

# STEMEN ENVIRONMENTAL, INC.

P.O. BOX 3644  
LACEY, WASHINGTON 98509-3644  
CONTR. LIC. #STEMEEI081J9

RECEIVED  
DEPT. OF ECOLOGY/SWRO

Telephone 360-438-9521 Fax 360-412-1225

02 AUG 27 P 4:31

August 23, 2002

Ms. Kris Flint  
Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, Washington 98101

Dear Ms. Flint:

RE: COMFORT LETTER FOR COMMERCIAL PROPERTIES LOCATED AT 4030 SOUTH TACOMA WAY, TACOMA, WASHINGTON. TAX PARCELS # RO220134014, #R0220134015, and #R0220134016.

In preparation for a proposed real estate transaction, a Phase I Environmental Site Assessment was performed on the subject property by Secor Inc. Upon the completion of this Phase I E.S.A., Secor Inc. recommended that a Phase II E.S.A. be performed on the subject property. Secor Inc. proceeded to perform The Phase II E.S.A on the subject property. This Phase II E.S.A included the sampling of the subsurface soils and groundwaters at selected locations on the subject property

The results of the Phase II E.S.A confirmed the presence of V.O.C.'s (Volatile Organic Compounds) at levels that exceeded Ecology's applicable clean up levels in the groundwaters present beneath selected locations on the subject property.

\*\* It should be noted that not all of the soil samples obtained during this initial on-site investigation were screened for V.O.C.'s by appropriate laboratory analyses methods.

The results of Secor's investigation of the subsurface soils present beneath the subject property, indicated no presence of V.O.C.'s at above acceptable levels in the subsurface soils present at the selected sampling locations on the subject property where the soil samples were screened for V.O.C.'s by appropriate laboratory analyses methods.

Secor Inc. then recommended and proceeded to supervise the installation of four (4) groundwater monitoring wells at selected locations on the subject property.

During the installation of groundwater monitoring wells Secor Inc. proceeded to obtain a total of four (4) discreet soil samples from the soils present at selected depths in the soil borings. One (1) soil sample was obtained from each soil boring. These soil samples were submitted for laboratory analyses.

Secor Inc. then proceeded to obtain four (4) groundwater samples, via the newly installed monitoring wells, and submitted these samples for appropriate laboratory analyses. Secor also obtained groundwater elevation measurements at this time.

The results of this groundwater monitoring event confirmed the presence of V.O.C.'s, at levels that exceed Ecology's applicable clean up levels in the groundwaters that are present beneath selected locations on the subject property.

Laboratory analyses results for the four (4) investigative soil samples indicated no presence of V.O.C.'s at above acceptable levels.

Based on the groundwater elevations obtained during this groundwater monitoring event, Secor Inc. reported that the inferred direction of groundwater flow is to the north-northeast.

Subsequent groundwater elevation measurements obtained on December 17, 2001, also indicated that the inferred direction of groundwater flow is to the north-northeast.

Based on the information obtained during their on-site investigations, Secor Inc. concluded that it appeared that the impacted groundwaters present beneath the subject property were possibly impacted by an off-site source.

Our company, Stemen Environmental Inc. performed additional investigations of the shallow subsurface soils, which are present beneath selected locations on the subject property. All soil samples obtained during these on-site investigative activities were submitted for appropriate laboratory analyses and were screened for V.O.C.'s.

The results of these additional investigations of the subsurface soils present beneath selected locations on the subject property indicated no presence of V.O.C.'s, at levels that exceeded Ecology's applicable clean up levels, in these sampled soils.

We also were unable to identify an on-site source and/or source point for the release of V.O.C.'s to the groundwaters beneath the subject property.

Available information confirms that the groundwaters that were present beneath the South Tacoma Field Site were adversely impacted by V.O.C.'s/Halogenated Organic Compounds and that the E.P.A. chose to treat these adversely impacted groundwaters using natural attenuation.

It is my opinion, based on all currently available information, that as a reasonably anticipated part of the natural attenuation treatment process, some of the adversely impacted groundwaters have migrated (flowed) off-site/downgradient, and have potentially had an adverse impact on the groundwaters that are present beneath selected downgradient properties, and more specifically the subject property.

In discussions with Mr. Charles Cline of Ecology's Voluntary Clean Up Program, and Mr. Ken Leaderman of the Washington State Attorney General's Office, it was learned that, based on the currently available information, Ecology could most likely issue a notice of "No

Further Action Required” for the soils present beneath the subject property. Mr. Cline stated that even though it appeared that the groundwaters beneath the subject property had potentially been adversely impacted by off-site sources, the confirmed presence of V.O.C.’s, at levels that exceed Ecology’s applicable clean up levels, in the groundwaters beneath the subject property prohibited him from addressing these groundwaters in his notice.

It was recommended, by Mr. Letterman and Mr. Cline, that I should contact the E.P.A. Site Manager for the South Tacoma Field Site. It was suggested that I should have discussions with you about the issues associated with the adversely impacted groundwaters that are present beneath the subject site and the possibility that these groundwaters have been adversely impacted by the environmental conditions that exist on and/or beneath the South Tacoma Field Site.

In my initial discussions with you, after providing you with a brief verbal summary of the results of the on-site and off-site investigations performed on the subject property, it was learned that under extenuating circumstances similar to those described above, the E.P.A. can issue a “Comfort Letter” for the owners and/or potential purchasers of commercial properties that have been impacted in an adverse manor by confirmed conditions that exist on an upgradient and/or neighboring property which is controlled and/or under the direct supervision of the E.P.A.

It is my wish, on behalf of Mr. Brian Wilson, the current owner of the subject property, that such a letter be generated for my client’s property (subject site) for the purposes of facilitating financing for the proposed real estate transaction.

I have enclosed a copy of all the reports issued in association with the environmental investigations performed on the subject property and the site/area maps that you requested, during our recent phone conversation.

If you have any questions or need any further information regarding the above, please feel free to contact me.

Sincerely,



Paul W. Stemen  
Ecology-Registered Site Assessment Supervisor  
ASTM Certified  
IFCI #0874201-26