Kent Station SIT 510
Kent Station

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April 20, 2005

Mr. Dennis Rattie
Tarragon, LLC
1000 Second Avenue, Suite 3200
Seattle, WA 98111

Re: Summary of Field Observations and Activities
Construction Monitoring at Kent Station
Kent, Washington
17057-00

Dear Dennis:

This letter summarizes the field observations, sampling and analysis activities, and overall construction monitoring for the period of July 2004 through March 2005. Construction activities began on the subject property in July 2004. We have attached copies of three photographs of the Kent Station site at various stages of development dated October 2004, December 2004, and February 2005.

Prior to commencement of construction activities, a construction contingency plan (CCP) was developed by Hart Crowser and distributed to the on-site contractors and subcontractors as appropriate. A kick-off meeting was also conducted prior to construction activities with the general contractors to go over the content and procedures outlined in the CCP. The CCP outlined the common sense protocol and steps to handle and manage potential impacted soils and groundwater as well as undiscovered underground storage tanks (USTs) during construction activities.

This letter further summarizes the observations and activities conducted by Hart Crowser in response to requests by the contractors implementing the CCP. As appropriate, analytical results are presented for samples collected and analyzed.

This letter also summarizes some of the general subsurface excavation activities by the contractors during this period.

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Project Understanding

Tarragon-Kent Station Phase I LLC, Kent Station LLC, and the City of Kent are redeveloping the former Borden plant property in Kent, Washington, into Kent Station, a collection of small retail shops, restaurants, office space, satellite college buildings (Green River Community College), and a movie theatre. The prime contractors for the project are Lease Crutcher Lewis (LCL) for a majority of the project and Vratsinas Construction Company (VCC) acting as the general contractor for the theatre building, and numerous respective subcontractors. As part of the construction, Hart Crowser was contracted to perform oversight and provide assistance on the identification, handling, and disposal of potentially impacted soils that were encountered during construction, in general accordance with the CCP.

Under separate agreement, Earth Consultants, Inc. (ECI), was retained and performed geotechnical investigations throughout the site development process. This fact is referenced for informational purposes only as ECI was not under contract as related to the CCP; however, their professional expertise in the field is very relevant to the fact they were present and would recognize problem soil conditions during the process.

Samples submitted for chemical analysis were analyzed by Advanced Analytical (Redmond, Washington). Advanced Analytical is an Ecology-certified laboratory.

Summary of General Subsurface Excavation Activities and Hart Crowser Site Visits and Screening Activities

Extensive subsurface excavation has occurred on the property since July 2004. Several shallow excavations have also been conducted on the property for connecting the major utilities to the buildings. During these subsurface excavation activities, the contractors utilized the CCP and were aware of the general areas of past cleanup and previous investigations. If there were any suspect areas of impacted soils noted by the contractors or subcontractors, the general contractors followed the CCP and notified Hart Crowser. A Hart Crowser representative conducted a site visit as soon as possible after receiving a call to assess the suspect area. The following summarizes the general subsurface excavation activities and site visits and screening activities conducted by Hart Crowser since July 2004.

General Subsurface Excavation Activities

The major subsurface excavation areas are shown on Figure 1. In total, 28,000 cubic yards of soil have been excavated from the subject property. As the soils were excavated, the soil

was stockpiled for either reuse on site, if geotechnically suitable, or disposed of off site, if geotechnically unsuitable (e.g., drilling spoils were wet and mud-like). Other soils removed and disposed of off site were based on findings from the screening and sampling of suspect soils as noted in the next section. Except as noted in the next section for specific areas that were identified as potential environmental impacts, the large stockpiles were observed and screened by Hart Crowser personnel prior to reuse or off-site disposal. Screening activities included visual, olfactory, and photoionization detector (PID) assessment of soils.

A brief summary of the major excavation areas include:

- Soil spoils from installation of over 100 augercast piles (35 feet deep) in Building 1 footprint;
- Soil spoils from installation of over 500 augercast piles (45 feet deep) in Multiplex Theater footprint;
- Three major utility vaults (ranging from 10 to 13 feet deep) and covering a surface area of approximately 13,000 square feet;
- Five major utility trenches (ranging from 5 to 14 feet deep); and
- Overexcavation of shallow foundations (4 feet or less) for Buildings 2, 3, 4, 5, 6, 7, and 8).

In addition, dozens of additional shallow excavations (less than 4 feet) were conducted to connect the major utilities to the buildings. The entire site will be capped predominantly with buildings and asphalt parking.

Hart Crowser Site Visits and Screening Activities

During the course of the construction activities, Hart Crowser was requested to observe and assess potential areas of suspect environmental conditions in accordance with the CCP. This section provides a chronological summary of the visits and assessments that took place. In some instances, soil samples were collected and chemically analyzed.

September 17, 2004. Hart Crowser personnel assessed possible creosote-impacted soil on this date. During trenching for installation of a sewer line west of Building 1, several buried creosote-treated pilings were encountered, and the adjacent soil had a creosote odor. LCL stockpiled the potentially impacted soil on site and covered it with plastic sheeting. The

pilings were also excavated, stockpiled separately on site, and covered with plastic sheeting. Hart Crowser personnel collected, screened, and analyzed one soil sample from the soil stockpile and three discrete soil verification samples from the trench to verify the material had been successfully excavated and remaining soils were below cleanup criteria. There were no PID readings recorded from the soil stockpile.

The results of the one stockpile sample submitted for analysis indicated a low concentration (130 mg/kg) of petroleum hydrocarbons in the creosote-range. The verification samples collected from the trench were non-detect for creosote and petroleum hydrocarbons.

September 21, 2004. Hart Crowser personnel observed the relocation of two potentially creosote-impacted soil stockpiles on this date. The soil in the stockpiles originated from the trenching for sewer and stormwater lines installed previously. Two stockpiles were created immediately west of the construction trailers on the site. The two stockpiles were created based on observations (odor primarily) in the field. Stockpile A (SP-A) consisted of soil that was considered to have a higher potential for creosote impacts, and stockpile B (SP-B) was considered less likely to contain creosote-impacted soil. One composite sample was collected from the second stockpile (SP-B), screened for volatile organic compounds (VOCs), and submitted to the chemical laboratory for analysis. The stockpiles were estimated to be approximately 20 and 30 cubic yards, respectively.

The sample from SP-B was the only sample submitted for analysis on this date because a sample from SP-A had been collected and submitted for analysis on September 17, 2004. The sample from SP-B was non-detect for petroleum hydrocarbons, including creosote.

Although the concentration of creosote in the one stockpile sample was below the MTCA Method A cleanup level, the soil was transported and disposed of off site to Columbia Ridge Landfill through Waste Management.

November 23, 2004. Hart Crowser personnel evaluated an area in the southcentral area (Building 1 footprint) of the property on this date. Pilings were being installed in this area, and suspect odors were noted. Seven samples from auger spoils were collected from two pilings, 40 and 51. These samples were screened by visually and olfactory means, and with the PID. There were no indications of environmental concerns because the PID readings remained at background levels (~0.0 ppm), there was no soil discoloration, no sheen was observed, there was no petroleum odor, and the suspect odor diminished over a short period of time. The spoils from the auger drilling were deemed geotechnically unsuitable and were transported and disposed of off site, including the spoils from these two pilings. No other odors or staining were noted in the remaining auger spoils during augercast pile

installation. Over 600 piles were drilled on site to depths ranging from 35 to 45 feet below the ground surface.

February 2, 2005. Hart Crowser personnel evaluated suspect soils on this date in the area of the foundation footing on the south side for the movie theatre complex near the parking garage used by Seattle Sounder commuter train. During excavation of the trench for the footing, the excavator operator noted a petroleum-like odor. Hart Crowser collected two soil samples from the bottom of the trench. The area where the trench was being installed was comprised of fill material and construction debris including steel rebar, roofing shingles, pieces of porcelain, heavy gauge wire, and an empty plastic bags. Soil excavated from the trench was stockpiled on site.

The two soil samples collected were submitted for chemical analysis. One of the soil samples (HC-002) contained TPH concentrations below the MTCA cleanup levels for petroleum in the heavy oil-range. The other sample (HC-003) had a detectable concentration of 3,000 mg/kg, which is above the MTCA cleanup level of 2,000 mg/kg. Additional excavation in the trench was to occur the following day.

February 3, 2005. Hart Crowser personnel collected additional samples from the trench previously sampled on February 2. Two samples from the side walls of the trench, one from the stockpile, and two from 22 inches below the bottom of the trench or about 6 feet below the ground surface were collected. The verification soil samples were collected to verify that the petroleum-impacted soils above MTCA Method A cleanup level identified on February 2, 2005, had been removed.

The five samples were submitted for analysis and were non-detect for petroleum hydrocarbon. Based on observations, chemical analysis results as heavy oil, and conversations with the contractor, it was determined that it was possible that the petroleum-impacted soil noted on February 2, 2005, may have been the result of heavy equipment residue and stormwater entering the trench. In addition, Hart Crowser was requested to evaluate the general area of where the petroleum odor was noted.

February 7, 2005. At the request of VCC, Hart Crowser's Certified Industrial Hygienist (CIH), Elisabeth Black, conducted a site visit to evaluate the property, specifically in the area of excavation activities for the movie theater complex. Based on Elisabeth's review of the history of the property, cleanup activities, and recent findings during construction activities, she determined that the potential for contractor workers on site to encounter significantly contaminated soils and experience a hazardous chemical exposure was low and that excavation and trenching may continue. As requested by VCC, Hart Crowser prepared a

letter confirming our findings and that construction activities could continue as long as the CCP continued to be used and implemented when appropriate.

Hart Crowser personnel continued to observe and evaluate, including air monitoring, the northwest area of the movie theatre complex. One soil sample was collected on February 7, 2005. Hart Crowser personnel also observed and sampled a black resin-type substance, which was discovered during foundation footing trenching in the northwest corner of the theater. A soil sample was collected from the area where the black resin was observed, and a sample of the resin was also collected.

The soil sample collected and analyzed from the northwest corner and from the soil near the black resin were non-detect for petroleum hydrocarbons, VOCs, and pesticides.

February 15, 2005. Hart Crowser personnel was on the site again to evaluate suspect petroleum-impacted soil identified during trenching for one of the foundation footings for the movie theatre complex. The excavator operator reported a petroleum-like odor from the same general area as was evaluated on February 2 and 3, 2005. One stockpile sample and two samples from the trench were collected for TPH analysis. The analytical results were non-detect for petroleum.

March 1, 2005. Hart Crowser personnel collected a sample of a solid white substance that looked like a plastic resin from the northwest corner of the movie theatre complex. The sample came from a detioriated container encountered during the excavation of one of the foundation footings for the movie theatre. The remnants of the container containing the white substance was near another dilapidated container, which contained the black resin-type substance that was sampled by Hart Crowser on February 7, 2005. The sample had no discernible odor or sheen and a PID reading of 0.0 ppm.

Advanced Analytical performed a Toxicity Characteristic Leaching Procedure (TCLP) test on the sample and performed Method 8270 C analysis for VOCs on the leachate. The analytical results were non-detect for the compounds analyzed. Based on our findings and lab results, the contractor was notified on March 3, 2005, that the resin could be disposed of as municipal solid waste.

March 14, 2005. Hart Crowser personnel conducted a site visit based on a request from LCL to observe and screen samples from a stockpile from drill auger spoils in the area of the movie theatre complex. No sheens, discolorations, odors, or stains were noted. Over a dozen samples were collected and screened with the PID for VOCs. Sheen tests were also

conducted on the soils. There were no indications of potential contamination, and the drill auger spoils were transported and disposed of off site as non-hazardous material.

March 15, 2005. Hart Crowser personnel were on site to observe and screen samples from two separate stockpiles, which were eventually going to be either reused on the site or disposed of off site. One stockpile (Pad 10) reportedly contained surface soil/topsoil from the site. The second stockpile reportedly contained additional drill auger spoils and other excavated material. No sheens, discolorations, odors, or stains were noted. Ten samples were collected and screened with the PID for VOCs and tested for sheen. There were no indications of potential impacts.

In summary, since July 2004, demolition and construction activities have been conducted under review by Hart Crowser and the CCP to protect workers and the public from potential exposure to any chemicals of concern. Based on the number of requested site visits by LCL and VCC, it is apparent the CCP has been a useful tool in monitoring the potential exposure. Except as noted above, no stained soils or USTs were identified and no past or new impacted soils were discovered during mass excavation, deep augercast pile drilling, and extensive trenching for utilities, stormwater vaults, and foundation footings for the proposed buildings.

Sincerely,

HART CROWSER, INC.

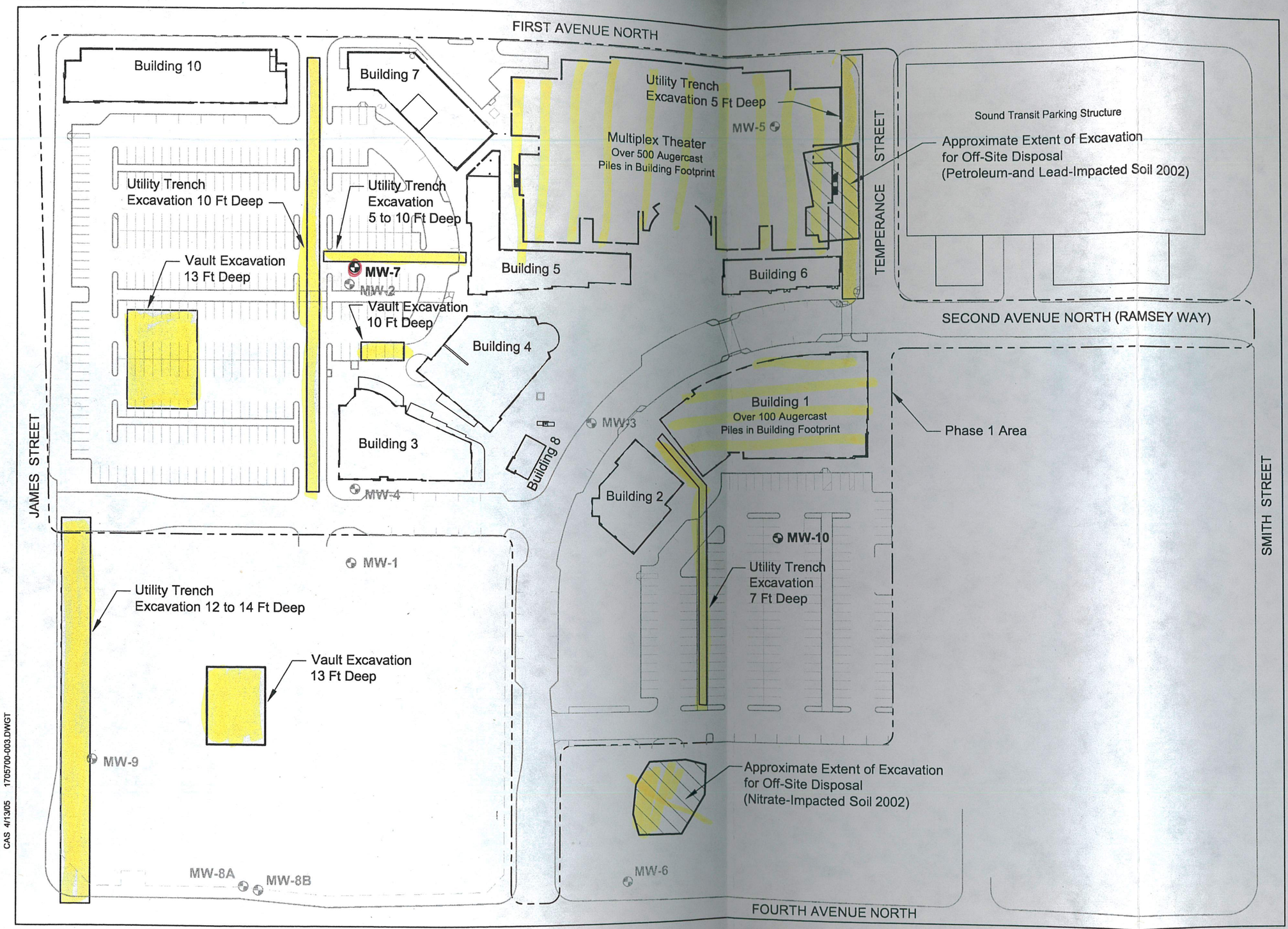
JULIE K. W. WUKELIC
Senior Principal

EVAN C. GRIFFITHS, PH.D., P.E.
Environmental Engineer

Attachments:
Figure 1 - Site Plan
Photographs

F:\docs\jobs\1705700\Kent Summary of Obs Letter.doc

Site Plan



CAS 4/13/05 1705700-003.DWGT

Source: Base map prepared from architectural plan provided by Coallison Architecture, Inc., titled Phase 1 Site Plan.

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17057-00 *4/05*

Figure 1

KENT STATION SITE CONSTRUCTION
OCTOBER 20, 2004

December 2004

February 2005