ENVIRONMENTAL SITE ASSESSMENT: PHASE I

at

2805 West Commodore Way Seattle, Washington

> Prepared for Time Oil Company

> > August 25, 2000

Prepared by

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1. INTRODUCTION

Foster Wheeler Environmental Corporation (Foster Wheeler Environmental) has been retained by the Time Oil Company (TOC) to conduct Phase I Environmental Site Assessments (ESAs) at seven properties located on West Commodore Way. The properties are all owned by TOC and are located within a ¹/₄-mile radius.

This report presents the results of the Phase I ESA of the property located at 2805 West Commodore Way, Seattle, Washington (the Property), shown in Figure 1. This report was prepared by Foster Wheeler Environmental for the sole use of TOC and with the express limitations detailed in Section 1.2. The format of this report is generally consistent with the recommended format in "Standard Practice for Environmental Site Assessment: Phase I," issued by the American Society for Testing Materials (ASTM) Standard E 1527-97.

1.1 PURPOSE

Pursuant to the scope of work, the purpose of this ESA was to identify recognized environmental conditions in connection with the property. As defined in Standard E 1527-97, "recognized environmental conditions" means 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, groundwater, or surface water of the property.

1.2 LIMITING CONDITIONS AND METHODOLOGY USED

The ESA was performed by Bryan S. Graham, RG, of Foster Wheeler Environmental. The scope of services for this project was limited to the following tasks:

- Task 1-Property Reconnaissance
- Task 2-Interview of Land Owner(s), Current Lessees, and Tenants
- Task 3-Regulatory Agency Database Search
- Task 4–Data Analysis and Report Preparation



Historical photographs were purchased from Walker & Associates. Available records and files were reviewed from:

- Seattle Department of Design, Construction, and Land Use
- Washington State Department of Ecology (Ecology)
- King County Tax Assessors Office
- Puget Sound Regional Archives

The above tasks were accomplished in accordance with ASTM Standard E 1527-97. The ESA did not include wetlands evaluation; testing for or surveying of asbestos and radon, lead in tap water, or lead paint; or soil or groundwater sampling.

2. PROPERTY LOCATION AND DESCRIPTION

2.1 PROPERTY LOCATION AND LEGAL DESCRIPTION

TOC owns the Property located at 2805 West Commodore Way, Seattle, Washington. The Property is currently leased to ASKO Hydraulic. The Property is within Section 11, township 25 north, range 3 east, Lawton Park, portions of Blocks 3, 4, and 5.

2.2 PROPERTY DESCRIPTION

Figure 2 shows the layout of the Property. Two structures are located on the Property. The main structure is a metal frame building with corrugated sheet metal siding. The interior of the main building is divided into separate areas including a storage area (location of oil/water separator, paint room, and sand blasting area). Offices are located on the north side of the building. The second structure located on the Property is a petroleum storage shed situated on the east portion of the Property. At the time of the visit there were six 55-gallon drums of machine/lube oil and coolant in secondary containment and seven 55-gallon drums of used oil. This open-air shed is used to store lube oils and petroleum products (oil and gas) prior to disposal. A small brick room is in the center of shed. The drum storage shed was constructed in approximately 1996. The area surrounding the building is paved, with the exception of the back of the property, which is a grassy bank leading toward the Burlington Northern rail line.

According to interviews with current and previous TOC employees, the Property owner, the current tenant (ASKO Hydraulic), and available regulatory files, there are no known or

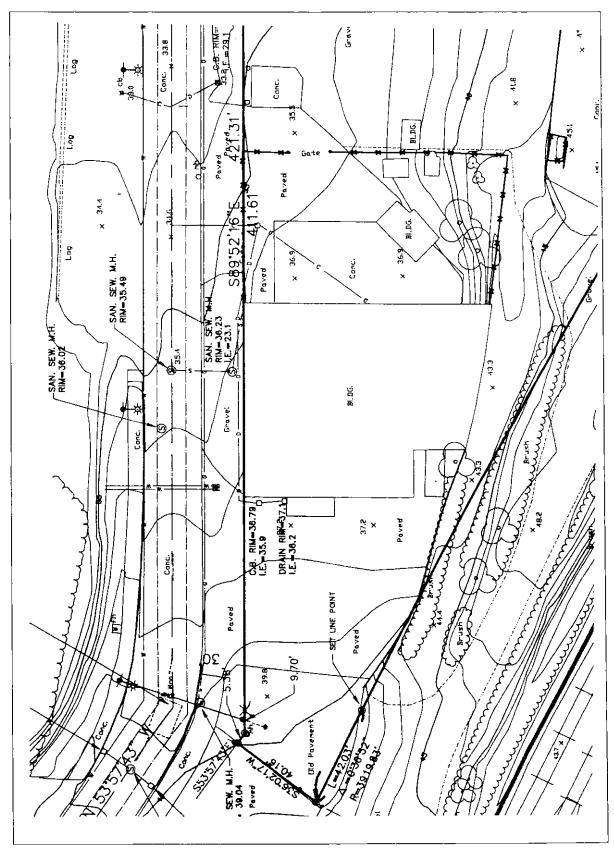


Figure 2. Layout of the Property at 2805 West Commodore Way

recorded wells or underground storage tanks on the Property. Appendix A shows photographs taken at the Property.

2.3 ADJOINING PROPERTIES

The area surrounding the Property generally consists of light industrial businesses, condominiums, and the ship canal. The Property is bounded on the northwest by Norpol Trawl; to the southwest by the Burlington Northern rail line; to the southeast by TOC's fuel storage facility; and to the northeast by West Commodore Way.

2.4 PROPERTY OPERATIONS

ASKO Hydraulic currently leases the Property from TOC and operates a machining and grinding business. Metal parts and equipment are brought to the shop where they are finished or re-tooled. The main shop houses drills, lathes, cutting racks, and sanding booths. Excess petroleum-based lubricants used in the grinding and machining process are contained by means of 5-gallon drip pails for recycling and reuse.

A steam cleaning area is located on the east side of the building. Parts are cleaned in this bermed area and the water is collected in a sump and transferred via subsurface piping to an oil water separator. Approximately 100 to 200 gallons of petroleum products are removed from the Property each month by a disposal company.

2.5 PROPERTY HISTORY

Information about the history of the Property was derived from a review of available documents, historical photographs, and regulatory records. Former and current employees of TOC were also interviewed.

The Property, which was originally broken into smaller lots, was acquired by the Time Oil Company from 1946 to 1950. Appendix B contains historical photographs taken from 1936 to 1997 of the Property and surrounding area. The earliest available photograph (1936) shows the Property as an undeveloped parcel. The 1946 photograph indicates that the Property had been cleared and was being used by TOC for the staging of empty 55-gallon drums. This information was verified during interviews of TOC personnel conducted on June 16, 2000. The aerial photograph dated 1960 shows the Property being used as a vehicle storage and parking lot. The current facility on the Property appears for the first time in the photograph from 1974. According to the King County Department of Design, Construction, and Land Use files, the building on the Property was planned as early as 1964. However, according to TOC employees interviewed, the building wasn't constructed until the late 1960s. The original purpose of the building was to service TOC's vehicles. According to the TOC real estate department, the Property was used by:

- Precision Engineering Specialists for marine and trucking rebuilds from 1974 to 1976
- Select Industries used the building as a warehouse and machine shop from 1976 to 1979. Select Industries became ASKO in 1979. ASKO has leased the building from 1979 to present.

Mr. Bill Thompson (ASKO) was interviewed regarding the evolution of operations at the Property. According to Mr. Thompson, several changes have occurred at the Property since it was originally built. The oil storage shed was added around 1996. Until then petroleum products were stored in a rack in that area. According to Mr. Thompson, the change was made in response to current regulations and the request of the local fire marshal. At some time, though documentation was not available to clarify when, the wash rack on the south side of the building was enclosed and converted to a storage area. According to interviews with TOC employees and Mr. Bill Thompson, a small (< 600-gallon) heating oil underground storage tank (UST) was removed outside the northeast corner of the building. No reports were available regarding the removal of this UST. However, the King County Department of Design, Construction, and Land Use does have a permit application from 1964 on file for the installation of two 550-gallon oil tanks at the Property. A second UST at the Property could not be confirmed.

3. RESULTS OF INVESTIGATION AND RECORDS REVIEW

3.1 PROPERTY INSPECTION OBSERVATIONS

On June 6, 2000, Foster Wheeler Environmental conducted a reconnaissance of the Property. The purpose of the visit was to obtain information relating to recognized environmental conditions, if any, associated with the Property.

In general, the interior of the main building was well kept. There were no visible cracks or stains on the floor. A few of the machines had sorbent material placed near them on the floor to absorb lube oils. The area near the oil/water separator had small quantities of oil on the floor near the base of the separator. It was not clear whether the oil originated from the separator or was transferred there from another area and subsequently spilled. The area

where the steam cleaning takes place was blackened from use; as was the wall of the building.

The drum storage shed was in good shape. Drums were stored in secondary containment. The floor of the petroleum storage drum area showed some staining from use.

3.2 RECORDS REVIEW

Because all of the properties for which Phase I ESAs were conducted are in close proximity to one another, one central point was used for the database search; that central point was the TOC property at 2737 West Commodore Way. The results of the database search are relative the property at 2737 West Commodore Way, located just a few blocks east of the target Property. Consequently, the information is transferable to the Property at 2805 West Commodore Way. The Phase I database search was performed by EDR, Inc. EDR searched readily available state, federal, regional, and local agency database listings. The results of the database search are presented in the following subsections. The entire EDR report is presented in the ESA for 2737 West Commodore Way (Foster Wheeler Environmental, 2000). As specified in ASTM E 1527-97, the following government records were reviewed:

- EPA National Priorities List (NPL) within 1.0 mile
- EPA Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) within ¹/₂ mile
- EPA Resource Conservation and Recovery Act (RCRA) Corrective Action Reports (CORRACTS) within 1.0 mile
- EPA RCRA non-CORRACTS Treatment, Storage, and Disposal Facilities within ¹/₂ mile
- EPA RCRA generators list on the Property and adjoining properties
- Emergency Response Notification System (ERNS) list on the Property
- State Hazardous Waste Site List within 1.0 mile
- Leaking Underground Storage Tanks (LUST) list within ¹/₂ mile
- State Registered UST list on the Property and adjoining properties
- Solid Waste/Landfills within ¹/₂ mile.

3.2.1 EPA National Priorities List (NPL)

The NPL identifies federal Superfund Sites with the highest priority for cleanup. ASTM Standards require the identification of NPL sites within 1 mile of the subject property. There were no NPL sites identified within a 1-mile radius of the Property.

3.2.2 EPA Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)

The CERCLIS list identifies sites that the USEPA has investigated or is in the process of investigating for potential hazardous substance contamination. A CERCLIS site may or may not become a NPL site. ASTM Standards require the identification of CERCLIS sites within ½ mile of the subject property. The EDR report did not identify any CERCLIS sites within a ½ mile radius of the Property.

3.2.3 EPA Resource Conservation and Recovery Act (RCRA) Corrective Action Reports (CORRACTS)

RCRA tracks the status and filing of any corrective actions that have taken place at a facility. ASTM Standards require the identification of RCRA CORRACTS facilities within 1 mile of the subject property. The EDR report did not identify any such facilities within a 1-mile radius of the Property.

3.2.4 EPA RCRA non-CORRACTS Treatment, Storage, and Disposal Facilities

RCRA non-CORRACTS Treatment, Storage, and Disposal (TSD) Facilities are those facilities on which treatment, storage, and/or disposal of hazardous wastes takes place and at which corrective remedial action has not been required by EPA, as defined and regulated by RCRA. The ASTM Standards require the identification of RCRA non-CORRACTS TSD Facilities within ½ mile of the subject property. This information is listed in the EDR report under the heading of Resource Conservation and Recovery Information System (RCRIS) TSD Facilities, which are substantively the same. The EDR report did not identify any such facilities within ½ mile of the Property.

3.2.5 EPA RCRA Generators List

The ASTM Standards require the identification of RCRA generators on or adjacent to the subject property. RCRIS includes information on facilities that generate, transport, store, treat and/or dispose of hazardous wastes as defined and regulated by RCRA, and as listed in the EDR report. The EDR report showed 11 RCRIS small quantity generators (SQGs) within ¼ mile of the site. The SQGs include:

- Aickinstrut Incorporated 2901 West Commodore Way
- ASKO Hydraulic Repair 2805 West Commodore Way

٠	Icicle Seafoods, Inc.	2752 West Commodore Way
	(no longer in operation)	(also listed as 2770 West Commodore Way)
•	Northwest Awning Fabric, Inc.	2600 West Commodore Way
٠	Tosco Corp. Seattle Terminal	2740 West Commodore Way
٠	Seattle Port Maritime Industries	2700 West Commodore Way
٠	U.S. DOT CG Support Center	2700 West Commodore Way
٠	Sea Coast Towing, Inc.	2700 West Commodore Way
٠	Rapp Hydema U.S., Inc.	4433 27th Avenue West
•	Abella Woodworking, Inc.	2600 West Commodore Way
٠	Gilman Pl. Waste Pain	4439 Gilman PL W

ASKO is listed as an SQG according to the EDR database search and according to Ecology's Facility/Site Identification System (FSIS). As previously mentioned, the facility does generate approximately 100 to 200 gallons of petroleum waste each month. Ecology's FSIS lists the operations as "active" and shows that their waste discharge permit is "inactive."

3.2.6 Federal Emergency Response Notification System (ERNS) List

The ERNS list records and stores information on reported releases of oil and hazardous substances. ASTM Standards require the identification of ERNS on the subject property. The EDR report did not identify the Property as appearing on the ERNS list.

3.2.7 State Hazardous Waste List

The State of Washington lists potential or confirmed hazardous substance release properties on Ecology's Confirmed and Suspected Contaminated Sites List (CSCSL) Database. The ASTM Standard requires the identification of these sites within 1 mile of the subject property. There were 20 sites on the CSCSL identified within 1 mile of the Property. The sites listed on the EDR report are:

٠	Springer Dave	4459 26th Avenue West
•	Washington Marine Engine Co.	4403 24th Avenue West (listed twice on database)
•	U.S. Army Corps of Engineers	3015 NW 54th Street
٠	Dyno Battery Co.	4248 23rd Avenue West
۲	NW Market Street Site	2801 NW Market Street
٠	Salmon Bay Center	5301-5309 Shilshole Avenue

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Weiman Property	5332 Ballard Avenue NW
Thordarson Property	2200 West Emerson Place
• Chevron 60090968	2021 NW Market Street
Ballard Auto Wrecking	1515 NW Leary Way
Ballard Recycling	1509 NW 49th Street
Interbay Prints	1809 West Emerson
• Discovery Park Old Maint Yd	Discovery Park 40th West
• The Tux Shop	5409 15th Avenue NW
Mamco MFG Bldg.	1415/1427 NW 49th Street (listed twice on database)
General Disposal Corp.	1415 NW Ballard Way
• Bardahl	1400 NW 52nd Street
Anderson Marine Repair	2360 West Commodore Way

3.2.8 EPA Leaking Underground Storage Tank (LUST) Sites

The LUST list show the sites containing one or more underground storage tanks that have been identified as having leaked or are potentially leaking their contents into the ground or groundwater. The ASTM Standards require the identification of LUST sites within ½ mile of the subject property. There are eight LUST Sites within ½ mile of the Property. The sites listed in the EDR report are:

• Time Oil Co.	2754 West Commodore Way
• Time Oil Co.	2750 West Commodore Way
USCG Support Center	2700 West Commodore Way
• Time Oil Co.	3031 West Commodore Way
• Ric's Automotive and Texaco	3317 West Government Way
Hiram Chittenden Locks	3015 Northwest 54th Street
 Northwest Market Street 	2801 NW Market Street
• Sabroe Refrigeration, Inc.	4401 23rd Avenue West

3.2.9 EPA Underground Storage Tank (UST) Sites

The UST list shows the sites containing one or more underground storage tanks that have been identified as being located on the subject property. The ASTM Standards require the identification of USTs on the subject property and adjoining properties. There are five USTs within ¹/₄ mile of the Property. The sites listed in the EDR report are:

• Time Oil Co. 2754 West Commodore Way

٠	Time Oil Co.	2752 West Commodore Way
•	USCG Support Center	2700 West Commodore Way
٠	Time Oil Co.	3031 West Commodore Way
٠	Northwest Instrument Co.	2525 West Commodore Way

3.2.10 Solid Waste/Landfill Facilities

Solid waste/landfill facilities are those sites that currently accept, or have in the past accepted, waste of any kind for disposal on site. The ASTM Standards require the identification of solid waste/landfill sites within ½ mile of the subject property. The EDR report did not identify any such sites within ½ mile of the Property.

4. CONCLUSIONS AND RECOMMENDATIONS

Foster Wheeler Environmental conducted a Phase I ESA of the Property at 2805 West Commodore Way, Seattle, Washington. The purpose of this Phase I ESA was to identify, to the extent feasible pursuant to the processes described herein, recognized environmental conditions, if any, associated with the Property. Our findings are summarized below.

According to available information, the Property has been used for light industrial activities (automobile maintenance, marine engine and hydraulic equipment repair) since the late 1960s. There are no registered USTs on the Property, though a permit is on file for the installation of two USTs and interviews confirmed the removal of only one UST. The Property has not been subject to any state or federal investigations relating to potential environmental contamination.

The EDR report listed four LUST sites near the target Property. The USTs and associated contaminated soil were removed from the TOC and Coast Guard properties. The sites remain on the LUST database because they have not been formally reviewed by Ecology.

Additional subsurface investigation may be necessary to determine the condition of soil beneath the steam cleaning area, near the drum storage shed, and the former heating oil UST.

4.1 LIMITATIONS

This report is prepared for the sole use of TOC, pursuant to their contract with Foster Wheeler Environmental. The scope of work and the findings should not be considered suitable for other potential users, and any use by other parties shall be at their sole risk. This report is based on the review of limited data, as described herein, in accordance with generally accepted professional practices, applicable to work of similar nature and complexity in similar localities, at the time the services were performed. No warranty, expressed or implied, is made. The scope of this report is limited in nature and intended to provide a preliminary evaluation of the current conspicuous environmental conditions at the Property at the time of the report, and does not constitute definitive or in-depth review of all the potential environmental impairments and situations. Foster Wheeler Environmental assumes no responsibility for conditions of which it is unaware and/or as to which there was no opportunity or request for review.

It is important to recognize that even the most comprehensive scope of services may not detect all the environmental liabilities at a particular Property. Therefore, nothing herein shall be construed as a representation or certification that the Property is either fully characterized or is free of environmental impairments and/or contamination.

In order to conduct the investigation for this report, Foster Wheeler Environmental relied upon readily available information, as discussed in the report, and unless explicitly included in our scope, included no verification of the accuracy or completeness of documentation or data or possible withholding of information by the interviewees, agencies, or other parties. [Please also refer to the EDR Disclaimer.]

5. REFERENCES

- EDR (Environmental Data Resources). 2000. The EDR-Radius Map with GeoCheck[®], prepared for Time Oil Company. Inquiry Number 502304.1s. June 2, 2000.
- EPA (U.S. Environmental Protection Agency). 2000. CERCLIS, RODS, & Archive (NFRAP) Information Database. Downloaded June 19, 2000. www.epa.gov/superfund/sites/cursites/index.htm.
- Foster Wheeler Environmental. 2000. Environmental Site Assessment: Phase I for Time Oil Company, 2737 West Commodore Way, Seattle, Washington. August 4, 2000.
- National Priorities List (NPL) Sites in Washington. Downloaded June 19, 2000. www.epa.gov/superfund/sites/npl/wa.htm.
- Washington State Department of Ecology Web Site. Downloaded on May 12, 2000. Facility/Site Identification System. www.wa.gov/ecology/iss/fsweb/fshelp.html.

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APPENDIX A

PROPERTY PHOTOGRAPHS

Property Photographs from 2805 West Commodore Way

- 1. West side of ASKO located at 2805 West Commodore Way.
- 2. South side of ASKO building, former wash rack behind container.
- 3. Norpol Trawl is located to the west of the Property.
- 4. East side of ASKO building located on the Property.
- 5. Parts cleaning area. Water is collected in an oil/water separator.
- 6. Drum storage area on the east side of the Property.
- 7. Waste oil drums in drum storage area.
- 8. Miscellaneous debris on east side of the Property.
- 9. Looking inside shop. Oil from machinery is collected in 5-gallon bucket under the bench.



















APPENDIX B

IIISTORICAL PHOTOGRAPHS

