scope of recorded land title records. For these reasons, this Environmental Site Assessment has relied upon other information sources assumed to be either more accurate or informative than recorded land titles.

With an abundance of caution, the Site tax records at the Office of the Pierce County Assessor were accessed from review. The reasonably ascertainable records contained the following information:

<i>Date:</i>	<i>Excise Number:</i> / Bldg Permit	<i>Action:</i>
1924		Construction of 912 square foot wood framed and sided one-story residence, with pitched composite shingles
1928		Construction of 1,104 square foot wood framed and sided one story residence, with pitched composite shingles.
1940		Construction of one-story, wood pole framed barn building, approximately 10,000 square feet.
1940		Construction of 1,092 square foot, concrete block two-story detached garage.

1950		Construction of 4,480 square foot wood pole framed “utility / storage” single-story barn
1950		Construction of 4,000 square foot wood pole framed single-story storage building
12/03/2011	4274495	Sharon Ottinger Grantor to: Peter Y and Liu Beth Chen, Statutory Warranty Deed – four assessor Parcels, Sale: \$632,000.
03/28/2019		Pierce County Assessor On Site Physical Property Inspection.
04/10/2020		Pierce Assessor on-site Physical Inspection

Topographical (Historical) Maps:

A topographic map is a flat representation of the curved surface of the surface of the earth. As a result, a topographic map shows the contours, which makes it possible to accurately place geological features and measure elevations. In addition, the maps contain symbols that represent features such as: streets, buildings, streams, vegetation, and actual occupancy or usage of particular areas. As areas become more developed, additional map symbols were added to represent: built-up roads, types of highways, areas of intermittent drainage, waterway descriptions, water retention and detention, seasonally submerged areas, and descriptions of areas of disturbed soils. This attention to accuracy and detail makes the use of historical topographic maps a reliable source of the historical development of an area or property.

The United States Geological Survey (“USGS”) has been the primary civilian mapping agency of the United States since 1879. The USGS topographic maps (“topo”) maps have been published at many scales, but 1:24,000 (also referred to as a 7.5-minute quadrangle) has been the standard topographic map scale since 1947. Since 2009, the new computer-generated maps have been published every three years).

The USGS Historical Map Collection contains the USGS topographic maps published from 1884 through 2006. The goal of the USGS National Map’s *Historical Topographic Map Collection* (“HTMC”) is to provide a digital repository of USGS 1:250,000 scale and larger maps printed between 1884 and 2006. The following topographic maps were reviewed

<i>Date:</i>	<i>Source:</i>	<i>Description:</i>
1949	USGS	The subject Property is developed with four parcels; two residences, a storage barn, and horse barn. No ponds are identified on the Property. A small “gravel pit” is identified to the southwest.

1956	USGS	The subject Property is developed with four parcels; two residences, a storage barn, and horse barn. No ponds are identified on the Property. Directly to the west is a small “gravel pit”; to the east is undeveloped land.
1968	USGS	The subject Property is developed with four parcels; two residences, a storage barn, and horse barn. No ponds are identified on the Property. Two ponds are located in their current location. Directly to the west is a small “gravel pit”; to the east is undeveloped land.
1973	USGS	The subject Property is developed with four parcels; two residences, a storage barn, and horse barn. No ponds are identified on the Property. Directly to the west is a large “gravel pit”; to the east is undeveloped land.
1981	USGS	The subject Property is developed with four parcels; two residences, a storage barn, and horse barn. No ponds are identified on the Property. Directly to the west is a large “gravel pit”; to the east is undeveloped land.
1993	USGS	The subject Property is developed with four parcels; two residences, a storage barn, and horse barn. Two ponds are located in their current location. Directly to the west is a large “gravel pit”; to the east is undeveloped land.

Washington Commercial Real Estate Disclosure:

On February 28, 2010, the State of Washington Legislature passed Substitute Senate Bill No.6749, concerning the transfer of commercial real estate – commonly known as the *Commercial Real Estate Disclosure Act*.

As required in the Act, a seller of commercial real estate must provide a buyer with a Disclosure Statement about the land – whether improved or unimproved – unless the buyer waives the right to receive it. The Disclosure for commercial real estate concerns title, water, sewer and on-site sewage, structure, systems, fixtures, and environmental.

The Disclosure Statement must be provided within five business days, or as otherwise agreed to, after mutual acceptance of a written purchase agreement between a buyer and a seller. Within three business days of receiving the Disclosure Statement, the buyer has the right to approve and accept the Statement or rescind the Agreement for purchase. If the seller fails to provide the Disclosure Statement, the buyer may rescind the transaction until the transfer has closed. If the Disclosure Statement is delivered late, the buyer’s right to rescind expires three days after receipt of the Disclosure Statement. A completed Commercial Real Estate Disclosure Statement was not provided prior to the completion of the Phase I Environmental Site Assessment.

Washington Business Registration:

The State of Washington Business Licensing Service maintains records of all business licenses issued within the State of Washington. In order to thoroughly evaluate potential environmental issues, a search of business licenses issued through the Washington State Business Licensing Service was completed for the Property, which did reveal any relevant recorded transfers.

VISUAL AND PHYSICAL OBSERVATIONS AND INFORMATION: STRUCTURAL AND BUSINESS OPERATIONAL

Dr. Peter Chen, the Owner of the Property, identified Mr. Craig Deaver with *C.E.S. NW, Inc.* as the Key Site Manager. The *Key Site Manager* is the person identified by the Client or the Owner of the Property as a person having the most reliable knowledge as to the previous uses and of the Property and have accurate information for the Environmental Questionnaire. The Site Reconnaissance was conducted multiple times from January through May of, 2024.

The *Site Knowledgeable Person* is a person identified by the Key Site Manager as an individual with first hand knowledge of the subject and / or adjoining properties historical and current development and able to provide information regarding the Site historical development and usage.

A Site Knowledgeable Person identified as Mr. Craig Deaver .

Site Reconnaissance: Key Site Manager:

The *Key Site Manager* (“KSM”) is the person identified by the Client or the Owner of the Property as a person having the most reliable knowledge as to the previous uses and current condition of the subject Property and in a position to provide reasonably accurate information for the Environmental Questionnaire. If the *Key Site Manager* is unable to be on Site at the time of the Site Reconnaissance, the KSM may identify a *Site Knowledgeable Person*.

Site Reconnaissance: Site Knowledgeable Person:

The *Site Knowledgeable Person* (“SNP”) a person identified by the Key Site Manager as an individual with first hand knowledge of the subject and / or adjoining properties historical and current development and able to provide information regarding the Site historical development and usage. In the alternative Real Estate Agent may also function the SNP. The definition and designation of the SNP is not included in the ASTM Standard Practice for Phase I Environmental Site Assessments.

A Site Knowledgeable Person was identified.

Site Reconnaissance: Personal Interviews / Site Document Review:

The Aerotech Assessor and Environmental Professional¹⁹, Alan T. Blotch, performed the on-site Reconnaissance in January, accompanied by the Key Site Manager. Prior to the Site Reconnaissance Interviews were conducted with the Key Site Manager. He was interviewed regarding the current Site operations, required environmental permits, his knowledge of current and historical environmental issues, past uses of the Property, and possible environmental concerns.

If an adjoining property represented an obvious Recognized Environmental Condition or a visual reconnaissance of the site indicated a potential environmental concern, the owner or operator of that site was also contacted regarding the type, nature, and potential impact of the environmental concern. The information obtained and conclusions reached during the course of these interviews and document review has been incorporated in this Assessment; while the specific source of the information may not be identified in the text of the Assessment Report.

Property Exterior Observations:

The subject of this *Phase I Environmental Site Assessment* is located on the southeast side of Puyallup, Washington currently a vacant, undeveloped Property that will be developed with a eighteen residential development lots known as *Sunset Pointe Development*.

The subject Property is level on the south side with residences adjoining to the south on 23rd Place southeast; to the west on 22nd Street Southeast; and 19th Avenue Southeast on the northwest. The southern portion is grassy with areas in the center and along the western fence line overgrown with native vegetation including underbrush and weeds including Oregon grape, western sword fern, salal, trailing blackberry, red huckleberry, western bracken fern, violet, trillium, evergreen blackberry, rose, and salmonberry. The trees are second growth or even younger, including Douglas Fir, Western Cedar, Western Hemlock, Big Leaf Maple, and Red Alder with an understory of vine maple. The eastern Property is level with a slope to the east which defines the eastern development.

In the south center of the Development is a small manmade lined plastic pond adjoining the east side of the pathway; which drains into a large Retention Pond defined on the north, east, and south sides. On the northeaster corner of the Retention Pond is beamed wall of non-native backfill which allows access to the surface of the Pond. Adjoining the west side of the Pond is an apparent wetlands area. Remaining on the Development are to foundations of the former *Western Washington Pioneer Museum*, horse barn, main residence, storage / utility building, and barn. In the approximate center of the Property is small telephone switching building.

The future of the Property is the development is the *Sunset Pointe*, The northern section of the Development be lots one through eight, accessed from 19th Avenue Southwest or 23rd Street Place Southeast into the dead end Cul de Sac. The southern portion will be developed with lots nine through eighteen with the individual driveways facing the 23rd Street Place Southeast dead end.

¹⁹ "Environmental Professional" as defined in the *Standards and Practices for All Appropriate Inquiries; Final Rule*; U.S. EPA, 40 CFR Part 312 (70 FR 66070) November 1, 2005, as specifically stated in § 312.10.

With the exception of environmental issues discussed in this Assessment, during the course of the on-site observations, particular attention was directed towards (i) pools of liquid; (ii) roads and paths that might be used for unauthorized entry; (iii) drains and sumps; (iv) stressed vegetation; (v) pits, ponds, or lagoons; (vi) surface or soil staining; (vii) ditches, catch basins, or dry wells; (viii) unidentified substance containers; (ix) location of manholes, sewer grates, sewer outfalls; and (x) other subterranean accesses. All roads, driveways, paths, and other vehicular access areas were identified and evaluated for suspected use as an avenue for transport or disposal of hazardous materials, regulated substances, or petroleum products. Railroad tracks and previous right-of-ways are also identified if present on the subject Property. Potential wetland area indicators were considered during the on-site activities. These indicators include (i) wetland characteristic soil types; (ii) areas that appear permanently wet during most of the year; (iii) the presence of wetlands-related submergent or emergent plants; and (iv) wetland indicative wildlife.

Structure Interior Access Limitations:

The State of Washington has previously stated that “face coverings are required statewide in all public spaces because they are effective in slowing the spread of COVID-19, especially when combined with 6 feet of physical distance.”

The State of Washington has promulgated revised *Covid-19 Response Guidelines for Employers* (November 15, 2020). These Guidelines include in part:

“6. **Miscellaneous Venues:** All retail activities and business meetings are prohibited. Miscellaneous venues include: convention / conference centers, designed meeting spaces in a hotel, events centers, fairgrounds, sporting events, nonprofit establishments, or similar venue.

9. **Real Estate:** Open houses are prohibited.

13. **Professional Services** are required to mandate that employees work from home when possible and close offices to the public if possible. Any office that must remain open must limit occupancy to 25 percent of indoor occupancy limits.

14. **Professional Services** are limited to 25 percent of outdoor occupancy limits.

* * * * *

For employers and workers: Washington employers must ensure workers wear face coverings at work in almost all situations. Employers must provide face coverings at work in almost all situations. Employers must provide face coverings if workers do not have them. Employers must comply with this order, which is enforced by the Department of Labor & Industries.”

Due to the State of Washington COVID-19 requirements Aerotech employees shall limit their interior contact with others whenever possible. If the interior configuration of a space or area

does not allow Aerotech employees to obtain such an objective, then portions of, or the entire interior of the Property will be observed without entrance into the area or building.

Structure Interior Observations:

All the former structures formerly on the Property have been removed.

Business Operations (Current and Historic) NAICS Classification:

The North American Industry Classification System (“NAICS”) is the classification that was developed for use by Federal Statistical Agencies for the collection, analysis, and publication of statistical data related to the U.S. Economy. Additionally, the goal was to develop a North American standard. It is the first economic classification system based on a single economic concept. It was adopted in 1997 to replace the Standard Industrial System (“SIC”).

The Small Business Administration SOP 50 10 6, effective October 1, 2020, requires all properties except a Multi-Unit Building are compared to the SOP Appendix 6: *NAICS Codes of Environmentally Sensitive Industries* for a match.²⁰ The comparison must include the Property’s current and known prior uses. (When indicated, a copy of the NAICS listing is included in the *Supplement Documents Section* of the Appendix of this Report).

All the former structures formerly on the Property have been removed. The NAICS Classification is No. 236.117, Developers / Builders of single and multi family housing. This classification is based upon the NAICS Code reported by the business as applicable to its operation. Had the prior Site historic business been in the general category of business operations identified by the EPA of U.S. SBA as a higher risk industry particular attention was paid to those activities that possibly presented an elevated environmental impact.

MATERIAL, PRODUCT, AND WASTE-STREAM HANDLING AND PROCESSING

Materials/Products Handling and Storage:

No improper storage of materials or products was observed at the Site. Reporting under the Spill Prevention, Control and Countermeasures program to address accidental chemical spills (40 CFR §§109-114) is not required. Additionally, no activities were observed that could be interpreted to be indicative of improper classification of waste material³.

Medical Waste Discharges:

For the purposes of this Assessment, medical waste is defined in the *Medical Waste Tracking*

²⁰ See, SBA SOP 50 10 7.1, §1(4)(a).

Act ("MWTa") 42 U.S.C. §§ 6992-92k, "as waste materials produced in the diagnosis, treatment, or immunization of human beings or animals, in research pertaining thereto, or in the production or testing of biologicals. Specifically covered are cultures and stocks of infectious agents and associated biologicals, human pathological wastes, human blood and blood products, sharps (both used and unused), animal waste, and isolation waste." For the purposes of this Assessment, bloodborne pathogen waste material is defined in paragraph (b) of the *Occupational Exposure to Bloodborne Pathogens; Final Rule*, 29 CFR § 1910.1030 as "blood" and "other potentially infectious materials." No improper medical waste storage or discharge was observed.

Storage Tanks - Above and Below Ground:

During the course of on-site activities, particular attention was directed toward indicators of above or below ground storage tanks, including (i) fill pipes, overflow pipes, vent pipes; (ii) areas of abnormal or heavy staining; (iii) man ways, manholes, or access covers; (iv) abandoned concrete saddles or gravity racks; (v) abandoned pumping equipment or gasoline pumps; (vi) concrete pads not homogeneous with surrounding surfaces; (vii) concrete build-up areas potentially pump islands or non-homogeneous patching; or (viii) new fill areas or piles of fill. No such visual indicators of suspected underground storage tanks was observed during the Site Reconnaissance.

Waste Disposal Local / State Compliance:

According to supplied information, the Site is not required to file, submit, or operate under any environmental permits, approvals, or notifications that were previously in place, or are known to be required in the future. Moreover, according the same supplied information and statements, the Site is not received prior notification of environmental violations, litigation, citations, claims, complaints, administrative actions, or environmental clean up or remedial actions pertaining to the Property or the operations conducted on the Property. This is consistent with the information reported in the Environmental Database prepared for the subject Site.

Waste Stream Processing and Disposal:

During the on-site observations, particular attention was directed toward activities or situations that could be considered contamination indicators by a regulated substance⁴. Potential indicators of contamination or violation can include: (1) stained or discolored sinks, drains, catch basins, drip pads, or sumps; (2) spills around loading docks, fueling areas, catch basins, or surface drains; (3) waste disposal areas, dumpsters, and other storage containers--evidence of spills or staining should be recorded; (4) pipes, gutters, spouts, or tubes protruding into bodies of water; or (5) waste that may require a RCRA permit. No areas of potential concern were observed.

Waste (Hazardous) Processing and Disposal:

In addition to solid waste disposal⁵, the on-site observations considered the potential

existence of hazardous waste, defined as a solid waste which, due to quantity, concentration, or other characteristics, may cause an increase in mortality or illness, or may pose a hazard to human health or the environment, under RCRA 42 USC §6903(5). The Assessor did not observe any such waste processing or disposal activities at the Site.

Wastewater, Storm Water Discharges:

All point source discharges regulated by the Clean Water Act (“CWA”) are subject to the applicable water quality-based standards as established in the National Pollutant Discharge Elimination System (“NPDES”) codification 40 CFR Subpart D §131.36. Additionally, CWA Sections 402 (p)(1) and (p)(2) have created categories of storm water discharges within Permit Issuance and Permit Compliance Deadlines for Phase I Storm water Discharges effective October 1, 1993, that may also be applicable to the subject Property (as detailed in the Federal Register, Volume 57, Number 244). Any significant change in the usage of the subject Property could require the submittal of an NPDES initial storm water discharge permit under 40 CFR §122.26 or 40 CFR Chapter I - Preamble Appendix A. However, no requirements for NPDES permitting were discovered that are currently applicable to the subject Property that have not been addressed.

VISUAL AND PHYSICAL OBSERVATIONS AND INFORMATION: ADJACENT AND ADJOINING PROPERTIES

For the Scope of this Assessment, properties are defined and categorized based upon their physical proximity to the subject Property. An *adjacent* property is any real property located within 0.25 mile of the subject Property's border. An *adjoining* property is any real property whose border is contiguous or partially contiguous with the Property, or that would be if the properties were not separated by a roadway, public thoroughfare, river, or stream.

Adjoining Properties Overview:

Adjoining properties that have contiguous borders with the subject Property were closely observed due to the lack of any physical obstruction between the properties that might impede or prevent the migration of contaminants onto the subject Property. When the subject Property and adjoining property are divided by a roadway – especially a multiple lane configuration – the migration of contaminants are often intercepted by underground utilities that typically divert the migration, by providing a pathway formed by the excavation and backfilling of the utility trenches that transports the contamination laterally down the roadway.

The subject Property is located in a residential area. To the north is 19th Avenue and multifamily residences; to the south is the 23rd Street Place Southeast; to the east are residences; and to the west are residences facing 22nd Street Southeast.

Adjoining and Adjacent Properties:

To the north: is 19th Avenue and multifamily residences;

To the south: is the 23rd Street Place Southeast;

To the east: are residences and undeveloped lots;

To the west: are residences facing 22nd Street Southeast.

Adjacent Properties Description:

An *adjacent property* is defined as: (1) a real property that would not meet the ASTM E1527-21 *adjoining properties* definition; and (2) are located within the “the distance that hazardous substances or petroleum products are likely to migrate based upon local geologic and/of hydrogeologic conditions; the property type; existing or past uses of surrounding properties; and other reasonable factors.”²¹ The primary function of Aerotech is to determine the search range within the constraints of: (1) ASTM recommended search range; (2) nature of the adjacent properties development; (3) density of the development; and (4) migration characteristics of the anticipated environmental contaminants. Since the major determinant of the adjacent properties search range tends to the development / density of surrounding properties, the nature of groundwater flow, and historical knowledge of the Aerotech Environmental Professionals, Aerotech believes the modified search ranges are reasonable and prudent. The search ranges for the subject Property are found in *Environmental Database Information* Section of this Phase I Environmental Site Assessment..

Limited visual observation of the adjoining properties was performed by the Aerotech Environmental Professions for the operations, conditions, and reported information that could reasonably be anticipated to environmentally impact the subject Property. There were no observed operations, obvious emission of contaminants, materials storage practices or other visual indicators of potential environmental impact originating at or on the adjoining properties which could affect the subject Property.

Adjoining and adjacent properties and landmarks include to the north 19th Avenue Southeast and 23rd Street Place Southeast; to the south is 23rd Avenue Southeast; to the east is Shaw Road East two-thirds; Pioneer Way East one mile north; State Route 161 / 512 one and one-third of a mile east; State Route WA-410 one and one-quarter of a mile northeast; and Wildwood Park one-third of a mile east. Significant bodies of water include *Wildwood Spring* one-third of a mile to the south; *Bradley Lake* one mile to the southwest; and the *Puyallup River* one and one-half of a mile to the north.

²¹ ASTM E1527-21 *Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process*, E1527-21 §8.1.2.

POTENTIAL ON-SITE CONTAMINATION SOURCES

Airborne Off-Site Arsenic / Lead Migration:

Overview of Contamination Source. Beginning in 1888, the American Smelter and Refining Company (“ASARCO”) operated a copper smelter in Ruston, located on the northwest side of Tacoma, Washington. The Smelter terminated operations in 1985 to the need for expensive air pollution control. At one time, the Smelter refined over 10% of the world’s copper. This operation, now referred to as the *Asarco Tacoma Smelter*, operated a 571 foot tall smokestack through which they exhausted their smelter smoke – that contained heavy metals including arsenic and lead.

The smelting operations generated an arsenic and lead plume that covers 1,000 square miles. The *Asarco Tacoma Smelter Plume* is classified as a Superfund Cleanup Site. U.S. Environmental Protection Agency has described the contamination plume one of the country’s most polluted sites.

Characteristics of Soil Contamination. The soil contamination varies in different areas due to the effects of: distance from the Smelter; wind currents; geographic features (such as elevation variations), the historical presence of trees and forests, and surficial disturbances such as construction, development, and landscaping. Generally, the presence of trees and foliage tended to reduce the concentrations of arsenic and lead that settled on the ground surface.

Overview of Extent of Contamination. In 2014 the *State of Washington Department of Ecology* (“WDOE”) published *Buying and Selling Real Estate in the Tacoma Smelter Plume (Frequently Asked Questions)*, WDOE Publication Number 14-09-085) which contained a map of the Tacoma Smelter Plume of the predicted levels of arsenic and lead contamination in soils. The map was based upon the information developed to date for the soil contamination highest 10% of parcels in the area. The map ranks areas as the *high zone* (over 100 ppm²²); *high moderate zone* (40.1 to 100 ppm); *low moderate zone* (20 to 40 ppm); and *low zone* (less than 20 ppm).

Predicted Zone of Subject Property. According to the WDOE 2014 map of predicted levels of arsenic and lead, the subject Property is located in the *High Moderate Zone* with estimated arsenic levels between 40.2 to 100 ppm.

(Presumed) Asbestos-Containing Building Materials:

During the on-site Reconnaissance, the following materials were observed²³, including but

²² PPM is concentration in parts per million

²³ The Site Reconnaissance observations were performed by an Accredited AHERA Asbestos Building Inspector trained and Certified to determine the presence, condition, and need for Response Actions for Suspected and Presumed Asbestos-Containing Building Materials. However, the Site

not limited to gypsum wall and ceiling surfacing materials, insulation, floor tiles and associated mastic and roofing materials. As defined in NESHAP §61.141, the observed materials may be classified as suspect regulated asbestos-containing building materials (ACBM"). Prior an activities that may disturb, contact, or remove the suspected materials, either they should be tested by an appropriated Certified Asbestos Building Inspector, or they should be treated as asbestos-containing.

No structures are present on the subject Property.

Formaldehyde:

Formaldehyde is an extremely popular chemical used in a variety of both building materials and furnishing products. Currently national usage is estimated in the billions of pounds per year. EPA has now classified formaldehyde as a "probable human carcinogen" suspected of inducing cancer in humans. Studies have shown that after installation, indoor formaldehyde levels require years of decline and reach residual background levels. During the off-gassing process, the indoor levels can be a significant source of irritation to hypersensitive individuals.

The formaldehyde product investigated within the scope of this Assessment is urea-formaldehyde foam insulation ("UFFI"), used in the 1970's primarily as wall cavity insulation. The release potential of UFFI from wall cavities is dependent upon factors such as; water-damaged walls, unpainted wall surfaces, or cracked paint or wall covering. While interior air sampling and analysis is the only conclusive method to delineate formaldehyde concentrations, visual and physical inspection of the subject Property indicate a virtually non-existent potential for UFFI contamination.

Lead-Based Paint:

In 1978 the Federal Government banned the use of lead-based paint in residential applications, however use in general industry continued at a decreased rate to the present. Lead-based paint presents a hazard through inhalation or ingestion of paint chips or vapor fumes. The greatest cumulative health threat is to young children, and for this reason the Department of Housing and Urban Development ("HUD") has promulgated lead standards and survey requirements for buildings affected by HUD funding. This HUD regulation represents the only Federal requirement for lead-based paint hazard management applicable to privately owned structures.

No structures are present on the subject Property.

Lead-Based Paint Pre-Renovation Limitations:

As controlled by the *Lead-Based Paint Pre-Renovation Rule*⁶ renovations or repairs are regulated in residential housing constructed prior to January 1, 1978. The Lead-Based Paint Pre-Renovation Rule ("Lead PRE") applies with limited exceptions to all residential dwellings built before January 1, 1978⁷. The Rule requires anyone whose compensated work disturbs painted

Reconnaissance activities were not an asbestos building survey, Good Faith Survey, or assessment pursuant to the regulatory requirements of AHERA.

surfaces in regulated housing – including rental property owners and managers, general contractors, and special trades contractors – larger in size than two square feet of lead-based painted surfaces to: (i) distribute the pamphlet, *Protect Your Family From Lead In Your Home*⁸, to the owners, occupants, and tenants before initiating the repairs or renovations; (ii) obtain confirmation of the receipt of this pamphlet; and (iii) retain those records for three years. The LBP Rules do not apply to the subject Property.

No structures are present on the subject Property.

Lead-Based Paint OSHA §1926.62 Regulations:

During the Site observations²⁴, suspected lead-based paint (“LBP”) surfaces were not identified with paint in poor or delaminated condition. As defined in the OSHA *Lead Standard in Construction and General Industry*, and applicable State regulations, prior to any activity that may disturb suspect LBP surfaces, either an inspection should be performed by an appropriately qualified Inspector, or the materials should be handled as lead-containing. Additionally, as required by 29 CFR §1926.62, (i) a limited response action should be initiated where necessary, and (ii) potentially impacted employees and occupants should be provided training.

No structures are present on the subject Property.

Lead in Drinking Water:

Based upon the lack of developed structures at the Site, there is a low potential for any still existing interior plumbing to contain lead in the pipes or lead-based solder, based upon construction standards before 1987 (40 CFR §141.11). The presence or absence of elevated lead concentrations in the water can only be confirmed through laboratory testing. However, no current Federal regulations require individual property owners to test for lead in drinking water.

Micro Biological Contaminants:

The presence of micro biological organisms and their byproducts is ubiquitous throughout the indoor and outdoor environments. Mold, also known as fungi, are a species of micro biological organisms that can detrimentally effect buildings via the presence of their spores, off gassing, and airborne suspension of the organisms themselves. In the presence of both excess moisture and a nutrient supply, molds can grow rapidly to produce larger colonies with adverse consequences.

²⁴ The Lead-Based Paint Survey and Assessment was completed by a Federally Certified Lead Inspector (Certification No.3521-09-09-5377) and Federally Certified Lead Risk Assessor (Certification No.3522-09-09-5361), also Licensed in the State of Washington Lead Risk Assessment (Certification No.6084) as required under the Washington Administrative Code §365-230 and is certified to conduct Lead-based Paint activities pursuant to Washington Administrative Code §365-230-200.

While it is generally accepted that in particular environments, molds can be allergenic, and occasionally infectious or toxic, there is both no clear scientific evidence to support the conclusions that the mere presence of micro organisms is in itself a recognized environmental condition, or that any threshold level exists of airborne organisms or byproducts above which a negative impact to human health will likely result ⁹. In particular, the U.S. EPA has stated “no EPA or other federal limits have been set for mold or mold spores...”¹⁰

In spite of the lack of scientific data – in response to the growing public concern over the potential adverse health effects of mold exposure – a variety of public agencies and regulatory authorities have published recommendations and guidelines for the assessment and remediation of mold. In recognition of both the increased public awareness and scientific limitations regarding mold, the observations conducted on Site attempted to identify clearly known indicators of potential micro biological impact.

These readily observable indicators typically include: (i) obvious visual indications of micro biological organism growth in readily accessible areas; (ii) indicators of extensive or continued water intrusion or severe staining; (iii) secondary indicators such as smells and odors; and (iv) information obtained from the Key Site Manager and other knowledgeable personnel. Since the majority of micro biological growth tends to occur in enclosed, covered, and otherwise inaccessible building and interstitial spaces, the likelihood that micro organisms would not be observed even though present, is possible. As such, even though no readily visible observations or indicators of micro biological impact were observed during the Site visit, a micro biologically-based problem could be present at the Site, even though not observed.

No structures are present on the subject Property.

PCB-Containing Exterior Electrical Transformers:

The Assessor did not observed any leaking pole-mounted electrical transformers on the subject Property. All transformers are owned by the utility company, and not the responsibility of the Property owner.

Radon:

Radon is emitted by the natural breakdown and radioactive decay of uranium in rocks and soils, which then enters buildings through cracks in the foundation, sump pumps, areas around drainage pipes and other openings. In addition, radon may enter a structure as a water contaminant, natural gas contaminant, or off-gas by-product of building materials. Once inside an enclosed space, radon can accumulate. No visual estimation technique exists that accurately predicts the potential radon risk within a building. The radon risk is a function of site location, soils composition, building construction, foundation integrity, and previous landfill practices. Actual physical testing of a building is the only way to accurately determine the radon levels. Radon health risks can be controlled by recognizing the potential for a problem, by testing and by reduction of radon levels in the building. In response to the unknown health risks of radon, the US EPA conducted a radon survey that attempted to generalize the radon health risks by County.

Radon is emitted by the natural breakdown and radioactive decay of uranium in rocks and soils, which then enters buildings through cracks in the foundation, sump pumps, areas around drainage pipes and other openings. In addition, radon may enter a structure as a water contaminant, natural gas contaminant, or off-gas by-product of building materials. Once inside an enclosed space, radon can accumulate. No visual estimation technique exists that accurately predicts the potential radon risk within a building. The radon risk is a function of site location, soils composition, building construction, foundation integrity, and previous landfill practices. Actual physical testing of a building is the only way to accurately determine the radon levels. Radon health risks can be controlled by recognizing the potential for a problem, by testing and by reduction of radon levels in the building. In response to the unknown health risks of radon, the US EPA conducted a radon survey that attempted to generalize the radon health risks by County.

The Property is located in Pierce County, Washington. The U.S. Environmental Protection Agency (“USEPA”) with assistance from the State of Washington, has sampled the radon concentrations throughout the State and classified those measurements based upon the risk to human health. the following matrix was developed by the USEPA:

**Radon Testing Results
Pierce County, Washington**

Area	Average Activity	% < 4 pCi/L	% 4-20 pCi/L	% < 20 pCi/L
1 st Floor / Living	0.334 pCi/L	99%	1%	0%
2 nd Floor / Living	0.800 pC/L	100%	0%	0%
Basement	0.538 pC/L	97%	3%	0%

Based upon these reported results, the County of Pierce has been rated by the U.S. Environmental Protection Agency as a Radon Zone3; the anticipated generalized level of Site radon is less than 2 Pico curies per liter (“pC/L”). Radon response actions are not indicated.

Underground Storage Tanks:

Careful observations were made during the Site reconnaissance for visual indicators of underground storage tanks, as typically exhibited by: fill pipes, overflow pipes, or vent pipes; areas of abnormal or heavy surficial staining; manways, manholes, or access covers; abandoned concrete saddles for gravity racks; concrete pads not homogeneous with surrounding surfaces; concrete build-up areas potentially indicating the locations of former pump islands; abandoned pumping equipment or gasoline pumps; or areas of non-homogeneous patching, new fill areas, piles of fill. No such indicators were observed during the Site Reconnaissance.

Vapor Intrusion:

The subject and adjoining properties were evaluated for Vapor Intrusion employing the *Standard Guild for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, ASTM Standard Practice designation E2600-15 approved October 1, 2015

The term *Vapor Encroachment Screen* (“VES”) is an evaluation of a Property to identify a Vapor Encroachment Condition (“VEC”). The objective is to identify the:

The presence of likely presence of COC [chemicals of concern] vapors in the vadose zone of the *target property* (TP) caused by the release of vapors in the vadose zone of the *target property* (TP) caused by the release of vapors from contaminated soil and/or groundwater either on or near the TP as identified by Tier 1 (see section 8) or Tier 2 (see section 9) procedures.

The VES process is a two-tiered screen process. The purpose of this Investigation is to determine if a *Vapor Encroachment Condition* ²⁵effects the subject Property. The procedure is to determine if a VEC exists or does not exist.

TIER 1 SCREENING PROCESS

The Tier 1 Screening begins with the default AOC²⁶ defined by the appropriate minimum search distances adjusted as appropriate for local conditions, and then determining if known or suspected contaminated properties with COCs within the established AOC.

The default Area of Concern is one-third of a mile around the Target Property for the Contaminants of Concern and one-tenth of a mile for petroleum hydrocarbons Contaminants of Concern. The Area of Concern is measured from the Target Property boundary to the contaminated property with known or suspected Contaminant of Concern contamination of soil or groundwater.

Area of Concern Adjustments

The default Area of Concern is one-third of a mile around the Target Property for the Contaminants of Concern; however, the distance for petroleum hydrocarbons is one-tenth of a mile. The term *appropriate minimum search distance* is used in lieu of radius to include

²⁵ *Vapor Encroachment Condition* (“VEC”) presence or likely presence of COC vapors in the vadose zone of the *TP* caused by the vapors from contaminated soil and/or groundwater either on or near the *TP* as identified by the Tier1 (see Section 8) or Tier 2 (see Section 9) procedures in this guide. (§ 3.2.37).

²⁶ *Area of Concern* (“AOC”) defined by the *appropriate minimum search distance* adjusted as appropriate. When the AOC is defined by the *appropriate minimum search distance* without adjustment, the AOC is the default *AOC*. (§ 3.2.3)

irregularly shaped properties.

If groundwater²⁷ flow is known or can be inferred, the default AOC in the down-gradient may be reduced to the area within the critical distance. The default Area of Concern in the down-gradient direction may be reduced to the area within the critical distance (i.e., 100 feet). The Area of Concern in the cross-gradient direction may also be reduced, depending upon the critical distance and the width of the COC-contaminated plume associated with a known or likely COC-contaminated property.

Other Factors of Consideration

Gradient and Subsurface Changes. The closer a known or suspected COC-contaminated property is to the target Property, the greater the probability for a VEC to exist, subsurface conditions being equal. When evaluating the location of a known or suspected *COC-contaminated properties* within the established AOC, the Environmental Professional should also take into consideration locations where the existing gradient can change significantly such as seasonal influences, tidal effects, and others. Soil gas migration maybe independent of the groundwater gradient. (§ 8.5.1.3 (1)).

Vapor Conduits, Design, and Aging. Man-made conduits²⁸ such as utility corridors, sanitary sewers, and storm sewers and significant natural conduits such as Karst terrain or fractured bedrock can sometimes create a sufficiently direct partway from a vapor contaminant source to the subsurface of the Target Property such that vapor encroachment may be a concern. Vapor encroachment may also be influenced by the age and design of infrastructure features associate with these conditions.

Site Cleanup Status. The date of a prior release, the volume or quantity of the COC release, and the response measures implement for the release.

If the linear distance from the nearest edge of a Contaminated Plume to the nearest structure on the subject Property – or to the subject Property boundary if there are no structures on the subject Property – or less than 100 feet, then the condition is considered to be a potential Vapor Encroachment Condition (“VEC”). If the Chemicals of Concern are dissolved petroleum hydrocarbons, the distance must be less than 30 feet in order for a potential VEC to exist.

Tier 1 Conclusions

Once the Area of Concern is established, Tier 1 screening involves evaluating whether any known or suspected properties that may be associated with COCs are located within the established Area of Concern. The Tier 1 Conclusion from the screen is (1) a Vapor Encroachment Condition

²⁷ *Groundwater* – water contained in the pore spaces of saturated geological media. (§ 3.2.15)

²⁸ *Conduit* – preferential pathway along which vapors released from contaminated soil and/or groundwater may migrate onto the *TP* or away from the *TP*. (§ 3.2.6)

exists, or (2) a Vapor Encroachment Condition does not exist.

TIER 2 SCREENING PROCESS

Tier 2 focuses on characteristics of the contaminated plume associated with contaminated properties and the proximity of said contaminated plume to the *TP*. The information to conduct a Tier 2 screen is often found in state regulatory files and may also be obtained from other available documents or information.

Vapor Encroachment Evaluation:

This Evaluation has not identified the presence of a Contaminated Plume within the ASTM specific distance as delineated in E 2600-08 §§ 8.5.1 - 8.5.3.

POTENTIAL ON-SITE HISTORICAL CONTAMINATION SOURCES

The Historical Usage Information research activities included a review of Standard Historical Sources, including but not limited to: (i) aerial photographs, (ii) fire insurance maps, (iii) property tax files, (iv) recorded land title records, (v) United States Geological Services topographical maps, (vi) local street directories, (vii) building department records, (viii) zoning or land use records, and (ix) other historical sources²⁹. The historical information contained in this Section may also include reviews of applicable Agency records, files, and database information.

Activity and Use Limitations:

Activity and Use Limitations (“AUL”) include both legal and physical or engineering controls that may be required by an authoritative agency. Agencies, organizations, and jurisdictions may define or utilize these terms differently. An AUL is often recorded in land title records. AUL information may often be recorded in the restrictions of record on the title, rather than within the chain of title.

“The term AUL is...to include both legal (that is, institutional) and physical (that is, engineering) controls within its scope. Other agencies, organizations, and jurisdictions may define or utilize these terms differently (for example, EPA and California do not include physical controls within their definitions of “*institutional controls*.” Department of Defense and International County / City Management Association use “Land Use Controls.” The term “land use restrictions” is but not

²⁹ As defined in the *ASTM Standard Practice for Environmental Site Assessments E1527-13* (§ 8.3.4.9), “other historical sources” can include: miscellaneous maps, newspaper archives, internet sites, community organizations, local libraries, historical societies, current owners or occupants of neighboring properties, or records and files of the Property Owner or occupants.

defined in the *Brownfields Amendments*). ASTM E1527-21 § 3.2.2. Note 1.

The subject Property is not controlled by any Activity or Use Limitations.

Controlled Recognized Environmental Conditions:

A Controlled Recognized Environmental Condition (“CREC”) resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. A “controlled recognized environmental condition – a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with *hazardous substances* or *petroleum products* allowed to remain in place subject to implementation of controls *property use* limitations limitation or activity and use limitations. (ASTM E1527-21 § 3.2.7)

A condition identified as a Controlled Recognized Environmental Condition does not imply that the Assessment has evaluated or confirmed the adequacy, implementation, or continued effectiveness of the required control that has been, or is intended to be implemented. For example, if a leaking underground storage tank has been cleaned up to a “commercial use” or “Commercial - Industrial” regulatory standard, but does not meet the most unrestricted residential standard, this is considered a Controlled Recognized Environmental Condition; the “control” is represented by the restriction that the property remain commercial - industrial. A Controlled Recognized Environmental Condition was not identified in connection with the subject Property.

Historical Recognized Environmental Condition:

As defined under the ASTM Phase I Standard Practice, a Historical Recognized Environmental Condition is a past release of any hazardous substance or petroleum product that has occurred in connection with the Property and has been addressed to the satisfaction of the applicable regulatory agency or meeting the unrestricted residential use criteria established by a regulatory authority, without subjecting the property to any required controls such as property use restrictions, activity and use limitations, institutional controls, or engineering controls – at the time of the completion of the Environmental Site Assessment. (See, ASTM E1527-21, § 3.2.0, *Definitions*¹¹). The final determination will be influenced by the current impact of the Historical Recognized Environmental Condition (“HREC”) on the property. For example, if a past release of any hazardous substances or petroleum products has occurred in connection with the property and has been remediated, with such remediation accepted by the responsible regulatory agency, this condition shall be considered an HREC.

The prior Site activities and agency interactions, as defined above, do not represent such an Historical Recognized Environmental Condition. Had such conditions were present, additional investigation in that regard would have been performed.

Property Use limitations:

The most recent *ASTM E-1527-21 Standard Practice for Environmental Site Assessments* promulgated a new recognized environmental condition defined as a “Property Use Limitation”. This condition is “... a limitation or restriction on current or future use of a *property* in connection with a response to a past *release* in accordance with the applicable regulatory authority or authorities that allows *hazardous substances* or *petroleum products* to remain in place at concentrations exceeding unrestricted use criteria.” (Refer to ASTM E1527-21 § 3.2.69).

A Property Use Limitation was not identified at the subject Property.

Regulatory Agency Records Information:

The Phase I Environmental Assessment activities included a review Standard Historical Sources³⁰ for: (i) reasonably ascertainable historical documents and records; (ii) commercially available environmental database information, and when appropriate, (iii) in person review by Aerotech personnel of regulatory Agency files and other Agency information. The following information was available from the State of Washington Department of Ecology:

Former Pioneer Museum
c/o: Ms. Sharon Tanner
2301 - 23rd Street Southeast
Puyallup, Washington 98373

Facility / Site ID.9490
ISIS Cleanup Site ID.11739

On June 27 and again on 28, 2010, an arson fire occurred primarily at the Western Washington Pioneer Museum that destroyed most of the Building. Subsequently on May 10, 2010. The previous sampling of the Site was performed by Ms. Sharon Bell (*Environmental Specialist*, Tacoma-Pierce County Health Department). This investigation reported:

“The results indicated the presence of gasoline range hydrocarbons (GRO), likely mineral spirits, and lube oil in concentrations significantly above the state’s cleanup levels: GRO [gasoline] was detected at 1900 ppm (state cleanup level is 100 ppm); lube oil ranged from 3100 to 37,000 ppm (state cleanup level is 2000 ppm). A variety of pesticides and herbicides were also detected,” [electronic communication by Sharon Bell to Joshua Gunia (Ms. Tanner grandson) , “Drums at 2301 23rd St E” dated May 10, 2011”].

³⁰ *Standard Historical Sources* include sources delineated in § 8.3.4 of the *ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* ASTM E 1527-13, including: (i) aerial photographs, (ii) Fire Insurance maps (commonly referred to as “Sanborn Maps”), Property tax files, (iii) recorded land title records, (iv) USGS topographical maps, (v) local street directories (commonly referred to as “Polk Directories”, building department records, (vi) zoning / land use records, (vii) and other historical records as discussed in § 8.3.4.9.

All of the samples were near-surface, at locations that visually contained: (1) fire debris visible on the ground; (2) within one foot of leaking drums, and (3) visual evidence of black staining typical of surficial staining of petroleum products. A second area of concern was the north-northeastern edge of the Retention Pond.

POTENTIAL OFF-SITE CONTAMINATION: SOURCES AND RECEPTORS

An *adjacent property* is defined as any real property located within 0.25 mile of the subject Property's border. An *adjoining property* is defined as any real property whose border is contiguous or partially contiguous with the subject Property, or that would be if the properties were not separated by a roadway, street, public thoroughfare, river, or stream.

Potential Adjacent and Adjoining Property Contamination Receptors:

Environmentally sensitive receptors were investigated within a thousand feet of the borders of the subject Property. The sensitive receptors are materials or structures particularly susceptible to environmental damage or stress from migrating contamination. The major receptor groups investigated were water supplies, surface water bodies, residential structures, and other public receptors. During the course of on-site visual and physical inspection, no indicators of sensitive receptor contamination from the subject Property were observed.

Potential Adjacent and Adjoining Property Contamination Sources:

Environmentally sensitive sources were investigated within a thousand feet of the borders of the subject Property. The sensitive sources are activities particularly susceptible to becoming a source for environmental damage or stress from the generation of migrating contamination. During the course of on-site visual and physical inspection, no indicators of contamination sources to the subject Property were observed.

Database Search Range and Modifications

Approximate Minimum Search Range:

“The area for which records must be obtained and reviewed pursuant to Section 8 [*Records Review*] subject to the limitations provided in that Section. This may include areas outside the subject Property and shall be measured from the nearest subject Property boundary. The term is used in lieu of *radius* to include irregularly shaped properties.” ASTM E1527-21 § 3.2.7.

Minimum Records Search Radius Adjustments:

When allowed by 8.2.2, the appropriate minimum search distance for a particular record may be adjusted at the discretion of the environmental professional. Factors to consider in adjusting the appropriate

minimum search distance include: (1) the density (for example, urban, suburban,, or rural of the setting in which the subject property is located; (2) the distance that the hazardous substances or petroleum products are likely to migrate are likely to migrate based on local geologic or hydrogeologic conditions; (3) the subject Property type; (4) existing or past uses of surrounding properties, and other reasonable factors. The justification for each adjustment and the approximate minimum search distance actually used for any particular record shall be explained in the report.” ASTM E1527-21 § 8.1.4.

ENVIRONMENTAL DATABASE INFORMATION

For the Scope of this Analysis, properties are defined and categorized based upon their physical proximity to the subject Property. An *adjacent property* is any real property located within 0.25 mile of the subject Property's border. An *adjoining property* is any real property whose border is contiguous or partially contiguous with the subject Property, or that would be if the Properties were not separated by a roadway, street, public thoroughfare, river, or stream. These definitions are consistent with ASTM Standards.

Database Search Range and Modifications

Approximate Minimum Search Range:

“The area for which records must be obtained and reviewed pursuant to Section 8 [*Records Review*] subject to the limitations provided in that Section. This may include areas outside the subject Property and shall be measured from the nearest subject Property boundary. The term is used in lieu of *radius* to include irregularly shaped properties.” ASTM E1527-21 § 3.2.7.

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Review of Federally Reported Environmental Data:

This review of the existing compilation of the Federal environmental databases attempts to identify environment problem sites, activities, and occurrences from the records and reports of the U.S. Environmental Protection Agency (“US EPA”). A detailed listing is included in the Appendix, *Environmental Databases*.

National Priorities List (“NPL”) of Superfund Sites:

The NPL is the EPA's database of hazardous waste sites currently identified and targeted for priority cleanup action under the Superfund program. An ERIS search of the most recent National Priorities List revealed no sites within the Property's database search range.

Comprehensive Environmental Response, Compensation and Liability Act (“CERCLA”) of 1980:

Mandated as part of the 1980 Superfund Act, the CERCLIS (Comprehensive Environmental Response, Compensation and Liability Information System) list is an EPA compilation of the sites investigated or currently being investigated for a release or potential release of a regulated hazardous substance under the CERCLA regulations. An ERIS search of the most recent CERCLIS database reported no sites within the Property's database search range.

CERCLIS No Further Remedial Action Planned (“NFRAP”) Sites:

The No Further Remedial Action Planned Report – also commonly known as the CERCLIS Archive report – contains information pertaining to sites which have been removed from the U.S. EPA CERCLIS database. NFRAP sites may be sites where, following an initial investigation, either not contamination was found, contamination was discovered and immediately remediated, or the contamination concentrations of threat to human health or the environmental was not serious enough to warrant Federal intervention, Superfund action, or NPL consideration. An ERIS review of the most recent designated database search range revealed no NFRAP sites within the selected and designated distance parameters.

Superfund Enterprise Management System Sites (“SEMS”):

The Superfund Enterprise Management System (“SEMS”) tracks hazardous waste sites, potentially hazardous waste sites, and remediation activities performed in support of the EPA Superfund Program across the United States. The list formerly known as CERCLIS was renamed to SEMS by the US EPA. The database additionally contains sites which are either proposed to or on the National Priorities List (“NPL”) and the sites which are in the screening and assessment phase for possible inclusion on the NPL. An ERIS review of the most recent SEMS database revealed no sites within one-quarter of a mile of the Property.

Superfund Enterprise Management System Sites Archives (“SEMS-ARCHIVE”):

The Superfund Enterprise Management System Archives (“SEMS-ARCHIVE”) tracks sites that have no further interest under the Federal Superfund Programs based on available information. This list was formerly known as the CERCLIS-NFRAP, renamed to SEMS ARCHIVE by the U.S. EPA in 2015. The database additionally contains sites which are either proposed to or on the National Priorities List (“NPL”) and the sites which are in the screening and assessment phase for possible inclusion on the NPL. An ERIS review of the most recent SEMS database revealed no sites within one-quarter of a mile of the Property.

RCRA Corrective Action Order Sites (“CORRACTS”):

The CORRACTS database contains information concerning the RCRA facilities that have conducted, or are currently conducting a Corrective Action. This occurs when a RCRA Corrective Action Order is issued pursuant to RCRA §3008(h), when there has been a release of a hazardous waste or constituents into the environment from a RCRA or potentially RCRA regulated facility. Additionally, Corrective Actions may be imposed as a prerequisite to receiving or maintaining a RCRA TSDF operating permit. An ERIS review of the most recent CORRACTS sites reported no sites within the appropriate distances.

Resource Conservation and Recovery Act (“RCRA”) Facilities:

The RCRA program identifies and tracks hazardous waste from the generation source to the point of ultimate disposal. The RCRA facilities database is the composite of reporting facilities that generate, store, transport, treat, or dispose of controlled or hazardous waste. The **RCRA Large Quantity Generators List (“RCRA LQG”)** Database lists sites that generate more than 1,000 kilograms of hazardous waste or 1 kilogram of acutely hazardous waste per month. The **RCRA Small Quantity Generators List (“RCRA SQG”)** Database identifies sites that generate hazardous or acutely hazardous waste under the *RCRA LQG* definitions. Generators that occasionally generate or generate amounts below the defined *RCRA LQG* are classified and identified on the **RCRA Very Small Generators List (“RCRA VSQG”)**. Additionally, a *VSQG* may not accumulate more than 1,000 kilograms of hazardous waste at any time. The **RCRA Non-Generator List (“RCRA Non Gen”)** identifies sites that may have generated hazardous waste in the past, but currently do not generate any hazardous waste.

An ERIS review of the most recent database identified the following sites within their appropriate database search ranges:

RCRA LQG Database:	no sites identified
RCRA SQG Database:	no sites identified
RCRA VSQG Database:	no sites identified
RCRA Non Gen Database:	no sites identified

Facility Index System / Facility Registry System (“FINDS”) Facilities:

The Facility Index System contains both facility information and “pointers” to other sources that contain more facility detail. This FINDS database is a compilation of the Permit Compliance System (“PCS”); Aerometric Information Retrieval System (“AIRS”); DOCKET Enforcement Cases; Federal Underground Injection Control (“FURS”); Federal Facilities Information System (“FFIS”); PCB Activity Data System (“PADS”); and state listings of laws and statutes. An ERIS search of the most recent FINDS facilities database found no FINDS facility within one-eighth of a mile of the subject Property.

Review of State of Washington Reported Environmental Data:

This review of the existing compilation of the State environmental databases attempts to identify environment problem sites, activities, and occurrences from the records and reports of the applicable State Agencies. A detailed listing is included in the Appendix.

State of Washington - Registered Underground Storage Tank ("UST") Sites:

Underground Storage Tanks are regulated under Subtitle I of RCRA and must be registered with the appropriate State agency. The State of Washington requires registration through the Department of Ecology ("WDOE"). An ERIS search of the most recent State UST database found no UST sites within one-eighth mile of the subject Property.

State of Washington - Leaking Underground Storage Tank ("LUST") Incident Location Sites:

Underground Storage Tank incident releases are regulated under RCRA and must be reported within 48 hours to the State of Washington Department of Ecology. The Agency maintains a database of all reported LUST incident sites. The LUST database identified no LUSTs site within one-eighth of a mile of the subject Property.

Independent Cleanup Response ("ICR")

The State of Washington Department of Ecology ("WDOE") maintains a list of facilities that have submitted Independent Remedial Action reports to the Department; the Reports may have been submitted from the Site Owner or a consultant. These cleanup actions have been conducted without Department oversight or approval and are not under an order of decree. "Independent Cleanup" is historical terminology for the WDOE Voluntary Cleanup Program ("VCP"). The IRC Database is no longer updated; current records are maintained in the VCP Program Database. An ERIS search of the most recent ICR Database identified one ICR Site within the appropriate database search range.

The identified ICR Site is the subject Property.

Confirmed and Suspected Contaminated Sites List ("CSCSL")

The State of Washington Department of Ecology ("WDOE") maintains a list of facilities that includes sites being cleaned up, waiting to be cleaned up, or that need additional investigation. Most contaminated sites are handled by the WDOE's Toxic Cleanup Program and are cleaned up and issued closure under Washington's environmental cleanup regulation, the Model Toxics Control Act ("MTCA"). Property owners may cleanup may cleanup sites independently or under WDOE supervision; and the WDOE can also clean up sites. The CSCSL database is equivalent to the federal CERCLIS database. An ERIS search of the most recent ICR Database identified no ICR Sites within the appropriate database search range.

The identified CSCSL Site is the subject Property.

State of Washington - Voluntary Cleanup Program ("VCP") Sites:

The State of Washington Department of Ecology ("Ecology") has received remedial action reports from site owners and operators for Response Actions that were conducted without Department approval or oversight, and not under the requirements of an order or decree. These reports were received before 1993 were entered into the Independent Cleanup Program, and starting January 1, 1993, were entered into the Voluntary Cleanup Program. An ERIS search of the most recent Department of Ecology VCP database found no VCP sites within one-eighth mile of the subject Property.

State of Washington Waste Landfill Facilities:

The State Solid Waste Landfill Facilities ("SW/LF") listing is the sites identified by the State of Washington Department of Ecology, Waste Management Division, as either currently operating or previously identified as a solid waste landfill. This classification can be a result of either RCRA Part B permitting or prior identification by the Board. A search of the March 2021 database revealed no SWLF site within one-quarter mile of the Site.

State of Washington - Environmental Report Tracking System ("ERTS") Sites:

The State of Washington Department of Ecology ("Ecology") maintains a list of reported environmental incidents received from the US EPA, county, and local agencies and sources known as the Environmental Report Tracking System ("ERTS") database. Every incident entered into the ERTS is assigned a unique ERTS Number. The ERTS system generally contains details of the reported incident including, but not limited to: initial contact and their description of the incident, responsible Agency and responding personnel, actions taken in response to the incident, and recommendations for further action if required. An ERIS search of the most recent Department of Ecology ERTS database found no incident sites within at, or adjoining the subject Property.

STATEMENT OF THE ENVIRONMENTAL PROFESSIONAL

Statement of Quality Assurance

I have performed this Assessment in accordance with generally accepted environmental practices and procedures, as of the date of this Report. I have employed the degree of care and skill ordinarily exercised under similar circumstances by reputable environmental technologists practicing in this area. The conclusions contained within this Assessment are based upon site conditions I observed or were reasonably ascertainable and present at the time of my inspection.

The objective of this Environmental Site Assessment was to ascertain the potential presence or absence of environmental releases or threatened releases that could impact the subject Property, as delineated by the Scope of Work. The Scope of this Assessment does not purport to encompass every report, record, or other form of documentation relevant to the Property being evaluated. Additionally, this Assessment does not include or address reasonably ascertainable Environmental Liens currently recorded against the Property.

The procedure was to perform reasonable steps in accordance with the existing regulations, currently available technology, and generally accepted engineering practices in order to accomplish the stated objective.

The conclusions and recommendations stated in this Report are based upon personal observations made by myself and other employees of Aerotech, and also upon information provided by others. I have no reason to suspect or believe that the information provided is inaccurate.

Statement of Regulatory Compliance

I have performed this Assessment in compliance with requirements set forth in the *Standards and Practices for All Appropriate Inquiries; Final Rule* ("AAI"); U.S. EPA, 40 CFR Part 312, 70 FR 66070, November 1, 2005.

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in § 312.10 of this part. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Signature of Environmental Professional:



Signature - Alan T. Blotch:

Environmental Assessment Report Limitations:

The enclosed Phase I Environmental Site Assessment has been performed for the exclusive use of the Client(s) for the transaction at issue concerning:

SUNSET POINTE DEVELOPMENT

2301 - 23rd Avenue Southeast
Puyallup, Washington 98372

This Assessment has been performed in accordance with generally accepted environmental practices and procedures, as of the date of the Report. All services have been performed employing that degree of care and skill ordinarily exercised under similar circumstances by reputable environmental technologists practicing in this, or similar localities. No other warranty or guarantee, expressed or implied, is made or offered.

Limitations. The conclusions and recommendations stated in this Report are based upon observations made by employees of Aerotech Environmental Consulting, Inc. and also upon information provided by others. We have no reason to suspect or believe that the information provided is inaccurate. However, we cannot be held responsible for the accuracy of the information provided to us by others. The Scope of this Assessment does not purport to encompass every report, record, or other form of documentation relevant to the Property being evaluated.

This Assessment does not include or address reasonably ascertainable Environmental Liens currently recorded against the subject Property.

The observations contained within this Assessment are based upon site conditions readily visible and present at the time of our Site inspection. These site observations are unable to specifically address conditions of subsurface soil, groundwater, or underground storage tanks, unless specifically mentioned. This Phase I Environmental Site Assessment does not attempt to address the past or forecast the future Site conditions.

Reliance Upon Report. This Report is prepared for the exclusive use and reliance upon by the named Client(s) in this Report. Only Aerotech, with the written approval of the Client(s), can assign the Reliance Interest for this Report to parties other than the named Client(s). Any use of, or reliance upon the Report by a party other than those specifically named in this Report, shall be solely at the risk of such third party and without recourse against Aerotech, or its affiliates or subsidiaries, or their respective employees, officers, or directors, regardless of whether the action in which recovery of damages is sought is based upon contract, tort, (including the sole, concurrent, or other negligence and strict liability of Aerotech), statute, or otherwise. This Report shall not be used by a party that does not agree to be bound by the above statement.

REFERENCES AND CITATIONS

1. See, *Amendment to Standards and Practices For All Appropriate Inquires Under CERCLA: Final Rule*, 78 Federal Register 79319, dated December 30, 2013.
2. For the purposes of this Assessment, information is considered reasonably ascertainable if it is (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints, and (3) practically reviewable. The length of time required to obtain information from the City Building and Zoning Department is considered to be reasonable.
3. *Solid Waste*: defined as garbage, refuse, sludge, and other discarded material including solid, semi-solid, and contained gaseous waste per RCRA 42 USC §6903(27). For visual assessment purposes, any material that is discharged is a solid waste. A majority of the regulatory exclusions do not apply to discharges made within a structure.
4. *Regulated Substance*: defined as a substance that is (i) regulated under RCRA via direct definition; or (ii) regulated under CERCLA or the Clean Air Act, that may become subject to RCRA regulations as a result of the CERCLA classification.
5. *Disposal*: defined as the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste of hazardous waste or constituent thereof may enter the environment or be emitted into the air or discharged into the waters, including ground waters, per RCRA 42 USC §6903(3).
6. Refer to, *Federal Register* Volume 61 Number 9064, March 6 1996, *Lead; Requirements for Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards in Housing*.
7. EPA and HUD consider "housing constructed before 1978" to mean housing for which a construction permit was obtained before January 1, 1978. If no permit was obtained, then housing in which construction was started before January 1, 1978.
8. The Lead PRE required the distribution of the pamphlet *Protect Your Family From Lead In Your Home*, available from the U.S. Environmental Protection Agency, U.S. Consumer Product Safety Commission, and the U.S. Department of Housing (Publication No. EPA-K-99-001). Contact: (800) 424-LEAD or www.epa.gov/lead.
9. The American Conference of Governmental Industrial Hygienists has concluded that there are no mandatory numerical limits against which investigators can compare measurements of air or source concentrations for the majority of substances of biological origin that are associated with building-related exposures.
10. See, U.S. EPA Publication: *A Brief Guide to Mold, Moisture, and Your Home*, page 13, Publication No. EPA 402-K-02-003, 2002.

INTERVIEWS WITH KNOWLEDGEABLE PARTIES

Qualification(s) of Knowledgeable Parties

Knowledgeable parties are those persons who may be aware of, have good or actual knowledge of, or: (1) the physical characteristics of the subject Property (§10.5.1); (2) the prior occupant(s) and uses of the subject Property; (3) the current occupant(s) of the subject Property; (3) any specialized knowledge or experience that may be material to a Recognized Environmental Condition that may effect the subject Property (§6.3); (4) actual knowledge of any Environmental Lien in connection with or encumbering the subject Property (§6.4); (5) knowledge of an Activity or Use Limitations in connection with the subject Property (§6.4); (6) any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject Property; (7) any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on or from the subject Property;(8) any notices from any governmental agency regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products that may effect the subject Property.

Key Site Manager Identification

The Key Site Manager is the person identified by the owner or operator of the property as having good knowledge of the uses and physical characteristics of the property. (§3.2..47) Prior to the Property Reconnaissance, the Property Owner shall be asked to identify the Key Site Manager. (§10.5.1)

If the User is the current Property Owner, the User has the obligation to identify a Key Site Manager, even if it is the User is himself or herself. (§10.5.10)

Key Site Manager Interview

If a Key Site Manager is identified, the Environmental Assessor conducting the Site Reconnaissance shall make at least one reasonable attempt (in writing or by telephone) to arrange a mutually convenient appointment for the Site Reconnaissance when the Key Site Manager agrees to be present. If the attempt is successful, the Key Site Manager shall be interviewed in conjunction with the Site Reconnaissance and requested to complete verbally or answer in writing the questions contained within the *Environmental Questionnaire*.

If such attempt is unsuccessful, when performing the Site Reconnaissance the Environmental Assessor shall inquire whether an identified Key Site Manager (if any) or if a person with good knowledge of the uses and physical characteristics of the subject Property is available to be interviewed at that time; if so, that person shall be interviewed. In either situation, it is within the discretion of the Environmental Assessor to decide which questions to ask before, during, or after the Site Reconnaissance or in some combination thereof. (§10.5.1)

User Identification

The User is the person seeking to rely upon the Phase I Environmental Site Assessment of the subject Property. A User may include, without limitation, a potential Purchaser of subject Property, a potential tenant of the subject Property, the Owner of the subject Property, a lender, or a Property Manager. (§3.2.98)

User Interview

The User has specific obligations for completing a successful application of this Practice. (§3.2.98) The User should provide to the Environmental Assessor: (1) any specialized knowledge or experience that is material to Recognized Environmental Conditions in connection with the subject Property (§6.3); (2) actual knowledge of any environmental lien encumbering the subject Property; and (3) actual knowledge of any Activity or Use Limitation encumbering the subject Property (§6.4).

The User should communicate any information based on such knowledge or experience to the Environmental Assessor before the Assessor conducts the Site Reconnaissance. (§6.4)

User - “the Party seeking to use the Practice E1527-13 to complete and environmental site assessment of the property. A user may include, without limitation, a potential purchaser of property, a potential tenant of the property, the owner of the property, a lender, or a property manager. The user has specific obligations for completing a successful application of this practice outlined in Section 6.” §3.2.98. “If the user has any specialized knowledge or experience that is material to recognized environmental conditions in connection with the property, the user should communicate any information based on such knowledge or experience to the environmental professional. The user should do so before the environmental professional conducts the site reconnaissance.” §6.3. “*Actual Knowledge of the User* – If the user has actual knowledge of any environmental lien or AULs encumbering the property or in connection with the property, the user should communicate such information to the environmental professional. The user should do so before the environmental professional conducts the site visit.” §6.4

“6.2 *Review of Title and Judicial Records for Environmental Liens and Activity and Use Limitations (AULs)*... Any environmental liens and AULs [activity and use limitations] known to the user should be reported to the environmental professional conducting a Phase I Environmental Site Assessment. Unless added by a change in the scope of work to be performed by the environmental professional, this practice does not impose on the environmental professional the responsibility to undertake a review of recorded land titles and judicial records for environmental liens and AULs.” §6.2

“6.8 *Other* – Either the user shall make known to the environmental professional the reason why the user wants to have the Phase I Environmental Site Assessment performed or, if the user does not identify the purpose of the Phase I Environmental Assessment, the environmental professional shall assume the purpose is to qualify for an LLP to CERCLA liability and state this in the report.” §6.8

“10.7.1 *User* – If the person to be interviewed is the user (the person on whose behalf the Phase I Environmental Site Assessment is being conducted), the user has an obligation to answer all questions posed by the person conducting the interview, in good faith, to the extent of his or her actual knowledge or to designate a key site manager to do so. If answers to questions are unknown or partially unknown to the user or such key site manager, this interview shall not thereby be deemed incomplete.” §10.7.1

Incomplete Interviews

While the Environmental Assessor conducting the interview(s) has an obligation to ask questions, in many instances the person to whom the questions are addressed will have no obligation to answer them. Additionally, incomplete answers will be recorded as received.

(§10.7)

If the User of the Phase I Environmental Site Assessment is not available or not identified, the Environmental Assessor shall assume that the purpose of the Assessment is to qualify for an LLP to

CERCLA liability. Such an assumption, if made by the Environmental Assessor, shall be stated in the Assessment. (§10.7.1)

“10.9 *Proceedings Involving the Property* – Prior to the site visit, the property owner, key site manager (if any is identified), the user (if different from the property owner) shall be asked whether they know of: (1) any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property; (2) any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on or from the property; and (3) any notices from any governmental agency regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.” §10.9

TERMS AND DEFINITIONS

(Effective April 1, 2019)

Description of Terms Specific to this Report

activity / use limitations Legal or physical restrictions or limitations on the use of, or access to, a site or facility: (1) to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil, soil vapor, ground water, or surface water on the property, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no risk to public health or the environment. These legal or physical restrictions, which may include institutional and/or engineering controls, are intended to prevent adverse impacts to individuals or populations that may be exposed to hazardous substances in the soil, soil vapor, ground water, or surface water on the property. (ASTM E 1527-13, § 3.2.3 *Definitions*).

adjacent property any real property located within 0.25 mile of the subject Property's border.

adjoining property any real property the border of which is contiguous (i.e., touching) or partially contiguous with that of the property, or that would be contiguous or partially contiguous with that of the subject property but for a street, road, or other public thoroughfare separating them. If the properties in question are separated by a public roadway with a minimum of four lanes and limited access, then the properties are not considered to be adjoining; they are adjacent.

ASTM formerly the American Society for Testing and Materials; a non profit organization that developed the standard industry guidance for the performance of environmental site assessments.

business environmental risk a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues evaluated in a Transaction Screen or Phase I Site Assessment.

Business Environmental Risk

A risk which may have a material environmental or environmentally-driven impact on the business associated with the current or planned use. This risk is not necessarily limited to those environmental issues required to be investigated pursuant to the Scope of Work for an ASTM Scope Environmental Site Assessment. (ASTM E 1527-13, § 3.2.11 *Definitions*). Substances may be present on a property in quantities or under conditions that may lead to contamination of the property or health risks, but if such contaminants do not present clear CERCLA liability, they are considered outside the ASTM Phase I Scope of Work and are considered an ASTM "Non-scope consideration."

Commercial Real Estate

Any real property except a dwelling or property with no more than four dwelling units exclusively used for residential use (except when a dwelling or property has a commercial function such as the construction for profit). This includes, but is not limited to, undeveloped real property and real property used for industrial, retail, office, agricultural, other commercial, medical, or education purposes. (ASTM E 1527-13, § 3.2.12 *Definitions*).

Controlled Recognized Environmental Condition

A Recognized Environmental Condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed by remain in place subject to the implementation of required controls. A condition identified as a Controlled Recognized Environmental Condition does not imply that the Assessment has evaluated or confirmed the adequacy, implementation, or continued effectiveness of the required control that has been, or is intended to be implemented. For example, if a leaking underground storage tank has been cleaned up to a “commercial use” or “Commercial - Industrial” regulatory standard, but does not meet the most unrestricted residential standard, this is considered a Controlled Recognized Environmental Condition; the “control” is represented by the restriction that the property remain commercial - industrial. (ASTM E 1527-13, § 3.2.18).

De Minimis Condition

The general regulatory definition is: insignificant in amount (either weight or volume) and toxicity or hazard. De minimis is derived from the Latin term meaning “at the least.” In a legal context, de minimis is something or an act “which does not rise to the level of sufficient importance to be dealt with judicially” (*Black’s Law Dictionary*, Third Edition). Originally, the term was used by the U.S. Environmental Protection Agency to describe waste contributions to Superfund sites that were minimal in either quantity or toxicity, or not significantly greater than the other contributors hazardous wastes present at a site. (*Superfund and Small Waste Contributors*, U.S. Environmental Protection Agency Department of Cleanup Enforcement, published June 24, 2010). The term de minimis has been expanded to include small amounts of hazardous waste of generally low toxicity that – due to their volume or quantity – would typically not result in Agency action. (*Policy 520B De Minimis Contribution Settlements*, State of Washington Department of Ecology, Effective January 6, 2006). As a general rule, with low toxicity substances this has translated into a volume of waste that can be contained in a single fifty-five gallon drum. The American Society for Testing and Materials (“ASTM”) has stated in their Standard Practices that de a minimis condition is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of

appropriate governmental agencies and such a condition is not a Recognized Environmental Condition or Controlled Recognized Environmental Condition. (ASTM E 1527-13, § 3.2.22, *Definitions*).

<i>Deteriorated Paint</i>	Any interior or exterior paint or other coating that is peeling, chipping, chalking, or cracking, or any paint or coating located on the interior of exterior surface or fixture that is otherwise damaged or separated from the substrate. (WAC Chapter 365-230-020(26)).
<i>dry wells</i>	underground areas where soil has been removed and replaced with pea gravel, coarse sand, or large rocks. Dry wells are used for drainage, to control storm runoff, for the collection of spilled liquids (intentional and non-intentional) and wastewater disposal (often illegal). Because the function of a dry well is to hold drainage and storm water until it soaks into the ground, these structures are capable of leaching potentially contaminated liquids into the subsurface soil and then into the ground water.
<i>dwelling</i>	any structure all or part of which is designed or used for human habitation, ie.; a place of residence or abode.
<i>engineering controls</i>	physical modifications to a site or facility (for example, capping, slurry walls, or point of use water treatment) to reduce or eliminate the potential for exposure to hazardous substances in the soil or ground water on the property.
<i>environmental audit</i>	the investigative process to determine if the operations of an existing facility are in compliance with applicable environmental laws and regulations. This term should not be used to describe Transaction Screens or Phase I Site Assessments, although an environmental audit may include an site assessment or, if prior audits are available, may be part of an environmental site assessment.
<i>Environmental Professional</i>	(for the performance of Environmental Site Assessments) a person possessing sufficient training and experience necessary to conduct a site reconnaissance, interviews, and other activities in accordance with the practices of the ASTM, and from the information generated by such activities, having the ability to develop opinions and conclusions regarding recognized environmental conditions in connection with the property in question. Status of an individual as an environmental professional may be limited to the type of assessment to be performed or to specific segments of the assessment for which the professional is responsible.
<i>Environmental Questionnaire (SBA)</i>	a questionnaire used by a Lender to determine the likelihood that Contamination may be present at Property offered to secure an SBA guaranteed loan. Environmental Questionnaires must be completed or reviewed by a Lender that has made at least one site visit to the Property and a good faith effort to conduct an interview with the current owner or operator of the Property. An Environmental

Professional may, but is not required to, assist with the responses to the questionnaire. An Environmental Questionnaire may be considered if it was completed up to 1 year prior to submission. The current owner or operator of the Property must sign the Environmental Questionnaire the Environmental Questionnaire. If the current owner or operator of the Property will not sign the Environmental Questionnaire it cannot be used and lender must then, at a minimum, obtain a Transaction Screen.

field screen questionnaire

the environmental questionnaire normally completed by the Key Site Manager, that asks the respondent to answer all questions to the best of their actual knowledge and good faith. The answers provide further details on the appropriateness of the investigation and areas of potential environmental concern.

*historical recognized
environmental condition*

an environmental condition which in the past would have been considered a recognized environmental condition, but presently may or may not be considered a recognized environmental condition. If a past release of any hazardous substances or petroleum products has occurred in connection with the property and has been remediated, with said remediation accepted by the responsible regulatory agency (for example, by the issuance of a No Further Action letter), this condition is generally considered to be an historical recognized environmental condition. As such, it still should be referenced in the findings or conclusions section of the assessment report. The environmental professional preparing the report may provide an opinion of the current impact upon the property of this historical recognized environmental condition.

Historical Recognized Environmental Condition

A past release of any hazardous substance or petroleum product that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory agency or meeting the unrestricted residential use criteria established by a regulatory authority, without subjecting the property to any required controls such as property use restrictions, activity and use limitations, institutional controls, or engineering controls – at the time of the completion of the Environmental Site Assessment. (ASTM E 1527-13, § 3.2.41, *Definitions*).

Judicial Records for Environmental Liens: Search and Review

To meet the requirements of the All Appropriate Inquiry Standard 40 CFR §§ 312.20 and 312.25, a review of title and judicial records for Environmental Liens recorded against the Property must be performed by the User of this Assessment and provided to the Environmental Professional for review. The Scope of Work for this Assessment states that the Firm and Environmental Professional will not perform a search for Environmental Liens.

Key Site Manager a person identified by the owner of the Property as having the best reliable

knowledge of the previous uses, current conditions, and physical characteristics of the Property, and in a position to provide reasonably accurate information for the Field Screen Questionnaire.

institutional controls a legal or administrative restriction (for example a deed restriction, restrictive zoning) on the use of, or access to, a site or facility to reduce or eliminate potential exposure to hazardous substances in the soil or ground water on the property.

Material Fact

information that substantially adversely affects the value of a property of a party's ability to perform its obligations in a real estate transaction, or operates to materially impair or defeat the purpose of the transaction (State of Washington Laws, Chapter 58, Section 1(9)).

material threat a physically observable or obvious threat which is reasonably likely to lead to a release that, in the opinion of the environmental professional, is threatening and might result in impact to the public health or the environment.

Migration

The movement of hazardous substances or petroleum products in any form, including but not limited to: solid and liquid at the surface or subsurface, and vapor in the subsurface. (Vapor in the subsurface is also described in the *Vapor Encroachment Screen on Property Involved in Real Estate Transactions*, ASTM Standard Practice No. E2600-08; however, this Environmental Site Assessment has not applied the E 2600-15 Practice to the subject Property in order to achieve compliance with the E 1527-13 Standards). (ASTM E 1527-13, § 3.2.55 Definitions).

obvious that which is plain or evident; a condition or fact that could not be ignored or overlooked by a reasonable observer while visually or physically observing the property.

*Phase I
Environmental
Site Assessment*

the process described in the ASTM practice E 1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. See also 40 CFR § 312.20.) The process by which a person or entity seeks to determine if a particular parcel of property including improvements is subject to recognized environmental conditions. The process does not purport to address all of the safety, environmental concerns, and regulatory compliance applicability associated with its use.

practically reviewable information that is practically reviewable means that the information is provided by the source in a manner and in a form that, upon examination, yields information relevant to the property without the need for extraordinary analysis

of irrelevant data. Records that cannot be feasibly retrieved by reference to the location of the property or a geographic area in which the property is located are not generally practically reviewable.

primary collateral the project site that is acquired or improved through the loan proceeds; and any business real property to be taken as collateral when it represents over 50% of the total collateral value. Primary collateral includes leasehold applications.

reasonable time and cost information is obtainable within reasonable time and cost if the information will be provided by the source within 20 calendar days of receiving a written, telephonic, or in-person request at no more than nominal cost intended to cover the source's cost of retrieving and duplicating the information.

reasonably ascertainable for the purposes of environmental assessments, information that is (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints, and (3) practically reviewable.

*Recognized
Environmental
Condition*

Defined by the ASTM as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to health or the environment and would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

Recognized Environmental Condition

The presence or likely presence of any hazardous substances or petroleum products in, on, or at the property (1) due to any release, (2) under conditions indicative of a release to the environment, (3) under conditions that pose a material threat of a future release to the environment. De Minimis Conditions are not Recognized Environmental Conditions. (ASTM E 1527-13, § 3.2.77 *Definitions*).

*Records Search with
Risk Assessment*

as defined by the U.S. Small Business Administration means and includes (1) a search of the government databases identified in 40 CFR § 312.26 for an AAI compliant Phase I as well as a search of historical use sources (for example, aerial photography, city directories, reverse directories and/or fire insurance maps) pertaining to the Property and Adjoining Properties; and a risk assessment by an Environmental Professional based on the results search as to whether the Property is either "low risk" or "elevated risk" or "high risk for Contamination. While the

choice of standard historical sources to be reviewed on any particular site is at the discretion of the Environmental Professional in his or her professional judgment, the historical sources should identify property uses back to the property's first developed use, or back to 1940, whichever is earlier. The Environmental Professional need only review as many of the standard historical sources as are necessary, reasonably ascertainable, and likely to be beneficial.

Regulatory Agency File and Records Review

If a property or any of the adjoining properties is identified on one or more of the *Standard Environmental Record Sources* as delineated in the ASTM E 1527-13 § 8.2.1, pertinent regulatory agency files and/or records associated with the listing should be reviewed in order to obtain sufficient information to assist in the determination of the presence of a Recognized Environmental Condition, Historical Recognized Environmental Condition, Controlled Recognized Environmental Condition, or a De Minimis Condition. The Assessment will provide a written summary of the reviewed materials. If such a review is not warranted, the Assessment will provide the justification for not conducting the regulatory file review.

residential building any room, group of rooms or other interior areas of a structure designed or used for human habitation; common areas accessible by inhabitants; and the surrounding property.

Site Assessment Many state agencies refer to the Phase II level of investigation as "Site Assessment," typically performed in the preliminary stages of a response action to recently discovered contamination, whose objective is to determine in an expeditious manner if the level or extent of site contamination poses an immediate risk to human health or the environment, thereby necessitating an immediate response action.

Site Characterization A Phase III investigation conducted in order to delineate and quantify the extent of contamination upon the subject Property, and generate sufficient information and data with which to reasonably estimate the cost of remediation or other response actions.

Site Reconnaissance Report A Reconnaissance Report is a written summary of the information and observations of the Site Assessor who personally performed the Site Visit at the subject Property. This Report is completed following the guidelines and procedures delineated in the *Aerotech Environmental Consulting Guidance for Performing the Site Visit and Reconnaissance Report*.

Title Records for Environmental Liens: Search and Review

To meet the requirements of the All Appropriate Inquiry Standard 40 CFR §§ 312.20 and 312.25, a review of title and judicial records for Environmental Liens recorded against the Property must be performed by the User of this Assessment and provided to the Environmental Professional for review. The Scope of Work

for this Assessment states that the Firm and Environmental Professional will not perform a search for Environmental Liens.

*Transaction Screen
Site Assessment*

the process described in the ASTM E 1528-14 standard, *Standard Practice for Environmental Site Assessments: Transaction Screen Process*.

VAPOR ENCROACHMENT TERMS AND DEFINITIONS
(Effective December, 2020)

**Appropriate Minimum
Search Distances**

are provided in the in the E2600-15 Standard Practice

Area of Concern

("AOC") defined by the *appropriate minimum search distance* adjusted as appropriate. When the AOC is defined by the *appropriate minimum search distance* without adjustment, the AOC is the default *AOC*. (§ 3.2.3)

**Business Environmental
Risk**

risk that can have a material environmental or environmentally drive impact on the transaction or the business associated with the current or planned use of a parcel of property, not limited to environmental issues that are investigated pursuant to this guide. (§ 3.3.2)

Chemicals of Concern

("COCs") a chemical that is present in the subsurface environment... and can potentially migrate as a vapor into the vadose zone of the *TP*; can also include volatility and toxicity and include volatile organic compounds, semi-volatile organic compounds.

Conduit

preferential pathway along which vapors released from contaminated soil and/or groundwater may migrate onto the *TP* or away from the *TP*. (§ 3.2.6)

Contaminated Plume

plume in which concentrations of COC are known to be present in the soil or groundwater or both at concentrations exceeding levels that generally would be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. (§ 3.2.8)

A contaminated plume can take the form of a groundwater or soil contaminated plume. In a groundwater contaminated plume, COC may be conveyed as solutes away from the point at which they were introduced into groundwater. They move with the migrating groundwater mass in the direction of the groundwater flow. When dispersion within the groundwater contaminated plume brings a dissolved COC to the groundwater-soil gas interface, the COC may transition from the dissolved state to the vapor state and migrate from groundwater into soil gas in the vadose zone. Once a COC migrates into soil gas in the vadose zone, its migration may no longer be dependent on or related to groundwater movement.

In a soil contaminated plume, COC volatilized from the soil mix freely with soil gas that exists within soil voids in the vadose zone. The COC in soil gas can also be introduced from underlying contaminated groundwater, as result of a liquid spill into vadose zone soils, or by the direct release of vapors from a leaking underground source. Migration of COC contaminated soil gas through the vadose zone may be in any direction; however, it preferentially follows the path of least resistance. Fluctuations in barometric pressure may cause movement of air and vapors into and out of the vadose zone through preferential pathways.

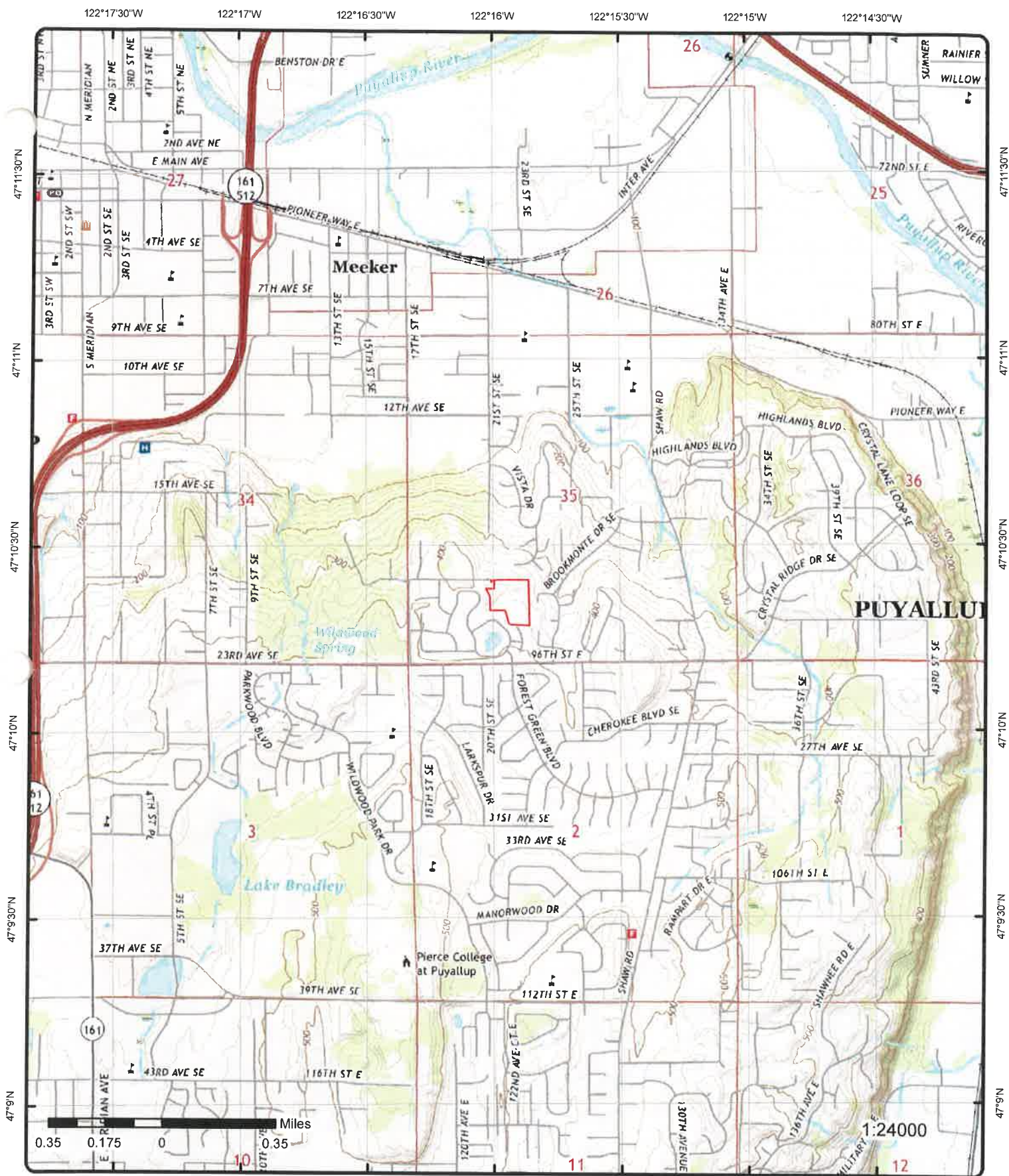
Critical Distance	the Critical Distance is the lineal distance in any direction between the nearest edge of the Contaminated Plume and the nearest Target Property boundary, and is equal to 100 feet for COCs or 30 feet for dissolved petroleum hydrocarbons COC. The critical distance represents an estimate of the lineal distance COC vapors volatilized from contaminated groundwater or contaminated soil might migrate in the vadose zone to the Target Property.
Groundwater	water contained in the pore spaces of saturated geological media. (§ 3.2.15).
Preferential Pathway	pathway that has the least amount of constraint on the migration of COC vapors (§ 3.2.25)
Recognized Environmental Condition	(“REC”) the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions <i>indicative of a release</i> to environment; or (3) under conditions that pose a material threat of a future release to the environment. (§ 3.3.22)
Saturated Zone	zone in which all of the voids in the rock or soil are filled with water at a pressure that is greater than atmospheric. (§ 3.2.29).
Solute	a substance that can be dissolved by a solvent to create a solution. A solute can come in many forms; it can be gas, liquid, or solid. The solvent or substance that dissolves the solute, breaks the solute apart and distributes the solute molecules equally. A solvent can dilute various amounts of solute, depending on how strong of a solvent is used and how strong of a solvent is used and how easily the solute molecules come apart. This property of solutes to dissolve in a solvent is known as solubility.
Vadose zone	(also referred to as the unsaturated zone) zone between the land surface and the water table within which moisture content is less than saturation (except in the capillary fringe) and pressure is less than atmospheric. (§ 3.2.29).
Vapor Encroachment Condition	(“VEC”) presence or likely presence of COC vapors in the vadose zone of the <i>TP</i> caused by the vapors from contaminated soil and/or groundwater either on or near the <i>TP</i> as identified by the Tier 1 (see Section 8) or Tier 2 (see Section 9) procedures

in this guide. (§ 3.2.37).

APPENDIX

- Site Location and Photographs
- Project Contract Documents
- Supplemental Documents
- Environmental Database

■ Site Location and Photographs



Topographic Map

Year: 2020

Order Number: 24050300454

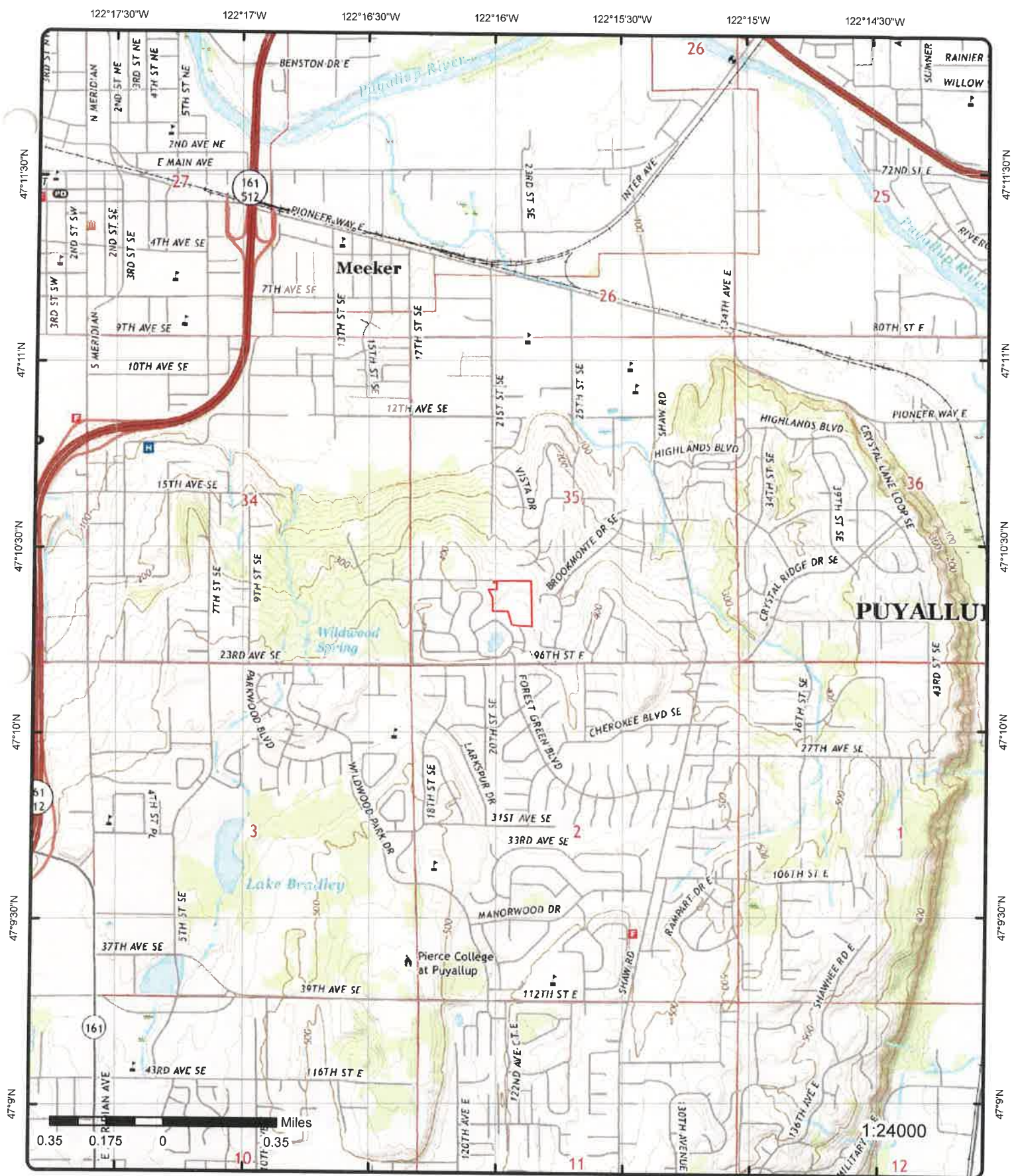
Address: n/a, WA

Quadrangle(s): Puyallup WA, Sumner WA

Source: USGS Topographic Map



© ERIS Information Inc.



Topographic Map

Year: 2020

Order Number: 24050300454

Address: n/a, WA

Quadrangle(s): Puyallup WA, Sumner WA

Source: USGS Topographic Map



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ERTS 620837, Greeley Property, 2301 23rd St. SE, Puyallup



- Map Legend
- Highlighted Tax Parcels
 - Roads
 - Interstate
 - Limited Access State Routes
 - Other State Routes
 - Ramps
 - Major Arterial
 - Collector
 - Local Access
 - County - 2008 - Ortho

Scale 1:1,747

0 75 150 ft.



Printed: 5/10/11 5:38 PM



The map features are approximate and are intended only to provide an indication of said feature. Additional areas that have not been mapped may be present. This is not a survey. Orthophotos and other data may not align. Pierce County assumes no liability for variations ascertained by actual survey. All data is expressly provided AS IS and WITH ALL FAULTS. Pierce County makes no warranty of fitness for a particular purpose.

Sunseet Point
Puyallup, Washington
Page 1 of 7

Northern entrance to
Property



Driveway entrance

Entrance road



Sunset Pointe
Puyallup, Washington
Page 2 of 7

Northern portion of Parcel



Eastern fence line

View to the east



Sunset Pointe
Puyallup, Washington
Page 3 of 7

Northeast wall of retention
pond



Center of pond

Western adjoining wetlands



Sunset Pointe
Puyallup, Washington
Page 4 of 7

Pathway along east side of
pond



Area south of pond

Former man-made retention
pond with discharge into
Retention Pond



Sunset Poine
Puyallup, Washington
Page 5 of 6

Foundation of Storage Barn



Foundation of residence

Foundation of Horse Barn



Sunset Pointe
Puyallup, Washington
Page 6 of 7

Foundation of Museum
building



Foundation of Museum
north addition

South side surfaces



Sunset Pointe
Puyallup, Washington
Page 7 of 7

Southern entrance to
Property



Signage on southern fence

Subject Property along
fence line



■ Project Contract Documents

ENVIRONMENTAL CONTRACTOR'S CERTIFICATION

SUNSET POINTE DEVELOPMENT

2301 - 23rd Avenue Southeast
Puyallup, Washington 98372

1. Contractor's Name: Aerotech Environmental Consulting, Inc.
2. Contractor's Address: 14247-R Ambaum Boulevard Southwest, Burien, Washington 98166
3. Name and title of person completing this certification: Alan T. Blotch / President
4. Answer the following questions about each employee that contractor will have perform the assessment or prepare the report showing the results of the inspection:
 - a. Name and Title of Employee: Alan T. Blotch – Environmental Assessor
 - b. Length of experience doing environmental assessments: 45 years
 - c. Education degrees received: Masters of Business Administration
Juris Doctor – Environmental Law
 - d. Relevant training received: ASTM E50 Environmental Assessment Committee Meetings
5. Identify any certifications and approvals issued to contractor pursuant to an official Federal, State or local program or policy to conduct environmental assessments: Registered Environmental Assessor
Issued by State of California (1993-2012)
6. Describe the generally recognized standards which the contractor will use to perform the assessment.
Standard Practice for Environmental Site Assessments: Phase I Assessment (ASTM E 1527-21)
Standard Practice for Environmental Site Assessments: Transaction Screen Process (ASTM E 1528-22)
7. Disclose the nature of any previous environmental inspections contractor has ever performed for the owner of the property: None.
8. Disclose the nature of any affiliation or association contractor now has, or ever had, with the above referenced seller of the property, of the above referenced buyer of the property - Phase I Assessment (2018)
9. Describe the liability insurance carried by contractor to cover claims in the event that it fails to discover adverse environmental conditions during an environmental inspection.
Professional Errors & Omissions Coverage \$1,000,000 / claim and \$1,000,000 aggregate liability

THE UNDERSIGNED HEREBY CERTIFIES, UNDER PENALTY OF THE CRIMINAL AND/OR CIVIL PENALTIES IN 18 U.S.C. § 1001 FOR FALSE STATEMENTS TO THE UNITED STATES GOVERNMENT, THAT THE ABOVE INFORMATION IS TRUE AND CORRECT.



Signature

05/06/24
Date

■ Supplemental Documents

Statement of Environmental Professional Qualifications:

CURRICULUM VITAE

Alan T. Blotch

Mr. Blotch was previously the Corporate General Counsel for a national industrial safety and environmental consulting firm, with offices throughout the United States. Since 2000, he has been the President of an environmental consulting firm while continuing his law practice, specializing in insurance defense litigation orientated towards construction, products liability, environmental, health, and safety matters.

Mr. Blotch has over 45 years experience in the industrial safety and environmental consulting industry, including both field assessment and management positions. For nine years he held a variety of positions with a national consulting firm, including division manager, marketing vice president, and executive vice president.

Additionally, Mr. Blotch has been involved since 1991 in the development of the ASTM E50 Committee Phase I Environmental Site Assessment Standard Practice, ASTM Standard for the Survey of Asbestos Building Materials, EPA/HUD contract NIBS Lead-Based Paint Operations Manual, and NIBS Asbestos Operations and Maintenance Guidance manual.

Education:

University of Illinois at Chicago Circle – undergraduate pre-law
Illinois Benedictine College – Masters of Business Administration
Chicago-Kent College of Law – Juris Doctor of Law
with Certificate in Environmental and Energy Law

Certifications / Licenses:

Registered Environmental Assessor – State of California (1993 - 2012)
Asbestos Supervisor, Project Manager – AHERA Accredited
Asbestos Building Inspector, Management Planner, Project Designer - AHERA Accredited
Attorney at Law – State of Washington & State of Oregon
Lead-Based Paint Inspector and Risk Assessor - US EPA Accredited
Lead-Based Paint Risk Assessor - State of Washington Licensed

Organization Memberships:

American Bar Association
– Section of Environmental, Energy, and Natural Resources, member.
American Industrial Hygiene Association
American Society of Safety Engineers
– Board of Directors, Puget Sound Chapter, former member;
– Former Chairman, Regulatory Affairs Committee
American Society for Testing and Materials (ASTM)
– Environmental Standards Committee E50, Environmental Site Assessments, member;
– Asbestos Inspection Protocol for the Survey of Asbestos Building Materials Working Group, member;
– Environmental Standards Committee E06, Performance of Buildings, member.
Association of Trial Lawyers of America

Defense Research Institute, Inc.

National Institute of Building Sciences

- Operations Committee of Consultative Council; member, Project Committee on Lead-Based Paint O&M Work Practices Manual and Procedures Development, member;
- Project Committee on Asbestos Management, and Operations and Maintenance Manual Development, member;
- Project Committee on Asbestos Specifications and Response Actions Standards Revision, former member.

Occupational Safety and Health Administration

- Advisory Committee on Construction Safety and Health, former participant.

Puget Sound Area Construction Safety Summit

Washington Defense Trial Lawyers Association

- Association magazine editorial board, former member.

Washington State Trial Lawyers Association

Washington State Bar Association

- Attorney Character and Fitness Committee / former Hearing Officer

Professional and Standards Development:

ASTM Phase I Environmental Site Assessment Practice. Beginning in 1991, Mr. Blotch was involved in the drafting and review of the American Society for Testing and Materials (“ASTM”) Environmental Standards Committee E50, Environmental Site Assessments, charged with the responsibility of developing the ASTM Phase I Environmental Site Assessment Standard Practice. This involvement in the committee’s work continues to the present, included the 2006 Standard Revisions.

ASTM Survey of Asbestos in Buildings Practice. In 1993, the ASTM formed a working group to develop an Asbestos Inspection Protocol for the Survey of Asbestos Building Materials Working Group. Mr. Blotch personally performed the drafting of significant portions of the initial Survey document. His involvement continues to the present.

National Institute of Building Sciences (“NIBS”) Lead-Based Paint Work Practices Manual. In 1992, Mr. Blotch was invited to join the newly formed NIBS Operations Committee of Consultative Council, Project Committee on Lead-Based Paint O&M Work Practices Manual and Procedures Development pursuant to a NIBS contract with the EPA and HUD. For two years Mr. Blotch attended the committee meetings and discussion groups and participated in the development and review of the Manual, which was subsequently published by the EPA.

NIBS Asbestos Operations and Maintenance Manual. Beginning in 1994, Mr. Blotch was invited to join the newly formed Project Committee on Asbestos Management, and Operations and Maintenance, charged with the responsibility of developing an Asbestos O&M Manual. This work included both the attendance of working group committee meetings and document review. This project was completed within two years.

NIBS Asbestos Specifications Revision. In order to ensure compliance with the revised OSHA asbestos regulations, in 1997, NIBS formed a Project Committee on Asbestos Specifications and Response Actions Standards Revision, of which Mr. Blotch was a member. His involvement included review and comment on the draft Specification revisions to the NIBS Asbestos MASTERSPEC® Removal and Response document.

State of Washington Industrial Hygiene & Safety Title Protection Act. Instrumental in drafting the 2001 Session Washington State Industrial Hygiene and Professional Safety Title Protection Act, Chapter 18

of the Washington Revised Code. Testified before the Legislature's combined House and Senate Committee on Commerce and Industry in support of the Title Protection Act.



City of Puyallup

Planning Division

333 S. Meridian, Puyallup, WA 98371

(253) 864-4165

www.cityofpuyallup.org

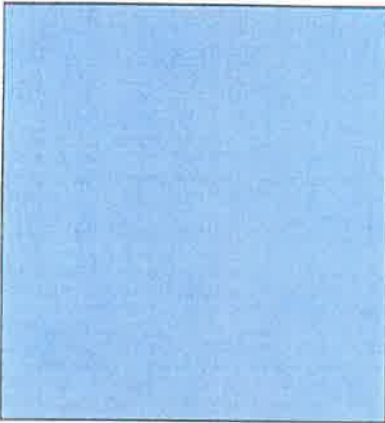
July 28, 2023

CES NW Inc.

29th St. NE, suite D

Puyallup, WA 98372

DEVELOPMENT REVIEW TEAM (DRT) LETTER	
DRT #	2
PERMIT #	P-18-0040
PROJECT NAME	SUNSET POINTE
PERMIT TYPE	Preliminary Major Plat
PROJECT DESCRIPTION	** SUNSET POINTE MAJOR PLAT ** AMR E-18-0166
SITE ADDRESS	2301 23RD ST SE ;
PARCEL #	0420353027;
ASSOCIATED LAND USE PERMIT(S)	
APPLICATION DATE	March 15, 2018
APPLICATION COMPLETE DATE	
PROJECT STATUS	Active Development Review Team (DRT) review case – resubmittal required. Please address review comments below and resubmit revised permit materials and by responding in writing to the remaining items that need to be addressed.
APPROVAL EXPIRATION	N/A – Active permit application, not approved
CONDITIONS	Active permit application, not approved; Pursuant to PMC 20.11.022 regarding inactive applications, any and all pending land use applications or plat applications shall be deemed null and void unless a timely re-submittal is made to the City within 1 year of issuance of this Development Review Team (DRT) comment letter. DRT review letters typically identify requested corrections, studies or other additional required pieces of information necessary to demonstrate conformance with the City's adopted development standards and codes.



Subsequent applicant re-submittals shall make a good faith effort to respond to each request from this letter in order for the application to remain active. The failure to provide timely responses or lack of providing the requested material(s) within the 1-year window following DRT comment letter issuance shall be grounds for expiration, thus deeming the pending application null and void with or without a full or partial refund of application fees.

The City has completed the review of the above-mentioned permit submittal. All of your review comments, conditions, and redlined plans can be found on the [City's permit portal](#). Redlined plans can be found on the City's Permit Portal in the "Reviews" section under "Documents Returned for Corrections". Below please find the permit submittal review comments from your review team and re-submittal instructions. Should you have any questions regarding the review comments, please contact the plan reviewer associated with the comment listed below.

Re-submittal Instructions

To resubmit, you must respond to all comments in a written response letter and submit a letter of transmittal. Letter of transmittal and response letter must be submitted to the 'Correction Response Letter' item listed in the submittal items list. Avoid using "upload additional docs" unless there is NO submittal item available for your document. Please Note: If you do not resubmit as instructed your re-submittal will be rejected. If you have any questions about how to resubmit, please contact the permit center at permitcenter@puyallupwa.gov.

- 1 Log in to your permits portal and navigate to the [status page](#) for this permit. Under the 'Upload Documents' section, select 'click here to upload document'.
- 2 For each submittal item listed re-submit a new version of the submittal item by clicking the "New Version" button next to the file name of the original file submitted. DO NOT click the 'browse' button unless the document you are submitting for that submittal item is not a new version of the originally submitted document.
- 3 Click 'Upload Documents' at bottom of the page.

How to use this letter

This review letter includes two sections: **"Corrections"** and **"Conditions"**.

The **"Corrections"** section includes all items that the applicant must address to comply with the Puyallup Municipal Code (PMC) and city standards. Items listed in under **Action Items** require a resubmittal under this permit for further review by the Development Review Team (DRT); your application is not approved. Please make those updates to the proposed plans and resubmit for review. Please include a response letter outlining how you have revised your proposal to meet these items for ease of plan check by DRT members.

The **"Conditions"** are items that will govern the final permit submittal(s) for the project. Please be aware that these conditions will become conditions of the final permits and/or recommendations to the Hearing Examiner, if applicable.

If you have questions regarding the action items or conditions outlined in this letter, please contact the appropriate staff member directly using the phone number and/or email provided.

Corrections

Planning Review - Chris Beale; (253) 841-5418; CBeale@PuyallupWA.gov

- The site appears to be marked as PENDING CLEAN UP for site contamination with the Tacoma Pierce County Health Department (TPCHD); previous SEPA comments from Ecology also indicate environmental clean up issues (see Ecology letter dated April, 2018). SEPA mitigation conditions are forthcoming regarding site environmental assessment, and possible site clean up at the direction of Ecology, to be addressed at the time of civil review. Applicant must coordinate with Ecology and/or TPCHD to resolve. February, 2022 staff follow up comment to this correct: The Ecology clean up report data was obtained in 2020 (Ecology clean up ID 11739). Also see the Ecology SEPA comment letter with requirements (dated April 27, 2018) under the Toxic Clean ups section. The response report (Environmental associates phase 1 report, dated January 14, 2005) provided does not resolve this comment. Please contact the Toxic Clean ups coordinator and Ecology and obtain updated guidance on needed remediation steps to resolve site contamination issues and provide upon resubmittal.

2023 PMS
ALSO DOES NOT

UPDATED COMMENT: (July 28, 2023) Staff has reviewed the Phase I Environmental Site Assessment of the site by Earth Solutions NW and transmitted the report to Ecology for review under SEPA. Ecology provided a response on July 26, 2023 - see file in documents and images. We will require pollution in the environment be cleaned up in compliance with WAC 173-340 before allowing any grading, filling, or other construction activities at the site. or an independent cleanup conducted under WAC 173-340-515, the cleanup would be complete when a no further action opinion (NFA) letter is issued under WAC 173-340-515(b). Please follow up with a response to the Ecology email with a plan of action on the part of the owner/applicant to address the recommendations from the Toxic Cleanup program staff.

- At the time of civil permit application, the applicant shall provide an access and grading plan for proposed lots 7 and 8 that demonstrates access drive will not exceed 10% slope, that storm water design will direct water to the proposed dispersion area to the west and that retaining walls needed to support access to lots 7 and 8 meet the retaining wall codes (PMC 19.12.070 (3) and PMC 20.58.005 (2)). The access tract may need to shift south to avoid conflicts and meet code which may impact final plat layout. See corresponding comments from Fire Prevention and Engineering.

UPDATED COMMENT: (July 28, 2023) Staff has reviewed the preliminary exhibit and cannot determine if the wall proposed will meet the setback and height regulations in PMC 19.12.070 (3) and PMC 20.58.005 (2). See mark ups. The feasibility of lot 8 appears dependent upon tract c access and grading and walls.

- All pedestrian walkways shall be dedicated as use by the public at the time of final plat; the walk way between lots 14/15, site wetlands, lots 3/5 will be a public right of way dedication at the time of final plat. These walkways shall be 15' wide right of way, and fully improved with blacktop asphalt or other approved surfacing by Public Works, 10' wide improved surface, with 24" gravel shoulders, access restrictions (bollards or other method as approved by Public Works) and landscaping, at the time of civil permitting.

UPDATED COMMENT: (July 28, 2023) These do not appear to be called out as ROW dedication and are not shown as improved as required. Please note this will be a condition of recommended approval.

- Other conditions outlined in the December, 2020 DRT letter remain in effect and will be carried forward to the Hearing Examiner once all issues related to the plat are resolved.
- Confirm that the NGPA will not be disturbed during site grading. Its not clear if a retaining wall is proposed or a storm drainage line? [R6-02 Prelim plat sheet P2, planning comment]
- Confirm the height and setback of this wall meets PMC 20.58.005 (2). The feasibility of lot 8 appears dependent upon tract c access and grading and walls. [R6-02 Prelim plat sheet P2, planning comment]
- Add a list of tracts and purpose of each tract to the cover sheet. Please note that tract E, the trail area between pond A and B and trail along west side of tract B are required to be dedicated as public right of way [R6-02 Prelim plat sheet 1, planning comment]
- Note condition from December 2020 letter that applies to this connection between Highlands DR and 19th Ave extension. Public right of way dedication of 80' for future roadway connection from the extended 19th Ave to Highlands Drive shall be provided at the time of final plat on parcel A; [R6-02 Prelim plat sheet 1, planning comment]

Engineering Review - Jamie Carter; (253) 435-3616; JCarter@puyallupwa.gov

- NOTE TO DESIGNER: As this project has a lot of history and several reviews/reviewers, on this round of Major Plat Review we have included many notes regarding plat layout and construction. This is to ensure that notes from previous reviews are not lost or forgotten. Many of these engineering comments do not require responses or corrections and are included as reminders or placeholders for items and design concepts that shall be included with the civil submittal. Other comments will require clarification or correction for this phase of development review. Please review the notes thoroughly in order to reduce subsequent submittals and review times.

- **STORM GENERAL**

- Development and redevelopment projects are required to employ, wherever feasible, Low Impact Development practices to meet the design criteria set forth in PMC 21.10.190 and the Ecology Manual.

- Public ROW runoff shall be detained and treated independently from proposed private stormwater facilities. This shall be accomplished by providing separate publicly maintained storm facilities within a tract or dedicated ROW; enlarging the private facilities to account for bypass runoff; or other methods as approved by the City Engineer. PMC 21.10.190(3).

- At the time of civil permit application the applicant is responsible for submitting a permanent stormwater management plan which meets the design requirements provided by PMC 21.10. The plan and accompanying information shall provide sufficient information to evaluate the environmental characteristics of the affected areas, the potential impacts of the proposed development on surface water resources, and the effectiveness and acceptability of measures proposed for managing storm water runoff. The findings, existing and proposed impervious areas, facility sizing, and overflow control shall be summarized in a written report. PMC 21.10.190, 21.10.060.

- In the event that during civil design there is insufficient room for proposed stormwater facilities in the area(s) shown on the plat, the stormwater area(s) shall be increased as necessary so that the final design will be in compliance with city and state standards. This may result in the number of lots being reduced, or a reduction in other site amenities. PMC 21.10.060(4), PMC 21.10.150.

- At the time of preliminary plat construction all storm drains shall be signed according to City of Puyallup Design Standard 204.11.

- All private storm drainage facilities shall be covered by a maintenance agreement provided by the city and recorded by Pierce County. Under this agreement, if the owner fails to properly maintain the facilities, the city, after giving the owner notice, may perform necessary maintenance at the owners expense. PMC 21.10.270

- Erosion control measures for this site will be critical. A comprehensive erosion control plan will be required as part of the civil permit application.

- Prior to the final plat being accepted by the city, all disturbed areas within the site shall be stabilized to the satisfaction of the City Engineer.

- A Stormwater System Development Charge (SDC) will be assessed for each new Single Family Residence (SFR). The current SDC as of this writing is \$4,013.00 per unit. Stormwater SDCs are due at the time of site development permit, or in the case where no site development permit is required, at the time of building permit issuance for the individual lot(s), and the fees do not vest until the time of site development permit issuance, or at the time of building permit issuance in the case where a site development permit is not required.

- A Construction Stormwater General Permit shall be obtained from the Washington State Department of Ecology if any land disturbing activities will disturb one or more

- **FULL DISPERSION** - The concept of FULL DISPERSION is acceptable to the City and is a preferred method of controlling runoff. However, there are specific design standards laid out by the ECY Manual that have to be met in order to qualify the design. The Drainage Report at CIVIL SUBMITTAL must clearly demonstrate how the design will achieve these requirements. Specifically:

- According to the 2019 SWMMWW the design must be laid out to allow the runoff from the impervious or cleared areas to fully disperse into the preserved area, meaning that the flows cannot be intercepted by PIPES, ditches, streams, rivers, lakes, or wetlands. See BMP T5.30.

-The entire parcel set aside for dispersion must be in an easement or be dedicated to the City. Showing the 100 foot flow path is correct for stormwater analysis, but the entire parcel is to be preserved.

-Specify that the project is using FULL DISPERSION FROM ROADWAY SURFACES under BMP T5.30 to mitigate roofs and driveways. Address each bullet (requirement) from that section in detail or describe how the roof and driveway runoff will be otherwise conveyed and dispersed through the preserved parcel.

-Refer to FULL DISPERSION FROM CLEARED AREAS IN RESIDENTIAL PROJECTS for requirements related to landscaped and cleared areas. Address each bullet from that section in detail or describe how the cleared areas will be dispersed through the preserved parcel.

-What is the true size of the proposed preserved parcel? Page 8 of the stormwater report says 10.74 while other docs claim about 11.13. GIS says 10.77. Measure the parcel POST-DEDICATION and use that number for the 10% impervious area within a dispersion basin calculation.

- **RECHARGE BASIN** - This project basin ultimately discharges to existing wetlands/ponds within the development. To that end the project must demonstrate compliance with the following conditions:

- Document the tributary area to the wetland/ponds and provide an analysis of surface water elevations and volume using a continuous runoff model for the 100-year recurrence interval developed condition.

- Any developed flows to the ponds shall match the pre-developed flowrates for the 2-, 10-, and 100-year recurrence interval flows.

- The overflow route from the wetlands/ponds shall be analyzed, using the fully developed contributing basin and any potential adverse impacts shall be identified and mitigated.

- Provide hydroperiod analysis in accordance with the ECY Manual MR#8 and Appendix I-C.

- RECHARGE BASIN - Will roofs from lots 16-18 be hard piped to manifold in back of lots? Is manifold to be installed in "forested" area? How will runoff from Lots 9-12 drain to the buffer?

model. Lawn is 0.76 on Basin Map and is modeled as 0.543 acres. Totals do not match: 5.45 acres on the map and 5.238 acres modeled. Clarify or revise.

- RECHARGE BASIN: Existing culverts should be analyzed in conjunction with the recharge of the ponds/wetlands for proper capacity based on the developed condition. The analysis shall be enhanced prior to civil submittal to include details about the proposed control structures and the specific inputs and outflows to the existing ponds/wetlands.
- ROADWAY BASIN - 23rd St PI SE - Model this basin like the recharge basin. Clearly step through each phase of the drainage (ex: lawn->forest->buffer->pond) for both routes (23rd St PI SE and through the buffer behind Lot 15). Current modeling shows that mitigated flows exceed pre-developed flows. Provide more information and show the graph of the mitigated versus the pre-developed. Incorporate the model results into the Hydroperiod Analysis and clearly illustrate the nexus between the two.
- GROUNDWATER MONITORING PROGRAM - Clarify for reviewers the results of the groundwater monitoring program. The purpose is to record the highest and median groundwater levels in order for the project to be allowed to exclude infiltration from the design (in this case). In TP-104 the peak depth is recorded, but the peak groundwater level would correspond with the smallest depth BGS recorded thus revealing the highest elevation that the groundwater reached. Also, it is unclear to reviewers why the other 2 wells (TP-201 and TP-202) were only dug to depths that represent a level that is just above all recorded groundwater levels resulting in negative (?) depths to groundwater and N/A readings in the table. If the level of the water is known can it not be reported and analyzed? Revise or clarify.
- Correct typo as indicated. [R6-05 Prelim Report 2023_05_23*, Page 15/281]
- Correct typo as indicated. [R6-05 Prelim Report 2023_05_23*, Page 38/281]
- Why are CB#1 and CB#2 proposed to drain directly into the City's system? Report says the roadway for 23rd St PI SE will flow to dispersion trench in Tract B. [R6-02 Preliminary Plat Plans, Sheet P2]
- Symbol not in legend. Is this a retaining wall? Provide details including drainage and structural engineering if required with civil submittal. [R6-02 Preliminary Plat Plans, Sheet P2]
- What does this shape and linetype represent? Legend shows this linetype as an easement line. [R6-02 Preliminary Plat Plans, Sheet P2]
- WATER PMC Chapter 14.02 and Puyallup Design Standards Section 300
 - A new 8-inch diameter water main shall be extended into the site. The 4-inch main proposed on the plans on 23rd St PI SE may be acceptable as it is a dead-end run with no possibility of being expanded in the future. If a fire hydrant is required then the pipe will need to be upsized. Pipe for water mains shall be ductile iron conforming to Section 7-9 of the Standard Specifications.
 - Water mains shall have a minimum cover of 36-inches from paved final grade in improved ROW and easements, and 48-inches of cover in unimproved ROW and easements.

- 2-inch blow off assemblies are required on dead-end water lines except where fire hydrants are installed at the dead-end. See Detail 03.06.01.
- A 3/4-inch water service shall be provided for each building lot and shall be extended 10-feet into each of the proposed lots.
- The water main shall be located generally 10 or 12-feet west or south of roadway centerlines per city standard details.
- The minimum distance between water lines and sewer lines shall be 10-feet horizontally and 18-inches vertically. If this criterion cannot be met the applicant shall isolate the sewer and water lines by encasement, shielding, or other approved methods. CS 301.1(8).
- Fire Hydrants and other appurtenances shall be placed as directed by the Puyallup Fire Code Official. Fire Hydrants shall be placed so that there is a minimum of 50-feet separation from hydrants to any building walls.
- Air relief valves are required at high points in water lines. See detail 03.07.01.
- Water valves shall be installed along the water line at a maximum spacing of 400 feet and at the intersection of lateral lines. Water valves shall be clustered generally and shall be designed and located so that each leg of the main line system can be isolated.
- Detectable marking tape shall be installed on all new water mains including water service lines. The tape shall be placed approximately 1.5 feet above the top of pipe and shall extend its full length. Detectable marking tape shall be blue in color and meet the material requirements specified in the Standard Specifications 9-15.18.
- A water systems development charge (SDC) will be assessed for each new single-family residence. The current amount as of this writing is \$5,218.00. SDCs are due at the time of building permit issuance and do not vest until time of permit issuance.
- SEWER PMC Chapter 14.08 and Puyallup Design Standards Section 400
 - The applicant shall extend the existing public sewer main located within 23rd St Pl SE into the new cul-de-sac.
 - 6-inch side sewers shall be extended 15 feet into the proposed lots. The depth at the property line shall be a minimum depth of 5-feet.
 - Side sewers shall have a cleanout at the property line, at the building, and every 100 feet between the two points.
 - A sewer systems development charge (SDC) will be assessed for each new single-family residence. The current amount as of this writing is \$5,218.00. SDCs are due at the time of building permit issuance and do not vest until time of permit issuance.
- TRAFFIC SCOPING WORKSHEET - Traffic scoping worksheet says 15 units and current plans show 18. Update scoping document for civil submittal.
- STREETS GENERAL
 - Root barriers in accordance with City Standard Detail 01.02.03 shall be installed for all street trees within 10-feet of the ROW.
 - Wheel chair ramps, driveways, etc. shall be constructed in accordance with city standards and current ADA regulations. If there is a conflict between the city standards

and ADA regulations, the ADA regulations shall take precedence over the city's requirements.

- A separate street lighting and channelization plan is required for the city's review as part of the civil permit review.
- The sidewalks fronting home sites within the plat shall be poured at the time the homes are built. All other sidewalks are to be poured at the time of plat development. The developer shall be responsible to post an assignment of funds to guarantee all sidewalks are poured within 18 months of final plat approval.
- The asphalt within the sub-division shall be placed in two 2-inch lifts. The first lift shall be placed prior to final plat approval. The second lift shall be delayed until 90% of the homes are built or until 18 months after time of final plat, whichever occurs first. The developer shall be required to post an assignment of funds to guarantee the second lift.
- Street numbering and addressing shall be provided by Engineering Services and reflected on the final plat documents.
- Prior to final plat approval, the developer shall post a maintenance bond with the city in an amount set by the city to guarantee all workmanship for a one-year period from the time of plat completion.
- Existing private utilities that are in conflict with city maintained ROW and utilities shall be relocated outside of the traveled road section, i.e., behind the curb and under the sidewalk area at the developers expense.
- What will become of the newly created areas of 23rd St Pl SE where the 'existing cul-de-sac is to be removed'? While these areas are dedicated to the City, they still need to be reconstructed or stabilized.
- Identify/locate and label with the AFN the storm easement depicted between 22nd St SE and 23rd St Pl SE.
- Label entire 40 foot utility easement on and near 19th Ave SE on the plans. The lines are shown, but more labels/dimensions are needed.
- GRADING GENERAL
 - A Grading Plan conforming to all requirements of PMC Section 21.14.120 will be required for this project during civil submittal.
 - Note on the plat shall indicate: Certified safe bearing load for the building lots.
 - Note on the plat shall indicate: Geotech report required for each building lot prior to issuance of a building permit for said lot.
 - Cross sections will be required at various points along the property lines extending 30-feet onto adjacent properties to assure no impact from storm water damming or runoff.
- The following dedication language shall be provided on the final plat document:
 - FURTHER, THE UNDERSIGNED OWNERS OF THE LAND HEREBY SUBDIVIDED, WAIVE FOR THEMSELVES, THEIR HEIRS AND ASSIGNS, AND ANY PERSON OR ENTITY DERIVING TITLE FROM THE UNDERSIGNED, ANY AND ALL CLAIMS FOR DAMAGES



INITIAL INVESTIGATION FIELD REPORT

ERTS Number: 620837

Parcel #: 0420353027

COUNTY: PIERCE

SITE INFORMATION

Site Name (e.g., Co. name over door): Pioneer Museum <i>Former</i>	Site Address (including City and Zip+4): 2301 23 rd St SE Puyallup, WA 98373	Site Phone: none
Site Contact and Title: Joshua Gunia, grandson of owner	Site Contact Address (including City and Zip+4): 11603 Canyon Road E. Puyallup 98373	Site Contact Phone: 253/435-9999
Site Owner: Sharon Tanner	Site Owner Address (including City and Zip+4): 11907 240 th St NE Arlington, WA 98223	Site Owner Phone: 360/474-1829
Site Owner Contact:	Site Owner Contact Address (including City and Zip+4):	Owner Contact Phone:
Alternate Site Name(s):	Comments:	Is property > 10 acres? Yes ☒ No ☐
Previous Site Owner(s):	Comments:	

Location: Quarter-Quarter: 3-4 Section: 35 Township: 20N Range: 04E

Latitude: Degrees: 47 Minutes: 10 Seconds: 19.6 N

Longitude: Degrees: 122 Minutes: 15 Seconds: 54.8 W

INSPECTION INFORMATION

Inspection Date: 11.16.10	Inspection Time: 10 am	Entry Notice: Announced ☒ Unannounced ☐
Photographs Yes ☒ No ☐	Weather: Clear ☒ Rain ☐ Temperature: ~50 ° F	
Samples Yes ☒ No ☐	Wind Direction: Wind Speed:	

RECOMMENDATION

No Further Action (Indicate NFA in box below):		LIST on ISIS (Indicate in box below):	
Release or threatened release does not pose a threat	☐	Site Hazard Assessment	☒
No release or threatened release	☐	Interim Action	☐
Educational mailing	☐	Emergency Action	☐
Refer to program/agency (Name: _____)	☐	Independent Cleanup Action In progress	☐
Independent Cleanup Action Completed (i.e., contam, removed)	☐		

COMPLAINT (Brief Summary of ERTS):

Leaking drums

SITE STATUS (Brief Summary of site condition(s) after investigation):

Soil in vicinity of a cluster of stored drums is contaminated with petroleum hydrocarbons and agricultural chemicals.

Investigator: S. Bell

Date Submitted: 05.27.11

OBSERVATIONS

Description:

This property is about 20 acres in size, and encompasses three parcels. Two parcels list the taxpayer as Grace Ardell Greeley. A third parcel lists a separate taxpayer, Sharon Ottinger, with the same listed mailing address as the Greeley parcels. The Ottinger parcel is a half acre in size and forms the northwest corner of the southern Greeley parcel. Sharon Tanner currently owns all three parcels and is the daughter of Grace Greeley; Ottinger was her maiden name. The property was used as a farm and a museum until approximately 5 years ago when all activity ceased. The property was referred to as the Pioneer Museum, not to be confused with the Pioneer Farm Museum in Eatonville.

An arson fire occurred on the southern parcel, 0420353027, in late June 2010. The Fire Department encountered a number of unaffected drums in a burned structure on the property and contacted Ecology. Ron Holcomb with Ecology's Spill Response conducted an assessment of the drums and other containers. Subsequent information collected by Ron indicated the listed taxpayer, Grace Ardell Greeley, had been dead for a number of years and the property had been inherited by her daughter, Sharon Tanner. Ms. Tanner designated her grandson, Joshua Gunia, as the point of contact regarding issues at the site. Spill Response referred the site to the Toxics Cleanup Program in November 2010 for follow up regarding soil contamination due to spillage from some of the drums.

I contacted Joshua Gunia and set up an appointment to meet him at the site on 11.16.10. We walked the site together, concentrating on the large storage building where the drums were located. The southern half of the building was destroyed in the fire. The remaining half is in poor condition, lacking a roof and exposing the drums stored inside to weather conditions. The drums were stored together and covered with tarps. Soil staining was apparent around the drums and in several other areas. I spoke with Joshua about the need for his family to hire an environmental professional to delineate the extent and type of contamination on the property due to the leaks and/or spills from the drums, and we also spoke about the need to properly dispose of the drum and their contents. He told me that it would require several months for the family to be able to coordinate that, and that they were trying to sell the property. I told Joshua that an interested buyer might be willing to conduct a Phase II Environmental Site Assessment.

No progress was made in assessing or remediating the soil contamination at this property. I eventually coordinated an approved site visit through Joshua to collect soil samples at the subject property. I returned to the property on 05.10.11 and collected three soil samples. All three samples were jar packed and submitted for HCID, Total RCRA metals, SVOCs, and PCB analyses. Metal and SVOC results were below MTCA CULs; PCBs were non-detect. HCID results indicated oil present in all three samples and gasoline present in S2. Further analysis with NWTPH-dx and NWTPH-gx found oil present in all three samples, ranging from 3100 to 37,000 mg/kg. Gasoline range organics were detected in S2 at 1,900 mg/kg and were noted by the lab to be similar to mineral spirits.

The S1 sample was also tested for the presence of chlorinated herbicides, as well as organochlorine and organophosphorus pesticides. All of the detected herbicide compounds are in the phenoxy chemical family. No organophosphorus pesticides were detected, with a reported laboratory PQL of 0.22 mg/kg. Lindane, an organochlorine pesticide, was detected at the cleanup level. The pesticide and herbicide compounds detected are tabulated below; only one has a MTCA Method A CUL (lindane). For those compounds found in CLARC, the Method B mg/kg values are also provided.

S1 results for pesticides and herbicides; measurement units are mg/kg

Method	Analyte Group	Detects	Concentration	MTCA CUL	CLARC
8081A	Organochlorine pesticides	Beta-BHC (lindane)	0.01	0.01	0.0769
		Methoxychlor	0.019	---	400
8151A	Chlorinated acid herbicides	MCPPP	36	---	---
		MCPA	15	---	---
		Dichlorprop	1.1	---	---
		Pentachlorophenol	0.0035	---	8.33
		2,4,5-TP (Silvex)	0.094	---	640
		2,4-DB	0.037	---	640
		Dinoseb	0.011	---	80

Soil samples were jar packed, stored in a sample refrigerator, and transported on ice. GRO/VOCs were not anticipated as contaminants of concern. HCID results indicated the need to run S2 for gasoline and BTEX; the analytical results for these parameters should be considered estimates, with potential negative bias in the results as 5035A sample collection methods were not used and the sample preparation occurred past the recommended holding times. Also, matrix interference resulted in potential negative bias for the methoxychlor results; actual concentrations could be greater.

Summary: lube oil and gasoline range organics were found in concentrations exceeding MTCA Method A CULs. A variety of pesticides and herbicides were also detected; lindane was found in concentrations equaling the CUL. Further assessment of the site

The TPCHD recommends listing this property as contaminated.

Overflowing drums, leaking drums, spillage associated with storage of products in drums.

Spill
Pesticide disposal
Landfill
Drums
Other – Describe:

☒ ☐ ☐ ☐

LUSTR
Tank
Improper handling
Improper disposal

1111

Standard Industrial Code(s)

AFFECTED MEDIA	CONTAMINANTS (#1-16: See contaminants key) Enter letter designating status of contaminant: C = Confirmed (above cleanup levels); S = Suspected; R= Remediated															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Ground Water		S				S	S									
Surface Water																
Drinking Water																
Soil		C				C	C									
Sediment																
Air																

1 Base/neutral organics
2 Halogenated organic compounds
3 Metals - Priority pollutants
4 Metals - Other
Polychlorinated biPhenyls (PCBs)
Pesticides

7 Petroleum products
8 Phenolic compounds
9 Non-halogenated solvents
10 Dioxin
11 Polynuclear aromatic hydrocarbons (PAHs)
12 Reactive wastes

13 Corrosive wastes
14 Radioactive wastes
15 Conventional contaminants, organic
16 Conventional contaminants, inorganic

SITE INFORMATION

Soil type 13B Everett gravelly sandy loam and
20B, 20C Kitsap silt loam

Slope Level

Site vegetation/cover present:

Forest ☒

Bare soil ☒

Brush ☒

Landscaped ☐

Other - Describe:

Pasture/open field ☒

Wetlands ☐

Pavement ☐

Surface water ☐

Are there any drinking water systems affected?

☐ Yes

☐ No

Municipal, private, or both? (Circle one)

How many people are estimated to be affected? _____

Is there a potential for a release or threatened release to affect a drinking water source?

☐ Yes

☐ No

Are there monitoring wells in the vicinity?

☐ Yes

☐ No

Are there dry wells in the vicinity?

☐ Yes

☐ No

CONTAMINANT PATHWAYS AND TARGETS

	Ingestion	Inhalation	Contact
Ground Water	x	x	x
Surface Water	x	x	x
Drinking Water	x	x	x
Soil	x	x	x
Sediment			
Air		x	
Targets possible:		Residential ☒	
Human, adult ☒		Industrial ☐	
Human, children ☒		Commercial ☐	

Sensitive environments (See WARM Scoring Manual for definition):

☒ Yes ☐ No If yes, describe:

This site overlies the Central Pierce County Sole Source Aquifer. A pond/wetland is present on the site. Within two miles are multiple wetlands, parks and streams.

General Comments:

Subject Property:

**State of Washington
Department of Ecology**

REGULATORY INTERACTIONS

From: Smith, Sandy B. (ECY) <sasm461@ECY.WA.GOV>
Sent: Wednesday, July 26, 2023 2:40 PM
To: Chris Beale <CBeale@PuyallupWA.gov>
Cc: Lawson, Rebecca (ECY) <rlaw461@ECY.WA.GOV>; Lambiotte, Jerome (ECY) <jela461@ECY.WA.GOV>
Subject: RE: Pioneer Museum clean up site ID 11739 | 2301 23RD AVE SE

You don't often get email from sasm461@ecy.wa.gov. [Learn why this is important](#)

CAUTION: This is an External Email. Do not click links or open attachments unless you are expecting them.

Hello Chris,

Thank you for reaching out to Ecology Toxics Cleanup Program regarding the Pioneer Museum cleanup site. I have looked at Ecology's site file, 2018 SEPA records, and pages from the Phase I Environmental Site Assessment of the site by Earth Solutions NW that you provided by email.

Based on my review of the documents, cleanup of the Pioneer Museum may be required by Ecology under the Model Toxics Control Act, Chapter 70A.305 RCW, and implementing regulations contained in Chapter 173-340 WAC. We recommend that the City of Puyallup require pollution in the environment be cleaned up in compliance with WAC 173-340 before allowing any grading, filling, or other construction activities at the site, and while contaminated soil and groundwater are still easily accessible. For an independent cleanup conducted under WAC 173-340-515, the cleanup would be complete when a no further action opinion (NFA) letter is issued under WAC 173-340-515(5)(b).

The project applicant may want to consider entering [Ecology's Voluntary Cleanup Program \(VCP\)](#) or expedited VCP. Under the VCP, Ecology works with customers by reviewing and providing technical opinions on cleanup work required by the Model Toxics Control Act (MTCA), which is Washington's environmental cleanup law. Jerome Lambiotte (cc'd here) is the VCP supervisor for the southwest region, which includes Puyallup. He can answer your questions about the VCP and what next steps would be under that program.

We recommend the following steps with regard to the Pioneer Museum site:

- Request the applicant submit the Phase I ESA to Ecology. The applicant also should submit documentation of the disposition of the approximately 50 drums and containers of waste material formerly present on the property.
- Include mitigation measures in the SEPA Determination to require site cleanup before any site disturbance or development of the property. Many cities in southwest Washington do require cleanup of known sites before development.
- Request the project applicant work with Ecology to clean up the site, such as through the VCP, and obtain an NFA. This typically involves the applicant hiring an environmental consultant familiar with cleanup in Washington State to assist the applicant through the [steps in the cleanup process](#).

If you have questions or want to discuss the site in more detail, please don't hesitate to contact me.

Sincerely, Sandy Smith

Sandy Smith

Cleanup Project Manager
Southwest Regional Office – Toxics Cleanup Program
Washington State Department of Ecology
sandy.smith@ecy.wa.gov
Mobile: 360.999.9588



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

December 7, 2011

Ms. Sharon Tanner
11907 240th Street NE
Arlington WA 98223

Dear Ms. Tanner:

RE: Early Notice Letter Regarding the Release of Hazardous Substance at the
Site Name: Former Pioneer Museum (site name),
Location: 2301 23rd Street SE, Puyallup, Washington 98373.
Facility Site Identification Number: 9490
ISIS Cleanup Site ID No.: 11739

Under Chapter 70.105D Revised Code of Washington (RCW) the Department of Ecology (Ecology) is required to conduct an Initial Investigation, of properties where we have received a report that there has been a release or threatened release of hazardous substance that could pose a threat to human health or the environment.

Ecology maintains a list of sites where an initial investigation has found that further testing and possible cleanup is needed. We call this our "database of Confirmed or Suspected Contaminated Sites". As a result of the initial investigation conducted by the Tacoma Pierce County Health Department, this property has been added to the database as a State Cleanup Site. The Facility Site Identification number assigned to this site is 18536 (existing site number). Please note that inclusion in this database does not mean Ecology has determined you liable for cleanup of the site, as that is a separate determination under the law.

This site has been added to our database because soil contaminated with Petroleum Hydrocarbons and agricultural products has been confirmed on this property. Our report indicates that contaminated soils were found during an arson fire investigation. Many drums containing hazardous substances were found at the site. We are aware the property was historically used as a farm and museum. We understand you inherited the property and designated your grandson as point of contact for issues involving the property and the fire. County staff talked to your grandson and were informed that it would take time for you to take care of the problem and that you were trying to sell the property. After months and no follow-up or cleanup activity our investigator collected samples which confirmed contamination and the property was listed. The purpose of the initial investigation is to confirm or deny the possibility of contamination on site.

Former Pioneer Museum
December 7, 2011
Page 2 of 2

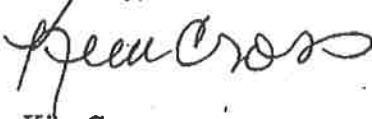
In the future, Ecology may conduct a more detailed inspection of this property including testing for possible contamination. This inspection is called a "Site Hazard Assessment". At that time, Ecology will assess whether action will be needed and if necessary establish a priority for the work.

Ecology's policy is to work cooperatively with individuals to accomplish prompt and effective cleanups. Your cooperation with Ecology in planning or conducting a remedial action is not an admission of guilt or liability. Please be aware of state laws that must be adhered to if you decide to proceed with cleanup work on your own. The primary law is Chapter 70.105D RCW and the implementing regulations, the Model Toxics Control Act Cleanup Regulation (MTCA or Chapter 173-340 WAC). These laws can be found at Ecology's Toxics Cleanup Program website, <http://www.ecy.wa.gov/toxicscleanup/policy>.

If you would like a printed copy of the MTCA regulations or if you have questions call me at (360) 407-6240. These rules and how they impact each site can be confusing and complicated. There are Environmental Consultants that can be employed to assist property owners with the cleanup and site assessment process.

Ecology's Voluntary Cleanup Program is designed to provide technical assistance, for a fee, to cleanup sites that qualify. If you would like additional information regarding this program you can find information on our website at <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm> or you can contact Scott Rose at 360-407-6347.

Sincerely,



Kim Cross
Toxics Cleanup Program
Southwest Regional Office

ksc:ENL 12072011 Former Pioneer Museum

by certified mail: (7010 0780 0002 3403 2803)

cc: Joshua Gunia
Sharon Bell, Department of Ecology
Cris Matthews, Department of Ecology



INITIAL INVESTIGATION (FIELD REPORT)

ERTS Number: 620837

Parcel #: 0420353027

COUNTY: PIERCE

SITE INFORMATION

Site Name (e.g., Co. name over door): Pioneer Museum <i>Former</i>	Site Address (including City and Zip+4): 2301 23 rd St SE Puyallup, WA 98373	Site Phone: none
Site Contact and Title: Joshua Gunia, grandson of owner	Site Contact Address (including City and Zip+4): 11603 Canyon Road E. Puyallup 98373	Site Contact Phone: 253/435-9999
Site Owner: Sharon Tanner	Site Owner Address (including City and Zip+4): 11907 240 th St NE Arlington, WA 98223	Site Owner Phone: 360/474-1829
Site Owner Contact:	Site Owner Contact Address (including City and Zip+4):	Owner Contact Phone:
Alternate Site Name(s):	Comments:	Is property > 10 acres? Yes ☒ No ☐
Previous Site Owner(s):	Comments:	

Location: Quarter-Quarter: 3-4 Section: 35 Township: 20N Range: 04E

Latitude: Degrees: 47 Minutes: 10 Seconds: 19.6 N

Longitude: Degrees: 122 Minutes: 15 Seconds: 54.8 W

INSPECTION INFORMATION

Inspection Date: 11.16.10	Inspection Time: 10 am	Entry Notice: Announced ☒ Unannounced ☐
Photographs Yes ☒ No ☐	Weather: Clear ☒ Rain ☐ Temperature: ~50 ° F	
Samples Yes ☒ No ☐	Wind Direction: Wind Speed:	

RECOMMENDATION

No Further Action (Indicate NFA in box below):		LIST on ISIS (Indicate in box below):	
Release or threatened release does not pose a threat	☐	Site Hazard Assessment	☒
No release or threatened release	☐	Interim Action	☐
Educational mailing	☐	Emergency Action	☐
Refer to program/agency (Name: _____)	☐	Independent Cleanup Action In progress	☐
Independent Cleanup Action Completed (i.e., contam, removed)	☐		

COMPLAINT (Brief Summary of ERTS):

Leaking drums

SITE STATUS (Brief Summary of site condition(s) after investigation):

Soil in vicinity of a cluster of stored drums is contaminated with petroleum hydrocarbons and agricultural chemicals.

Investigator: S. Bell

Date Submitted: 05.27.11

OBSERVATIONS

Description:

This property is about 20 acres in size, and encompasses three parcels. Two parcels list the taxpayer as Grace Ardell Greeley. A third parcel lists a separate taxpayer, Sharon Ottinger, with the same listed mailing address as the Greeley parcels. The Ottinger parcel is a half acre in size and forms the northwest corner of the southern Greeley parcel. Sharon Tanner currently owns all three parcels and is the daughter of Grace Greeley; Ottinger was her maiden name. The property was used as a farm and a museum until approximately 5 years ago when all activity ceased. The property was referred to as the Pioneer Museum, not to be confused with the Pioneer Farm Museum in Eatonville.

An arson fire occurred on the southern parcel, 0420353027, in late June 2010. The Fire Department encountered a number of unaffected drums in a burned structure on the property and contacted Ecology. Ron Holcomb with Ecology's Spill Response conducted an assessment of the drums and other containers. Subsequent information collected by Ron indicated the listed taxpayer, Grace Ardell Greeley, had been dead for a number of years and the property had been inherited by her daughter, Sharon Tanner. Ms. Tanner designated her grandson, Joshua Gunia, as the point of contact regarding issues at the site. Spill Response referred the site to the Toxics Cleanup Program in November 2010 for follow up regarding soil contamination due to spillage from some of the drums.

I contacted Joshua Gunia and set up an appointment to meet him at the site on 11.16.10. We walked the site together, concentrating on the large storage building where the drums were located. The southern half of the building was destroyed in the fire. The remaining half is in poor condition, lacking a roof and exposing the drums stored inside to weather conditions. The drums were stored together and covered with tarps. Soil staining was apparent around the drums and in several other areas. I spoke with Joshua about the need for his family to hire an environmental professional to delineate the extent and type of contamination on the property due to the leaks and/or spills from the drums, and we also spoke about the need to properly dispose of the drum and their contents. He told me that it would require several months for the family to be able to coordinate that, and that they were trying to sell the property. I told Joshua that an interested buyer might be willing to conduct a Phase II Environmental Site Assessment.

No progress was made in assessing or remediating the soil contamination at this property. I eventually coordinated an approved site visit through Joshua to collect soil samples at the subject property. I returned to the property on 05.10.11 and collected three soil samples. All three samples were jar packed and submitted for HCID, Total RCRA metals, SVOCs, and PCB analyses. Metal and SVOC results were below MTCA CULs; PCBs were non-detect. HCID results indicated oil present in all three samples and gasoline present in S2. Further analysis with NWTPH-dx and NWTPH-gx found oil present in all three samples, ranging from 3100 to 37,000 mg/kg. Gasoline range organics were detected in S2 at 1,900 mg/kg and were noted by the lab to be similar to mineral spirits.

The S1 sample was also tested for the presence of chlorinated herbicides, as well as organochlorine and organophosphorus pesticides. All of the detected herbicide compounds are in the phenoxy chemical family. No organophosphorus pesticides were detected, with a reported laboratory PQL of 0.22 mg/kg. Lindane, an organochlorine pesticide, was detected at the cleanup level. The pesticide and herbicide compounds detected are tabulated below; only one has a MTCA Method A CUL (lindane). For those compounds found in CLARC, the Method B mg/kg values are also provided.

S1 results for pesticides and herbicides; measurement units are mg/kg

Method	Analyte Group	Detects	Concentration	MTCA CUL	CLARC
8081A	Organochlorine pesticides	Beta-BHC (lindane)	0.01	0.01	0.0769
		Methoxychlor	0.019	---	400
8151A	Chlorinated acid herbicides	MCPP	36	---	---
		MCPA	15	---	---
		Dichlorprop	1.1	---	---
		Pentachlorophenol	0.0035	---	8.33
		2,4,5-TP (Silvex)	0.094	---	640
		2,4-DB	0.037	---	640
		Dinoseb	0.011	---	80

Soil samples were jar packed, stored in a sample refrigerator, and transported on ice. GRO/VOCs were not anticipated as contaminants of concern. HCID results indicated the need to run S2 for gasoline and BTEX; the analytical results for these parameters should be considered estimates, with potential negative bias in the results as 5035A sample collection methods were not used and the sample preparation occurred past the recommended holding times. Also, matrix interference resulted in potential negative bias for the methoxychlor results; actual concentrations could be greater.

Summary: lube oil and gasoline range organics were found in concentrations exceeding MTCA Method A CULs. A variety of pesticides and herbicides were also detected; lindane was found in concentrations equaling the CUL. Further assessment of the site

The TPCHD recommends listing this property as contaminated.

ACTIVITIES OR PRACTICES RESPONSIBLE FOR CONTAMINATION:

☒ ☐ ☐ ☐

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CONTAMINANT(S)

CONTAMINANT(S)		AFFECTED MEDIA															
		CONTAMINANTS (#1-16: See contaminants key) Enter letter designating status of contaminant: C = Confirmed (above cleanup levels); S = Suspected; R = Remediated															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Ground Water			S				S	S									
Surface Water																	
Drinking Water																	
Soil			C				C	C									
Sediment																	
Air																	

1 Base/neutral organics
2 Halogenated organic compounds
3 Metals - Priority pollutants
4 Metals - Other
5 Polychlorinated biPhenyls (PCBs)
6 Pesticides

7 Petroleum products
8 Phenolic compounds
9 Non-halogenated solvents
10 Dioxin
11 Polynuclear aromatic hydrocarbons (PAHs)
12 Reactive wastes

13 Corrosive wastes
14 Radioactive wastes
15 Conventional contaminants, organic
16 Conventional contaminants, inorganic

SITE INFORMATION

Soil type 13B Everett gravelly sandy loam and
20B, 20C Kitsap silt loam

Slope Level

Site vegetation/cover present:

Forest

☒

Bare soil

☒

Brush

☒

Landscaped

☐

Other -- Describe:

Pasture/open field

☒

Wetlands

☐

Pavement

☐

Surface water

☐

Are there any drinking water systems affected?

☐ Yes

☐ No

Municipal, private, or both? (Circle one)

How many people are estimated to be affected? _____

Is there a potential for a release or threatened release to affect a drinking water source?

☐ Yes

☐ No

Are there monitoring wells in the vicinity?

☐ Yes

☐ No

Are there dry wells in the vicinity?

☐ Yes

☐ No

CONTAMINANT PATHWAYS AND TARGETS

	Ingestion	Inhalation	Contact
Ground Water	x	x	x
Surface Water	x	x	x
Drinking Water	x	x	x
Soil	x	x	x
Sediment			
Air		x	
Targets possible:		Residential	☒
Human, adult	☒	Industrial	☐
Human, children	☒	Commercial	☐

Sensitive environments (See WARM Scoring Manual for definition):

☒ Yes ☐ No If yes, describe:

This site overlies the Central Pierce County Sole Source Aquifer. A pond/wetland is present on the site. Within two miles are multiple wetlands, parks and streams.

General Comments:



14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

May 23, 2011

Sharon Bell
Tacoma-Pierce County Health Department
3629 South "D" Street
Tacoma, WA 98418-6813

Re: Analytical Data for Project 620837
Laboratory Reference No. 1105-092

Dear Sharon:

Enclosed are the analytical results and associated quality control data for samples submitted on May 11, 2011.

The standard policy of OnSite Environmental, Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "DeB" followed by a stylized flourish.

David Baumelster
Project Manager

Enclosures

OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

This report pertains to the samples analyzed in accordance with the chain of custody,
and is intended only for the use of the individual or company to whom it is addressed.

Date of Report: May 23, 2011
Samples Submitted: May 11, 2011
Laboratory Reference: 1105-092
Project: 620837

Case Narrative

Samples were collected on May 10, 2011 and received by the laboratory on May 11, 2011. They were maintained at the laboratory at a temperature of 2°C to 6°C.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Organochlorine Pesticides by EPA 8081A Analysis

Due to negative effects of the matrix on the instrument, values for 4,4'-DDT and Methoxychlor in the continuing calibration verification standards (CCVs) were low. Therefore, values can be greater than reported. Since the degradation of the CCV standards was reproducible after re-injecting the sample extracts, the CCV degradation problem was attributed to the matrix of these samples.

Any other QA/QC issues associated with this extraction and analysis will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

Samivials by EPA 8270D/SIM Analysis

Some MTCA cleanup levels are non-achievable for samples S1-00-051011, S2-00-051011, and S3-00-051011 due to the necessary dilutions of the samples.

Surrogate recovery data is not available for sample S2-00-051011 due to the necessary dilution of the sample coupled with sample matrix effects.

Organophosphorus Pesticides by EPA 8270D/SIM Analysis

The surrogate recovery for Triphenyl phosphate is not available due to sample matrix interference.

NWTFH Gx/BTEX Analysis

Method 5035 VOA vials were not provided for sample S2-00-051011. The sample was therefore extracted from a 4-ounce jar for analysis.

The chromatogram for sample S2-00-051011 is similar to mineral spills.

Please note that any other QA/QC issues associated with these extractions and analyses will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

NWTPH-HCID
 (with acid/silica gel clean-up)

Matrix: Soil
 Units: mg/kg (ppm)

Analyte	Result	POL	Method	Date Prepared	Date Analyzed	Flags
Client ID: S1-00-051011	05-092-01					
Laboratory ID:						
Gasoline Range Organics	ND	33	NWTPH-HCID	5-11-11	5-11-11	UI
Diesel Range Organics	ND	6600	NWTPH-HCID	5-11-11	5-11-11	UI
Lube Oil	Detected	110	NWTPH-HCID	5-11-11	5-11-11	
Surrogate: <i>o</i> -Terphenyl	Percent Recovery	Control Limits				
	117	50-150				
Client ID: S2-00-051011	05-092-02					
Laboratory ID:						
Gasoline Range Organics	Detected	110	NWTPH-HCID	5-11-11	5-12-11	
Diesel Range Organics	ND	630	NWTPH-HCID	5-11-11	5-12-11	UI
Lube Oil	Detected	640	NWTPH-HCID	5-11-11	5-12-11	
Surrogate: <i>o</i> -Terphenyl	Percent Recovery	Control Limits				
	121	50-150				
Client ID: S3-00-051011	05-092-03					
Laboratory ID:						
Gasoline Range Organics	ND	21	NWTPH-HCID	5-11-11	5-11-11	
Diesel Range Organics	ND	6600	NWTPH-HCID	5-11-11	5-11-11	UI
Lube Oil	Detected	110	NWTPH-HCID	5-11-11	5-11-11	
Surrogate: <i>o</i> -Terphenyl	Percent Recovery	Control Limits				
	117	50-150				

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-082
 Project: 620837

NWTPH-HCID
QUALITY CONTROL
 (with acid/silica gel clean-up)

Matrix: Soil
 Units: mg/kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB051S1					
Gasoline Range Organics	ND	20	NWTPH-HCID	5-11-11	5-11-11	
Diesel Range Organics	ND	50	NWTPH-HCID	5-11-11	5-11-11	
Light Oil Range Organics	ND	100	NWTPH-HCID	5-11-11	5-11-11	
Surrogate:						
o-Terphenyl		118				
Percent Recovery		50-150				
Control Limits						

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

SEMIVOLATILES by EPA 8270/SIM

page 1 of 2

Matrix: Soil
 Units: mg/kg

Analyte	Result	PQL	Method	Prepared Date	Analyzed Date	Flags
n-Nitrosodimethylamine	ND	1.9	EPA 8270	5-16-11	5-18-11	
Pyridine	ND	18	EPA 8270	5-16-11	5-18-11	
Phenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
Aniline	ND	1.9	EPA 8270	5-16-11	5-18-11	
bis(2-Chloroethyl)ether	ND	1.9	EPA 8270	5-16-11	5-18-11	
2-Chlorophenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
1,3-Dichlorobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
1,4-Dichlorobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
Benzyl alcohol	ND	1.9	EPA 8270	5-16-11	5-18-11	
1,2-Dichlorobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
2-Methylphenol (o-Cresol)	ND	1.9	EPA 8270	5-16-11	5-18-11	
bis(2-Chloroisopropyl)ether	ND	1.9	EPA 8270	5-16-11	5-18-11	
(3+4)-Methylphenol (m,p-Cresol)	ND	1.9	EPA 8270	5-16-11	5-18-11	
n-Nitro-o-di-n-propylamine	ND	1.9	EPA 8270	5-16-11	5-18-11	
Hexachloroethane	ND	1.9	EPA 8270	5-16-11	5-18-11	
Nitrobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
Isophorone	ND	1.9	EPA 8270	5-16-11	5-18-11	
2-Nitrophenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,4-Dimethylphenol	ND	18	EPA 8270	5-16-11	5-18-11	
bis(2-Chloroethyl)methane	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,4-Dichlorophenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
1,2,4-Trichlorobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
Naphthalene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
4-Chloroaniline	ND	1.9	EPA 8270	5-16-11	5-18-11	
Hexachlorobutadiene	ND	1.9	EPA 8270	5-16-11	5-18-11	
4-Chloro-3-methylphenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
2-Methylnaphthalene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
1-Methylnaphthalene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Hexachlorocyclopentadiene	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,4,6-Trichlorophenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,3-Dichloroaniline	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,4,5-Trichlorophenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
2-Chloronaphthalene	ND	1.9	EPA 8270	5-16-11	5-18-11	
2-Nitroaniline	ND	1.9	EPA 8270	5-16-11	5-18-11	
1,4-Dinitrobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
Dimethylphthalate	ND	1.9	EPA 8270	5-16-11	5-18-11	
1,3-Dinitrobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,6-Dinitrobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
1,2-Dinitrobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
Acenaphthylene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
3-Nitroaniline	ND	1.9	EPA 8270	5-16-11	5-18-11	

OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

This report pertains to the samples analyzed in accordance with the chain of custody and is intended only for the use of the individual or company to whom it is addressed.

SEMIVOLATILES by EPA 8270/SIM
 page 2 of 2

Analyte	Result	PQL	Method	Prepared Date	Analyzed Date	Flags
Client ID: 91-00-081011						
Laboratory ID: 05-082-01						
2,4-Dinitrophenol	ND	9.3	EPA 8270	5-16-11	5-18-11	
Acenaphthylene	0.019	0.015	EPA 8270/SIM	5-16-11	5-20-11	
4-Nitrophenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,4-Dinitrotoluene	ND	1.9	EPA 8270	5-16-11	5-18-11	
Dibenzofuran	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,3,4,5-Tetrachlorophenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
2,3,4,6-Tetrachlorophenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
Dibenzophenone	ND	9.3	EPA 8270	5-16-11	5-18-11	
4-Chlorophenyl-phenyl ether	ND	1.9	EPA 8270	5-16-11	5-18-11	
4-Nitroanisole	ND	1.9	EPA 8270	5-16-11	5-18-11	
Fluorene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
4,6-Dinitro-2-methylphenol	ND	9.3	EPA 8270	5-16-11	5-18-11	
n-Nitrochlorophenylamine	ND	1.9	EPA 8270	5-16-11	5-18-11	
1,2-Diphenylhydrazine	ND	1.9	EPA 8270	5-16-11	5-18-11	
4-Bromophenyl-phenyl ether	ND	1.9	EPA 8270	5-16-11	5-18-11	
Hexachlorobenzene	ND	1.9	EPA 8270	5-16-11	5-18-11	
Pentachlorophenol	ND	9.3	EPA 8270	5-16-11	5-18-11	
Phenanthrene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Anthracene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Carbazole	ND	1.9	EPA 8270	5-16-11	5-18-11	
D-n-butylphenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
Fluoranthene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Benzidine	ND	1.9	EPA 8270	5-16-11	5-18-11	
Pyrene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Butylbenzylphenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
bis-2-Ethylhexylphenol	ND	1.9	EPA 8270	5-16-11	5-18-11	
Di-n-octylphthalate	ND	1.9	EPA 8270	5-16-11	5-18-11	
Benzobiphenylene	0.029	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Benzofluoranthene	0.040	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Benzofluoranthene	0.13	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Indeno[1,2,3-cd]pyrene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Dibenz[a,h]anthracene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Benzofluoranthene	ND	0.015	EPA 8270/SIM	5-16-11	5-20-11	
Surrogate:						
2-Fluorophenol	73	30 - 97				
Phenol-d6	87	40 - 104				
Nitrobenzene-d5	78	35 - 102				
2-Fluorobiphenyl	91	44 - 97				
2,4,6-Trichlorophenol	91	41 - 110				
Terphenyl-d14	88	53 - 107				

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

SEMIVOLATILES by EPA 8270D/SIM
 page 1 of 2

Matrix: Soil
 Units: mg/Kg

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	82-00-051011					
Laboratory ID:	05-082-02					
n-Nitrosodimethylamine	ND	3.6	EPA 8270	5-16-11	5-19-11	
Pyridine	ND	3.6	EPA 8270	5-16-11	5-19-11	
Phenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
Aniline	ND	3.6	EPA 8270	5-16-11	5-19-11	
bis(2-Chloroethyl)ether	ND	3.6	EPA 8270	5-16-11	5-19-11	
2-Chlorophenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
1,3-Dichlorobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
1,4-Dichlorobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
Benzyl alcohol	ND	3.6	EPA 8270	5-16-11	5-19-11	
1,2-Dichlorobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
2-Methylphenol (o-Cresol)	ND	3.6	EPA 8270	5-16-11	5-19-11	
bis(2-Chloroisopropyl)ether	ND	3.6	EPA 8270	5-16-11	5-19-11	
(3+4)-Methylphenol (m,p-Cresol)	ND	3.6	EPA 8270	5-16-11	5-19-11	
n-Nitroso-di-n-propylamine	ND	3.6	EPA 8270	5-16-11	5-19-11	
Hexachloroethane	ND	3.6	EPA 8270	5-16-11	5-19-11	
Nitrobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
Isophorone	ND	3.6	EPA 8270	5-16-11	5-19-11	
2-Nitrophenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,4-Dimethylphenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
bis(2-Chloroethoxy)methane	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,4-Dichlorophenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
1,2,4-Trichlorobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
Naphthalene	0.55	0.036	EPA 8270/SIM	5-16-11	5-20-11	
4-Chloroaniline	ND	3.6	EPA 8270	5-16-11	5-19-11	
Hexachlorobutadiene	ND	3.6	EPA 8270	5-16-11	5-19-11	
4-Chloro-3-methylphenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
2-Methylnaphthalene	0.096	0.036	EPA 8270/SIM	5-16-11	5-20-11	
1-Methylnaphthalene	0.055	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Hexachlorocyclopentadiene	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,4,6-Trichlorophenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,3-Dichloroaniline	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,4,5-Trichlorophenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
2-Chloronaphthalene	ND	3.6	EPA 8270	5-16-11	5-19-11	
2-Nitroaniline	ND	3.6	EPA 8270	5-16-11	5-19-11	
1,4-Dinitrobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
Dimethylphthalate	ND	3.6	EPA 8270	5-16-11	5-19-11	
1,3-Dinitrobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,6-Dinitrotoluene	ND	3.6	EPA 8270	5-16-11	5-19-11	
1,2-Dinitrobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
Acenaphthylene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
3-Nitroaniline	ND	3.6	EPA 8270	5-16-11	5-19-11	

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

SEMIVOLATILES by EPA 8270D/SIM
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Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
2,4-Dinitrophenol	ND	18	EPA 8270	5-16-11	5-19-11	
Acenaphthene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
4-Nitrophenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,4-Dinitrofluorene	ND	3.6	EPA 8270	5-16-11	5-19-11	
Dibenzofuran	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,3,5,6-Tetrachlorophenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
2,3,4,6-Tetrachlorophenol	ND	3.6	EPA 8270	5-16-11	5-19-11	
Dibutylphthalate	ND	18	EPA 8270	5-16-11	5-19-11	
4-Chlorophenyl-phenyl ether	ND	3.6	EPA 8270	5-16-11	5-19-11	
4-Nitroaniline	ND	3.6	EPA 8270	5-16-11	5-19-11	
Fluorene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
4,6-Dinitro-2-methylphenol	ND	18	EPA 8270	5-16-11	5-19-11	
n-Nitrosodiphenylamine	ND	3.6	EPA 8270	5-16-11	5-19-11	
1,2-Diphenylhydrazine	ND	3.6	EPA 8270	5-16-11	5-19-11	
4-Bromophenyl-phenyl ether	ND	3.6	EPA 8270	5-16-11	5-19-11	
Hexachlorobenzene	ND	3.6	EPA 8270	5-16-11	5-19-11	
Phenanthrene	0.060	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Anthracene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Carbazole	ND	3.6	EPA 8270	5-16-11	5-19-11	
Di-n-butylphthalate	ND	3.6	EPA 8270	5-16-11	5-19-11	
Fluoranthene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Benzidine	ND	36	EPA 8270	5-16-11	5-19-11	
Pyrene	0.051	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Butylbenzylphthalate	ND	36	EPA 8270	5-16-11	5-19-11	
Di-2-Ethylhexylphthalate	ND	36	EPA 8270	5-16-11	5-19-11	
3,3'-Dichlorobenzidine	ND	36	EPA 8270	5-16-11	5-19-11	
Benz[a]anthracene	0.076	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Chrysene	0.17	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Di[2-Ethylhexyl]phthalate	ND	3.6	EPA 8270	5-16-11	5-19-11	
Di-n-octylphthalate	ND	3.6	EPA 8270	5-16-11	5-19-11	
Benz[b]fluoranthene	0.037	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Benzofluoranthene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Benz[a]pyrene	0.038	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Indeno[1,2,3-cd]pyrene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Dibenz[a,h]anthracene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
Benzofluoranthene	ND	0.036	EPA 8270/SIM	5-16-11	5-20-11	
2-Fluorophenol	...	30 - 97				
Phenol-d8	...	40 - 104				
Nitrobenzene-d5	...	35 - 102				
2-Fluorobiphenyl	...	44 - 97				
2,4,6-Trichlorophenol	...	41 - 110				
Terphenyl-d14	...	53 - 107				
Surrogate:						
Percent Recovery	Control Limits					

SSSSSS

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

SEMIVOLATILES by EPA 8270/SIM

page 1 of 2

Matrix: Soil
 Units: mg/kg

Analyte	Result	POL	Method	Date Prepared	Date Analyzed	Flags
n-Nitrosodimethylaniline	ND	1.8	EPA 8270	5-16-11	5-19-11	
Pyridine	ND	1.8	EPA 8270	5-16-11	5-19-11	
Phenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
Aniline	ND	1.8	EPA 8270	5-16-11	5-19-11	
bis(2-Chloroethyl)ether	ND	1.8	EPA 8270	5-16-11	5-19-11	
2-Chlorophenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
1,3-Dichlorobenzene	ND	1.8	EPA 8270	5-16-11	5-19-11	
1,4-Dichlorobenzene	ND	1.8	EPA 8270	5-16-11	5-19-11	
Benzyl alcohol	ND	1.8	EPA 8270	5-16-11	5-19-11	
1,2-Dichlorobenzene	ND	1.8	EPA 8270	5-16-11	5-19-11	
2-Methylphenol (o-Cresol)	ND	1.8	EPA 8270	5-16-11	5-19-11	
bis(2-Chloroisopropyl)ether	ND	1.8	EPA 8270	5-16-11	5-19-11	
(3,4)-Methylphenol (m,p-Cresol)	ND	1.8	EPA 8270	5-16-11	5-19-11	
n-Nitroso-dl-n-propylamine	ND	1.8	EPA 8270	5-16-11	5-19-11	
Hexachlorocyclopentadiene	ND	1.8	EPA 8270	5-16-11	5-19-11	
Isophorone	ND	1.8	EPA 8270	5-16-11	5-19-11	
2-Nitrophenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,4-Dimethylphenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
bis(2-Chloroethoxy)methane	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,4-Dichlorophenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
1,2,4-Trichlorobenzene	ND	1.8	EPA 8270	5-16-11	5-19-11	
Naphthalene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
4-Chloroaniline	ND	1.8	EPA 8270	5-16-11	5-19-11	
Hexachlorobutadiene	ND	1.8	EPA 8270	5-16-11	5-19-11	
4-Chloro-3-methylphenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
2-Methylnaphthalene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
1-Methylnaphthalene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Hexachlorocyclopentadiene	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,4,6-Trichlorophenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,3-Dichloroaniline	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,4,5-Trichlorophenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
2-Chloronaphthalene	ND	1.8	EPA 8270	5-16-11	5-19-11	
2-Nitroaniline	ND	1.8	EPA 8270	5-16-11	5-19-11	
1,4-Dichlorobenzene	ND	1.8	EPA 8270	5-16-11	5-19-11	
Dimethylphtalate	ND	1.8	EPA 8270	5-16-11	5-19-11	
1,3-Dichlorobenzene	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,6-Dinitrotoluene	ND	1.8	EPA 8270	5-16-11	5-19-11	
1,2-Dinitrobenzene	ND	1.8	EPA 8270	5-16-11	5-19-11	
Acenaphthylene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
3-Nitroaniline	ND	1.8	EPA 8270	5-16-11	5-19-11	

OnSite Environmental, Inc. 14848 NE 95th Street, Redmond, WA 98052 (425) 883-3881
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Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

SEMIVOLATILES by EPA 8270/SIM

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Analyte	Result	PQL	Method	Prepared Date	Analyzed Date	Flags
Client ID: S3-00-051011						
Laboratory ID: 05-092-03						
2,4-Dinitrophenol	ND	8.8	EPA 8270	5-16-11	5-19-11	
Acenaphthene	0.018	0.014	EPA 8270/SIM	5-16-11	5-19-11	
4-Nitrophenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,4-Dinitrotoluene	ND	1.8	EPA 8270	5-16-11	5-19-11	
Dibenzofuran	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,3,5,6-Tetrachlorophenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
2,3,4,6-Tetrachlorophenol	ND	1.8	EPA 8270	5-16-11	5-19-11	
Dibenzophthalate	ND	8.8	EPA 8270	5-16-11	5-19-11	
4-Chlorophenyl-phenyl ether	ND	1.8	EPA 8270	5-16-11	5-19-11	
4-Nitroaniline	ND	1.8	EPA 8270	5-16-11	5-19-11	
Fluorene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
1,6-Dinitro-2-methylphenol	ND	8.8	EPA 8270	5-16-11	5-19-11	
n-Nitrocediphenylamine	ND	1.8	EPA 8270	5-16-11	5-19-11	
1,2-Diphenylhydrazine	ND	1.8	EPA 8270	5-16-11	5-19-11	
4-Bromophenyl-phenyl ether	ND	1.8	EPA 8270	5-16-11	5-19-11	
Hexachlorobenzene	ND	1.8	EPA 8270	5-16-11	5-19-11	
Perfluorobenzene	ND	8.8	EPA 8270	5-16-11	5-19-11	
Phenanthrene	0.052	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Anthracene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Carbazole	ND	1.8	EPA 8270	5-16-11	5-19-11	
Di-n-butylphthalate	ND	1.8	EPA 8270	5-16-11	5-19-11	
Fluoranthene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Benzidine	ND	1.8	EPA 8270	5-16-11	5-19-11	
Pyrene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Butylbenzylphthalate	ND	1.8	EPA 8270	5-16-11	5-19-11	
Di-2-ethylhexylphthalate	ND	1.8	EPA 8270	5-16-11	5-19-11	
Di-n-octylphthalate	ND	1.8	EPA 8270	5-16-11	5-19-11	
Di(2-ethylhexyl)phthalate	ND	1.8	EPA 8270	5-16-11	5-19-11	
Chrysene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Benz[a]anthracene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
3,3'-Dichlorobenzidine	ND	1.8	EPA 8270	5-16-11	5-19-11	
Benz[a]pyrene	0.044	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Indeno[1,2,3-cd]pyrene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Dibenz[a,h]anthracene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Benz[ghi]perylene	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Summable:						
Percent Recovery	ND	0.014	EPA 8270/SIM	5-16-11	5-19-11	
Control Limits						
83	30 - 97					
88	40 - 104					
94	35 - 102					
89	44 - 97					
87	41 - 110					
92	53 - 107					
2,4-Dinitrophenol						
2-Fluorophenol						
Phenol-d8						
Alkylbenzene-d5						
2-Fluorobiphenyl						
2,4,6-Tribromophenol						
Terphenyl-d14						

OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

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Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

SEMIVOLATILES by EPA 8270/SIM
 METHOD BLANK QUALITY CONTROL

page 1 of 2

Matrix: Soil
 Units: mg/kg

Analyte	Result	PQL	Method	Prepared Date	Analyzed Date	Flags
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n-Nitrosodimethylamine	ND	0.033	EPA 8270	5-16-11	5-17-11	
Pyridine	ND	0.33	EPA 8270	5-16-11	5-17-11	
Phenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
Aniline	ND	0.033	EPA 8270	5-16-11	5-17-11	
bis(2-Chloroethyl)ether	ND	0.033	EPA 8270	5-16-11	5-17-11	
2-Chlorophenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
1,3-Dichlorobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
1,4-Dichlorobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
Benzyl alcohol	ND	0.033	EPA 8270	5-16-11	5-17-11	
1,2-Dichlorobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
2-Methylphenol (o-Cresol)	ND	0.033	EPA 8270	5-16-11	5-17-11	
bis(2-Chloroisopropyl)ether	ND	0.033	EPA 8270	5-16-11	5-17-11	
(3+4)-Methylphenol (m,p-Cresol)	ND	0.033	EPA 8270	5-16-11	5-17-11	
n-Nitroso-di-n-propylamine	ND	0.033	EPA 8270	5-16-11	5-17-11	
Hexachloroethane	ND	0.033	EPA 8270	5-16-11	5-17-11	
Nitrobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
Isophorone	ND	0.033	EPA 8270	5-16-11	5-17-11	
2-Nitrophenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,4-Dimethylphenol	ND	0.33	EPA 8270	5-16-11	5-17-11	
bis(2-Chloroethoxy)methane	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,4-Dichlorophenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
1,2,4-Trichlorobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
Naphthalene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
4-Chloroaniline	ND	0.033	EPA 8270	5-16-11	5-17-11	
Hexachlorobutadiene	ND	0.033	EPA 8270	5-16-11	5-17-11	
4-Chloro-3-methylphenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
2-Methylmethylaniline	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
1-Methylmethylaniline	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Hexachlorocyclopentadiene	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,4,6-Trichlorophenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,3-Dichloroaniline	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,4,5-Trichlorophenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
2-Chloronaphthalene	ND	0.033	EPA 8270	5-16-11	5-17-11	
2-Nitroaniline	ND	0.033	EPA 8270	5-16-11	5-17-11	
1,4-Dichlorobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
Dimethylphthalate	ND	0.033	EPA 8270	5-16-11	5-17-11	
1,3-Dichlorobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,6-Dinitrobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
1,2-Dinitrobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
Acenaphthylene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
3-Nitroaniline	ND	0.033	EPA 8270	5-16-11	5-17-11	

OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

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Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

SEMIVOLATILES by EPA 8270/SIM
 METHOD BLANK QUALITY CONTROL

page 2 of 2

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
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2,4-Dinitrophenol	ND	0.17	EPA 8270	5-16-11	5-17-11	
Acenaphthene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
4-Nitrophenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,4-Dinitrotoluene	ND	0.033	EPA 8270	5-16-11	5-17-11	
Dibenzofuran	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,3,5-Trichlorophenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
2,3,4,5-Tetrachlorophenol	ND	0.033	EPA 8270	5-16-11	5-17-11	
Diethylphthalate	ND	0.17	EPA 8270	5-16-11	5-17-11	
4-Chlorophenyl-phenylether	ND	0.033	EPA 8270	5-16-11	5-17-11	
4-Nitroanisole	ND	0.033	EPA 8270	5-16-11	5-17-11	
Fluorene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
4,6-Dinitro-2-methylphenol	ND	0.17	EPA 8270	5-16-11	5-17-11	
n-Nitrosodiphenylamine	ND	0.033	EPA 8270	5-16-11	5-17-11	
1,2-Diphenylhydrazine	ND	0.033	EPA 8270	5-16-11	5-17-11	
4-Bromophenyl-phenylether	ND	0.033	EPA 8270	5-16-11	5-17-11	
Hexachlorobenzene	ND	0.033	EPA 8270	5-16-11	5-17-11	
Pentachlorophenol	ND	0.17	EPA 8270	5-16-11	5-17-11	
Phenanthrene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Anthracene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Carbazole	ND	0.033	EPA 8270	5-16-11	5-17-11	
Di-n-butylphthalate	ND	0.33	EPA 8270	5-16-11	5-17-11	
Fluoranthene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Benzidine	ND	0.33	EPA 8270	5-16-11	5-17-11	
Pyrene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Bulbibenzylphthalate	ND	0.33	EPA 8270	5-16-11	5-17-11	
bis-2-Ethylhexyladipate	ND	0.033	EPA 8270	5-16-11	5-17-11	
3,3'-Dichlorobenzidine	ND	0.33	EPA 8270	5-16-11	5-17-11	
Benz[a]anthracene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Chrysene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
bis(2-Ethylhexyl)phthalate	ND	0.033	EPA 8270	5-16-11	5-17-11	
Di-n-octylphthalate	ND	0.033	EPA 8270	5-16-11	5-17-11	
Benzob[b]fluoranthene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Benzof[k]fluoranthene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Benz[a]pyrene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Indeno[1,2,3-cd]pyrene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Dibenz[a,h]anthracene	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Benzof[a]lupirenone	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Surrogates:						
Percent Recovery	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
Control Limits	ND	0.0067	EPA 8270/SIM	5-16-11	5-19-11	
2-Fluorophenol	58	30 - 97				
Phenol-d8	64	40 - 104				
Nitrobenzene-d5	60	35 - 102				
2-Fluorobiphenyl	66	44 - 97				
2,4,6-Trichlorophenol	71	41 - 110				
Terphenyl-d14	74	53 - 107				

OnSite Environmental, Inc. 14649 NE 95th Street, Redmond, WA 98052 (425) 883-3881
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Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

SEMI-VOLATILES by EPA 8270D/SIM
SB/SBD QUALITY CONTROL

Matrix: Soil
 Units: mg/Kg

Analyte	Result		Spike Level		Percent Recovery		Recovery Limits	RPD	RPD Limit	Flags
SPIKE BLANKS										
Laboratory ID:	SB051863									
	SB	SBD	SB	SBD	SB	SBD				
Phenol	0.895	1.04	1.33	1.33	67	78	31 - 111	15	34	
2-Chlorophenol	0.889	1.03	1.33	1.33	68	77	29 - 112	14	37	
1,4-Dichlorobenzene	0.421	0.488	0.667	0.667	63	73	24 - 100	16	37	
n-Nitroso-di-n-propylamine	0.438	0.491	0.667	0.667	65	74	35 - 104	12	32	
1,2,4-Trichlorobenzene	0.420	0.472	0.667	0.667	63	71	29 - 94	12	35	
4-Chloro-3-methylphenol	0.957	1.08	1.33	1.33	73	80	53 - 104	9	25	
Acenaphthene	0.462	0.505	0.667	0.667	69	76	50 - 95	9	23	
4-Nitrophenol	1.06	1.14	1.33	1.33	80	88	42 - 126	7	30	
2,4-Dinitrotoluene	0.486	0.565	0.667	0.667	74	85	53 - 103	13	31	
Pentachlorophenol	0.971	1.08	1.33	1.33	73	80	50 - 116	9	30	
Pyrene	0.495	0.531	0.667	0.667	74	80	57 - 108	7	27	
Surrogate:										
2-Fluorophenol					62	71	30 - 97			
Phenol-d6					69	80	40 - 104			
Nitrobenzene-d5					70	77	35 - 102			
2-Fluorobiphenyl					72	76	44 - 97			
2,4,6-Tribromophenol					74	80	41 - 110			
Terphenyl-d14					75	81	53 - 107			

OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3661

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Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620637

PCBs by EPA 8082

Matrix: Soil
 Units: mg/kg (ppm)

Analyte	Result	POL	Method	Prepared	Date	Analyzed	Flags
Client ID: 81-00-051011							
Laboratory ID: 05-092-01							
DCB							
Surrogate:	Percent Recovery	Control Limits					
Aroclor 1016	ND	0.056	EPA 8082	5-11-11	5-12-11		
Aroclor 1221	ND	0.056	EPA 8082	5-11-11	5-12-11		
Aroclor 1232	ND	0.056	EPA 8082	5-11-11	5-12-11		
Aroclor 1242	ND	0.056	EPA 8082	5-11-11	5-12-11		
Aroclor 1248	ND	0.056	EPA 8082	5-11-11	5-12-11		
Aroclor 1254	ND	0.056	EPA 8082	5-11-11	5-12-11		
Aroclor 1260	ND	0.056	EPA 8082	5-11-11	5-12-11		
Client ID: 82-00-051011							
Laboratory ID: 05-092-02							
DCB							
Surrogate:	Percent Recovery	Control Limits					
Aroclor 1016	ND	0.054	EPA 8082	5-11-11	5-12-11		
Aroclor 1221	ND	0.054	EPA 8082	5-11-11	5-12-11		
Aroclor 1232	ND	0.054	EPA 8082	5-11-11	5-12-11		
Aroclor 1242	ND	0.054	EPA 8082	5-11-11	5-12-11		
Aroclor 1248	ND	0.054	EPA 8082	5-11-11	5-12-11		
Aroclor 1254	ND	0.054	EPA 8082	5-11-11	5-12-11		
Aroclor 1260	ND	0.054	EPA 8082	5-11-11	5-12-11		
Client ID: 83-00-051011							
Laboratory ID: 05-092-03							
DCB							
Surrogate:	Percent Recovery	Control Limits					
Aroclor 1016	ND	0.053	EPA 8082	5-11-11	5-12-11		
Aroclor 1221	ND	0.053	EPA 8082	5-11-11	5-12-11		
Aroclor 1232	ND	0.053	EPA 8082	5-11-11	5-12-11		
Aroclor 1242	ND	0.053	EPA 8082	5-11-11	5-12-11		
Aroclor 1248	ND	0.053	EPA 8082	5-11-11	5-12-11		
Aroclor 1254	ND	0.053	EPA 8082	5-11-11	5-12-11		
Aroclor 1260	ND	0.053	EPA 8082	5-11-11	5-12-11		

OnSite Environmental, Inc. 14848 NE 95th Street, Redmond, WA 98052 (425) 883-3881

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Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-082
 Project: 620837

PCBs by EPA 8082
 QUALITY CONTROL

Matrix: Soil
 Units: mg/Kg (ppm)

METHOD BLANK						
Analyte	Result	PQL	Method	Prepared	Date	Flag
Laboratory ID: MB0511S1						
Aroclor 1018	ND	0.050	EPA 8082	5-11-11	5-12-11	
Aroclor 1221	ND	0.050	EPA 8082	5-11-11	5-12-11	
Aroclor 1232	ND	0.050	EPA 8082	5-11-11	5-12-11	
Aroclor 1242	ND	0.050	EPA 8082	5-11-11	5-12-11	
Aroclor 1248	ND	0.050	EPA 8082	5-11-11	5-12-11	
Aroclor 1254	ND	0.050	EPA 8082	5-11-11	5-12-11	
Aroclor 1260	ND	0.050	EPA 8082	5-11-11	5-12-11	
Surrogate: 81						
Percent Recovery Control Limits						
42-123						
Analyte	Result	Source	Percent Recovery	Limit	RPD	Flag
MATRIX SPIKES						
Laboratory ID: 05-078-01						
MS MSD MS MSD						
Aroclor 1260	0.468 0.461	0.500 0.500	ND	84 82	44-125 2	15
Surrogate: DCB						
77 75 42-123						

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-082
 Project: 620837

ORGANOCHLORINE
 PESTICIDES by EPA 8081A

Matrix: Soil
 Units: ug/Kg (ppb)

Analyte	Result	POL	Method	Date Prepared	Date Analyzed	Flags
Client ID: 81-00-051011	81-00-051011					
Laboratory ID: 05-082-01	05-082-01					
alpha-BHC	ND		EPA 8081	5-12-11	5-13-11	
gamma-BHC	ND		EPA 8081	5-12-11	5-13-11	
beta-BHC	10		EPA 8081	5-12-11	5-13-11	
delta-BHC	ND		EPA 8081	5-12-11	5-13-11	
Heptachlor	ND		EPA 8081	5-12-11	5-13-11	
Aldrin	ND		EPA 8081	5-12-11	5-13-11	
Heptachlor Epoxide	ND		EPA 8081	5-12-11	5-13-11	
gamma-Chlordane	ND		EPA 8081	5-12-11	5-13-11	
alpha-Chlordane	ND		EPA 8081	5-12-11	5-13-11	
4,4'-DDE	ND		EPA 8081	5-12-11	5-13-11	
Endosulfan I	ND		EPA 8081	5-12-11	5-13-11	
Dieldrin	ND		EPA 8081	5-12-11	5-13-11	
Endrin	ND		EPA 8081	5-12-11	5-13-11	
4,4'-DDD	ND		EPA 8081	5-12-11	5-13-11	
Endosulfan II	ND		EPA 8081	5-12-11	5-13-11	
4,4'-DDT	ND		EPA 8081	5-12-11	5-13-11	
Endrin Aldehyde	ND		EPA 8081	5-12-11	5-13-11	
Methoxychlor	19		EPA 8081	5-12-11	5-13-11	
Endosulfan Sulfate	ND		EPA 8081	5-12-11	5-13-11	
Endrin Ketone	ND		EPA 8081	5-12-11	5-13-11	
Toxaphene	ND		EPA 8081	5-12-11	5-13-11	
Sumogate:						
TCMX	74					
DCB	64					
Percent Recovery	30-111					
Control Limits	33-118					

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

ORGANOCHLORINE
 PESTICIDES by EPA 8081A
 METHOD BLANK QUALITY CONTROL

Matrix: Soil
 Units: ug/Kg (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID: MB0512S1						
alpha-BHC	ND	5.0	EPA 8081	5-12-11	5-13-11	
gamma-BHC	ND	5.0	EPA 8081	5-12-11	5-13-11	
beta-BHC	ND	5.0	EPA 8081	5-12-11	5-13-11	
delta-BHC	ND	5.0	EPA 8081	5-12-11	5-13-11	
Heptachlor	ND	5.0	EPA 8081	5-12-11	5-13-11	
Aldrin	ND	5.0	EPA 8081	5-12-11	5-13-11	
Heptachlor Epoxide	ND	5.0	EPA 8081	5-12-11	5-13-11	
gamma-Chlordane	ND	10	EPA 8081	5-12-11	5-13-11	
alpha-Chlordane	ND	10	EPA 8081	5-12-11	5-13-11	
4,4-DDE	ND	10	EPA 8081	5-12-11	5-13-11	
Endosulfan I	ND	5.0	EPA 8081	5-12-11	5-13-11	
Dieldrin	ND	10	EPA 8081	5-12-11	5-13-11	
Endrin	ND	10	EPA 8081	5-12-11	5-13-11	
4,4-DDD	ND	10	EPA 8081	5-12-11	5-13-11	
Endosulfan II	ND	10	EPA 8081	5-12-11	5-13-11	
4,4-DDT	ND	10	EPA 8081	5-12-11	5-13-11	
Endrin Aldehyde	ND	10	EPA 8081	5-12-11	5-13-11	
Methoxychlor	ND	10	EPA 8081	5-12-11	5-13-11	
Endosulfan Sulfate	ND	10	EPA 8081	5-12-11	5-13-11	
Endrin Ketone	ND	10	EPA 8081	5-12-11	5-13-11	
Toxaphene	ND	10	EPA 8081	5-12-11	5-13-11	
Surrogate:						
TCMX	83	Percent Recovery	Control Limits			
DCB	81					
	39-118					

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Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

**ORGANOCHLORINE
 PESTICIDES by EPA 8081A
 MS/MSD QUALITY CONTROL**

Matrix: Soil
 Units: ug/Kg (ppb)

Analyte	Result	Spike Level	Source	Percent	Recovery	Limit	RPD	RPD	Flags
MATRIX SPIKES									
Laboratory ID: 05-092-01									
gamma-BHC	MS	MSD	MS	MSD	MS	MSD			
	33.4	34.6	50.0	50.0	ND	67	69	32.96	4
Hepachlor	MS	MSD	MS	MSD	ND	68	70	29-101	3
	33.8	36.0	50.0	50.0	ND	68	70	29-101	13
Alrin	MS	MSD	MS	MSD	ND	75	72	27.99	4
	37.4	38.1	50.0	50.0	ND	75	72	33.92	10
Dieldrin	MS	MSD	MS	MSD	ND	72	76	29-101	3
	90.3	93.3	125	125	ND	72	76	29-101	10
Endrin	MS	MSD	MS	MSD	ND	72	76	29-101	11
	90.0	91.6	125	125	ND	72	76	29-101	15
4,4'-DDT	MS	MSD	MS	MSD	ND	68	67	21-114	
	84.6	83.6	125	125	ND	68	67	21-114	
Surrogate:									
TCMX	77	84	73	78	30-111	33-119			
DCB	73	78	30-111	33-119					

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620637

**CHLORINATED ACID
 HERBICIDES by EPA 8151A**

Matrix: Soil
 Units: ug/Kg (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	S1-00-051011					
Laboratory ID:	05-092-01					
Dalapon	ND	280	EPA 8151	5-12-11	5-19-11	
Dicamba	ND	11	EPA 8151	5-12-11	5-19-11	
MCPP	36000	10000	EPA 8151	5-12-11	5-19-11	
MCPA	18000	10000	EPA 8151	5-12-11	5-19-11	P
Dichloroprop	1100	790	EPA 8151	5-12-11	5-19-11	
2,4-D	ND	11	EPA 8151	5-12-11	5-19-11	
Pentachlorophenol	3.5	1.1	EPA 8151	5-12-11	5-19-11	P
2,4,5-TP (Silvex)	94	11	EPA 8151	5-12-11	5-19-11	
2,4,5-T	ND	11	EPA 8151	5-12-11	5-19-11	
2,4-DB	37	11	EPA 8151	5-12-11	5-19-11	
Dinoseb	11	11	EPA 8151	5-12-11	5-19-11	P
Surrogate:	Percent Recovery	Control Limits				
DCAA	57	30-98				

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

TOTAL METALS
EPA 6010B/7471A

Matrix:	Units:	mg/kg (ppm)	Soil	Result	POL	EPA Method	Prepared Date	Analyzed Date	Flags
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Lab ID:	05-092-01	Client ID:	S1-00-061011		
Arsenic	ND	11	6010B	5-13-11	5-13-11
Barium	210	28	6010B	5-13-11	5-13-11
Cadmium	ND	0.56	6010B	5-13-11	5-13-11
Chromium	25	0.56	6010B	5-13-11	5-13-11
Lead	79	5.6	6010B	5-13-11	5-13-11
Mercury	ND	0.28	7471A	5-11-11	5-11-11
Selenium	ND	11	6010B	5-13-11	5-13-11
Silver	ND	0.58	6010B	5-13-11	5-13-11
Lab ID:	05-092-02	Client ID:	S2-00-061011		

Arsenic	ND	11	6010B	5-13-11	5-13-11	5-13-11
Barium	130	2.7	6010B	5-13-11	5-13-11	5-13-11
Cadmium	ND	0.54	6010B	5-13-11	5-13-11	5-13-11
Chromium	28	0.54	6010B	5-13-11	5-13-11	5-13-11
Lead	13	5.4	6010B	5-13-11	5-13-11	5-13-11
Mercury	ND	0.27	7471A	5-11-11	5-11-11	5-11-11
Selenium	ND	11	6010B	5-13-11	5-13-11	5-13-11
Silver	ND	0.54	6010B	5-13-11	5-13-11	5-13-11

OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98062 (425) 863-3861
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Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-082
 Project: 620837

TOTAL METALS
EPA 6010B/7471A

Matrix:	Units:	Soil	mg/kg (ppm)	Analyte	Result	PQL	EPA Method	Prepared Date	Analyzed Date	Flags
Client ID:	S3-00-081011									
Lab ID:	05-092-03									

Arsenic	ND	11	6010B	5-13-11	5-13-11	5-13-11	
Barium	91	2.7	6010B	5-13-11	5-13-11	5-13-11	
Cadmium	ND	0.53	6010B	5-13-11	5-13-11	5-13-11	
Chromium	18	0.53	6010B	5-13-11	5-13-11	5-13-11	
Lead	10	5.3	6010B	5-13-11	5-13-11	5-13-11	
Mercury	ND	0.27	7471A	5-11-11	5-11-11	5-11-11	
Selenium	ND	11	6010B	5-13-11	5-13-11	5-13-11	
Silver	ND	0.53	6010B	5-13-11	5-13-11	5-13-11	

OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881
 This report pertains to the samples analyzed in accordance with the chain of custody,
 and is intended only for the use of the individual or company to whom it is addressed.

Date of Report: May 23, 2011
Samples Submitted: May 11, 2011
Laboratory Reference: 1105-082
Project: 820837

**TOTAL METALS
EPA 6010B
METHOD BLANK QUALITY CONTROL**

Date Extracted: 5-13-11
Date Analyzed: 5-13-11

Matrix: Soil
Units: mg/kg (ppm)

Lab ID: MB0513S1

Analyte	Method	Result	PQL
Arsenic	6010B	ND	10
Barium	6010B	ND	2.5
Cadmium	6010B	ND	0.50
Chromium	6010B	ND	0.50
Lead	6010B	ND	5.0
Selenium	6010B	ND	10
Silver	6010B	ND	0.50

Date of Report: May 23, 2011
Samples Submitted: May 11, 2011
Laboratory Reference: 1105-092
Project: 620837

**TOTAL MERCURY
EPA 7471A
METHOD BLANK QUALITY CONTROL**

Date Extracted: 5-11-11
Date Analyzed: 5-11-11

Matrix: Soil
Units: mg/kg (ppm)

Lab ID: MB0511S1

Analyte	Method	Result	PQL
Mercury	7471A	ND	0.25

Date of Report: May 23, 2011
Samples Submitted: May 11, 2011
Laboratory Reference: 1105-082
Project: 820837

**TOTAL METALS
EPA 8010B
DUPLICATE QUALITY CONTROL**

Date Extracted: 5-13-11

Date Analyzed: 5-13-11

Matrix: Soil

Units: mg/kg (ppm)

Lab ID: 05-090-01

Analyte	Sample Result	Duplicate Result	RPD	PQL	Flags
Arsenic	ND	ND	NA	10	
Barium	67.1	71.8	7	2.5	
Cadmium	ND	ND	NA	0.50	
Chromium	40.5	43.0	6	0.50	
Lead	9.79	9.83	0	5.0	
Selenium	ND	ND	NA	10	
Silver	ND	ND	NA	0.50	

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Date of Report: May 23, 2011
Samples Submitted: May 11, 2011
Laboratory Reference: 1105-092
Project: 620837

**TOTAL MERCURY
EPA 7471A
DUPLICATE QUALITY CONTROL**

Date Extracted: 5-11-11
Date Analyzed: 5-11-11

Matrix: Soil
Units: mg/kg (ppm)

Lab ID: 05-081-13

Analyte	Sample Result	Duplicate Result	RPD	PQL	Flags
Mercury	ND	ND	NA	0.25	

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

**TOTAL METALS
 EPA 8010B
 MS/MSD QUALITY CONTROL**

Date Extracted: 5-13-11

Date Analyzed: 5-13-11

Matrix: Soil

Units: mg/kg (ppm)

Lab ID: 05-090-01

Analyte	Spike Level	MS	Percent Recovery	MSD	Percent Recovery	RPD	Flags
Arsenic	100	92.6	93	92.8	93	0	
Barium	100	176	109	168	101	5	
Cadmium	50.0	48.4	97	47.8	95	2	
Chromium	100	137	97	132	92	4	
Lead	250	240	92	237	91	1	
Selenium	100	96.0	96	94.8	95	1	
Silver	25.0	22.3	89	22.0	88	2	

OnSite Environmental, Inc. 14848 NE 95th Street, Redmond, WA 98052 (425) 883-3881

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Date of Report: May 23, 2011
Samples Submitted: May 11, 2011
Laboratory Reference: 1105-092
Project: 620837

**TOTAL MERCURY
EPA 7471A
MS/MSD QUALITY CONTROL**

Date Extracted: 5-11-11
Date Analyzed: 5-11-11

Matrix: Soil
Units: mg/kg (ppm)

Lab ID: 05-081-13

Analyte	Sample Result	Duplicate Result	RPD	PQL	Flags
Mercury	ND	ND	NA	0.25	

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

**ORGANOPHOSPHORUS
 PESTICIDES by EPA 8270D/SIM**

Matrix: Soil
 Units: mg/Kg

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	S1-00-051011					
Laboratory ID:	05-092-01					
Dichlorvos/DDVP	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Mevinphos/Phosdrin	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Etihoprophos	ND	0.56	EPA 8270/SIM	5-16-11	5-17-11	
Monocrotophos	ND	0.56	EPA 8270/SIM	5-16-11	5-17-11	
Naled	ND	0.56	EPA 8270/SIM	5-16-11	5-17-11	
Sulfotep	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Phorate	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Dimethoate	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Demeton-S	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Diazinon	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Disulfoton	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Parathion-methyl	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Fenchlorphos/Rennel	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Malathion	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Fenthion	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Parathion-ethyl	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Chlorpyrifos/Dursban	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Trichloronate	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Merphos&Merphos-oxona	ND	0.56	EPA 8270/SIM	5-16-11	5-17-11	
Stirofos/Tetrachlorvinphos	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Tokuthion/Prothiofos	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Fensulfothion	ND	0.56	EPA 8270/SIM	5-16-11	5-17-11	
Bolstar/Sulprofos	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
EPN	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Azinphos-methyl/Guthion	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Coumaphos	ND	0.22	EPA 8270/SIM	5-16-11	5-17-11	
Surrogate:	Percent Recovery	Control Limits				
Tributyl phosphate	106	28 - 109				
Triphenyl phosphate	...	37 - 118				F

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-082
 Project: 620837

**ORGANOPHOSPHORUS
 PESTICIDES by EPA 8270/SIM
 METHOD BLANK QUALITY CONTROL**

Matrix: Soil
 Units: mg/Kg

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Laboratory ID: MB0516S1						
Dichlorvos(DDVP)	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Mevinphos/Phosdrin	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Ethoprophos	ND	0.050	EPA 8270/SIM	5-16-11	5-16-11	
Monocrotophos	ND	0.050	EPA 8270/SIM	5-16-11	5-16-11	
Naled	ND	0.050	EPA 8270/SIM	5-16-11	5-16-11	
Sulfotep	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Phorate	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Dimethoate	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Demeton-S	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Diazinon	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Disulfoton	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Parathion-methyl	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Fenchlorphos/Ronnel	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Malathion	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Fenthion	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Parathion-ethyl	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Chlorpyrifos/Dursban	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Trichloronate	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Merphos&Merphos-oxone	ND	0.050	EPA 8270/SIM	5-16-11	5-16-11	
Sitrofos/Tetrachlorvinphos	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Tekuthion/Prothiofos	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Fensulfthion	ND	0.050	EPA 8270/SIM	5-16-11	5-16-11	
Bolstar/Sulprofos	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
EPN	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Azinphos-methyl/Guthion	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Coumaphos	ND	0.020	EPA 8270/SIM	5-16-11	5-16-11	
Surrogate:	Percent Recovery	Control Limits				
Tributyl phosphate	85	28 - 109				
Triphenyl phosphate	80	37 - 118				

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

**ORGANOPHOSPHORUS
 PESTICIDES by EPA 8270D/SIM
 SB/SBD QUALITY CONTROL**

Matrix: Soil
 Units: mg/Kg

Analyte	Result		Spike Level		Percent Recovery		Recovery Limits	RPD	Limit	Flags
SPIKE BLANKS										
Laboratory ID:	SB0516S1									
	SB	SBD	SB	SBD	SB	SBD				
Dichlorvos(DDVP)	0.0585	0.0612	0.100	0.100	59	61	45 - 110	5	30	
Mevinphos/Phosdrin	0.0543	0.0590	0.100	0.100	54	59	50 - 110	8	30	
Ethoprophos	0.0741	0.0817	0.100	0.100	74	82	50 - 110	10	30	
Sulfotepp	0.0788	0.0856	0.100	0.100	80	86	45 - 110	7	30	
Phorate	0.0784	0.0849	0.100	0.100	78	85	50 - 110	8	30	
Dimethoate	0.0780	0.0863	0.100	0.100	78	86	50 - 110	10	30	
Demeton-S	0.0713	0.0813	0.100	0.100	71	81	45 - 110	13	30	
Diazinon	0.0739	0.0814	0.100	0.100	74	81	50 - 110	10	30	
Disulfoton	0.0780	0.0865	0.100	0.100	79	87	50 - 110	9	30	
Parathion-methyl	0.0708	0.0803	0.100	0.100	71	80	60 - 120	13	30	
Fenchlorphos/Ronnel	0.0879	0.0963	0.100	0.100	88	96	50 - 110	9	30	
Malathion	0.109	0.119	0.100	0.100	109	119	50 - 120	9	30	
Fenthion	0.0872	0.0949	0.100	0.100	87	95	50 - 110	8	30	
Parathion-ethyl	0.0679	0.0767	0.100	0.100	68	77	45 - 110	12	30	
Chlorpyrifos/Dursban	0.0850	0.0919	0.100	0.100	85	92	50 - 110	8	30	
Trichloronate	0.0872	0.0930	0.100	0.100	87	93	50 - 110	8	30	
Stirofos/Tetrachlorvinphos	0.139	0.153	0.100	0.100	139	153	80 - 160	10	30	
Tokuthion/Prothiotos	0.0780	0.0880	0.100	0.100	79	88	50 - 110	11	30	
Fensulfothion	0.0801	0.0885	0.100	0.100	80	87	45 - 110	19	30	
Boistar/Sulprofos	0.0817	0.0919	0.100	0.100	82	92	50 - 110	12	30	
EPN	0.0700	0.0792	0.100	0.100	70	79	50 - 110	12	30	
Azinphos-methyl/Guthion	0.127	0.139	0.100	0.100	127	139	70 - 140	9	30	
Coumaphos	0.0728	0.0860	0.100	0.100	73	86	60 - 120	17	30	
Surrogate:										
Tributyl phosphate					68	71	28 - 108			
Triphenyl phosphate					78	86	37 - 116			

Date of Report: May 23, 2011
 Samples Submitted: May 11, 2011
 Laboratory Reference: 1105-092
 Project: 620837

NWTPH-Gx/BYEX

Matrix: Soil
 Units: mg/kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	S2-00-051011					
Laboratory ID:	05-092-02					
Benzene	ND	0.023	EPA 8021	5-13-11	5-16-11	
Toluene	0.60	0.12	EPA 8021	5-13-11	5-16-11	
Ethyl Benzene	27	2.9	EPA 8021	5-13-11	5-17-11	
m,p-Xylene	180	2.9	EPA 8021	5-13-11	5-17-11	
o-Xylene	31	2.9	EPA 8021	5-13-11	5-17-11	
Gasoline	1900	280	NWTPH-Gx	5-13-11	5-17-11	Z
Surrogate:	Percent Recovery	Control Limits				
Fluorobenzene	92	68-124				

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PHASE I ENVIRONMENTAL AUDIT

Proposed Sunset Pointe Residential Plat
East of Intersection of 21st St SE and 19th Ave SE
Puyallup, Washington

DESERT CREEK, LLC

ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue Northeast, Suite 300
Bellevue, Washington 98004
(425) 455-9025 Office
(888) 453-5394 Toll Free
(425) 455-2316 Fax

January 14, 2005

JN 24420

Nick Scholten
Desert Creek, LLC
P.O. Box 731989
Puyallup, Washington 98373

Subject: **PHASE I ENVIRONMENTAL AUDIT
Proposed Sunset Pointe Residential Plat
East of Intersection of 21st St SE and 19th Ave SE
Puyallup, Washington**

Dear Mr. Scholten,

Environmental Associates, Inc., has completed a Phase I Environmental Audit of the subject property located in Puyallup, Washington. This report, prepared in accordance with the terms of our proposal dated December 29, 2004, and in a manner consistent with the intent and methodologies of ASTM E 1527-00; "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", summarizes our approach to the project along with results and conclusions.

The contents of this report are confidential and are intended solely for your use and the use of your representatives. Four (4) copies of this report are being distributed to you. No other distribution or discussion of this report will take place without your prior approval in writing. Additional copies are available for a small fee.

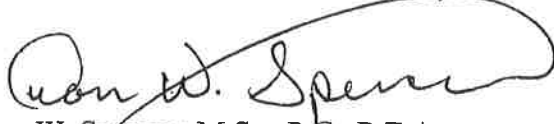


Desert Creek, LLC
January 14, 2005

JN 24420
Page - 2

We appreciate the opportunity to be of service on this assignment. If you have any questions or if we may be of additional service, please do not hesitate to contact us.

Respectfully submitted,
ENVIRONMENTAL ASSOCIATES, INC.



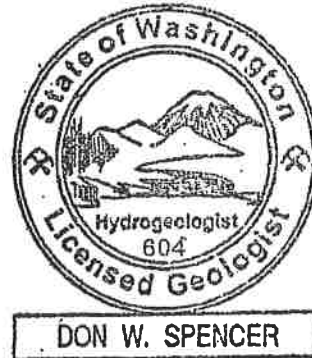
Don W. Spencer, M.Sc., P.G., R.E.A.
Principal

EPA-Certified Asbestos Inspector/Management Planner
I.D. # AM 48151

EPA/HUD Certified Lead Inspector (Licensed)

Registered Site Assessor/Licensed UST Supervisor
State Certification #0878545-U7

License: 604	(Washington)
License: 11464	(Oregon)
License: 876	(California)
License: 5195	(Illinois)
License: 0327	(Mississippi)



ENVIRONMENTAL ASSOCIATES, INC.

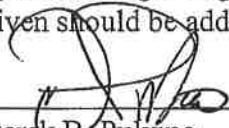
PHASE "1" ENVIRONMENTAL AUDIT

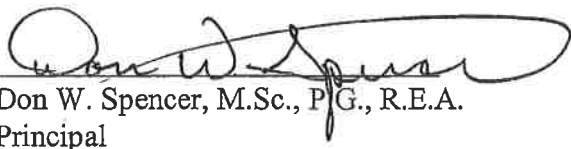
Proposed Sunset Pointe Residential Plat
East of Intersection of 21st St SE and 19th Ave SE
Puyallup, Washington

Prepared for:

Desert Creek, LLC
P.O. Box 731989
Puyallup, Washington 98373

Questions regarding this investigation, the conclusions reached and the recommendations given should be addressed to one of the following undersigned.


Derek B. Pulvino
Environmental Scientist
EPA-Certified Building Inspector
I.D. # 1010794

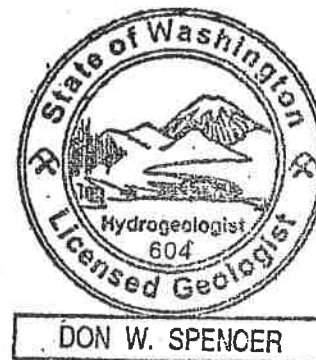

Don W. Spencer, M.Sc., P.G., R.E.A.
Principal

EPA-Certified Asbestos Inspector/Management Planner
I.D. # AM 48151

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State Certification #0878545-U7

License: 604 (Washington)
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License: 876 (California)
License: 5195 (Illinois)
License: 0327 (Mississippi)



Reference Job Number: JN 24420

January 14, 2005

ENVIRONMENTAL ASSOCIATES, INC.

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METHODOLOGY/SCOPE OF WORK

Our study approach consisted of completing a series of investigative tasks intended to satisfy the level of effort often referred to as "due diligence" by the "innocent purchaser" in the context of the Superfund Amendment and Reauthorization Act of 1986 (SARA), and nearly identical requirements set forth in the Model Toxics Control Act (MTCA), Chapter 70.105 D (Section 040) RCW pertaining to standards of liability. The objective of a Phase I audit is to reduce potential risk for exposure to future liability for environmental problems by demonstrating that at the time of acquisition or refinancing, the owner, buyer, or lender had no knowledge or reason to know that any hazardous substance had been released or disposed of on, in, or at the property. Moreover, in defining the purpose of the Phase I environmental site assessment process, section 1.1.1 of ASTM E-1527 advises that the goal of a Phase I is to identify "recognized environmental conditions," and defines a recognized environmental condition as "the presence or likely presence of any hazardous substances . . . on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances . . . into structures on the property or into the ground, groundwater, or surface water of the property."

In an effort to evaluate condition and previous uses of the property in a manner consistent with good commercial and customary practice and in accordance with methods outlined under ASTM E 1527-00, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", our scope of work for this study included:

- Review of chronology of ownership and site history using the resources of the Pierce County Assessor's Office, business directories from several time periods, and aerial photography from several time periods as primary resources. This included an attempt to identify possible former industries or uses presenting some potential for generating waste which may have included dangerous or hazardous substances as defined by state and federal laws and regulations.
- Acquisition and review of available reports and other documentation pertaining to the subject site or nearby sites.
- Review of Washington Department of Ecology (WDOE) and Puyallup/Pierce County Department of Public Health documents regarding current and abandoned landfills.
- Review of the current EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), the EPA National Priority List (NPL), the EPA Resource Conservation and Recovery Act (RCRA) Notifiers, RCRA Corrective Action Report (CORRACTS), and Emergency Response Notification System (ERNS) lists of sites which are potentially contaminated or which produce hazardous substances as a normal part of their commercial operation in the vicinity of the site.

- Review of the current Washington Department of Ecology (WDOE) listing of underground storage tanks (USTs) along with the WDOE's Leaking Underground Storage Tank (LUST) listing for WDOE-documented leaking USTs in the vicinity of the subject property.
- Review of the current WDOE Confirmed and Suspected Contaminated Sites (CSCS) list of potentially contaminated sites which have been the subject of hazardous waste investigation and/or cleanup activity in conjunction with the Washington Model Toxics Control Act (MTCA) Chapter 173-340 WAC.
- Review published documents from the Bonneville Power Administration (BPA) to evaluate the risk for naturally occurring radon.
- A reconnaissance of the subject property and neighboring areas to look for evidence of potential contamination in the form of soil stains, odors, asbestos, lead-based paint (LBP), vegetation stress, discarded drums, discolored water, careless manufacturing or industrial practices, etc.
- Preparation of a summary report which documents the audit process and findings.

FINDINGS

GENERAL DESCRIPTION

The subject property consists of four separate tax parcels which together comprise an irregular-shaped parcel covering approximately 890,000 square feet (20 acres) of land. Improvements to the property include multiple buildings such as residences, barns, garages, and utility sheds. The improvements on the site, as documented by the Pierce County Assessor's Office, are outlined in the table below.

Stories	Framing/ construction	Size	Date of Construction	Roof
Tax Parcel: 0420353026				
Single story residence	Wood Framed	1,104	1928	Pitched with composition shingles
Tax Parcel: 0420353027				
Single story residence	Wood-framed	912	1924	Pitched with composition shingles
Single story storage shed	Wood-pole supported	10,000	1940	Pitched, surfacing not listed

Stories	Framing/ construction	Size	Date of Construction	Roof
Tax Parcel: 0420353027(continued)				
Single story barn	Wood-pole supported	4,480	1950	Pitched, surfacing not listed
Single story storage shed	Wood-pole supported	4,000	1950	Pitched, surfacing not listed
Two-story, detached garage	Cinder block	1,092	1940	Pitched, surfacing not listed

The Pierce County Assessor's Office did not list improvements on the remaining two parcels (#'s 0420357011, 0420353009). Currently the property is utilized as a residential property, with only the western house on the property (parcel# 0420353026) occupied. According to Mr. Richard Tanner, current occupant, the structures on the eastern portion of the site are occupied. The approximate location of the site is shown on the Vicinity Map, Plate 1, appended herewith.

The property is located in a rural/residential area approximately one-mile southeast of downtown Puyallup, Washington. Photographs reflecting the character of the subject property are provided with this report as Plates 4 and 5.

A brief description of land use on nearby parcels is provided below. Plate 3, Site Plan, depicts the setting of the subject property and land use for adjacent sites.

North: A residential subdivision is located adjacent to the northern border of the subject property.

South: A residential subdivision is also located adjacent to the southern border of the subject property.

East: The residential subdivision located to the north of the subject property also extends to run along the eastern border of the subject property.

West: A residential subdivision is located to the west of the southern portion of the subject property. Land to the west of the northern edge of the subject property is also residentially developed, however with a lower development density than sites located adjacent to the rest of the property.

According to the Pierce County Assessor's Office, the subject property is zoned for residential and agricultural use.

GEOLOGIC SETTING

Physiographically, the site is situated on a gently rolling elevated plain (the Vashon Drift Plain) which was formed during the last period of continental glaciation that ended approximately 13,500 years ago.

Published geologic maps for the site vicinity (Jones, 1999) suggest that much of the material underlying the subject site may be recessional gravel, a "moderately to poorly sorted gravel and sand with small amounts of silt and clay." Typically, the recessional deposits exhibits relatively moderate to high vertical hydraulic conductivity which frequently results in formation of a "perched" water table along interstitial contacts. The "perched" water table (if present) is frequently seasonal and derives recharge primarily from infiltration of precipitation through more permeable overlying soils.

Topographically, the site is situated on a northerly facing slope ranging from approximately 240- to 380-feet above sea level. Based upon inference from topography and local drainage patterns, it appears that shallow-seated groundwater (if present) in the vicinity of the subject property may flow in a northerly direction.

Although no site specific information has been developed by our firm with respect to depth to groundwater at this site, our experience in the area suggests that "perched" groundwater (if present) beneath the site may lie at a depth of approximately 10 to 20 feet or more beneath the ground surface.

With respect to surface water resources, several small unnamed ponds are located on the subject property.

DEVELOPMENT HISTORY AND LAND USE

Sources reviewed for information on site and area development and land use included the resources of the Seattle and Tacoma Public Libraries, Pierce County Assessor's Office, and aerial photographs of the subject property and surrounding area from several time periods.

Aerial photographs of the area were reviewed for the years 1969, 1979, 1985, 1996, 2000, and 2003. The following paragraphs provide an interpretive summary of our observations in each photo. The time intervals between the various historic aerial photographs selected for this particular project are, in our opinion, entirely adequate for the intended purpose which was to permit a general assessment of overall development and land use in the vicinity of the subject property.

- 1969 All of the currently present structures are visible on the property. Four small sheds are visible approximately 75-feet northeast of the southern on-site house. The currently present pond is not visible. A gravel mining operation is visible on the adjacent property to the south of the site. Two conveyor/loading belts are visible at the mine. As indicated by an access drive/road going from this gravel

mine to the southern portion of the site, the southern onsite structures appear to be utilized by the mining operation. The land located adjacent to the west is roughly half cleared and half forested. A small area of surface grading is visible adjacent to the eastern border of the northern portion of the site. Generally, a minimal quantity of houses are visible in the area of the site.

- 1979 Small areas of surface grading are visible both near the northern onsite house and on the southeast corner of the pasture area. The area adjacent to the east of the site, formerly noted as graded, has now become a residential housing development (to east/northeast). A new pond is visible within the gravel mining property. Trees/shrub vegetation has regrown on approximately 50% of the adjacent mining site.
- 1985 The graded area is no longer visible within the pasture, however the graded area near the northern house appears to be utilized as a parking area. To the south, the operations at the gravel mining site have expanded westward. No other significant changes are visible from the previous photograph.
- 1996 Development as a residential housing sub-division has commenced on the southern adjacent gravel mine property. The pond remains within the gravel mine site. Onsite, the current pond is now visible. Within the subject property pasture, trees continue to regrow. Several of the small sheds near the southern house on the property are no longer discernable.
- 2000 The housing development has been completed to the west/southwest of the site, on the former gravel mine property. None of the small sheds are visible in the vicinity of the southern onsite house.
- 2003 The houses currently present to the west/northwest of the site are either in construction or have been constructed. In general terms, the majority of the site vicinity has now been developed with residential properties.

PROPERTY CONVEYANCE/OWNERSHIP DATA

From the file resources of the Pierce County Assessor's Office and resources of the Tacoma and Seattle Public Libraries, the following limited history of ownership has been established:

SOURCE	OWNER	DATE OF PURCHASE
tax parcel #0420353026		
Pierce County Assessor's Office	Ottinger, Sharon	Not Listed
Metsker's Atlas of Pierce County (1965, 1951)	Greeley, V	Not Listed
Metsker's Atlas of Pierce County (1941)	V.B., L.T. and A.B. Greeley	Not Listed

SOURCE	OWNER	DATE OF PURCHASE
Kroll Atlas of Pierce County (1924)	Mark Graves, Jms Williams	Not Listed
Kroll Atlas of Pierce County (1915)	Mark Graves, E.G. Griswold	Not Listed
tax parcel #0420353027		
Pierce County Assessor's Office	Greeley, Grace Ardell	Not Listed
Metsker's Atlas of Pierce County (1965, 1951)	Greeley, V	Not Listed
Metsker's Atlas of Pierce County (1941)	V.B., L.T. and A.B. Greeley	Not Listed
Kroll Atlas of Pierce County (1924)	Mark Graves, Jms Williams	Not Listed
Kroll Atlas of Pierce County (1915)	Mark Graves, E.G. Griswold	Not Listed
tax parcel #0420357011		
Pierce County Assessor's Office	Greeley, Grace	11/26/1990
Pierce County Assessor's Office	Parkwood Homes	4/20/1990
Metsker's Atlas of Pierce County (1965, 1951)	Greeley, V	Not Listed
Metsker's Atlas of Pierce County (1941)	V.B., L.T. and A.B. Greeley	Not Listed
Kroll Atlas of Pierce County (1924)	Mark Graves, Jms Williams	Not Listed
Kroll Atlas of Pierce County (1915)	Mark Graves, E.G. Griswold	Not Listed
tax parcel #042035309		
Pierce County Assessor's Office	Greeley, Grace	11/26/1990
Metsker's Atlas of Pierce County (1965, 1951)	Greeley, V	Not Listed
Metsker's Atlas of Pierce County (1941)	V.B., L.T. and A.B. Greeley	Not Listed
Kroll Atlas of Pierce County (1924)	Mark Graves, Jms Williams	Not Listed
Kroll Atlas of Pierce County (1915)	Mark Graves, E.G. Griswold	Not Listed

According to resources available at the Tacoma and Seattle Public Libraries the Pierce County Assessor's Office, and a review of aerial photographs, the subject site was developed as early as 1924 with a single-family dwelling. Subsequent development of an additional residence as well as several storage sheds and barns occurred between that time and approximately 1950. In the earliest available aerial photograph (1969), the northern portion of the property currently used for pastoral purposes had been cleared of trees and other low-standing shrubbery, while a road/driveway was observed connecting the southern margin of the property with the gravel mine operating to the south of the site. Conversations with one of the current occupants/owners of the subject property (Pat Tanner) confirmed the use of the southern onsite buildings by the adjacent gravel mining operation. The exact nature of this usage (i.e. vehicle fueling, maintenance, clerical offices, etc) was not disclosed. Sanborn Fire Insurance maps did not provide coverage in the vicinity of the subject property. Borrowing from the jargon of ASTM, no "reasonably ascertainable" or "likely to be useful" information prior to 1924 was available. The absence of such information has no material effect upon the conclusions of this report.

Historic reverse street directories and archive records documented seven (7) occupants of the property in the directories/records reviewed for the years 1953 through 2003. These occupants included:

LISTED OCCUPANT	ADDRESS OF BUSINESS	OCCUPATION OF SITE (date of Polk's Guide Listing)
ON SUBJECT SITE		
Hill Top Gravel	2102 19 th Ave SE	1953
Greeley, Vinto		1953
Greeley, Grace		1959
Ingham, Gerald	2100 19 th Ave SE	1972
Ottinger, Edw		1979, 1985
Ottinger, Sharon		1990, 1997, 2003
Frontier Museum	2301 23 rd Ave SE	1979, 1985, 1990
SOUTH/WEST OF SUBJECT SITE		
Hilltop Concrete Co	2223 23 rd Ave SE	1959
Reid Concrete Inc.		1965
South Hill Sand and Gravel		1990

SITE RECONNAISSANCE

An Environmental Scientist/EPA-certified Asbestos Building Inspector from our firm visited the property on January 5, 2005 to review on-site conditions and land use practices in the surrounding area. Mr Nick Schoelten, potential purchaser of the property, arranged for access to the site. The representative areas reviewed during our site visit included the exterior grounds, and adjacent property usages. Access to the structure interiors was not provided to EAI during the course of our site reconnaissance.

As mentioned earlier, existing improvements to the subject property include multiple 1924-1950-vintage buildings. For further information on building construction details, please refer to the General Information section within this report. A gravel drive accesses the property from the northwest. Gravel/dirt covered parking areas are located adjacent to the onsite structures. Landscaped areas are situated adjacent to the houses, with the majority of the remaining property cleared pasture land. Residents occupy one of the onsite buildings. The remainder of the buildings are not occupied on a full time basis for residential or commercial purposes. Typical building materials and/or conditions observed during our site reconnaissance included:

- Floors appeared to be wood or concrete covered with carpet, sheet vinyl, or square vinyl tile.
- Interior walls throughout the building are painted sheetrock, natural wood, or concrete.
- Ceilings are painted drywall, or "popcorn" textured materials.
- A wood-fired stove is reported to be the sole current source of heat for the two residences. Referring to Photo #3 of Plate #5, an above-ground storage tank used to store heating oil was observed adjacent to the southern wall of the northern onsite residence. According to Ms. Tanner, use of this tank was discontinued approximately 20-years ago. No staining was noted near the base of this tank.
- Multiple junked cars were observed in the area of the northern house. No leaking or odors were noted in the vicinity of these vehicles. According to Richard Tanner, one of the current residents, these cars are slated for disposal and not used for parting out or onsite repair work.
- Cultural debris such as lumber, furniture, fencing, appliances, and general household rubbish was noted in the vicinity of the buildings located on the southern portion of the site.
- A steel vertical rack containing three separate above ground tanks/drums was noted near the southern border of the subject property. Although the bottom of one of these tanks was rusted out, no odors, stained soil, or disturbed vegetation was noted in the vicinity of these tanks. According to Ms. Tanner, these tanks were used to store gasoline to refuel the gravel mining vehicles. Ms. Tanner did not report any spills or releases from these tanks.
- A small pond was noted approximately halfway between the two onsite residences, on the southern side of the driveway. A soil retention wall consisting of battery casings was noted on the northern edge of this pond, at the area where the driveway crosses the ponds drainage conduit. According to Ms. Pat Tanner, property owner, these batteries were brought on the site approximately 40-years ago after being obtained from a local battery recycler (Kiby's Battery Company). Ms. Tanner stated that prior to purchasing the battery casings, Kiby's had removed the contents and cleaned the interiors of the casings. Onsite, the empty casings were then filled with soil and stacked in their present configuration adjacent to the roadway. More recently, Mr. Scholten of Desert Creek, LLC (potential purchaser of site) informed us (EAI) that in an attempt to independently evaluate environmental conditions, his company had collected a single soil sample from inside one of these battery casings. The sample was submitted by Desert Creek to Spectra Laboratories for Lead Toxicity Characteristic Leaching Potential (TCLP) and pH analyses. Analysis indicated the leachable lead concentrations to be 0.38-parts per million (ppm). The pH analysis indicated the soils to be slightly basic (7.5 pH units). As a basis for comparison of TCLP results to total concentrations, an unofficially adopted "rule of thumb" used by some regulators and investigators is that total concentration of a given metal in soils can be roughly estimated by multiplying the TCLP results by a factor of twenty. Using this calculation, an estimated

"total" concentration of lead in the tested soil would be roughly 7.6-ppm, a concentration below the median concentration of "total" lead in soils of the Puget Sound region, as detailed by the Washington State Department of Ecology, in "Natural Background Soil Metals Concentrations in Washington State" (publication #94-115). To the extent that the results of the sampling and analysis undertaken by Desert Creek are reflective of conditions at other locations near the wall, it would then be possible to conclude that the risk of environmental impacts relating to this battery casing wall would be relatively low.

- An additional area of accumulated rubbish and household waste was noted in the vicinity of the northern house on the subject property.

According to Ms. Pat Tanner, no hazardous waste is generated on the property. In addition, she stated that there are no below-ground fuel storage tanks on the property. No obvious, visually discernable evidence to suggest the presence of any underground fuel storage tanks (i.e., vent lines, filler caps, etc.) was noted on the property. Similarly, no groundwater monitoring wells were noted on the property. At the time of our visit, no stains, odors, or unusual vegetation conditions that might otherwise indicate the potential presence of hazardous materials were observed on the subject property.

CHECK FOR PCB-CONTAINING MATERIALS

Prior to 1979, polychlorinated biphenyls (PCBs) were widely used in electrical equipment such as transformers, capacitors, switches, fluorescent lights (ballasts) and voltage regulators owing to their excellent cooling properties. In 1976, the EPA initiated regulation of PCBs through issues pursuant to the Toxic Substances Control Act (TSCA). These regulations generally control the use, manufacturing, storage, documentation, and disposal of PCBs. EPA eventually banned PCB use in 1978, and adoption of amendments to TSCA under Public Law 94-469 in 1979 prohibited any further manufacturing of PCBs in the United States.

Light Fixtures

Based upon the age of the onsite buildings (1924 through 1950-vintage), it is conceivable that some transformer ballasts containing PCB's may exist within these buildings. In the event that ballasts are later discovered which do not possess clear labeling stating "No PCB's", we have attached an EPA information pamphlet as Appendix C for information regarding the handling and disposal of such ballasts.

Main Service Electrical Transformers

Pole mounted main service electrical transformer was noted on the eastern edge of the property. No certifications or labels regarding PCBs were noted on the transformer. Careful examination of the transformer revealed no cracks, staining, or other evidence of potential leakage. Liability for this equipment ultimately lies with the utility company in any event.

CHECK FOR ASBESTOS-CONTAINING MATERIALS

During our site review, five (5) types of materials suspected to possibly contain asbestos were observed within the subject building. These materials included a ceiling/wall plaster, vinyl floor-tile, sheet-vinyl, window glazing, and popcorn ceiling. At the time of this writing we were not authorized by the client to sample or test the suspect materials to confirm or deny this presumption. A summary of the suspect materials is provided in the table below. As Eai Was not granted interior access, this list was compiled based upon materials visible from the exterior building windows, as well information supplied by the onsite residence.

MATERIAL	LOCATION	CONDITION ¹
Gypsum Wallboard	Throughout residence interiors	Good
Vinyl Floor Tile	Various locations within residences	Good
Sheet Vinyl Flooring	Various locations within residences	Good
Popcorn Ceiling	Front room of northern residence	Good
Window Glazing	Exterior of multi-pane windows	Good
Note: 1 - Material condition was evaluated borrowing criteria adopted under the Asbestos Hazard Emergency Response Act (AHERA), 40 CFR, part 763.		

Our effort regarding identification of asbestos-containing materials within the subject building was a preliminary review and not an asbestos survey. Since no destructive sampling was authorized for this audit, materials not readily accessible such as roofing materials and/or materials obscured behind, beneath, or within walls or existing flooring materials were not reviewed.

REVIEW FOR LEAD-BASED PAINT

Lead was formerly a common additive to many paints to improve their durability and coverage. Lead-based paint presents a special hazard to small children who can ingest it by chewing on painted woodwork or eating flakes of paint. A number of studies showing the toxic effects of lead on humans, and on small children in particular, prompted the Consumer Product Safety Commission to mandate in 1977 that the amount of lead in most paints, including those for residential use, should not exceed 0.06 %.

A review of exterior painted surfaces on the subject property was conducted to assess the potential for lead-content in surface layers of paint. Representative painted surfaces (listed in the table below) were analyzed using "Lead-Check" sodium rhodizonate color reagent paint tests. These tests provide a qualitative indication as to whether lead is present in paint samples with reproducible results to a lower detection limit of 0.5 percent, a level corresponding to a threshold of concern established by HUD.

PAINTED SURFACE	RESULT
White wood trim on southern house exterior	Positive
Red wooden trim on exterior of detached garage on southern portion of site	Positive
White painted aluminum siding on exterior of southern house	Non-Detect
White painted wood on exterior of barn door, southern portion of property	Positive

As noted in the table above, three (3) of the surfaces tested using the "Lead Check" screening method showed a reddish hue response characteristic of the sodium rhodizonate method as an indication of the likely presence of lead in the painted surfaces. On that basis, we conclude that lead was likely present in the surfaces which tested positive.

RADON EVALUATION

Occurrence Radon is a naturally occurring, highly mobile, chemically inert radioactive gas created through radioactive decay of uranium and thorium. The potential for occurrence of radon varies widely and is dependent upon (1) the concentration of radioactive materials in the underlying bedrock; (2) the relative permeability of soils with respect to gases; and (3) the amount of fracturing or faulting in surficial materials (EPA, 1987).

Health Risks The concern regarding radon and its potential effects upon humans arises from the results of studies (EPA, 1987) which suggest that approximately fifteen percent of all lung cancer mortalities in the United States may be attributable to exposure to radon.

The EPA has established a concentration of radon of four (4) picocuries per liter (pCi/l) as a maximum permissible concentration "action level". Concentrations above this value would signal a potential health threat. According to some studies, an average concentration in homes across the United States is on the order of 1.4 pCi/l.

**Risk of
Potential
Exposure in
the Puyallup
Area**

The Bonneville Power Administration (BPA) recently published the results of measurements for radon made in residences throughout the region they serve which includes Washington, Oregon and Idaho. For the Puyallup area in the immediate vicinity of the subject property eleven tests have been performed. The results of their work (BPA, 1993) suggest that radon levels over 4 pCi/l were detected in two of the monitored residences in the vicinity of the subject site. Additionally, the average listed radon reading in the subject site township was 0.41 pCi/l, well below the EPA threshold of concern.

On the basis of the findings presented in the cited BPA survey, we conclude that the potential for exposure to naturally occurring radon at the subject site is very low.

WATER SUPPLY, WASTE WATER AND SOLID WASTE MANAGEMENT

Information supplied by Ms. Tanner revealed that water service is provided by onsite wells. Onsite septic systems service the current wastewater needs.

As discussed in the Site Reconnaissance section of this report, various areas of collected refuse were noted on the property.

REVIEW OF WASHINGTON DOE LISTING OF UNDERGROUND STORAGE TANKS

Review of the current Washington Department of Ecology listing of underground storage tanks (USTs) suggests that no facilities with registered USTs are located within a one-quarter mile radius of the subject property. Similarly, according to the most recent WDOE Leaking Underground Storage Tank (LUST) listing, none of the listed tank facilities located within an approximately one-half mile radius of the subject property have reported accidental releases or leakage to the WDOE in the past.

EPA & STATE RECORDS OF POTENTIALLY HAZARDOUS SITES

- | | |
|--------------------------|---|
| Superfund and NPL | Review of the current EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and National Priority List (NPL) listings revealed <u>no CERCLIS</u> and <u>no NPL</u> sites within approximately one mile of the subject property that have been designated as potentially hazardous or eligible for participation in the Superfund cleanup program. |
| CORRACTS | Review of the current EPA Corrective Action Report (CORRACTS) listing revealed that <u>no CORRACTS</u> sites are located within approximately one mile of the subject property that have been designated as having a potential release at the property under RCRA. |
| MTCA/CSCSL | The Washington Department of Ecology hazardous waste cleanup and investigation program was launched in 1989 as a part of the Model Toxics Control Act (MTCA), Chapter 173-340 WAC, in order to evaluate potential and actual hazards at sites within the state. Of the more than 1,730 sites currently on the WDOE Confirmed and Suspected Contaminated Sites (CSCS) list, none are located within a one mile radius of the subject property. |

**RCRA/FINDS/
TSDs** Review of EPA's Treatment, Storage and Disposal (TSD) facilities listing for sites that treat, store, or dispose of potentially hazardous materials revealed that no TSD sites are located within a one mile radius of the subject property.

Additionally, review of the Resource Conservation and Recovery Act (RCRA) listings, also revealed no RCRA Generators within a one-quarter mile radius of the subject property, and no RCRA Non-Regulated generators within a one-eighth mile radius of the subject property.

ERNS Review of the EPA's Emergency Response Notification Systems (ERNS) list for the State of Washington revealed that the subject site has not reported a spill. This list has been compiled with periodic updates since October 1987.

LANDFILLS

A review of WDOE and Tacoma/Pierce County Health Department documents regarding current and abandoned landfills revealed that there are no documented landfills located within a mile radius of the subject property.

CONCLUSIONS/RECOMMENDATIONS

Consistent with the report language requirements defined under ASTM E-1527-00 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", and more specifically section 11.7 thereto, the following conclusory statements are made:

We (EAI) have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E-1527 of the Proposed Sunset Pointe Residential Plat, located to the east of the intersection of 19th Avenue SE and 21st Street SE, Puyallup, Pierce County, Washington. No exceptions to, or deletions from this practice were made. This Phase I assessment has revealed no evidence of "recognized environmental conditions" as defined by ASTM in connection with the property except for the acknowledged past storage and dispensing of motor fuel (gasoline) associated with vehicles used in commercial mining of gravel in the site vicinity. Additional discussion and guidance is provided below.

HISTORIC ABOVE-GROUND STORAGE AND DISPENSING OF GASOLINE

Referring to Photo #1 on Plate 5 and as discussed briefly in earlier sections of the report, the current occupant of the site (Tanner) disclosed that gasoline was historically stored in and dispensed from multiple above-ground tanks located on the southern part of the property in support of vehicles associated with gravel mining operations. The bottom of one of the tanks was rusted out at the time of our site visit.

In defining the purpose of the Phase 1 environmental site assessment process, section 1.1.1 of ASTM E-1527 advises that the goal of a Phase 1 is to identify "recognized environmental conditions", and defines a recognized environmental condition as:

"the presence or likely presence of any hazardous substances. . . on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances . . . into structures on the property or into the ground, groundwater, or surface water of the property".

By virtue of the materials (motor fuel in substantial volume) stored at the subject site over a potentially extended period, in the context of the ASTM definition, such gasoline storage and dispensing operations appear to qualify as a "recognized environmental condition" for this property.

A list of mitigating factors which may moderate contemporary concerns regarding this aspect of site history from a purchase or lending perspective would include the following:

- (1) No evidence was found in the public record to suggest that a release has occurred at the site;
- (2) No obvious, visually discernable evidence to suggest or confirm that a release had occurred was observed in the course of our (EAI's) visual reconnaissance of the property;
- (3) If the findings of this report were disclosed to the Washington Department of Ecology (WDOE), it is unlikely that the WDOE would impose a requirement for additional studies or other actions upon the property owner, lender(s), or other involved parties.

In summary, without benefit of factual information in the form of sampling and testing in the vicinity of the fuel storage and dispensing area, the strongest conclusion we (EAI) can offer at this time is simply that we are not aware of a specific environmental problem which has been shown to be adversely affecting the environmental integrity of the subject property.

If, for reasons of their own, the client, owner, lender, or other involved parties desire a higher degree of confidence than is afforded by the current level of knowledge, limited but statistically representative shallow subsurface sampling in areas proximal to the former fuel storage and dispensing area supported by appropriate laboratory analysis could be employed to confirm actual subsurface environmental conditions in that area. As strongly implied under section 4.5.3 of ASTM E-1527, decision-making authority in that regard clearly lies with the client and/or other involved parties, depending upon their individual risk tolerances.

NON-CERCLA CONDITIONS

Non-CERCLA conditions of potential environmental significance identified at the subject site include:

- Potential PCB-containing fluorescent light ballasts within the subject buildings.
- Presence of "suspect" asbestos-containing building materials in the form of ceiling/wall plaster, vinyl floor-tile, sheet-vinyl, window glazing, and popcorn ceiling.
- Presence of a white and red lead-containing paint on the exterior of onsite structures.

Guidance with respect to future management of the above-noted non-CERCLA conditions is provided in the following paragraphs.

PCBS

Based upon the information developed during the course of our site review, it appears that some or all of the transformer ballasts in the fluorescent lights in the subject buildings may contain polychlorinated biphenyls (PCBs).

In our opinion, there is no immediate cause for concern regarding the potential for PCB-containing light ballasts. The only likely potential for exposure to PCBs would come in the event that one of the sealed ballasts were ruptured through abusive handling or as a result of a defect in a ballast.

It may be prudent to implement a management policy providing the inspection of ballasts by maintenance personnel during routine bulb changing activities. Ballasts may be periodically checked or replaced depending upon long-term management desires. Please refer to the attached EPA pamphlet, Appendix C, regarding appropriate handling and disposal practices for such ballasts.

ASBESTOS

Borrowing evaluation criteria adopted under the Asbestos Health Emergency Response Act (AHERA, 40 CFR Part 763), the observed potentially asbestos containing materials, enumerated earlier in this report are in "good" condition. In the current use and condition, the materials pose no threat to public health or to the environment.

To reduce exposure to potential future liability, and in an effort to comply with regulations regarding the presence of asbestos in commercial and apartment buildings under Chapter 296-62-07753 WAC, it may be prudent to consider implementation of a management policy (Operations and Maintenance Program/O&M) whereby all maintenance, repair, or service personnel who may be engaged to work

on the property are formally advised (i.e., signed acknowledgment) as to the "suspected" presence of asbestos-containing materials (ACM) prior to commencement of any work associated with the ACM.

Should the owner intend to renovate, demolish, remodel, or repair any or all portions of the structure containing asbestos, please note that applicable sections of WAC 296-65 require that all projects relating to construction, demolition, repair, or maintenance where release or likely release of asbestos fibers into the air could occur must be performed by "certified asbestos workers". Additional information may be obtained through the offices of Environmental Associates, Inc., or directly from the Washington State Department of Labor and Industries, P.O. Box 207, Olympia, Washington 98504. Finally, if future representative sampling and laboratory testing of these suspect materials were to confirm that they do not contain asbestos, these recommendations may logically be disregarded.

LEAD-BASED PAINT

As discussed earlier, a positive qualitative reaction suggesting the likely presence of lead was observed during "Lead Check" testing of the painted wood exterior finishes on several of the buildings located on the southern portion of the property. On the basis of the positive indications, we conclude that lead is most likely present in these areas, and could conceivably be in other areas as well. All painted surfaces were in poor to fair condition. Additional sampling and testing would be required to quantify the concentration of lead and the extent of the lead-bearing paint.

As with asbestos, workers who may have cause to disturb suspect lead-bearing surfaces in future activities as renovation, demolition, etc., should be formally advised of these findings so that they may take appropriate precautions in terms of exposure. Special handling and disposal requirements may apply in the event that lead-bearing painted surfaces are disturbed, removed, or demolished at this facility.

Alternative management approaches to resolve lead paint issues frequently include: (1) painting over paint layers containing lead with high density quality penetrating/sealing paint; or (2) removal of the paint under controlled conditions to prevent the release of lead-bearing paint into the atmosphere. Current thinking on this issue according to U.S. EPA Region 10, is to manage the material in-place until a structure is renovated or demolished.

With the endorsement of the Lead Based Paint Hazard Reduction Act, Title 10, came the need for special care on the part of landlords, consultants, and others who may become involved with lead-bearing structures to minimize potential health hazards as well as legal liabilities. Appendix D to this report provides an informational pamphlet which may be useful in gaining familiarity with concerns and practices relating to lead in residential structures. Additional information and guidance may be obtained directly from Environmental Associates, Inc., or from EPA.

Finally, under Section 1018 of the Residential Lead Based Paint Hazard Reduction Act of 1992 (also known as Title 10), the owner may be required to provide new renters as well as tenants renewing leases with (1) the standard EPA Pamphlet "Protect Your Family from Lead in Your Home" and (2) disclosure of all known lead-based paint occurrences at the facility.

LIMITATIONS

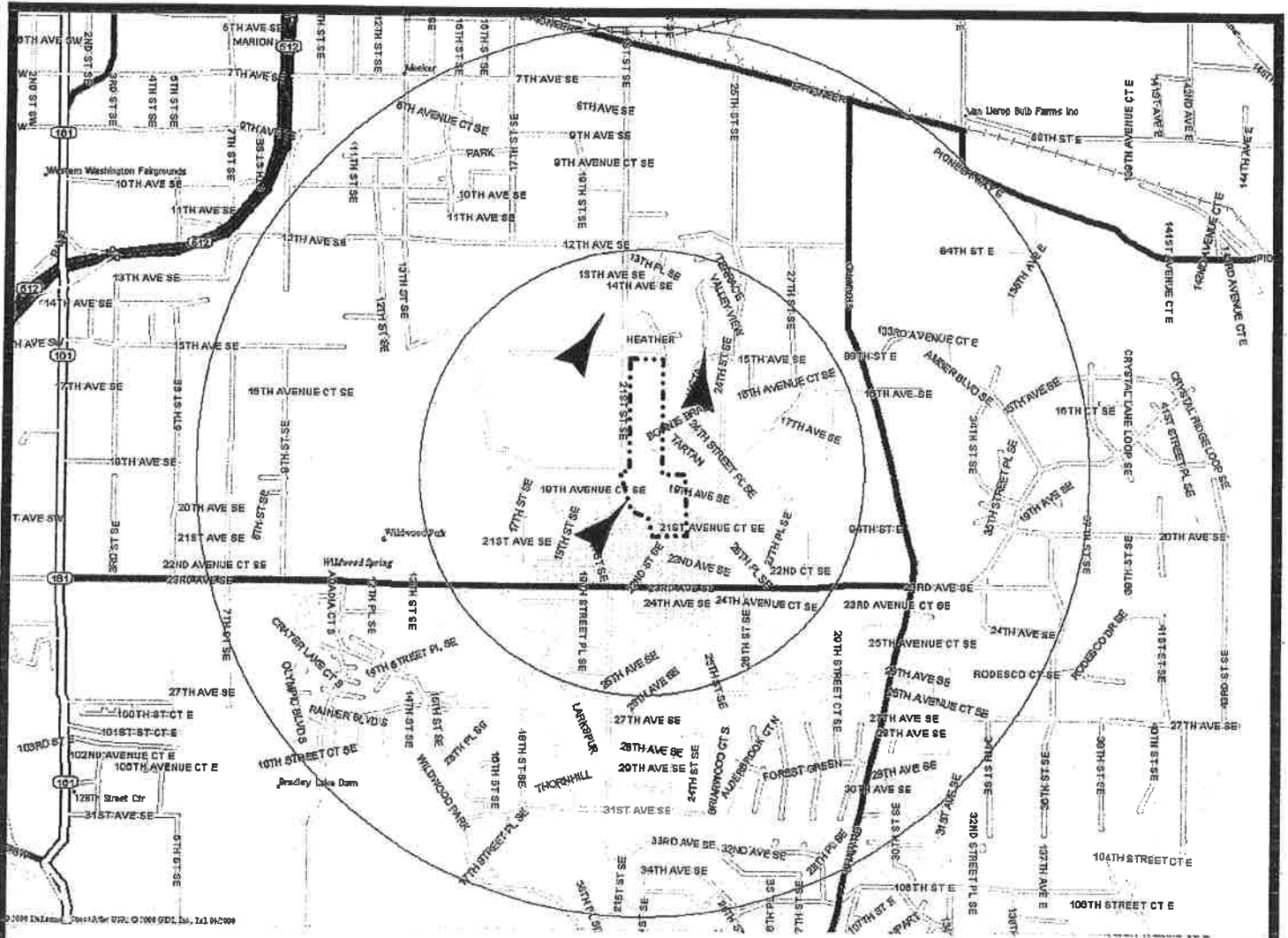
This report has been prepared for the exclusive use of Desert Creek, LLC, along with and their several representatives for specific application to this site. Our work for this project was conducted in a manner consistent with that level of care and skill normally exercised by members of the environmental science profession currently practicing under similar conditions in the area, and in accordance with the terms and conditions set forth in our proposal dated December 29, 2004. Conclusions and opinions offered here pertaining to materials and/or conditions rely solely upon results of sampling and testing conducted by others at separated sampling localities and conditions may vary between sampling localities or at other locations or depths. The environmental condition of subsurface soil and/or groundwater cannot typically be determined by visual examination of surficial conditions such as afforded by the scope of a Phase I audit such as performed here. Acknowledging that limitation, no warranty in that regard is made. No other warranty, expressed or implied, is made. If new information is developed in future site work which may include excavations, borings, studies, etc., Environmental Associates, Inc., must be retained to reevaluate the conclusions of this report and to provide amendments as required.

The level of effort regarding identification of potential ACM should be considered a reconnaissance, should not be confused with an asbestos survey, and should not be used as a sole informational resource for removal, construction, or abatement bidding purposes.

REFERENCES

GENERAL

- Bonneville Power Administration (BPA), January 1993, Radon Monitoring Results from BPA's Residential Conservation Program, Report No. 15, (with April 1993 Map).
- Environmental Protection Agency (EPA), September 1987, Radon Reference Manual EPA 520/1-87-20.
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- Thomas Brothers Map Co., 1995, The Thomas Guide: King/Pierce/Snohomish Counties.
- U.S. EPA, April 1994. Reducing Lead Hazards When Remodeling Your Home. EPA 747-R-94-002. 20 pps.
- U.S. Geological Survey, 1961, Puyallup, Washington, 1:24,000 Quadrangle. Photorevised 1981, 1 sheet.



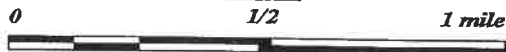
**Inferred Direction of
Groundwater Flow**



Subject Property



Scale
1/2



**ENVIRONMENTAL
ASSOCIATES, INC.**

1380 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

VICINITY MAP

**Proposed Sunset Pointe Residential Plat
East of Intersection of 19th Ave SE
and 21st St SE
Puyallup, Washington**

Job Number:

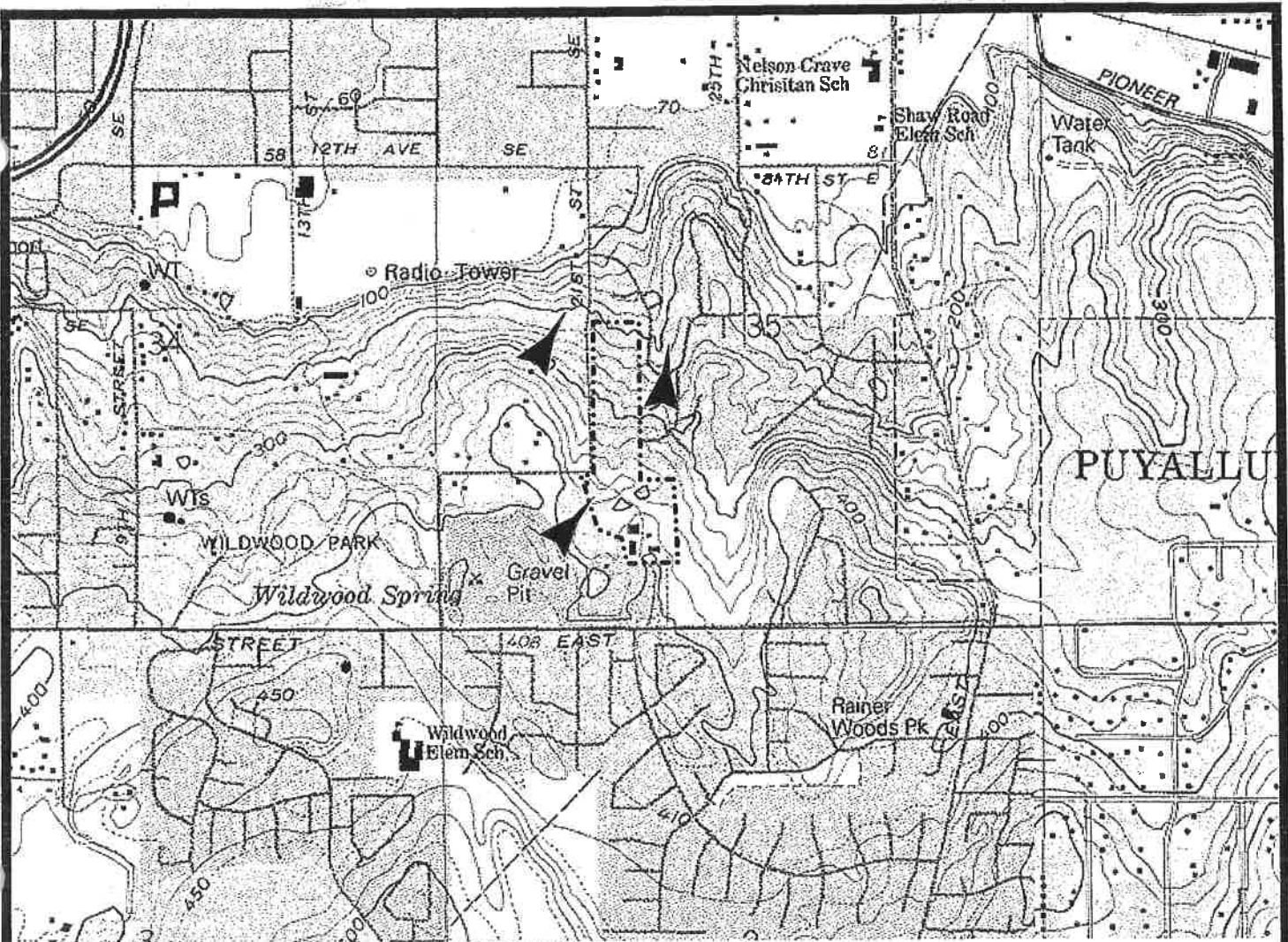
JN 24420

Date:

January 2005

Plate:

1



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Probable Direction of Regional Groundwater Flow



Subject Property



**ENVIRONMENTAL
ASSOCIATES, INC.**

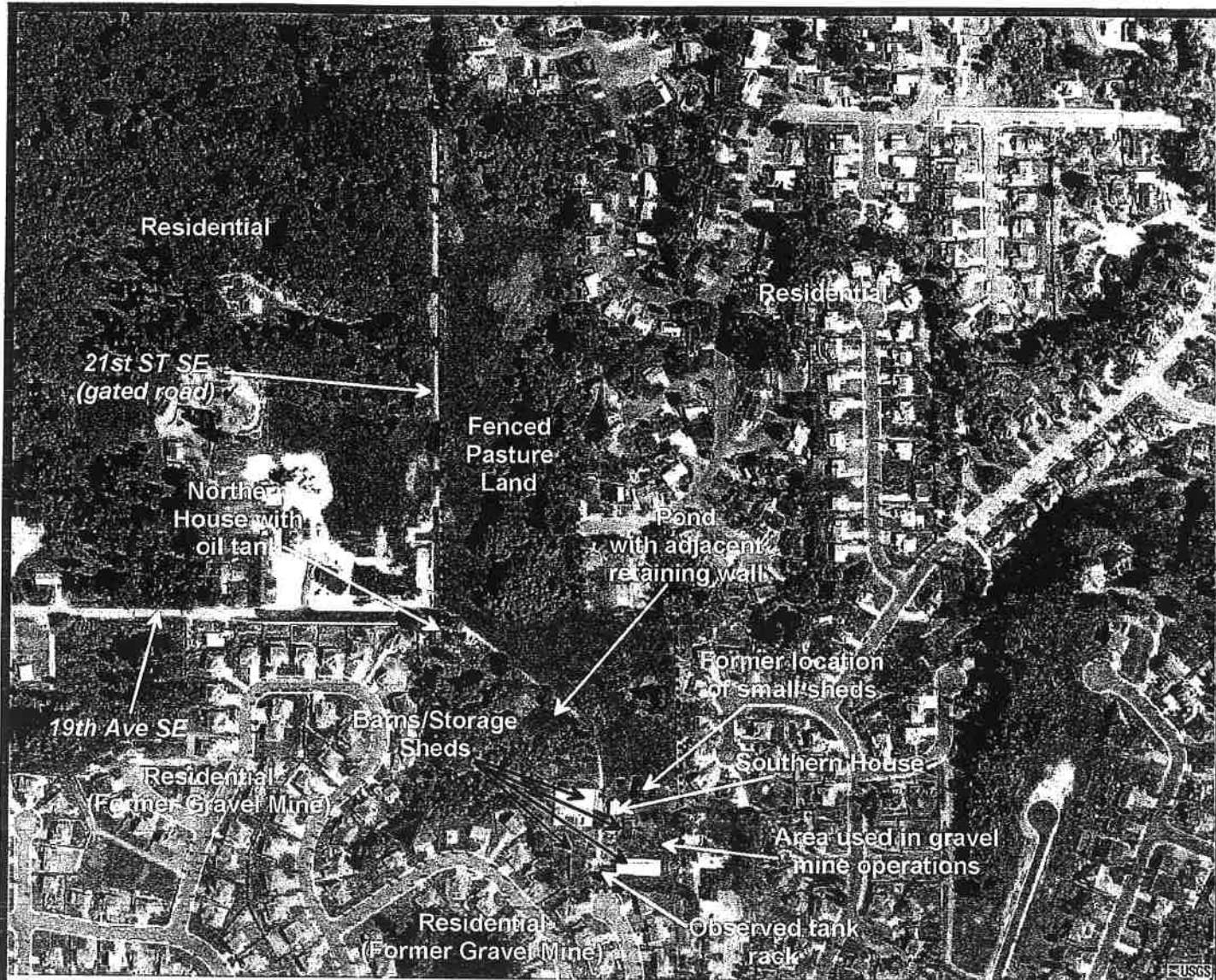
1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

TOPOGRAPHIC MAP
Proposed Sunset Pointe Residential Plat
East of Intersection of 19th Ave SE
and 21st St SE
Puyallup, Washington

Job Number:
JN 24420

Date:
January 2005

Plate:
2



Subject Property

Inferred regional groundwater flow direction



**ENVIRONMENTAL
ASSOCIATES, INC.**

1380 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

SITE PLAN

**Proposed Sunset Pointe Residential Plat
East of Intersection of 19th Ave SE
and 21st St SE
Puyallup, Washington**

Job Number:

JN 24420

Date:

January 2005

Plate:

3

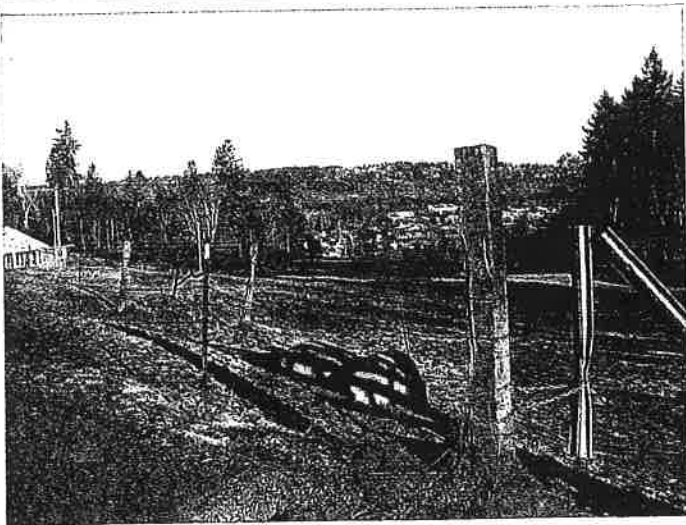


Photo 1: Pasture land on northern portion of the site, as viewed from subject property driveway.

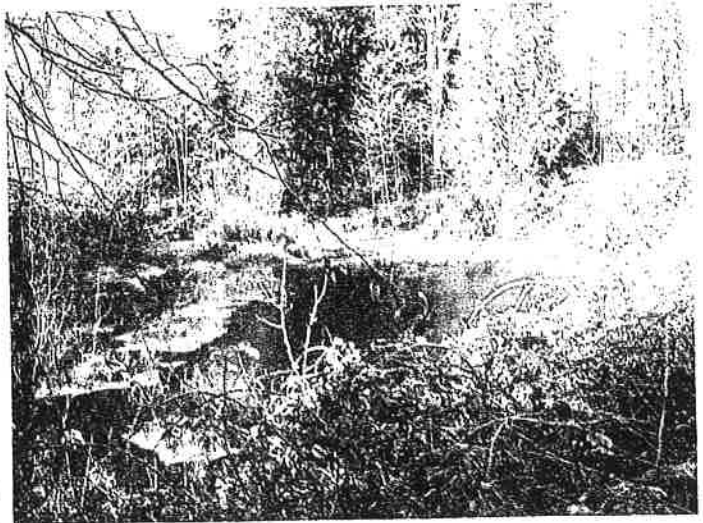


Photo 2: Pond located on southern portion of site. Retaining wall constructed with battery casings is located on northern portion of pond, near location where photo taken from.

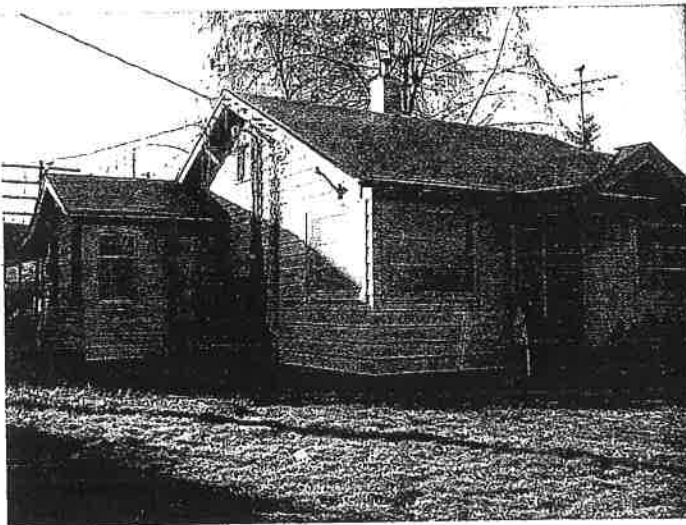


Photo 2: Southern house on subject property. Wood window, door, and other trim painted with a lead containing finish. Siding is aluminum. Lead not detected on siding finish.



Photo 4: Example of barn/storage sheds located on southern portion of site as well as types of refuse accumulated in this area.



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

SITE PHOTOGRAPHS

Proposed Sunset Pointe Residential Plat
East of Intersection of 19th Ave SE
and 21st St SE
Puyallup, Washington

Job Number:

JN 24420

Date:

January 2005

Plate:

4

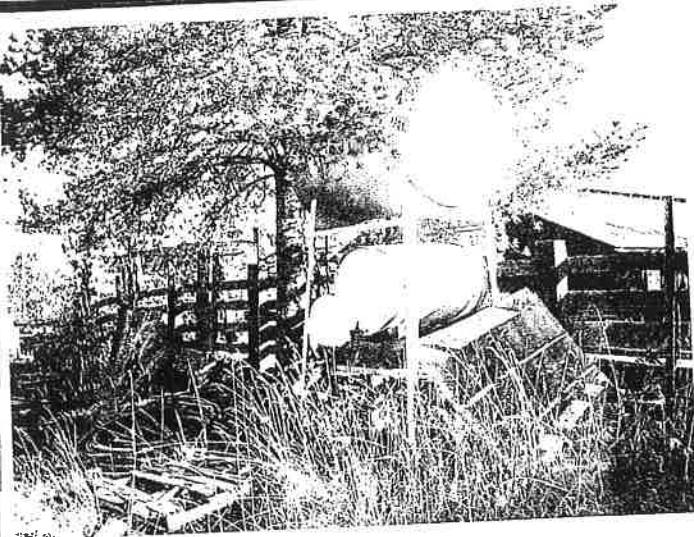


Photo 1: Steel rack containing multiple tanks/drums on southern portion of property. Bottom of lower left drum noted to be rusted out. No staining, odors, or disturbed vegetation noted under tanks.

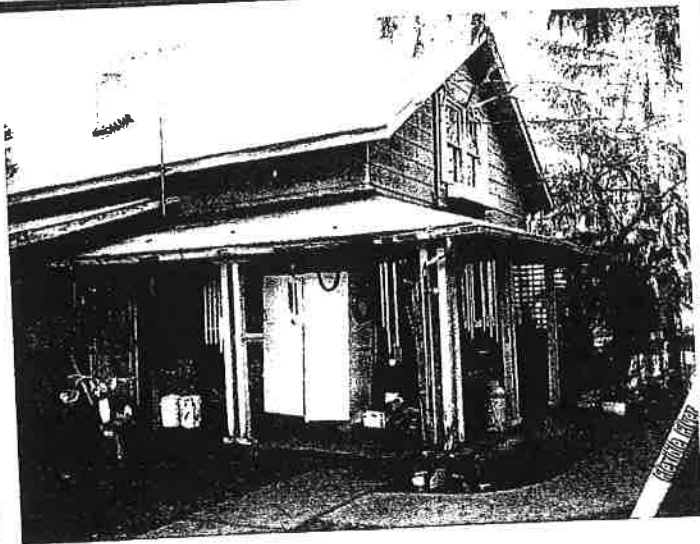


Photo 2: Northern house observed on subject site. Siding is asphaltic shingle material.

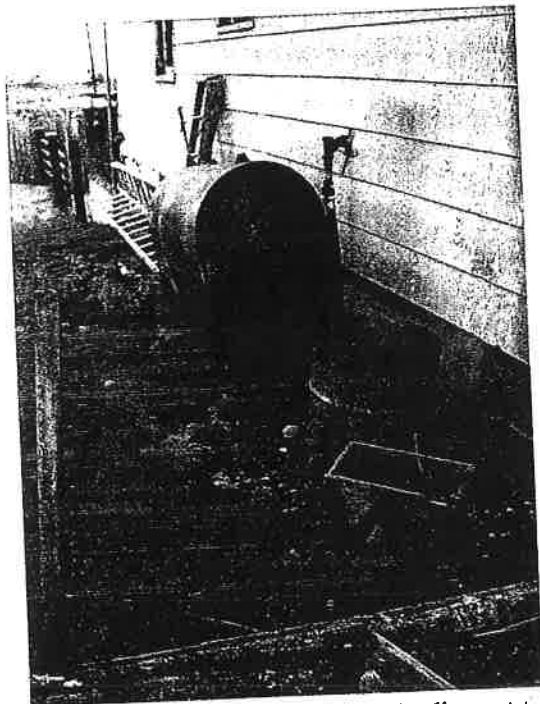


Photo 3: Heating oil tank observed adjacent to southern wall of northern house. Tank appeared to be in good condition.

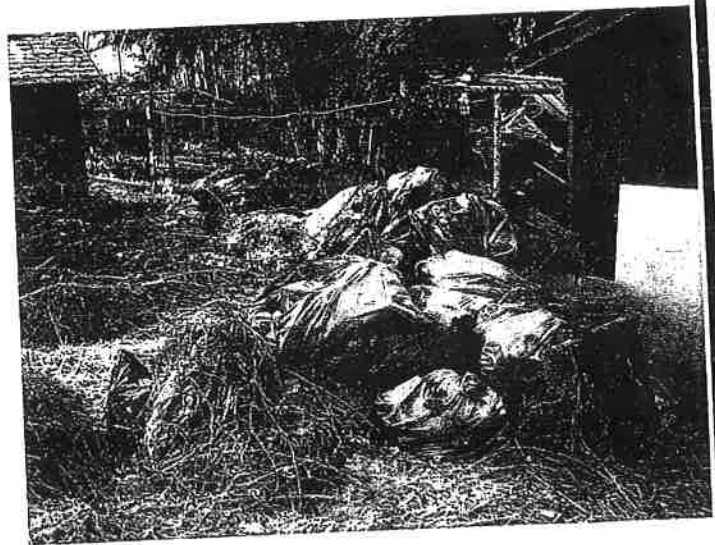


Photo 4: Household refuse noted in the vicinity of northern house on site.



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

SITE PHOTOGRAPHS

Proposed Sunset Pointe Residential Plat
East of Intersection of 19th Ave SE
and 21st St SE
Puyallup, Washington

Job Number:
JN 24420

Date:
January 2005

Plate:

5

■ Environmental Questionnaire

■ Environmental Database



DATABASE REPORT

Project Property: *Sunset Pointe Development*
n/a
Puyallup WA

Project No: *24-246*

Report Type: *Database Report*

Order No: *24050300454*

Requested by: *Aerotech Environmental Consulting, Inc.*

Date Completed: *May 7, 2024*

Environmental Risk Information Services

A division of Glacier Media Inc.

1.866.517.5204 | info@erisinfo.com | erisinfo.com

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Reliance on information in Report: This report DOES NOT replace a full Phase I Environmental Site Assessment but is solely intended to be used as database review of environmental records.

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Executive Summary

Property Information:

Project Property: *Sunset Pointe Development
n/a Puyallup WA*

Project No: 24-246

Coordinates:

Latitude: 47.1725387
Longitude: -122.26543114
UTM Northing: 5,224,599.71
UTM Easting: 555,665.87
UTM Zone: 10T

Elevation: 373 FT

Order Information:

Order No: 24050300454
Date Requested: May 3, 2024
Requested by: Aerotech Environmental Consulting, Inc.
Report Type: Database Report

Historicals/Products:

ERIS Xplorer *ERIS Xplorer*
Excel Add-On *Excel Add-On*

Executive Summary: Report Summary

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
Standard Environmental Records								
Federal								
NPL	Y	1	0	0	0	0	0	0
PROPOSED NPL	Y	1	0	0	0	0	0	0
DELETED NPL	Y	0.5	0	0	0	0	-	0
SEMS	Y	0.5	0	0	0	0	-	0
ODI	Y	0.5	0	0	0	0	-	0
SEMS ARCHIVE	Y	0.5	0	0	0	0	-	0
IODI	Y	0.5	0	0	0	0	-	0
CERCLIS	Y	0.5	0	0	0	0	-	0
CERCLIS NFRAP	Y	0.5	0	0	0	0	-	0
CERCLIS LIENS	Y	PO	0	-	-	-	-	0
RCRA CORRACTS	Y	1	0	0	0	0	0	0
RCRA TSD	Y	0.5	0	0	0	0	-	0
RCRA LQG	Y	0.25	0	0	0	-	-	0
RCRA SQG	Y	0.25	0	0	0	-	-	0
RCRA VSQG	Y	0.25	0	0	0	-	-	0
RCRA NON GEN	Y	0.25	0	0	0	-	-	0
RCRA CONTROLS	Y	0.5	0	0	0	0	-	0
FED ENG	Y	0.5	0	0	0	0	-	0
FED INST	Y	0.5	0	0	0	0	-	0
LUCIS	Y	0.5	0	0	0	0	-	0
NPL IC	Y	0.5	0	0	0	0	-	0
ERNS 1982 TO 1986	Y	PO	0	-	-	-	-	0
ERNS 1987 TO 1989	Y	PO	0	-	-	-	-	0
ERNS	Y	PO	0	-	-	-	-	0
FED BROWNFIELDS	Y	0.5	0	0	0	0	-	0
FEMA UST	Y	0.25	0	0	0	-	-	0
FRP	Y	0.25	0	0	0	-	-	0

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
DELISTED FRP	Y	0.25	0	0	0	-	-	0
HIST GAS STATIONS	Y	0.25	0	0	0	-	-	0
REFN	Y	0.25	0	0	0	-	-	0
BULK TERMINAL	Y	0.25	0	0	0	-	-	0
SEMS LIEN	Y	PO	0	-	-	-	-	0
SUPERFUND ROD	Y	1	0	0	0	0	0	0
DOE FUSRAP	Y	1	0	0	0	0	0	0

State

HSL	Y	1	0	0	0	0	0	0
CSCSL	Y	1	0	1	0	0	1	2
DELISTED SHWS	Y	1	0	0	0	0	0	0
CSCSL NFA	Y	0.5	0	0	0	0	-	0
SWF/LF	Y	0.5	0	0	0	0	-	0
RECYCLERS	Y	0.5	0	0	0	0	-	0
WASTE TIRE	Y	0.5	0	0	0	0	-	0
LUST	Y	0.5	0	0	0	0	-	0
LUST PTAP	Y	0.5	0	0	0	0	-	0
UST LOAN	Y	0.5	0	0	0	0	-	0
LST HOT	Y	0.5	0	0	0	0	-	0
UST	Y	0.25	0	0	0	-	-	0
DELISTED LST	Y	0.5	0	0	0	0	-	0
AST	Y	0.25	0	0	0	-	-	0
AST SPL PREV	Y	0.25	0	0	0	-	-	0
DELISTED TNK	Y	0.25	0	0	0	-	-	0
INST	Y	0.5	0	0	0	0	-	0
VCP	Y	0.5	0	0	0	0	-	0
BROWNFIELDS	Y	0.5	0	0	0	0	-	0

Tribal

INDIAN LUST	Y	0.5	0	0	0	0	-	0
INDIAN UST	Y	0.25	0	0	0	-	-	0
DELISTED INDIAN LST	Y	0.5	0	0	0	0	-	0
DELISTED INDIAN UST	Y	0.25	0	0	0	-	-	0

County

<i>Database</i>	<i>Searched</i>	<i>Search Radius</i>	<i>Project Property</i>	<i>Within 0.12mi</i>	<i>0.125mi to 0.25mi</i>	<i>0.25mi to 0.50mi</i>	<i>0.50mi to 1.00mi</i>	<i>Total</i>
TP HIST LF	Y	0.5	0	0	0	0	-	0
HIST GAS STATION	Y	0.5	0	0	0	0	-	0

Additional Environmental Records

Federal

PFAS GHG	Y	0.5	0	0	0	0	-	0
FINDS/FRS	Y	PO	0	-	-	-	-	0
TRIS	Y	PO	0	-	-	-	-	0
PFAS NPL	Y	0.5	0	0	0	0	-	0
PFAS FED SITES	Y	0.5	0	0	0	0	-	0
PFAS SSEHRI	Y	0.5	0	0	0	0	-	0
ERNS PFAS	Y	0.5	0	0	0	0	-	0
PFAS NPDES	Y	0.5	0	0	0	0	-	0
PFAS TRI	Y	0.5	0	0	0	0	-	0
PFAS WATER	Y	0.5	0	0	0	0	-	0
PFAS TSCA	Y	0.5	0	0	0	0	-	0
PFAS E-MANIFEST	Y	0.5	0	0	0	0	-	0
PFAS IND	Y	0.5	0	0	0	0	-	0
HMIRS	Y	0.125	0	0	-	-	-	0
NCDL	Y	0.125	0	0	-	-	-	0
TSCA	Y	0.125	0	0	-	-	-	0
HIST TSCA	Y	0.125	0	0	-	-	-	0
FTTS ADMIN	Y	PO	0	-	-	-	-	0
FTTS INSP	Y	PO	0	-	-	-	-	0
PRP	Y	PO	0	-	-	-	-	0
SCRD DRYCLEANER	Y	0.5	0	0	0	0	-	0
ICIS	Y	PO	0	-	-	-	-	0
FED DRYCLEANERS	Y	0.25	0	0	0	-	-	0
DELISTED FED DRY	Y	0.25	0	0	0	-	-	0
FUDS	Y	1	0	0	0	0	0	0
FUDS MRS	Y	1	0	0	0	0	0	0
FORMER NIKE	Y	1	0	0	0	0	0	0
PIPELINE INCIDENT	Y	PO	0	-	-	-	-	0
MLTS	Y	PO	0	-	-	-	-	0
HIST MLTS	Y	PO	0	-	-	-	-	0
MINES	Y	0.25	0	0	0	-	-	0

Database

	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
SMCRA	Y	1	0	0	0	0	0	0
MRDS	Y	1	0	1	0	0	0	1
LM SITES	Y	1	0	0	0	0	0	0
ALT FUELS	Y	0.25	0	0	0	-	-	0
CONSENT DECREES	Y	0.25	0	0	0	-	-	0
AFS	Y	PO	0	-	-	-	-	0
SSTS	Y	0.25	0	0	0	-	-	0
PCBT	Y	0.5	0	0	0	0	-	0
PCB	Y	0.5	0	0	0	0	-	0

State

SPILLS	Y	0.125	0	0	-	-	-	0
SPILLS WATER	Y	0.125	0	0	-	-	-	0
ALL SITES	Y	0.5	0	1	1	7	-	9
ERTS	Y	0.125	0	0	-	-	-	0
ICR	Y	0.5	0	0	1	0	-	1
DRYCLEANERS	Y	0.25	0	0	0	-	-	0
DELISTED DRYCLEANERS	Y	0.25	0	0	0	-	-	0
TIER 2	Y	0.125	0	0	-	-	-	0
CDL	Y	PO	0	-	-	-	-	0
HIST CDL	Y	PO	0	-	-	-	-	0
AIR PERMITS	Y	0.25	0	0	0	-	-	0
UIC	Y	PO	0	-	-	-	-	0

Tribal

No Tribal additional environmental record sources available for this State.

County

Total:	0	3	2	7	1	13
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* PO – Property Only

* 'Property and adjoining properties' database search radii are set at 0.25 miles.

Executive Summary: Site Report Summary - Project Property

<i>Map Key</i>	<i>DB</i>	<i>Company/Site Name</i>	<i>Address</i>	<i>Direction</i>	<i>Distance (mi/ft)</i>	<i>Elev Diff (ft)</i>	<i>Page Number</i>
--------------------	-----------	--------------------------	----------------	------------------	-----------------------------	---------------------------	------------------------

No records found in the selected databases for the project property.

Executive Summary: Site Report Summary - Surrounding Properties

Map Key	DB	Company/Site Name	Address	Direction	Distance (mi/ft)	Elev Diff (ft)	Page Number
<u>1</u>	MRDS	UNNAMED PIT	PIERCE COUNTY PUYALLUP WA 98372 <i>Dep ID: 10277634</i>	SW	0.11 / 568.23	19	<u>18</u>
<u>2</u>	CSCSL	Pioneer Museum	2301 23RD AVE SE PUYALLUP WA 98372	S	0.12 / 616.78	44	<u>18</u>
<u>2</u>	ALL SITES	PIONEER MUSEUM	2301 23RD AVE SE PUYALLUP WA 98372	S	0.12 / 616.78	44	<u>20</u>
<u>3</u>	ICR	Pioneer Museum	2301 23RD AVE SE PUYALLUP WA 98372	SE	0.15 / 790.80	17	<u>20</u>
<u>4</u>	ALL SITES	CYPRESS MANOR	CORNER 19TH AVE SE & 17TH ST SE PUYALLUP WA 98372	W	0.24 / 1,242.08	-4	<u>21</u>
<u>5</u>	ALL SITES	Sullys Glen	2820 23rd Ave SE Puyallup WA 98374	ESE	0.39 / 2,039.19	101	<u>22</u>
<u>6</u>	ALL SITES	Puyallup Highlands Richmond American Homes	1500 Shaw Rd Puyallup WA 98372	ENE	0.48 / 2,555.05	-249	<u>22</u>
<u>6</u>	ALL SITES	Puyallup Highlands Construction Site	1500 SHAW RD PUYALLUP WA 98372	ENE	0.48 / 2,555.05	-249	<u>23</u>
<u>6</u>	ALL SITES	Puayllup Highlands Phase 3 Partial	1500 SHAW RD PUYALLUP WA 98372	ENE	0.48 / 2,555.05	-249	<u>23</u>
<u>6</u>	ALL SITES	Puyallup Highlands Phase 3 Partial	1500 SHAW RD PUYALLUP WA 98372	ENE	0.48 / 2,555.05	-249	<u>24</u>
<u>6</u>	ALL SITES	Puyallup Highlands Phase 4	1500 Shaw Rd Puyallup WA 98372	ENE	0.48 / 2,555.05	-249	<u>24</u>
<u>6</u>	ALL SITES	Puyallup Highlands High Country	1500 SHAW RD PUYALLUP WA 98372	ENE	0.48 / 2,555.05	-249	<u>25</u>

<i>Map Key</i>	<i>DB</i>	<i>Company/Site Name</i>	<i>Address</i>	<i>Direction</i>	<i>Distance (mi/ft)</i>	<i>Elev Diff (ft)</i>	<i>Page Number</i>
<u>7</u>	CSCSL	Puyallup School District Elementary School 20	SHAW & 12TH PUYALLUP WA 98371	NE	0.63 / 3,349.02	-293	<u>25</u>

Executive Summary: Summary by Data Source

Standard

State

CSCSL - Confirmed and Suspected Contaminated Sites List

A search of the CSCSL database, dated Mar 6, 2024 has found that there are 2 CSCSL site(s) within approximately 1.00miles of the project property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction</u>	<u>Distance (mi/ft)</u>	<u>Map Key</u>
Pioneer Museum	2301 23RD AVE SE PUYALLUP WA 98372	S	0.12 / 616.78	<u>2</u>

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction</u>	<u>Distance (mi/ft)</u>	<u>Map Key</u>
Puyallup School District Elementary School 20	SHAW & 12TH PUYALLUP WA 98371	NE	0.63 / 3,349.02	<u>7</u>

Non Standard

Federal

MRDS - Mineral Resource Data System

A search of the MRDS database, dated Mar 15, 2016 has found that there are 1 MRDS site(s) within approximately 1.00miles of the project property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction</u>	<u>Distance (mi/ft)</u>	<u>Map Key</u>
UNNAMED PIT	PIERCE COUNTY PUYALLUP WA 98372 <i>Dep ID: 10277634</i>	SW	0.11 / 568.23	<u>1</u>

State

ALL SITES - Facility/Site Identification System

A search of the ALL SITES database, dated Jan 8, 2024 has found that there are 9 ALL SITES site(s) within approximately 0.50miles of the project property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction</u>	<u>Distance (mi/ft)</u>	<u>Map Key</u>
PIONEER MUSEUM	2301 23RD AVE SE PUYALLUP WA 98372	S	0.12 / 616.78	<u>2</u>
Sullys Glen	2820 23rd Ave SE Puyallup WA 98374	ESE	0.39 / 2,039.19	<u>5</u>

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction</u>	<u>Distance (mi/ft)</u>	<u>Map Key</u>
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<u>Lower Elevation</u>	<u>Address</u>	<u>Direction</u>	<u>Distance (mi/ft)</u>	<u>Map Key</u>
------------------------	----------------	------------------	-------------------------	----------------

CYPRESS MANOR	CORNER 19TH AVE SE & 17TH ST SE PUYALLUP WA 98372	W	0.24 / 1,242.08	<u>4</u>
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Puyallup Highlands Richmond American Homes	1500 Shaw Rd Puyallup WA 98372	ENE	0.48 / 2,555.05	<u>6</u>
---	-----------------------------------	-----	-----------------	----------

Puyallup Highlands Construction Site	1500 SHAW RD PUYALLUP WA 98372	ENE	0.48 / 2,555.05	<u>6</u>
---	-----------------------------------	-----	-----------------	----------

Puayllup Highlands Phase 3 Partial	1500 SHAW RD PUYALLUP WA 98372	ENE	0.48 / 2,555.05	<u>6</u>
---------------------------------------	-----------------------------------	-----	-----------------	----------

Puyallup Highlands Phase 3 Partial	1500 SHAW RD PUYALLUP WA 98372	ENE	0.48 / 2,555.05	<u>6</u>
---------------------------------------	-----------------------------------	-----	-----------------	----------

Puyallup Highlands Phase 4	1500 Shaw Rd Puyallup WA 98372	ENE	0.48 / 2,555.05	<u>6</u>
----------------------------	-----------------------------------	-----	-----------------	----------

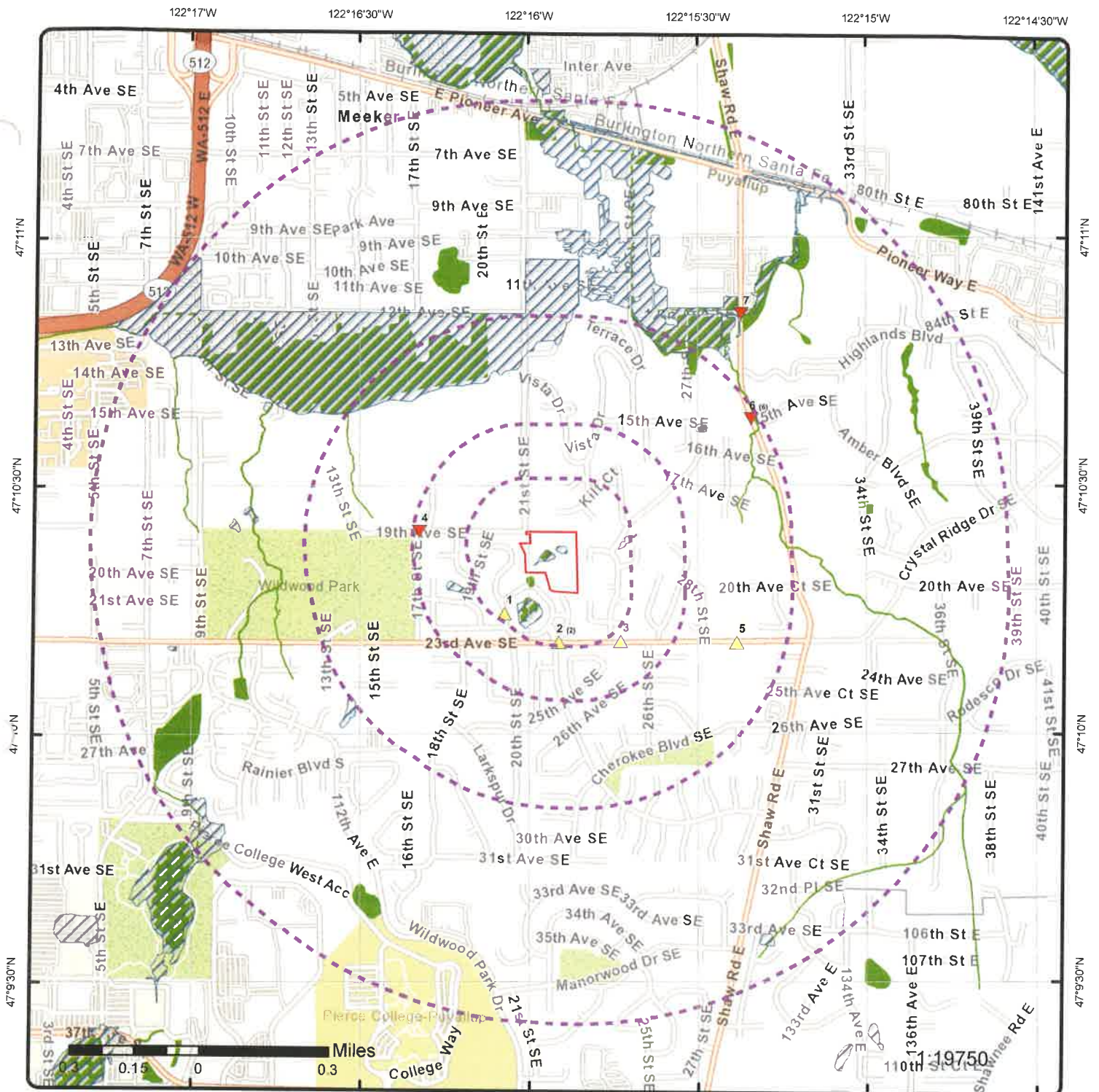
Puyallup Highlands High Country	1500 SHAW RD PUYALLUP WA 98372	ENE	0.48 / 2,555.05	<u>6</u>
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ICR - Independent Cleanup Reports

A search of the ICR database, dated Nov 6, 2015 has found that there are 1 ICR site(s) within approximately 0.50miles of the project property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction</u>	<u>Distance (mi/ft)</u>	<u>Map Key</u>
-------------------------------	----------------	------------------	-------------------------	----------------

Pioneer Museum	2301 23RD AVE SE PUYALLUP WA 98372	SE	0.15 / 790.80	<u>3</u>
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Map: 1.0 Mile Radius

Order Number: 24050300454

Address: n/a, Puyallup, WA

Project Property

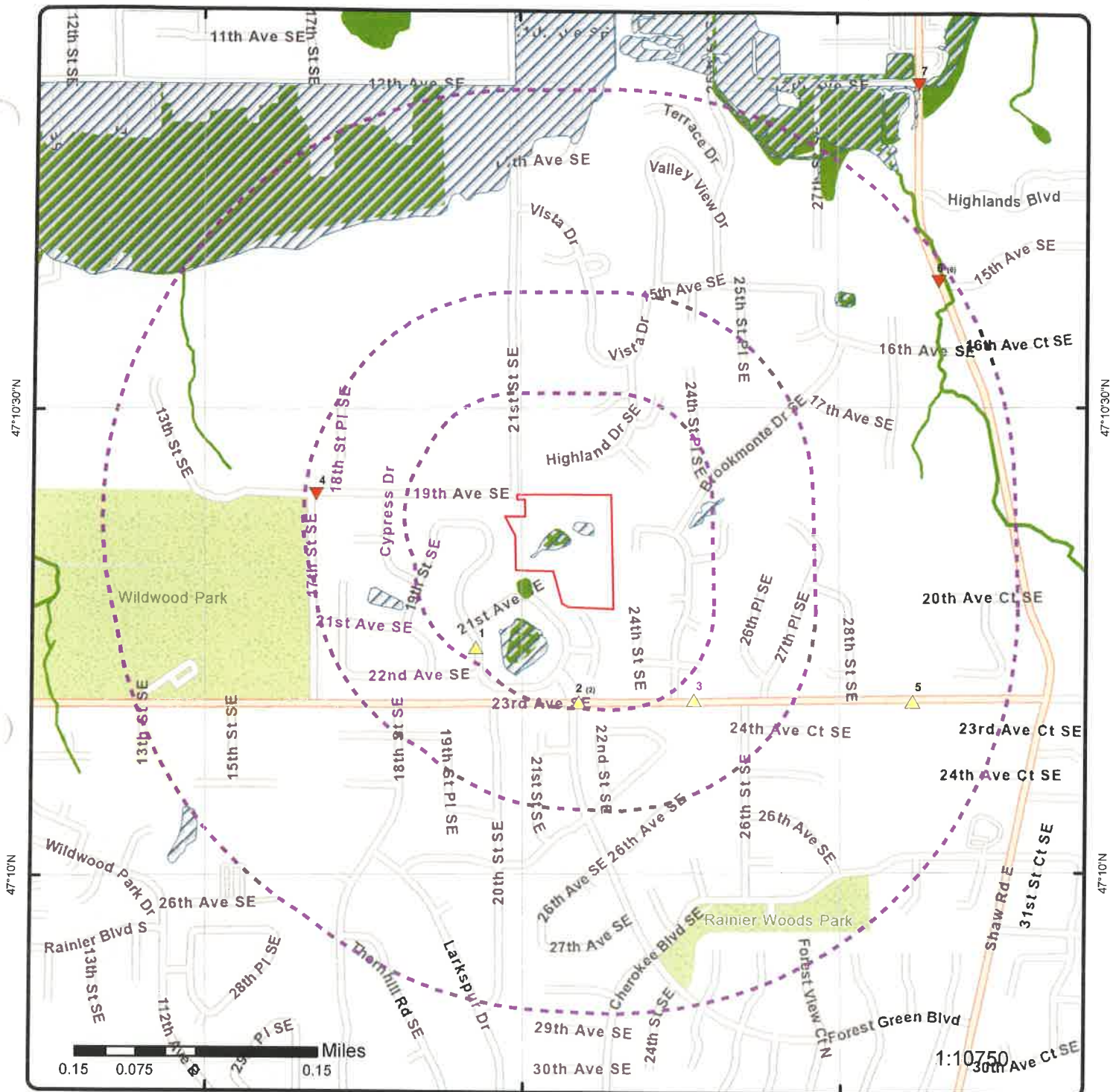
Buffer Outline

- Sites with Higher Elevation
- Sites with Same Elevation
- Sites with Lower Elevation
- Sites with Unknown Elevation
- Areas with Higher Elevation
- Areas with Same Elevation
- Areas with Lower Elevation
- Areas with Unknown Elevation

- Freeways; Highways
- Traffic Circle; Ramp
- Major & Minor Arterial
- Traffic Circle; Ramp
- Local Road
- Rail

- State
- Country
- National Wetland
- Indian Reserve Land
- 100 Year Flood Zone
- 500 Year Flood Zone

- FWS Special Designation Areas
- National Priorities List (Active, Delisted, Proposed, Institutional Control)



Map: 0.5 Mile Radius

Order Number: 24050300454

Address: n/a, Puyallup, WA

Project Property

Buffer Outline

- ▲ Sites with Higher Elevation
- Sites with Same Elevation
- ▼ Sites with Lower Elevation
- Sites with Unknown Elevation
- Areas with Higher Elevation
- Areas with Same Elevation
- Areas with Lower Elevation
- Areas with Unknown Elevation

- Freeways; Highways
- Traffic Circle; Ramp
- Major & Minor Arterial
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- Rail

- State
- Country
- National Wetland
- Indian Reserve Land
- 100 Year Flood Zone
- 500 Year Flood Zone

- FWS Special Designation Areas
- National Priorities List (Active, Delisted, Proposed, Institutional Control)

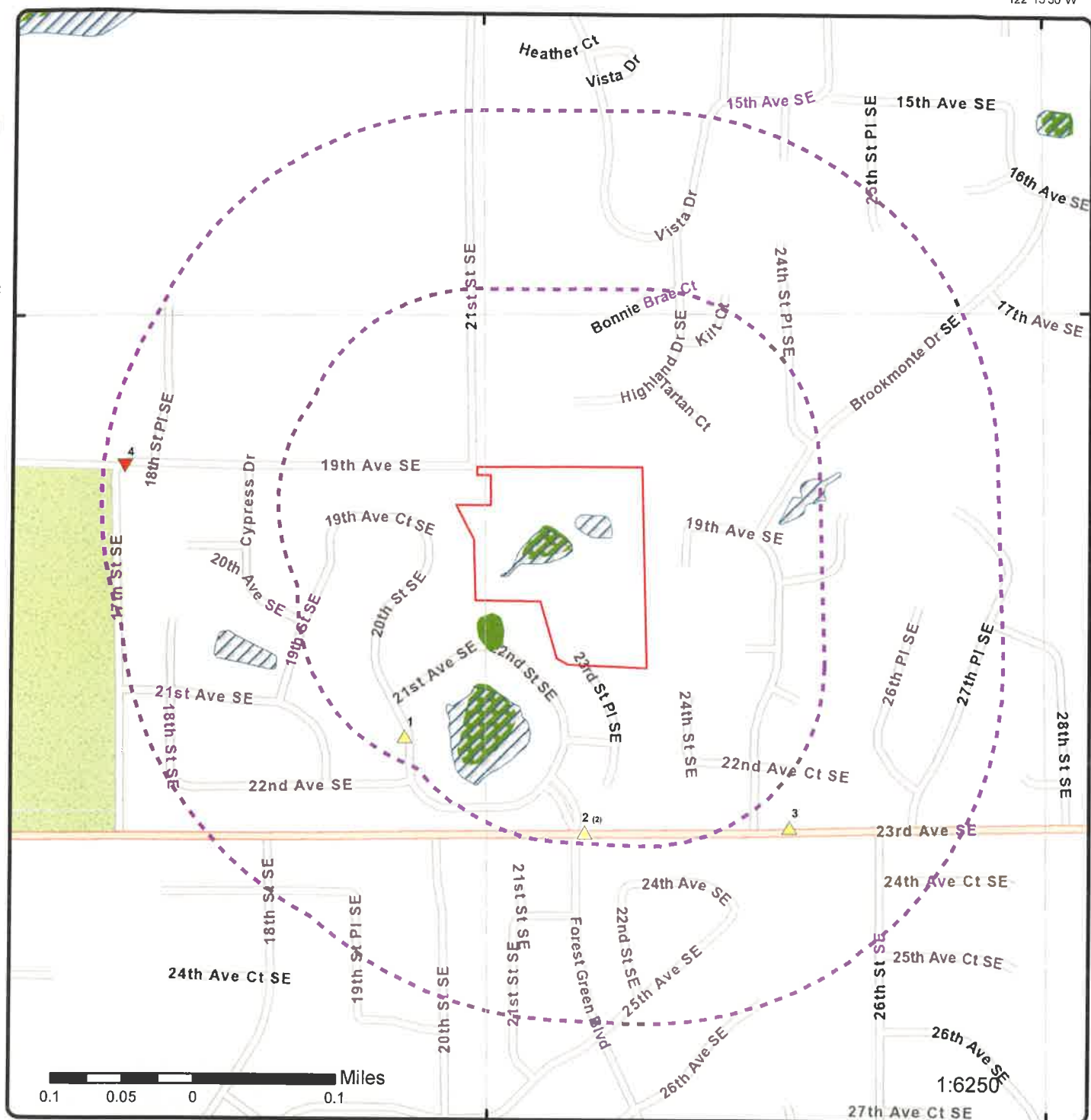


122°16'W

122°15'30"W

47°10'30"N

47°10'30"N



Map: 0.25 Mile Radius

Order Number: 24050300454

Address: n/a, Puyallup, WA

Project Property

Buffer Outline

- ▲ Sites with Higher Elevation
- Sites with Same Elevation
- ▼ Sites with Lower Elevation
- Sites with Unknown Elevation
- Areas with Higher Elevation
- Areas with Same Elevation
- Areas with Lower Elevation
- Areas with Unknown Elevation

- Freeways; Highways
- Traffic Circle; Ramp
- Major & Minor Arterial
- Traffic Circle; Ramp
- Local Road
- Rail

- State
- Country
- National Wetland
- Indian Reserve Land
- 100 Year Flood Zone
- 500 Year Flood Zone

- FWS Special Designation Areas
- National Priorities List (Active, Delisted, Proposed, Institutional Control)



122°16'30"W

122°16'W

122°15'30"W

47°10'30"N

47°10'30"N

47°10'N

47°10'N

0.1 0.05 0 0.1 Miles

1:10000

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Aerial Year: 2022

Address: n/a, Puyallup, WA

Source: ESRI World Imagery

Order Number: 24050300454



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Detail Report

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
<u>1</u>	1 of 1	SW	0.11 / 568.23	391.34 / 19	UNNAMED PIT PIERCE COUNTY PUYALLUP WA 98372	MRDS
Dep ID: 10277634 Dev Status: PAST PRODUCER Code List: SDG Url: http://mrdata.usgs.gov/mrds/show-mrds.php?dep_id=10277634 I1: 15 Latitude: 47.170715 Longitude: -122.267883						
<u>Commodity</u>						
I1: 27 Code: SDG Commodity: Sand and Gravel, Cons Commodity Type: Non-metallic Commodity Group: Sand and Gravel Importance: Primary Line: 1 Inserted By: MAS migration Insert Date: 29-OCT-2002 09:00:24 Updated By: USGS Update Date: 29-OCT-2002 09:02:25						
<u>Names</u>						
I1: 17 Status: Previous Site Name: Pyramid Sand and Gravel Line: 1 Inserted By: MAS migration Insert Date: 29-OCT-02 Updated By: USGS Update Date: 29-OCT-02						
<u>Names</u>						
I1: 39 Status: Current Site Name: Unnamed Pit Line: 2 Inserted By: MAS migration Insert Date: 29-OCT-02 Updated By: USGS Update Date: 29-OCT-02						
<u>2</u>	1 of 2	S	0.12 / 616.78	416.74 / 44	Pioneer Museum 2301 23RD AVE SE PUYALLUP WA 98372	CSCSL
Fac Site ID: 9490 Cleanup Site ID: 11739 Site Status: Awaiting Cleanup Site Rank: Current VCP: Past VCP: Has Inst Control: County: Pierce Region: Southwest Latitude: 47.172527 Longitude: -122.265384 Site Name: Pioneer Museum Address: 2301 23RD AVE SE City: PUYALLUP Zip Code: 98372 Site Status (OD): Awaiting Cleanup Site Name (OD): Pioneer Museum Address (OD): 2301 23RD AVE SE City (OD): PUYALLUP Responsible Unit: Southwest Fac Site ID (OD): 9490 Cleanup SiteID(OD): 11739 Site Rank (OD): Has Env Coven (OD): Respon Unit (OD): Southwest County (OD): Pierce Region (OD): Southwest Longitude (OD): -122.265384 Latitude (OD): 47.172527						

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
Zipcode (OD):		98372				
Location (OD):		"" (47.172527, -122.265384)				
Alternate Site Names:						
Data Source(s):		Confirmed and Suspected Contaminated Sites; Cleanup Sites (Open Data Portal); Open Data Portal - Media and Contaminants				
Site URL:		https://apps.ecology.wa.gov/cleanupsearch/site/11739				
Site Details URL:		https://apps.ecology.wa.gov/cleanupsearch/reports/cleanup/sitedetails/11739				
<u>Contaminants Detail(s)</u>						
Contaminant Name:		Other Halogenated Organics				
Groundwater:						
Surfacewater:						
Soil:		Confirmed Above Cleanup Levels				
Sediment:						
Air:						
Bedrock:						
Contaminant Name:		Petroleum-Other				
Groundwater:						
Surfacewater:						
Soil:		Confirmed Above Cleanup Levels				
Sediment:						
Air:						
Bedrock:						
Contaminant Name:		Petroleum-Gasoline				
Groundwater:						
Surfacewater:						
Soil:		Confirmed Above Cleanup Levels				
Sediment:						
Air:						
Bedrock:						
Contaminant Name:		Non-Halogenated Pesticides				
Groundwater:						
Surfacewater:						
Soil:		Confirmed Above Cleanup Levels				
Sediment:						
Air:						
Bedrock:						
Contaminant Name:		Phenolic Compounds				
Groundwater:						
Surfacewater:						
Soil:		Confirmed Above Cleanup Levels				
Sediment:						
Air:						
Bedrock:						
<u>Open Data Portal - Media and Contaminants as of August 24, 2022</u>						
Contaminant:		Petroleum-Other				
Contaminant Media:		Soil				
Contaminant Status:		Confirmed Above Cleanup Levels				
Contaminant:		Petroleum-Gasoline				
Contaminant Media:		Soil				
Contaminant Status:		Confirmed Above Cleanup Levels				
Contaminant:		Other Halogenated Organics				
Contaminant Media:		Soil				
Contaminant Status:		Confirmed Above Cleanup Levels				
Contaminant:		Phenolic Compounds				
Contaminant Media:		Soil				

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
Contaminant Status:		Confirmed Above Cleanup Levels				
Contaminant:		Non-Halogenated Pesticides				
Contaminant Media:		Soil				
Contaminant Status:		Confirmed Above Cleanup Levels				
<u>2</u>	2 of 2	S	0.12 / 616.78	416.74 / 44	PIONEER MUSEUM 2301 23RD AVE SE PUYALLUP WA 98372	ALL SITES
Facility/Site ID:		9490				
Point Y:		47.1725259052823				
Point X:		-122.265370589115				
Source File:		Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites				
<u>Facility/Site Interaction</u>						
Program ID:						
Interaction ID:		98655		Interact Start Dt:		28-Jun-2010
Interaction Status:		A		Interact End Dt:		
Interac Stat Desc:		Active		Ecology Program:		TOXICS
Interaction Type:		SCS		Prog Database Name:		ISIS
Facility Alternate:		PIONEER MUSEUM				
Interaction Desc:		State Cleanup Site				
Program Name Desc:		Toxics Cleanup Program				
Database Name Desc:		Integrated Site Info System				
<u>Facility Location Detail</u>						
Coord Extension:		0		Horizont Accuracy:		99
Coord Geog:		8		Hor Dtm Co:		4
Horizontal:		Unknown		Horz Coll Meth Cd:		4
Horizont 1:		WGS84		Location Verified:		
Horizont 2:		Address		Geo Loc ID:		9490
<u>3</u>	1 of 1	SE	0.15 / 790.80	389.40 / 17	Pioneer Museum 2301 23RD AVE SE PUYALLUP WA 98372	ICR
Cleanup Site ID:		11739		WRIA ID:		10
Facility Site ID:		9490		Is NFA Site:		
Site Status:		Awaiting Cleanup		Responsible Unit:		Southwest
Statute:		MTCA		Latitude:		47.172527000000002
Rank:				Longitude:		-122.265384
Rank Description:				Legislative District:		25
Has Env Covenant:				Congr District:		10
Is Brownfiled Site:				County Name:		Pierce
Is PSI Site:						
<u>Cleanup Activities</u>						
Related ID:				Start Date:		2010-06-28
VCP Prj No:				End Date:		2011-12-07
Activity Name:		Initial Investigation / Federal Preliminary Assessment		Legal Mechanism:		
Activity Status:		Completed		Performed by:		Ecology w/ Contractor
County Name:		Pierce		Project Manager:		County Health-SW
Applies to:		CleanupSite				
Applies to Description:						
Related ID:				Start Date:		
VCP Prj No:				End Date:		2011-12-07
Activity Name:		Early Notice Letter(s)		Legal Mechanism:		

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
Activity Status:						
County Name:	Pierce			Performed by:		
Applies to:	CleanupSite			Project Manager:	Cross, Kim	
Applies to Description:						
<u>Media Contaminants</u>						
Contaminant Type:	Petroleum-Gasoline			Sediment:		
Groundwater:				Sediment Desc.:		
Groundwater Desc.:				Air:		
Surface Water:				Air Desc.:		
Surfacewater Desc.:				Bedrock:		
Soil:	C			Bedrock Desc.:		
Soil Desc.:	Confirmed Above Cleanup Level			County Name:	Pierce	
Contaminant Type:	Petroleum-Other			Sediment:		
Groundwater:				Sediment Desc.:		
Groundwater Desc.:				Air:		
Surface Water:				Air Desc.:		
Surfacewater Desc.:				Bedrock:		
Soil:	C			Bedrock Desc.:		
Soil Desc.:	Confirmed Above Cleanup Level			County Name:	Pierce	
Contaminant Type:	Phenolic Compounds			Sediment:		
Groundwater:				Sediment Desc.:		
Groundwater Desc.:				Air:		
Surface Water:				Air Desc.:		
Surfacewater Desc.:				Bedrock:		
Soil:	C			Bedrock Desc.:		
Soil Desc.:	Confirmed Above Cleanup Level			County Name:	Pierce	
Contaminant Type:	Non-Halogenated Pesticides			Sediment:		
Groundwater:				Sediment Desc.:		
Groundwater Desc.:				Air:		
Surface Water:				Air Desc.:		
Surfacewater Desc.:				Bedrock:		
Soil:	C			Bedrock Desc.:		
Soil Desc.:	Confirmed Above Cleanup Level			County Name:	Pierce	
Contaminant Type:	Other Halogenated Organics			Sediment:		
Groundwater:				Sediment Desc.:		
Groundwater Desc.:				Air:		
Surface Water:				Air Desc.:		
Surfacewater Desc.:				Bedrock:		
Soil:	C			Bedrock Desc.:		
Soil Desc.:	Confirmed Above Cleanup Level			County Name:	Pierce	

4	1 of 1	W	0.24 / 1,242.08	368.68 / -4	CYPRESS MANOR CORNER 19TH AVE SE & 17TH ST SE PUYALLUP WA 98372	ALL SITES
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Facility/Site ID: 14849
Point Y: 47.1769000001415
Point X: -122.260999999959
Source File: Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites

Facility/Site Interaction

Program ID:	WAR007059	Interact Start Dt:	07-Apr-2006
Interaction ID:	84127	Interact End Dt:	
Interaction Status:	A	Ecology Program:	WATQUAL
Interac Stat Desc:	Active	Prog Database Name:	PARIS
Interaction Type:	CONSTSWGP		
Facility Alternate:	CYPRESS MANOR		

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
Interaction Desc:		Construction SW GP				
Program Name Desc:		Water Quality Program				
Database Name Desc:		Permitting & Reporting Information System				
<u>Facility Location Detail</u>						
Coord Extension:	0			Horizont Accuracy:	99	
Coord Geog:	0			Hor Dtm Co:	4	
Horizontal:	Unknown			Horz Coll Meth Cd:	99	
Horizont 1:	WGS84			Location Verified:		
Horizont 2:	Unknown			Geo Loc ID:	14849	
<u>5</u>	1 of 1	ESE	0.39 / 2,039.19	473.25 / 101	Sullys Glen 2820 23rd Ave SE Puyallup WA 98374	ALL SITES
Facility/Site ID:		7041				
Point Y:		47.1688087563446				
Point X:		-122.25644171358				
Source File:		Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites				
<u>Facility/Site Interaction</u>						
Program ID:	WAR305747			Interact Start Dt:	09-Aug-2017	
Interaction ID:	123271			Interact End Dt:		
Interaction Status:	A			Ecology Program:	WATQUAL	
Interac Stat Desc:	Active			Prog Database Name:	PARIS	
Interaction Type:	CONSTSWGP					
Facility Alternate:	Sully's Glen					
Interaction Desc:	Construction SW GP					
Program Name Desc:	Water Quality Program					
Database Name Desc:	Permitting & Reporting Information System					
<u>Facility Location Detail</u>						
Coord Extension:	0			Horizont Accuracy:	99	
Coord Geog:	0			Hor Dtm Co:	4	
Horizontal:	Unknown			Horz Coll Meth Cd:	4	
Horizont 1:	WGS84			Location Verified:		
Horizont 2:	Address			Geo Loc ID:	7041	
<u>6</u>	1 of 6	ENE	0.48 / 2,555.05	123.75 / -249	Puyallup Highlands Richmond American Homes 1500 Shaw Rd Puyallup WA 98372	ALL SITES
Facility/Site ID:		19488				
Point Y:		47.1771297227509				
Point X:		-122.255868884921				
Source File:		Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites				
<u>Facility/Site Interaction</u>						
Program ID:	WAR126927			Interact Start Dt:	02-Apr-2013	
Interaction ID:	104667			Interact End Dt:	15-Jun-2018	
Interaction Status:	I			Ecology Program:	WATQUAL	
Interac Stat Desc:	Inactive			Prog Database Name:	PARIS	
Interaction Type:	CONSTSWGP					
Facility Alternate:	Puyallup Highlands Richmond American Homes					
Interaction Desc:	Construction SW GP					
Program Name Desc:	Water Quality Program					

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
Database Name Desc:		Permitting & Reporting Information System				
<u>Facility Location Detail</u>						
Coord Extension:	0			Horizont Accuracy:	6	
Coord Geog:	8			Hor Dtm Co:	3	
Horizontal:	40ft			Horz Coll Meth Cd:	13	
Horizont 1:	NAD83HARN			Location Verified:		
Horizont 2:	Digital map or GIS			Geo Loc ID:	19488	
6	2 of6	ENE	0.48 / 2,555.05	123.75 / -249	Puyallup Highlands Construction Site 1500 SHAW RD PUYALLUP WA 98372	ALL SITES
Facility/Site ID:		6587244				
Point Y:		47.1769189998338				
Point X:		-122.25570299964				
Source File:		Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites				
<u>Facility/Site Interaction</u>						
Program ID:				Interact Start Dt:		22-Feb-2010
Interaction ID:		90992		Interact End Dt:		
Interaction Status:		A		Ecology Program:		WATQUAL
Interac Stat Desc:		Active		Prog Database Name:		DMS
Interaction Type:		ENFORFNL				
Facility Alternate:						
Interaction Desc:		Enforcement Final				
Program Name Desc:		Water Quality Program				
Database Name Desc:		Docket Management System				
Program ID:		WAR006083		Interact Start Dt:		18-Mar-2005
Interaction ID:		87647		Interact End Dt:		16-Dec-2010
Interaction Status:		I		Ecology Program:		WATQUAL
Interac Stat Desc:		Inactive		Prog Database Name:		PARIS
Interaction Type:		CONSTSWGP				
Facility Alternate:		PUYALLUP HIGHLANDS				
Interaction Desc:		Construction SW GP				
Program Name Desc:		Water Quality Program				
Database Name Desc:		Permitting & Reporting Information System				
Program ID:		WAR124893		Interact Start Dt:		11-Apr-2011
Interaction ID:		96273		Interact End Dt:		20-Nov-2014
Interaction Status:		I		Ecology Program:		WATQUAL
Interac Stat Desc:		Inactive		Prog Database Name:		PARIS
Interaction Type:		CONSTSWGP				
Facility Alternate:		Puyallup Highlands Phase 3				
Interaction Desc:		Construction SW GP				
Program Name Desc:		Water Quality Program				
Database Name Desc:		Permitting & Reporting Information System				
<u>Facility Location Detail</u>						
Coord Extension:	99			Horizont Accuracy:	99	
Coord Geog:	99			Hor Dtm Co:	2	
Horizontal:	Unknown			Horz Coll Meth Cd:	99	
Horizont 1:	NAD83			Location Verified:	F	
Horizont 2:	Unknown			Geo Loc ID:	6587244	
6	3 of6	ENE	0.48 / 2,555.05	123.75 / -249	Puayllup Highlands Phase 3 Partial 1500 SHAW RD	ALL SITES

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
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PUYALLUP WA 98372

Facility/Site ID: 11283
Point Y: 47.1802054941701
Point X: -122.249252181185
Source File: Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites

Facility/Site Interaction

Program ID:	WAR125473	Interact Start Dt:	06-Jan-2012
Interaction ID:	99219	Interact End Dt:	05-Aug-2014
Interaction Status:	I	Ecology Program:	WATQUAL
Interac Stat Desc:	Inactive	Prog Database Name:	PARIS
Interaction Type:	CONSTSWGP		
Facility Alternate:	Puayllup Highlands Phase 3 Partial		
Interaction Desc:	Construction SW GP		
Program Name Desc:	Water Quality Program		
Database Name Desc:	Permitting & Reporting Information System		

Facility Location Detail

Coord Extension:	0	Horizont Accuracy:	6
Coord Geog:	8	Hor Dtm Co:	3
Horizontal:	40ft	Horz Coll Meth Cd:	13
Horizont 1:	NAD83HARN	Location Verified:	
Horizont 2:	Digital map or GIS	Geo Loc ID:	11283

6	4 of 6	ENE	0.48 / 2,555.05	123.75 / -249	Puyallup Highlands Phase 3 Partial 1500 SHAW RD PUYALLUP WA 98372	ALL SITES
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Facility/Site ID: 6276
Point Y: 47.1789834889905
Point X: -122.246638256843
Source File: Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites

Facility/Site Interaction

Program ID:	WAR126613	Interact Start Dt:	12-Dec-2012
Interaction ID:	103330	Interact End Dt:	20-Nov-2013
Interaction Status:	I	Ecology Program:	WATQUAL
Interac Stat Desc:	Inactive	Prog Database Name:	PARIS
Interaction Type:	CONSTSWGP		
Facility Alternate:	Puyallup Highlands Phase 3 Partial		
Interaction Desc:	Construction SW GP		
Program Name Desc:	Water Quality Program		
Database Name Desc:	Permitting & Reporting Information System		

Facility Location Detail

Coord Extension:	0	Horizont Accuracy:	6
Coord Geog:	8	Hor Dtm Co:	3
Horizontal:	40ft	Horz Coll Meth Cd:	13
Horizont 1:	NAD83HARN	Location Verified:	
Horizont 2:	Digital map or GIS	Geo Loc ID:	6276

6	5 of 6	ENE	0.48 / 2,555.05	123.75 / -249	Puyallup Highlands Phase 4 1500 Shaw Rd Puyallup WA 98372	ALL SITES
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Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
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Facility/Site ID: 15776
Point Y: 47.1769183619257
Point X: -122.255701102411
Source File: Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites

Facility/Site Interaction

Program ID:	WAR125927	Interact Start Dt:	25-Jun-2012
Interaction ID:	101944	Interact End Dt:	
Interaction Status:	A	Ecology Program:	WATQUAL
Interac Stat Desc:	Active	Prog Database Name:	PARIS
Interaction Type:	CONSTSWGP		
Facility Alternate:	Puyallup Highlands Phase 4		
Interaction Desc:	Construction SW GP		
Program Name Desc:	Water Quality Program		
Database Name Desc:	Permitting & Reporting Information System		

Facility Location Detail

Coord Extension:	0	Horizont Accuracy:	99
Coord Geog:	8	Hor Dtm Co:	4
Horizontal:	Unknown	Horz Coll Meth Cd:	99
Horizont 1:	WGS84	Location Verified:	
Horizont 2:	Unknown	Geo Loc ID:	15776

6	6 of 6	ENE	0.48 / 2,555.05	123.75 / -249	Puyallup Highlands High Country 1500 SHAW RD PUYALLUP WA 98372	ALL SITES
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Facility/Site ID: 9017
Point Y: 47.1810006611168
Point X: -122.247990916528
Source File: Washington State Department of Ecology Facilities - Sites Interactions; Washington State Department of Ecology Facilities - Sites

Facility/Site Interaction

Program ID:	WAR302153	Interact Start Dt:	30-Jun-2014
Interaction ID:	109335	Interact End Dt:	
Interaction Status:	A	Ecology Program:	WATQUAL
Interac Stat Desc:	Active	Prog Database Name:	PARIS
Interaction Type:	CONSTSWGP		
Facility Alternate:	Puyallup Highlands High Country		
Interaction Desc:	Construction SW GP		
Program Name Desc:	Water Quality Program		
Database Name Desc:	Permitting & Reporting Information System		

Facility Location Detail

Coord Extension:	0	Horizont Accuracy:	6
Coord Geog:	8	Hor Dtm Co:	3
Horizontal:	40ft	Horz Coll Meth Cd:	13
Horizont 1:	NAD83HARN	Location Verified:	
Horizont 2:	Digital map or GIS	Geo Loc ID:	9017

7	1 of 1	NE	0.63 / 3,349.02	79.92 / -293	Puyallup School District Elementary School 20 SHAW & 12TH PUYALLUP WA 98371	CSCSL
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Fac Site ID: 18433269 **Responsible Unit:** Southwest

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
Cleanup Site ID:	8207				Fac Site ID (OD):	18433269
Site Status:	Cleanup Started				Cleanup SiteID(OD):	8207
Site Rank:					Site Rank (OD):	
Current VCP:					Has Env Coven (OD):	
Past VCP:					Respon Unit (OD):	Southwest
Has Inst Control:					County (OD):	Pierce
County:	Pierce				Region (OD):	Southwest
Region:	Southwest				Longitude (OD):	-122.25633
Latitude:	47.1833300009404				Latitude (OD):	47.18333
Longitude:	-122.25633					
Site Name:	Puyallup School District Elementary School 20					
Address:	SHAW & 12TH					
City:	PUYALLUP					
Zip Code:	98371					
Site Status (OD):	Cleanup Started					
Site Name (OD):	PUYALLUP SCHOOL DISTICT ELEMENTARY SCHOOL 20					
Address (OD):	SHAW & 12TH					
City (OD):	PUYALLUP					
Zipcode (OD):	98371					
Location (OD):	""					
Alternate Site Names:	(47.18333, -122.25633) ELEMENTARY SCHOOL 20					
Data Source(s):	Confirmed and Suspected Contaminated Sites; Cleanup Sites (Open Data Portal); Open Data Portal - Media and Contaminants					
Site URL:	https://apps.ecology.wa.gov/cleanupsearch/site/8207					
Site Details URL:	https://apps.ecology.wa.gov/cleanupsearch/reports/cleanup/sitedetails/8207					

Contaminants Detail(s)

Contaminant Name: Other Non-Halogenated Organics
Groundwater: Suspected
Surfacewater:
Soil: Confirmed Above Cleanup Levels
Sediment:
Air:
Bedrock:

Contaminant Name: Lead
Groundwater: Confirmed Above Cleanup Levels
Surfacewater:
Soil: Remediated-Below
Sediment:
Air:
Bedrock:

Contaminant Name: Benzene
Groundwater: Suspected
Surfacewater:
Soil: Remediated-Above
Sediment:
Air:
Bedrock:

Contaminant Name: Petroleum-Gasoline
Groundwater: Confirmed Above Cleanup Levels
Surfacewater:
Soil: Confirmed Above Cleanup Levels
Sediment:
Air:
Bedrock:

Open Data Portal - Media and Contaminants as of August 24, 2022

Contaminant: Lead
Contaminant Media: Groundwater
Contaminant Status: Confirmed Above Cleanup Levels

Map Key	Number of Records	Direction	Distance (mi/ft)	Elev/Diff (ft)	Site	DB
Contaminant:		Benzene				
Contaminant Media:		Groundwater				
Contaminant Status:		Suspected				
Contaminant:		Petroleum-Gasoline				
Contaminant Media:		Soil				
Contaminant Status:		Confirmed Above Cleanup Levels				
Contaminant:		Other Non-Halogenated Organics				
Contaminant Media:		Groundwater				
Contaminant Status:		Suspected				
Contaminant:		Lead				
Contaminant Media:		Soil				
Contaminant Status:		Remediated-Below				
Contaminant:		Petroleum-Gasoline				
Contaminant Media:		Groundwater				
Contaminant Status:		Confirmed Above Cleanup Levels				
Contaminant:		Benzene				
Contaminant Media:		Soil				
Contaminant Status:		Remediated-Above				
Contaminant:		Other Non-Halogenated Organics				
Contaminant Media:		Soil				
Contaminant Status:		Confirmed Above Cleanup Levels				

Unplottable Summary

Total: 0 Unplottable sites

DB	Company Name/Site Name	Address	City	Zip	ERIS ID
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No unplottable records were found that may be relevant for the search criteria.