

1.0 EXECUTIVE SUMMARY

At the request of David J. Guild Investment Properties, Silva Environmental Consulting & Assessments, Inc. (SECA) performed a Phase 1 Environmental Site Assessment at the property located at 11406 & 11408 NE Rosewood Avenue in Vancouver, Washington 98662. Records compiled by federal, state, and local agencies were reviewed for the subject property and adjacent properties. These records included the **Clark** County Tax Assessor's and Recorder's records, the Historical Society records, and select records maintained by the EPA and the Washington Department of Ecology. Environmental Data Resources (EDR) was utilized to perform part of the Federal, State, Local and Tribal records review.

This investigation presents a review of readily available information and limited observations of the site. This information is accurate to the best of SECA's knowledge.

Subject Property:

Field inspections of the property were conducted in August & September of 2020 that consisted of walk-through inspections of the subject property. At this time, observations were made of the subject property and the neighboring properties. The subject property consists of approximately 3.61 acres of land and is occupied by two multi-unit warehouse buildings. There are 24 individual warehouse units and some tenants occupy multiple units. The buildings were built in 1975 and consist of approximately 40,180 square feet (20,100 SF & 20,080 SF). The metal buildings are equipped with concrete floors and overhead doors (one per unit). Some of the units have built-in finished office spaces, mezzanine storage and restrooms.

Exterior areas of the property consist of asphalt paved parking/driveway areas between the buildings and along the north, east and west sides of the buildings, additional gravel parking areas on the south side of the buildings, gravel parking area at the north end of the paved area and a grass field area at the north end of the property. The property is serviced by public utilities (city sewer/city water). A new sewer system/connection with utility vaults appeared to be installed in the asphalt area through the center of the property.

Tenants of the buildings consist of automotive repair related businesses, general warehouse storage tenants, and light industrial tenants. Below is a list of current tenants at the time of the assessment.

11406 Warehouse Units

- A-Metropolitan Hardwood Floors
- B-American RV Repair
- C-Holes Unlimited (used for Storage)
- D-American RV Repair
- E-Tuff Turf
- F-Tuff Turf
- G Stair Crafters (wood shop)
- H-Prewitt Hardwood Floors
- I- Prewitt Hardwood Floors
- J- GB Repair & Restoration
- K-Buell Contracting
- L-Mr. Powder Kote

11408 Warehouse Units

A-Unlimited V-Dub

B- Unlimited V-Dub

C-American RV

D-American RV

E-B&L Car Care

F-Tuff Turf

G-Tuff Turf

H-B&L Car Care

I-American RV Repair

J-DB Machine Sales

K-Unlimited V-Dub

L-Vacant (formerly Golf Cart Maintenance Shop-owner deceased)

During the physical inspection, SECA observed a few drums and containerized materials of automotive related fluids in the automotive repair units. In addition, a 275-gallon aboveground used oil tank was observed in the Unlimited F-Dub unit and a 300-gallon poly tote of used oil was observed in the B&L Car Care unit. All of the containerized materials, drums and AST's appeared in good condition and free of any leaks or spills. Used oil and used antifreeze are pumped out and recycled by Emerald Environmental Services on a routine basis. Minor surface stains were observed in the auto repair units where vehicles were currently being worked on. There are no drains or sumps in any of the units. The auto repair tenants indicated that surface stained areas are cleaned up daily with absorbent materials. The auto repair units are equipped with above ground hydraulic lifts. There were no below ground lifts observed.

Several containerized materials of lawn maintenance products and bags of fertilizers were observed in the Tuff Turf units. All of the containerized materials and bags observed appeared to be labeled, properly stored and free of any leaks or spills. All of the materials are used off-site at customer locations. Tuff Turf uses the warehouse space for storage and dispatch of work crews. The site representative indicated that SDS sheets are kept on file and available for review.

Several boxes/containers of powder coating/epoxy products were observed in the unit occupied by the Mr. Powder Kote business (Unit L at 11406 building). Mr. Powder Kote uses non-hazardous products for powder coating applications of a variety of metal objects for commercial and residential customers. The representative indicated that there is no hazardous waste generation or disposal involved in his process. Powder coating is a type of coating that is applied as a free-flowing, dry powder. Unlike conventional liquid paint which is delivered via an evaporating solvent, powder coating is typically applied electrostatically and then cured under heat. It is usually used to create a hard finish that is tougher than conventional paint. The unit is equipped with a small spray booth for the initial application and a large heat curing kiln/oven. All of the containerized materials and containers observed appeared to be labeled, properly stored and free of any leaks or spills.

Several containerized materials (paints/auto fluids) were observed in Unit L of the 11408 building formerly occupied by a Golf Cart Repair Business. In addition, minor surface stains were observed in the unit. It is SECA's understanding that the unit has been abandoned (occupant deceased) for several months.

Site History

Historical records indicate that the subject property was vacant undeveloped land until construction of the existing buildings in 1975. Historical aerial photographs between 1935 and 1970 did not indicate any structures or obvious use of the subject property. The subject property was commercially developed by Grimm Enterprises (Grimm Family) in 1975 with the construction of the existing multi-unit buildings. The subject property appeared fully developed with the construction of both buildings in the 1975 historical aerial photograph. Aerial photographs from 1975 to present indicate the same building/parking lot configuration. Historical city directories indicate listings for automotive repair related businesses, general warehouse storage tenants, and light industrial tenants. The ownership of the property is currently listed as Grimm Joseph D. & Grimm Carolyn M. Trustees.

Regulatory Records – Subject Property

The subject property is identified in the ALLSITES, Confirmed or Suspected Contaminated Site (CSCSL) and Hazardous Sites (HSL) databases. The listing is for Commercial Radiator Service formerly located in unit L at 11408 NE Rosewood Avenue. The release was reported in 1997. The property ownership (trustee) indicated that they were not aware of any prior reports, subsurface investigations or environmental issues at the subject property. The DOE records indicate that the site does not have regulatory closure and is still an active site awaiting cleanup. Historical records indicate that the former radiator tenant vacated the site in the early 2000's (between 2005-2010).

DOE records from 1998 indicate that the site was operating as an auto and farm equipment radiator repair shop that operated at the site for 28 years. There are no floor drains inside the unit. Neighbors in the complex reported that the owner/operator/sole employee, Mr. Victor Milligan, flushed radiators and the associated chemicals directly to the asphalt, which then drained to the soil. The 1998 site investigation summary indicates that there was a 2-foot-wide crimson stain on the asphalt in front of the shop leading to the adjacent grassy area east of the property. The summary indicates that the vegetation at the point of discharge in the soil was stained crimson in some areas, and antifreeze green in other areas. The area of stained soil extended under a cyclone fence and onto the adjacent property to the east.

Soil samples were collected and analyzed for Lead, Copper and Zinc. Analytical results for total Lead were above the State of Washington Model Toxics Control Act (MTCA) Method A Non-Industrial Soil Cleanup Levels. Analytical results for total Copper & Zinc were above the MTCA Method B 100 x Groundwater Formula values for soil.

The DOE site summary report indicates the site status as “awaiting cleanup”. The site rank is listed as 4 – Low-Moderate Risk. DOE available records on-line were limited. A request for the full file was submitted to DOE in August of 2020. Due to Covid-19, archived records requests are experiencing exceptionally long waits and could be up to 4-8 weeks. Based on the open regulatory file, lack of regulatory closure and the fact that the last site regulatory status up-date was in 1998 on DOE's regulatory activity summary posted online; it is unlikely that significant additional data would change the recognized environmental condition and/or general recommendations in this report. Any additional information received from DOE will be forwarded to client and should be included in any future investigations or reports.

Copies of available DOE records available at the time of the assessment can be found in Appendix F.

Regulatory Records - Adjacent and Nearby Sites:

The EDR report identified three Hazardous Sites (HSL) within 1 mile of the subject property, eight Confirmed or Suspected Contaminated Site (CSCSL) within 1 mile of the subject property, 1 Voluntary Cleanup site (VCP) within ½ mile of the subject property, four independent cleanup sites within ½ mile of the subject property and six Leaking Underground Storage Tank Site (LUST) within ½ mile of the subject property. A copy of the EDR regulatory database report can be found in section 5.1.2 and in **Appendix G**.

Conclusion:

The results of this investigation represent a review of current conditions, based on available information and limited observations. Silva Environmental Consulting & Assessments, Inc. (SECA) has performed a Phase 1 Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 at the property located at 11406 & 11408 NE Rosewood Avenue in Vancouver, Washington 98662. Any exceptions to, or deletions from this practice are described in Section 9.5 of this report. This assessment has revealed no evidence of *recognized environmental conditions* or *controlled recognized environmental conditions* in connection with the property except the following:

- ***DOE Hazardous Sites & Confirmed or Suspected Contaminated Site Listings:*** The subject property is identified in the Confirmed or Suspected Contaminated Site (CSCSL) and Hazardous Sites (HSL) databases. The listing is for Commercial Radiator Service formerly located in Unit L at 11408 NE Rosewood Avenue. The DOE records indicate that the site does not have regulatory closure and is still an active site awaiting cleanup. The release was reported in 1997. Historical records indicate that the former radiator tenant vacated the site in the early 2000's (between 2005-2010). The property ownership (trustee) indicated that they were not aware of any prior reports, subsurface investigations or environmental issues at the subject property.

DOE records from 1998 indicate that the site was operating as an auto and farm equipment radiator repair shop that operated at the site for 28 years. There are no floor drains inside the unit. Neighbors in the complex reported that the owner/operator/sole employee, Mr. Victor Milligan, flushed radiators and the associated chemicals directly to the asphalt, which then drained to the soil/vegetated area. The 1998 site investigation summary indicates that there was a 2-foot-wide crimson stain on the asphalt in front of the shop leading to the adjacent grassy area east of the property. The summary indicates that the vegetation at the point of discharge in the soil was stained crimson in some areas, and antifreeze green in other areas. The area of stained soil extended under a cyclone fence and onto the adjacent property to the east.

Soil samples were collected and analyzed for Lead, Copper and Zinc. Analytical results for total Lead were above the State of Washington Model Toxics Control Act (MTCA) Method A Non-Industrial Soil Cleanup Levels. Analytical results for total Copper & Zinc were above the MTCA Method B 100 x Groundwater Formula values for soil.

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the last site regulatory status up-date was in 1998 on DOE's regulatory activity summary posted online; it is unlikely that significant additional data would change the recognized environmental condition and/or general recommendations in this report. Any additional information received from DOE will be forwarded to client and should be included in any future investigations or reports.

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Opinion: The open regulatory file on the DOE Confirmed or Suspected Contaminated Site (CSCSL) and Hazardous Sites (HSL) database is a *recognized environmental condition*. It appears that additional investigation and/or assessments to resolve the regulatory listings were never completed. SECA recommends performing additional subsurface investigations to evaluate the current conditions and environmental impacts to the site. SECA also recommends entering the DOE Voluntary Cleanup Program and performing the necessary steps to obtain regulatory closure (NFA).

- **Evaluation of Non-scope Environmental Considerations:** Several containerized materials (paints/auto fluids) were observed in Unit L of the 11408 building formerly occupied by a Golf Cart Repair Business. In addition, minor surface stains were observed in the unit. It is SECA's understanding that the unit has been abandoned (occupant deceased) for several months. *As a general site management activity, all of the containerized materials in the abandoned golf cart repair shop business should be properly disposed of and surface stained areas should be cleaned up.*

2.0 INTRODUCTION

2.1 SPECIAL TERMS AND CONDITIONS

This Site Assessment was completed based on the *All Appropriate Inquiry* rule for Phase 1 Environmental Site Assessments. All work was completed by an Environmental Professional (Misty Silva) as required and defined in the AAI rule.

2.2 INVOLVED PARTIES

This report presents the results of a Phase 1 Environmental Site Assessment at the property located at 11406 & 11408 NE Rosewood Avenue in Vancouver, Washington 98662. SECA was retained by **David J. Guild Investment Properties** to perform the assessment for the purpose of evaluating the site for any *recognized environmental conditions*. The property is owned by Grimm Joseph D & Grimm Carolyn M. Trustees.

2.3 CONFIDENTIALITY & USER RELIANCE

Under the contract agreement between SECA and David J. Guild Investment Properties, SECA will not disclose confidential data, including the conclusion or recommendations, to anyone other than the undersigned, including the owner of the property, borrower, or any other individual connected directly or indirectly to this transaction, unless authorized by the undersigned. Authorized “Users” of this Phase 1 Environmental Site Assessment is David J. Guild Investment Properties. Reliance by others is prohibited without the permission of David J. Guild Investment Properties & SECA.

2.4 SIGNIFICANT ASSUMPTIONS

It is assumed that all interviews, agency records, site conditions and historical information obtained for this report were provided in good faith, is accurate and complete to the point of being reasonably ascertainable data satisfying the *All Appropriate Inquiry* requirements.

2.5 PURPOSE AND SCOPE OF WORK

The purpose of the Phase 1 Environmental Site Assessment was to evaluate the site for recognized environmental conditions, as defined below. The ESA may also satisfy one of the requirements for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (hereinafter, the “landowner liability protections,” or “LLPs”): that is, the practice that constitutes “*all appropriate inquiry* into the previous ownership and uses of the property consistent with good commercial or customary practice”.

As defined in the American Society of Testing and Materials (ASTM) Practice E 1527-13, *recognized environmental conditions* means the presence of likely presence of any *hazardous substances* or *petroleum products* in, on, or at a *property*: (1) due to a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term is not intended to include *de minimus* conditions that generally do not present a material risk of harm 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 government agencies. De minimis conditions are not *recognized environmental conditions*.

The Phase 1 Assessment was performed under conditions of, and in accordance with the guidelines outlined in, ASTM E1527-13, *Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process*. The Phase 1 Environmental Assessment was performed by an Environmental Professional (Misty Silva) as required and defined in the AAI rule. The Phase 1 scope of work included the following components:

- * The Phase 1 Environmental Site Assessment was performed by an Environmental Professional as required and defined in the new AAI rule.
- * A historical review of records related to the subject property to ascertain whether evidence exists that prior usage may have contributed to a potential risk for environmental concern. The review of historical databases included information on file with the pertinent county, Sanborn Fire Insurance maps, city directories, aerial photographs and prior environmental reports if available.
- * Review a current database report of available federal, state and local regulatory agency lists of known or potential hazardous waste sites or landfills, and sites currently under investigation for environmental concerns. The records review will also include available Tribal records, Engineering & Institutional Control sites as required by the new AAI rule.
- * Performed a physical inspection of the subject property to identify and assess potential characteristics of environmental concern. This involved physically walking around the subject property and through any accessible structures on the subject property. The physical inspection was documented via field notes and photographs. At the time of the physical inspection, SECA will also observe business types and obvious business practices adjacent to the subject property that may potentially impact it.
- * Conducted interviews with the property owner and occupants to evaluate site history and operations.
- * Preparing and submitting a final written report of all pertinent data collected including observations and recommendations for the site.
- * Sampling and analysis were not included as part of this Phase 1 Environmental Site Assessment.

2.6 PREVIOUS ENVIRONMENTAL/GEOTECHNICAL INVESTIGATIONS

The subject property is identified in the ALLSITES, Confirmed or Suspected Contaminated Site (CSCSL) and Hazardous Sites (HSL) databases. The listing is for Commercial Radiator Service formerly located in unit L at 11408 NE Rosewood Avenue. The release was reported in 1997. The property ownership (trustee) indicated that they were not aware of any prior reports, subsurface investigations or environmental issues at the subject property. The DOE records indicate that the site does not have regulatory closure and is still an active site awaiting cleanup. Historical records indicate that the former radiator tenant vacated the site in the early 2000's (between 2005-2010).

DOE records from 1998 indicate that the site was operating as an auto and farm equipment radiator repair shop that operated at the site for 28 years. There are no floor drains inside the unit. Neighbors in the complex reported that the owner/operator/sole employee, Mr. Victor Milligan, flushed radiators and the associated chemicals directly to the asphalt, which then drained to the soil. The 1998 site investigation summary indicates that there was a 2-foot-wide crimson stain on

the asphalt in front of the shop leading to the adjacent grassy area east of the property. The summary indicates that the vegetation at the point of discharge in the soil was stained crimson in some areas, and antifreeze green in other areas. The area of stained soil extended under a cyclone fence and onto the adjacent property to the east.

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3.0 SITE DESCRIPTION

3.1 LOCATION AND LEGAL DESCRIPTION

- Site Address: 11406 & 11408 NE Rosewood Avenue in Vancouver, Washington 98662
- County: Clark County
- Zoning: IL – Industrial
- Map & Tax Parcel: T-2 North, R-2 East, Section 10 Parcel 157502-000 (3.61 acres)
- Abbreviated Legal: #Sub-Div Nerton EST #2 of Lot 5 – 3.61A

3.2 SITE AND VICINITY CHARACTERISTICS

The subject property consists of approximately 3.61 acres of land on one Tax Parcel in Clark County. The location is also known under the Federal Rectangular Quadrant System as being within Section 10, Township 2-North, Range 2-East of the Willamette Meridian. The subject property is bound on the south by NE Rosewood.

The subject property is occupied by two multi-unit warehouse buildings. There are 24 individual warehouse units and some tenants occupy multiple units. The buildings were built in 1975 and consist of approximately 40,180 square feet (20,100 SF & 20,080 SF). The metal buildings are equipped with concrete floors and overhead doors (one per unit). Some of the units have built-in finished office spaces, mezzanine storage and restrooms.

Exterior areas of the property consist of asphalt paved parking/driveway areas between the buildings and along the north, east and west sides of the buildings, additional gravel parking areas on the south side of the buildings, gravel parking area at the north end of the paved area and a grass field area at the north end of the property. The property is serviced by public utilities (city sewer/city water). A new sewer system/connection with utility vaults appeared to be installed in the asphalt area through the center of the property.

Tenants of the buildings consist of automotive repair related businesses, general warehouse storage tenants, and light industrial tenants. Below is a list of current tenants at the time of the assessment.

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D-American RV
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G-Tuff Turf
H-B&L Car Care
I-American RV Repair
J-DB Machine Sales
K-Unlimited V-Dub
L-Vacant (formerly Golf Cart Maintenance Shop-owner deceased)

3.3 PAST USES OF THE PROPERTY (summary)

Historical records indicate that the subject property was vacant undeveloped land until construction of the existing buildings in 1975. Historical aerial photographs between 1935 and 1970 did not indicate any structures or obvious use of the subject property. The subject property was commercially developed by Grimm Enterprises (Grimm Family) in 1975 with the construction of the existing multi-unit buildings. The subject property appeared fully developed with the construction of both buildings in the 1975 historical aerial photograph. Aerial photographs from 1975 to present indicate the same building/parking lot configuration. Historical city directories indicate listings for automotive repair related businesses, general warehouse storage tenants, and light industrial tenants. The ownership of the property is currently listed as Grimm Joseph D. & Grimm Carolyn M. Trustees.

3.4 CURRENT USES OF THE PROPERTY

The subject property consists of approximately 3.61 acres of land and is occupied by two multi-unit warehouse buildings. There are 24 individual warehouse units and some tenants occupy multiple units. The buildings were built in 1975 and consist of approximately 40,180 square feet (20,100 SF & 20,080 SF). The metal buildings are equipped with concrete floors and overhead doors (one per unit). Some of the units have built-in finished office spaces, mezzanine storage and restrooms.

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L-Vacant (formerly Golf Cart Maintenance Shop-owner deceased)

3.5 CURRENT USES OF ADJOINING PROPERTIES

Most of the properties surrounding the subject property consist of commercial properties.

- North: Distribution Warehouse
- South: NE Rosewood/Rose Retail Center (Walgreens/Blind Onion Etc.)
- West: Covington Middle School
- East: Tri-Tech Heating & Cooling

4.0 USER PROVIDED INFORMATION

4.1 TITLE RECORDS

User did not provide any title records or preliminary title report.

4.2 ENVIRONMENTAL LIENS, ACTIVITY OR USE LIMITATIONS

The county records did not indicate any environmental liens against the subject property. The property representative was not aware of any environmental liens, activity and/or use limitations.

4.3 SPECIALIZED KNOWLEDGE

None Provided.

4.4 VALUATION REDUCTION FOR ENVIRONMENTAL LIENS

None Provided.

4.5 PURCHASE PRICE AND FAIR MARKET VALUE

The relationship of the purchase price and fair market value was not included in this report. Such information is only included and disclosed if the client supplies SECA with substantial documentation of the purchase agreement, appraisal and market value of the property. Otherwise, SECA will assume that the client prefers that the purchase information be kept confidential. None provided.

4.6 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION

The property is owned by Grimm Joseph D & Grimm Carolyn M. Trustees. The property representative interviewed at the time of the Assessment was Ms. Rachael Sapp (property manager) via questionnaire.

4.7 REASON FOR PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

SECA performed this Phase 1 Environmental Site Assessment for the purpose of identifying *Recognized Environmental Conditions (RECS)* at the property. It is SECA's understanding that the Phase 1 ESA was required as condition of a property transaction.

4.8 OTHER RELATED INFORMATION

None

5.0 RECORDS REVIEW

5.1 STANDARD ENVIRONMENTAL RECORD SOURCES

Environmental Data Resources (EDR) was retained to provide current listings of government databases for sites located within the ASTM/AAI standard radius of the subject site including Tribal, Engineering, and Institutional Control sites. The database report also provides a summary of the regulatory status of the subject site. A copy of the EDR report can be found in **Appendix G**. A summary of the findings of the EDR report is listed below.

5.1.1 Subject Property

The subject property is identified in the ALLSITES, Confirmed or Suspected Contaminated Site (CSCSL) and Hazardous Sites (HSL) databases. The listing is for Commercial Radiator Service formerly located in unit L at 11408 NE Rosewood Avenue. The release was reported in 1997. The property ownership (trustee) indicated that they were not aware of any prior reports, subsurface investigations or environmental issues at the subject property.

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5.1.2 Adjacent Property – Summary

The EDR report identified three Hazardous Sites (HSL) within 1 mile of the subject property, eight Confirmed or Suspected Contaminated Site (CSCSL) within 1 mile of the subject property, one Voluntary Cleanup site (VCP) within ½ mile of the subject property, four independent cleanup sites within ½ mile of the subject property and six Leaking Underground Storage Tank Site (LUST) within ½ mile of the subject property.

*Tri-Tech Heating located Vancouver is listed in the ALLSITES database. The ALLSITES database provides listing information on facilities and sites of interest to the Department of Ecology for tracking purposes only and does not indicate that a release has occurred. There were no reportable releases or spills. The site adjoins the east side of the subject property.

*US West Communications, located at 11508 4th Plain Blvd. is listed in the RCRA non-Gen, ICR, UST, LUST, CSCSL-NFA databases. The DOE records indicate that soil was impacted with diesel petroleum products and discovered during tank decommissioning activities in 1998. Soil remediation activities were completed in 2011. The cleanup completion/regulatory closure date was 8/20/12 and a No Further Action letter was issued. The site is located within 1/8 mile and approximately 591 feet southeast of the subject property.

*Geneva Woods Pharmacy located 6600 NE 112th is listed in the manifest, RCRA-SQG and ALLSITES database. The RCRA database indicates that the site is a Small Quantity Generator with no violations. The ALLSITES database provides listing information on facilities and sites of interest to the Department of Ecology for tracking purposes only and does not indicate that a release has occurred. There were no reportable releases or spills. The site is located within 1/8 mile and approximately 630 feet northwest of the subject property.

All other sites are over 1/8 mile away from the subject property.

CONTAMINATED SITES - SUMMARY & OPINION

Based on the review of regulatory records, regulatory closure, gradient and/or distance away from the subject property, the potential for concern of contaminants or potential environmental liabilities from adjacent properties impacting the subject property appears to be minimal. The owner of the subject property would not generally be considered a primary potentially responsible party for any cleanup that may be required from contamination originating from other properties. *It is SECA's opinion that additional investigation of offsite sources is not warranted.*

5.2 ADDITIONAL ENVIRONMENTAL SOURCES

5.2.1 Fire Department

The local fire department did not indicate any environmental or release incidents at the subject property.

5.3 PHYSICAL SETTING SOURCE

5.3.1 Soil/Geologic Conditions: According to the Soil Survey of Clark County, printed by the United States Department of Agriculture Soil Conservation Service, the soils in the area of the subject property are characterized as Sifton gravelly loam, 0 to 3 percent slopes (SvA). In a typical profile the surface layer is gravelly loam about 16 inches thick. It is black in the upper part and very dark brown in the lower part. The layer below is very friable, dark-brown very gravelly loamy coarse sand about 8 inches thick. The underlying material, to a depth of 60 inches, is very dark grayish-brown very gravelly coarse sand.

5.3.2 Hydrologic Conditions: Surface water in the near proximity of the site consists of Burnt Bridge Creek located within 3/4 miles south of the subject property. Annual precipitation is 45 inches. The EDR report indicates that the property is outside of the 100- and 500-year flood zones. The subject property is not listed in the State or National Wetlands inventory.

5.4 HISTORICAL USE INFORMATION

A historical review of records related to the subject property was conducted to ascertain whether evidence exists that prior usage may have contributed to a potential risk for environmental contamination. The review included examination of ownership records when available, city directories, and historical maps.

5.4.1 Aerial Photographs:

Historical aerial photographs were reviewed through EDR & Google Earth. Photographs were reviewed for the following years: 1935, 1951, 1960, 1970, 1975, 1981, 1986, 1990, 2006, 2000, 2006 and 2019. A chronological summary is included below.

Review Comments

- | | |
|------|--|
| 1935 | The subject property appears to be vacant undeveloped land. Adjoining properties appear mostly vacant with some residential development. |
| 1951 | The subject property appears to be vacant undeveloped land. Adjoining properties appear mostly vacant with some residential development. |
| 1960 | The subject property appears to be vacant undeveloped land. The adjacent property west appears developed with the existing Covington middle school. |
| 1970 | The subject property still appears to be vacant undeveloped land. The property southeast of the subject property appears commercially developed with the construction of a large warehouse building. Other adjacent properties appear the mostly residential or undeveloped. |
| 1975 | The subject property appears commercially developed the construction of the two existing buildings. |
| 1981 | The subject property and adjacent properties appear relatively the same. |
| 1986 | The subject property and adjacent properties appear relatively the same. |
| 1990 | The subject property and adjacent properties appear relatively the same. |
| 2000 | The subject property appears relatively the same. The adjacent property northwest appears commercially developed with the construction of a large warehouse building. |
| 2006 | The subject property appears relatively the same. Adjacent property east is still undeveloped. Other adjacent properties appear fully developed. |
| 2019 | The subject property appears relatively the same as it does today. The adjacent east property appears developed with the construction of the existing building. The subject property and adjacent properties appear relatively the same as they do today. |

5.4.2 Historical Maps

Sanborn Fire Insurance Maps were researched at the Clark County Historical Library. Sanborn Fire Insurance maps did not provide coverage for this area of Clark County.

5.4.3 City Directories:

Historical city directories were researched through EDR. Below is a summary of listings for the subject property address. Coverage for the area of the subject property was limited.

Year	Address	Description
1992	11406 NE Rosewood Ave 11408 NE Rosewood Ave	No listing Allied Production, Inc.
1995	11406 NE Rosewood Ave 11408 NE Rosewood Ave	Mr. Powder Kote Ottoboni Mushrooms Sherrell Cabinet & Commercial Spectrum Lighting B&L Car Care Commercial Radiator Forano Northwest Super Screen Tuff Turf, Inc. Unlimited V Dub
2000	11406 NE Rosewood Ave 11408 NE Rosewood Ave	Mr. Powder Kote Biztek Enterprises Inc. Sherrell Cabinet & Commercial Spectrum Lighting B&B Machine B&L Car Care Commercial Radiator DB machine Sau Mass Fabrication Tuff Turf, Inc. Unlimited V Dub
2005	11406 NE Rosewood Ave 11408 NE Rosewood Ave	Mr. Powder Kote Sabin Sound Product Holes Unlimited Spectrum Lighting Unlimited V Dub B&L Car Care Commercial Radiator DB machine Sales Mass Fabrication Tuff Turf, Inc. Unlimited V Dub
2010	11406 NE Rosewood Ave 11408 NE Rosewood Ave	Mr. Powder Kote Bidders Choice Auction Holes Unlimited Prewitt Hardwood B&L Car Care Commercial Radiator DB Machine Sales Mass Fabrication Onsite Equipment Repair Unlimited V Dub
2014	11406 NE Rosewood Ave	Mr. Powder Kote Holes Unlimited Stair Crafters Western Floors

	11408 NE Rosewood Ave	Prewitt Hardwood B&L Car Care American RV Repair Big Moore Motorsports DB Machine Sales Tuff Turf, Inc. Unlimited V Dub
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5.4.4 County Tax Assessors Records/Title Info:

The Clark County Tax Assessors and Auditors records were also researched to review property characteristics and ownership. The property is owned by Grimm Joseph D & Grimm Carolyn M. Trustees. SECA did not find any evidence of environmental liens associated with the subject property.

6.0 SITE RECONNAISSANCE

6.1 METHODOLOGY AND LIMITING CONDITION

The site reconnaissance consisted of a visual inspection of the interior and exterior areas of the subject property. Observations of the subject property and adjacent properties were documented via field notes & photographs. There were no adverse conditions limiting the site reconnaissance.

6.2 GENERAL SITE SETTING

The subject property consists of approximately 3.61 acres of land on one Tax Parcel in Clark County. The location is also known under the Federal Rectangular Quadrant System as being within Section 10, Township 2-North, Range 2-East of the Willamette Meridian. The subject property is bound on the south by NE Rosewood.

6.3 SITE INVESTIGATION OBSERVATIONS

6.3.1 Underground Storage Tanks (USTs)

SECA did not observe any evidence of former or existing underground storage tanks on the subject property. SECA researched the fire department records for any historical UST permits. No UST permits were found in the research.

Potential Concerns/Recommendations: None

6.3.2 Aboveground Storage Tanks (ASTs)

During the physical inspection, a 275-gallon aboveground used oil tank was observed in the Unlimited F-Dub unit and a 300-gallon poly tote of used oil was observed in the B&L Car Care unit. the AST & Tote appeared in good condition and free of any leaks or spills. Used oil and used antifreeze are pumped out and recycled by Emerald Environmental Services on a routine basis.

Potential Concerns/Recommendations: None.

6.3.3 Polychlorinated Biphenyl's (PCBs)

The Toxic Substances Control Act (TSCA) generally prohibited the domestic manufacture of PCBs after 1979. SECA observed two pad mounted transformers on the subject property. SECA did not observe any evidence of leakage around the transformer.

Potential Concerns/Recommendations: None

6.3.4 Waste Generation and Disposal

SECA did not observe any evidence of hazardous waste generation or disposal on the subject property other than used oil and antifreeze materials stored in the auto repair shops. It is SECA's understanding that Emerald Environmental Services recycles used oil and antifreeze from the auto repair shops on a routine basis.

Potential Concerns/Recommendations: None

6.3.5 Containerized Materials & Drums

During the physical inspection, SECA observed a few drums and containerized materials of automotive related fluids in the automotive repair units. In addition, a 275-gallon aboveground used oil tank was observed in the Unlimited F-Dub unit and a 300-gallon poly tote of used oil was observed in the B&L Car Care unit. All of the containerized materials, drums and AST's appeared in good condition and free of any leaks or spills. Used oil and used antifreeze are pumped out and recycled by Emerald Environmental Services.

Several containerized materials of lawn maintenance products and bags of fertilizers were observed in the Tuff Turf units. All of the containerized materials and bags observed appeared to be labeled, properly stored and free of any leaks or spills. All of the materials are used off-site at customer locations. Tuff Turf uses the warehouse space for storage and dispatch of work crews. The site representative indicated that SDS sheets are kept on file and available for review.

Several boxes/containers of powder coating/epoxy products were observed in the unit occupied by the Mr. Powder Kote business (Unit L at 11406 building). Mr. Powder Kote uses non-hazardous products for powder coating applications of variety of metal objects for commercial and residential customers. The representative indicated that there is no hazardous waste generation or disposal involved in his process. Powder coating is a type of coating that is applied as a free-flowing, dry powder. Unlike conventional liquid paint which is delivered via an evaporating solvent, powder coating is typically applied electrostatically and then cured under heat. It is usually used to create a hard finish that is tougher than conventional paint. The unit is equipped with a small spray booth for the initial application and a large heat curing kiln/oven. All of the containerized materials and containers observed appeared to be labeled, properly stored and free of any leaks or spills.

Several containerized materials (paints/auto fluids) were observed in Unit L of the 11408 building formerly occupied by a Golf Cart Repair Business. In addition, minor surface stains were observed in the unit. It is SECA's understanding that the unit has been abandoned (occupant deceased) for several months.

Potential Concerns/Recommendations: As a general site management activity, all of the containerized materials in the abandoned golf cart repair shop (unit L at 11408 building) should be properly disposed of.

6.3.6 Catch Basin Storm Drains

SECA observed stormwater catch basins in the asphalt paved area between the buildings. SECA did not observe any evidence of petroleum residual or staining inside or around the catch basins. According to the questionnaire completed by the property owner, the site is serviced by public utilities.

Potential Concerns/Recommendations: None

6.3.7 Surface Stains

SECA did not observe any evidence of heavy surface stains on the subject property. Minor surface stains were observed in the auto repair units where vehicles were currently being worked on. There are no drains or sumps in any of the units. The auto repair tenants indicated that surface stained areas are cleaned up daily with absorbent materials.

Minor surface stains were observed in the former golf cart repair shop unit (Unit L at 11408 warehouse). It is SECA's understanding that the unit has been abandoned (occupant deceased) for several months.

Potential Concerns/Recommendations: As a general site management activity, surface stained areas in the former Golf Cart repair shop unit (abandoned) should be properly cleaned up.

7.0 INTERVIEWS

Interviews are conducted to collect additional information about the past and present activities of the subject property or adjacent properties that may be useful in identifying any potential environmental concerns.

7.1 INTERVIEW 1 (Via Questionnaire Form)

In August of 2020, SECA received a completed questionnaire form from Ms. Rachael Sapp (property manager). Ms. Sapp indicated that the buildings were built in 1975. Current use/tenants consist of automotive repair businesses and storage. Ms. Sapp indicated that the property was serviced by public utilities. Ms. Sapp indicated that she was not aware of any prior reports, subsurface investigations or environmental issues at the subject property (via questionnaire).

* The property is currently part of an estate and it is SECA's understanding that the current trustees of the estate had very little knowledge of the site history or activities.

8.0 DATA GAPS & EVALUATION OF NON-SCOPE ENVIRONMENTAL CONSIDERATIONS

8.1 DATA GAPS

Documentation of data gaps as defined in AAI: a lack of or inability to obtain information required by the standards and practices listed in the regulation despite good faith efforts to gather such information. The objective the assessment is to gather the information required to satisfy the purpose of the assessment, rather than completion of specific tasks. Data gaps occur when the information required by the practice cannot be obtained despite good faith efforts. The practice requires consultants to comment on the impact of significant data gaps on their ability to identify recognized environmental conditions.

- DOE available records on-line were limited. A request for the full file was submitted to DOE in August of 2020. Due to Covid-19, archived records requests are experiencing exceptionally long waits and could be up to 4-8 weeks. Based on the open regulatory file, lack of regulatory closure and the fact that the last site regulatory status up-date was in 1998 on DOE's regulatory activity summary posted online; it is unlikely that significant additional data would change the recognized environmental condition and/or general recommendations in this report. Any additional information received from DOE would be included in future investigations/report if SECA is engaged in any follow-up investigations.
- The property is currently part of an estate and it is SECA's understanding that the current trustees of the estate had very little knowledge of the site history or activities.

8.2 EVALUATION OF NON-SCOPE ENVIRONMENTAL CONSIDERATIONS

8.2.1 Wetlands: The area of the subject property is not listed in the State or National Wetlands inventory

8.2.2 Asbestos Containing Material (ACM)

An asbestos survey was not performed as part of this site assessment. SECA did not observe any obvious significantly damaged suspect asbestos containing materials in the buildings.

8.2.3 Vapor Intrusion: A few sites with reported releases and cleanup activities were identified in the vicinity of the subject property (EDR report). None of the sites with reported releases (other than the subject property itself) adjoin the subject property and several of the sites have been remediated and/or have regulatory closure. It is SECA's opinion that it is unlikely adjacent contaminant sources reviewed in the EDR report have impacted the subject property.

8.2.4 Containerized Materials and Surface Stains: Several containerized materials (paints/auto fluids) were observed in Unit L of the 11408 building formerly occupied by a Golf Cart Repair Business. In addition, minor surface stains were observed in the unit. It is SECA's understanding that the unit has been abandoned (occupant deceased) for several months. *As a general site management activity, all of the containerized materials in the abandoned golf cart repair shop business should be properly disposed of and surface stained areas should be cleaned up.*

9.0 RESULTS OF INVESTIGATION **(FINDINGS, OPINIONS, RECOMMENDATIONS)**

9.1 RECOGNIZED ENVIRONMENTAL CONDITIONS ON SITE

The results of this investigation represent a review of current conditions, based on available information and limited observations. Silva Environmental Consulting & Assessments, Inc. (SECA) has performed a Phase 1 Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 at the property located at 11406 & 11408 NE Rosewood Avenue in Vancouver, Washington 98662. Any exceptions to, or deletions from this practice are described in Section 9.5 of this report. This assessment has revealed no evidence of *recognized environmental conditions* or *controlled recognized environmental conditions* in connection with the property except the following:

- ***DOE Hazardous Sites & Confirmed or Suspected Contaminated Site Listings:*** The subject property is identified in the Confirmed or Suspected Contaminated Site (CSCSL) and Hazardous Sites (HSL) databases. The listing is for Commercial Radiator Service formerly located in Unit L at 11408 NE Rosewood Avenue. The DOE records indicate that the site does not have regulatory closure and is still an active site awaiting cleanup. The release was reported in 1997. Historical records indicate that the former radiator tenant vacated the site in the early 2000's (between 2005-2010). The property ownership (trustee) indicated that they were not aware of any prior reports, subsurface investigations or environmental issues at the subject property.

DOE records from 1998 indicate that the site was operating as an auto and farm equipment radiator repair shop that operated at the site for 28 years. There are no floor drains inside the unit. Neighbors in the complex reported that the owner/operator/sole employee, Mr. Victor Milligan, flushed radiators and the associated chemicals directly to the asphalt, which then drained to the soil/vegetated area. The 1998 site investigation summary indicates that there was a 2-foot-wide crimson stain on the asphalt in front of the shop leading to the adjacent grassy area east of the property. The summary indicates that the vegetation at the point of discharge in the soil was stained crimson in some areas, and antifreeze green in other areas. The area of stained soil extended under a cyclone fence and onto the adjacent property to the east.

Soil samples were collected and analyzed for Lead, Copper and Zinc. Analytical results for total Lead were above the State of Washington Model Toxics Control Act (MTCA) Method A Non-Industrial Soil Cleanup Levels. Analytical results for total Copper & Zinc were above the MTCA Method B 100 x Groundwater Formula values for soil.

The DOE site summary report indicates the site status as "awaiting cleanup". The site rank is listed as 4 – Low-Moderate Risk. DOE available records on-line were limited. A request for the full file was submitted to DOE in August of 2020. Due to Covid-19, archived records requests are experiencing exceptionally long waits and could be up to 4-8 weeks. Based on the open regulatory file, lack of regulatory closure and the fact that the last site regulatory status up-date was in 1998 on DOE's regulatory activity summary posted online; it is unlikely that significant additional data would change the recognized environmental condition and/or general recommendations in this report. Any additional information received from DOE will be forwarded to client and should be included in any future investigations or reports.

Copies of available DOE records available at the time of the assessment can be found in Appendix F.

Opinion: The open regulatory file on the DOE Confirmed or Suspected Contaminated Site (CSCSL) and Hazardous Sites (HSL) database is a *recognized environmental condition*. It appears that additional investigation and/or assessments to resolve the regulatory listings were never completed. SECA recommends performing additional subsurface investigations to evaluate the current conditions and environmental impacts to the site. SECA also recommends entering the DOE Voluntary Cleanup Program and performing the necessary steps to obtain regulatory closure (NFA).

9.2 RECOGNIZED ENVIRONMENTAL CONDITIONS OFF SITE

Based on the review of regulatory records, regulatory closure, gradient and/or distance away from the subject property, the potential for concern of contaminants or potential environmental liabilities from adjacent properties impacting the subject property appears to be minimal. The owner of the subject property would not generally be considered a primary potentially responsible party for any cleanup that may be required from contamination originating from other properties. *It is SECA's opinion that additional investigation of off-site sources is not warranted.*

9.3 DE MINIMIS CONDITIONS

None

9.4 EVALUATION OF NON-SCOPE ENVIRONMENTAL CONSIDERATIONS

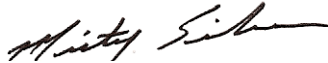
Several containerized materials (paints/auto fluids) were observed in Unit L of the 11408 building formerly occupied by a Golf Cart Repair Business. In addition, minor surface stains were observed in the unit. It is SECA's understanding that the unit has been abandoned (occupant deceased) for several months. *As a general site management activity, all of the containerized materials in the abandoned golf cart repair shop business should be properly disposed of and surface stained areas should be cleaned up.*

9.5 DEVIATIONS:

None

10.0 ENVIRONMENTAL PROFESSIONAL SIGNATURE/CERTIFICATION

This Site Assessment was completed based on the *All Appropriate Inquiry* rule for Phase 1 Environmental Site Assessments. I declare that I meet the definition of an Environmental Professional as defined by the AAI Rule. I declare that I have the qualifications, training and experience to assess the property and have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 C.F.R. Part 312. Any deviations from the standards are identified in section 9.5.



Misty Silva
Environmental Professional
Silva Environmental Consulting & Assessments, Inc. (SECA)
Unified Business ID #604-475-317
Tax ID #84-2238591

11.0 STATEMENT OF LIMITATIONS

A Phase 1 Environmental Site Assessment is not a comprehensive investigation. All portions of this Phase 1 investigation were conducted in a manner that is consistent with the generally accepted practices of such investigations now being performed in Oregon and Washington. This investigation is limited to a visual inspection of the subject property and surrounding area, and a review of the readily available records and databases mentioned in the body of this report. Because a Phase 1 investigation is limited in nature, SECA cannot accept responsibility for conditions arising after the investigation described in this report was performed, for conditions which were not perceptible at the subject property during the investigation, or through activities or incidents that have occurred and gone unreported to the databases that were reviewed during the course of investigation for this report. Due to report time-line constraints, individual regulatory files for adjacent properties were not reviewed as part of this assessment. SECA was only able to review regulatory records available on-line and through EDR.

Silva Environmental Consulting & Assessments, Inc. (SECA)

12.0 REFERENCES

- * Washington Department of Ecology (DOE)
- * Historical Society (Sanborn Maps/Metsker Maps/City Directories)
- * Clark County Tax Assessors & Recorders (Ownership Records/Plat Map/Appraisal Cards)
- * Clark County Land Use and Development Department
- * Local Fire Department
- * City of Vancouver
- * Clark County Historical Museum
- * Public Library
- * Soil Survey of Clark County, Oregon printed by the United States Department of Agriculture
Soil Conservation Service
- * Environmental Data Resources (EDR) (Regulatory/Tribal Records Review/Historical)
- * Google Earth (Aerial Photo's)
- * Rachael Sapp – Property Manager via Questionnaire