



PHASE I ENVIRONMENTAL SITE ASSESSMENT

Bellingham Tower
119 North Commercial Street
Bellingham, Washington
Parcel #3803301852180000



Prepared For:

Mark Hollander
Hollander Investments
119 North Commercial Street
Bellingham, Washington 98225

January 14, 2021
Project No. 2BJ0216915

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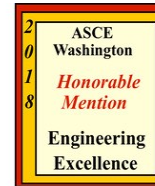
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January 14, 2021
Project No. 2BJ0216915

Mark Hollander
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Re: Phase I Environmental Site Assessment
Bellingham Towers
119 North Commercial St
Bellingham, WA 98225
Parcel #3803301852180000



Dear Mark:

At your request, we have conducted a Phase I Environmental Site Assessment at the above referenced site. The following report summarizes our findings from site visual reconnaissance and interviews, database research, and historical records survey.

Thank you for this opportunity to work with you on this project. Please contact us if you have any questions about this report.

Sincerely,

Austin X. Huang, Ph.D., P.E., L.G., D.GE., F.ASCE
Principal

F.ASCE: Fellow - American Society of Civil Engineering

D.GE - Diplomate - Academy of GeoProfessionals

D.GEs provide successful projects that benefit their clients.

The D.GE certification recognizes geotechnical engineers who possess specialty education, extensive experience, integrity, and good judgment.



EXECUTIVE SUMMARY

At the request of Mr. Mark Hollander of Hollander Investments, Inc. of Bellingham, Washington, Merit Engineering, Inc. conducted a Phase I Environmental Site Assessment on the property at 119 North Commercial Street, Bellingham, Washington. The purpose of this study was to evaluate site history and surrounding conditions, to identify any recognized environmental conditions in connection with the subject property, locate the loss records of tank decommission at the northeast corner of the subject property.

We reviewed the documentations you provided to us; including the following:

- Phase I ESA by Merit Engineering, Inc on June 2, 2004.
- ESA: Transaction Screen by Stratum Group on August 17, 2012
- GPR and ESA Phase II Soil Sampling Investigation by Stratum Group on October 12, 2012
- Permanent Closure of Underground Storage Tank by Stratum Group on November 14, 2012

We understand from above documentations, Merit Engineering was informed that two UST's (Underground Storage Tank) have been closed in place below northeast portion of the property in 1997. However, it is unclear if the site's soils were tested for contamination from the USTs when decommissioning (Merit, 2004). Hollander Investments did not have any soil test reports from the tank closure activities at that time.

Moreover, Stratum Group states that two USTs were found in northeast corner of the property in 1997. The tanks were closed-in-place. However, no documentation is available regarding the soil conditions around the tanks. The conclusions from Merit Engineering and Stratum Group are consistent.

Merit Engineering has conducted this research in December, 2020 for the missing soil lab report for the two (2) Tanks. We found on City of Bellingham Records Center; a permit related

to underground storage tanks with attached lab report for the two UST's tested on Gasoline were below cleanup level. Detailed information will be discussed later of this report.

In addition to review above documentations, our recent geotechnical drilling at Bellingham Towers revealed obvious Gas or Diesel smell at depths of 10 through 15 ft, located at two (2) test borings in north garage. Merit Engineering sent soil samples collected during geotechnical drilling to lab testing on NWTPH-HCID, the results come back undetected.

As we understand, at this time, the result of this study, does not present concern for contamination and adverse effect to subject property environmental conditions, with exception of the following:

1. According to Stratum Group, soil testing was not completed after tank closure located at boiler room in 2021.

It is our opinion that a soil sampling and testing is needed for the tank located at boiler room in order to verify the soil is not contaminated.

2. Tanks located at south parking lot did not have any record regards to tank closure. Stratum Group performed a Phase II ESA for south parking lot in 2021, where a gas station had previously been located. Two anomalies were identified and four borings around the anomalies and suspected fueling areas. Site was underlain by fine grained, very dense glaciomarine drift. Stratum Group found no detections of any petroleum in the soil samples collected. The borings were extended to ~12 feet depth and no groundwater was encountered. No follow-up work was completed to further evaluate or remove the anomalies.

It is unclear about tanks whether closed-in-place or removed. Therefore, it is our opinion that a further investigation may propose to determine the tank status and filling formal closure.

In summary, topography at the site is relatively flat. There is a Bellingham Tower building located at the mid to north portion of the site. There is a parking lot located at south portion of the site. The site appears well maintained, with no obvious evidence of environmental hazard or impact to the property.

In accordance with ASTM (American Standard of Testing Materials) E1527-13. In general, our scope of study has included environmental database review, historical and physical research, site reconnaissance, and interviews with knowledgeable parties. This ESA Phase I report summarizes the information gathered, our opinions, and study conclusions.

This assessment has yielded no evidence of recognized environmental conditions in connection with or in the vicinity of the subject property. Therefore, it is our opinion that past and present site usage of the property and immediate surrounding area, as we understand it at this time by the results of this study, does not present any obvious concern for contamination and adverse effect to subject property environmental conditions.

This is a Phase I Environmental Site Assessment report, prepared in accordance with generally accepted Phase I practices in this area. No other warranty, expressed or implied, is made. This report is intended for the exclusive use of Hollander Investment, Inc., and as such its use is not fully transferable to any other party. Reliance on or use of this report by any party other than the client shall be at their own risk. No warranty, expressed or implied, is made to any party.

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Bellingham Towers
119 North Commercial St,
Bellingham, WA 98225
Parcel #380330185218

Report Prepared for:

Mark Hollander
119 North Commercial St,
Bellingham, WA 98225

by



Austin X. Huang, Ph.D., P.E., L.G., F.ASCE, D.GE.
Principal

Project No. 2BJ0216915
January 14, 2021

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COMMONLY USED ABBREVIATIONS

AIRS:	Aerometric Information Retrieval System
ASTM:	American Society for Testing and Materials
CERCLA:	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS:	Comprehensive Environmental Response, Compensation, and Liability Indexing System
CORRACTS:	Corrective Action
DoE:	Department of Ecology
EPA:	U.S. Environmental Protection Agency
ERNS:	Emergency Response Notification System
ESA:	Environmental Site Assessment
FIRM:	Flood Insurance Rate Maps
LUST:	Leaking Underground Storage Tank
NPL:	National Priority List
PCB:	Polychlorinated Biphenyl
RCRA:	Resource Conservation and Recovery Act
RCRIS:	Resource Conservation and Recovery Information System
SCS:	Soil Conservation Services
TRI:	Toxic Release Inventory
TSD:	Treatment, Storage, and Disposal
USGS:	United States Geological Survey
UST:	Underground Storage Tank

1. INTRODUCTION

1.1 Purpose

At the request of Mr. Mark Hollander of Hollander Investments, Inc. Merit Engineering has conducted a Phase I Environmental Site Assessment for the site address of 119 N Commercial St, Bellingham, WA 98225, which were derived from the 0.6464 acres property, known as Bellingham Towers. The property has a Property ID: 74984 on the Whatcom County Assessor's office record. Topography at the project is relatively flat. Currently, the Bellingham Tower occupied at the mid to north portion of the site. The south of the property is a parking lot. No critical area was observed during searching on the Whatcom critical areas ordinance map or site visit.

The purpose of this study was to evaluate site history and surrounding conditions, in order to identify any recognized environmental conditions in connection with the subject property, in accordance with the assessment process for a Phase 1 ESA prescribed in ASTM (*American Standard of Testing Materials*) E1527-13. ASTM defines a *recognized environmental condition* as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property, even under conditions in compliance with laws. The definition excludes *de minimis* conditions, which generally do not present a threat to human health or the environment, and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies.

1.2 Scope of Assessment

The Phase I ESA will conform to American Society for Testing and Materials Standards (ASTM) and specifically includes:

- Environmental Records Review;
- Historical Records Research;
- Physical Setting Research;
- Site Reconnaissance survey of property exterior and adjacent boundary conditions;
- Site Reconnaissance survey of interior owner and tenant spaces;
- Interviews with the owner and occupants, attempted past owner and ecology officials;
- Preparing this report documenting the results of our research and site assessment and
- Providing our opinions regarding any possible environmental conditions at the site.

Our records review is limited to the research into and evaluation of existing information documented by others concerning the property and its vicinity. Information will be reviewed from the following sources upon availability and accessibility in accordance with ASTM E1527-13:

U.S. Environmental Protection Agency (EPA) including databases:

- ❖ NPL (*National Priority List*)
- ❖ SEMS (Superfund Enterprise Management System)
- ❖ RCRIS (*Resource Conservation and Recovery Act Information System*)
- ❖ CORRACTS TSD, non-CORRACTS TSD, Handlers, Generators
- ❖ TRI (*Toxics Release Inventory*)
- ❖ ICIS-Air
- ❖ ERNS (*EPA Emergency Response Notification System*)
- Washington Department of Ecology Databases
 - ❖ HSL/CSCS/NFA (*Hazardous Sites Databases*)
 - ❖ LUSTs (*Leaking USTs*), Registered USTs VCP (*Voluntary Cleanup Program*) Sites
 - ❖ Institutional Control/Engineering Control Registries
 - ❖ Landfill/Solid Waste sites, Brownfields
- USGS (*United States Geological Survey*) Topographic Maps, Air Photos
- SCS (*Soil Conservation Services*) for Whatcom County and NRCS Web Soil Survey
- City of Bellingham, Whatcom County Offices/Record:
 - ❖ Assessor-Treasurer Office, County Auditor
 - ❖ Whatcom County Health Departments:
 - Site Records Inquiry
 - ❖ Planning and Development, Permit Departments for:
 - Site Permit History
 - Land Use & Critical Area Information, Historical Aerial Photos
 - ❖ Public Library Historical Aerial Photos:
 - Metsker Maps, Kroll Atlases, Polk Directories
 - Our records review was limited to the research into and evaluated of existing information documented by others concerning the property and its vicinity.

1.3 Limitations and Significant Assumptions

This report has been prepared for the exclusive use of Hollander Investments, Inc., for specific application to the property at 119 N commercial St, Bellingham, WA 98225, parcel # 3803301852180000. The property has the existing Bellingham Tower and a parking lot as described above in Section 1.1.

Merit Engineering, Inc. has conducted this Phase 1 ESA and prepared this report in good faith, in order to, as accurately as reasonably allowable, identify and estimate the presence and extent of any recognized environmental conditions on the subject site and in its vicinity. This report does not claim to eliminate all uncertainties regarding environmental conditions, which are unavoidably an inherent possibility for any site, but attempts in good faith and judgment to reduce uncertainty to a minimum level. Therefore, it is possible that environmental conditions may exist on the subject property or within its area of concern that were not discovered or evaluated in this assessment.

1.4 Limiting Conditions and Methodology Used

The methodology of this Environmental Site Assessment was conducted in compliance with suggested standards presented in ASTM E 1527-13 (*American Standard of Testing Materials*). This study does not include a subsurface investigation, or any sampling of site media, which is typically outside the scope of a Phase 1 ESA. No other limiting conditions or methodology were used.

1.5 User Reliance

This is a Phase I Environmental Site Assessment report, prepared in accordance with generally accepted Phase I practices in this area. No other warranty, expressed or implied, is made.

This report is intended for the exclusive use of Hollander Investments, Inc., for Bellingham Tower property. The client, and its agents, and as such its use is not fully transferable to other parties. Reliance on or use of this report by another party shall be done at the assumed risk of said party. No warranty, expressed or implied, is made to any third party.

2. SITE DESCRIPTION

2.1 Location and Legal Description

The subject property is located at 119 N Commercial St, Bellingham, WA 98225. A location and vicinity map is included in the Appendix of this report (Figure 1).

The property has a Parcel # 3803301852180000 and Property ID: 74984 on the Whatcom County Assessor's office record. The project site is bordered to north by Flora St, The Avalon apartment. East by N Commercial St, Mt Baker Theatre, and SRCC Snowy River Cocktail Co Bellingham. South by W Champion St, and West by a commercial land occupied with two commercial buildings. Topography at the project is relatively flat. Currently, the Bellingham Tower occupied at the mid to north portion of the site. The south of the property is an uncovered parking area. No critical area was observed during searching on the Whatcom critical areas ordinance map and site visit.

The site is listed as other business service use with a legal description as CENTRAL WHATCOM LOTS 1 THRU 8-S 1/2 OF LOT 9 BLK 9. The following parcel number and street address is listed with the Whatcom County Assessor's office:

119 N Commercial St, Bellingham, WA 98225

Property ID: 74984

Parcel #: 3803301852180000

2.2 Site and Vicinity General Characteristics

Judy Zhu, an environmental scientist of Merit Engineering, Inc. visited the site on December 10, 2020 for reconnaissance. Brent Wisbey, the maintenance manager from Hollander investments provided a general tour. Details of our observations regarding site conditions are addressed below.

The Bellingham Tower is 15 stories building covers the central to north portion of the property, a 3-leveled parking garage is located at very north of the building. Roof top can be access from floor 15. According to Brent, AT&T rented roof top for placing the signal towers. Basement is located beneath the Tower. The building is occupied by dozens of offices and one restaurant is located at ground level adjacent to the N Commercial St. The building is constructed on a concrete foundation with brick and concrete siding. The building is heated by cascade natural gas. Drinking water and sewer utilities are provided by the City of Bellingham.

There are boiler room, mechanical room, storage closet, and electrical/telephone meter room in basement level. According to Stratum group November 14, 2012, the heating oil tank is located in the boiler room beneath the concrete floor in the basement was permanently closed-in-place by WL Repair of Ferndale with permit number: FCP2012-00294 from City of Bellingham.

Judy Zhu also found out a wall picture during site visit. The year of the picture was unknow, a former convenient gas station was located at northeast portion of the site. According to the letter from B.J. Westra, a former employee of Hollander Investments, Inc., states that two underground gasoline tanks buried in the northeast corner of the space. Upon further research, the space had been occupied for several years as a gas station. In conclusion, the two(2) USTs closure at northeast corner in 1997 were the tanks associated with the former gasoline station.

2.3 Current Use and Existing Improvements

The site is currently occupied by a Bellingham Tower, and a parking lot. 84 office units and one restaurant are tenants to the Bellingham Tower.

2.4 Current Uses of Adjoining Properties

The Avalon apartment building is located across Flora Street from north of the subject property. North Commercial Avenue bounds the subject property to the east. The Mount Baker Theater, and a parking area are located across North Commercial Avenue from east of subject property. West Champion Street bounds the subject property to the south. A paved alley bounds the subject property to the west. Two commercial buildings and a parking area are located across the alley from west of the subject property. The building occupants include a bank, book store, apartments, and offices.

3. USER PROVIDED INFORMATION

As suggested in ASTM E1527-13 guidelines, we queried the current user for USER QUESTIONNAIRE via Mark Hollander of Hollander Investments, Inc., for relevant information at the start of this assessment. The following sections represent information supplied by the user for this Phase 1 ESA in return of our User Questionnaire standard form.

3.1 Title Records

Below Deeds were found under Whatcom County Recording Center:

File Number	Document Type	Recording Date	Grantor	Grantee
2140400759	Deed of Trust	04/09/2014	Bellingham Towers LLC	Whatcom Educational Credit Union
2121002544	Assignment of Lease	10/17/2012	Bellingham Towers LLC	Whatcom Educational Credit Union

2121002543	Deed of Trust	10/17/2012	Bellingham Towers LLC	Whatcom Educational Credit Union
2100802618	Assignment of Lease	08/24/2010	Bellingham Towers LLC	Whatcom Educational Credit Union
2100802617	Deed of Trust	08/24/2010	Bellingham Towers LLC	Whatcom Educational Credit Union
2081101302	Deed of Trust	11/14/2008	Bellingham Towers LLC	Whatcom Educational Credit Union
2050302669	Deed of Trust	03/15/2005	Bellingham Towers LLC	Whatcom Educational Credit Union
2040604439	Assignment of Rents/Deed of Trust/UCC	06/22/2004	Bellingham Towers LLC	Whatcom Educational Credit Union
1990404658	Agreement	04/29/1999	Bellingham Towers LLC	Quality Dining, Inc

3.2 Environmental Liens or Activity and Use Limitations

A User Questionnaire signed by the property owner returned by Mark Hollander of Hollander Investment, Inc., stated that he is not aware of any existing environmental Liens or Activity and Use Limitations (AULs) on the subject property. To his knowledge, there has not been nor is here currently any litigation or notices of possible violation or liability relating to hazardous substances or petroleum products associated with the site.

Two Tenant Questionnaire were completed by Caroline Chaplean from BNS Accounting and Emile Diffley from Anmly Café. BNS Accounting states that they occupied at Bellingham tower for 1 year and 4 months, and they did not aware of any environmental conditions on site. Anmly café is a restaurant which has occupied on site for almost 2 years. Emile states that the prior occupancy at current location is Torre café for 10-15 years. Beside regular restaurant cleaning tools, there is no other chemicals used on site. Emile does not aware of any environmental conditions at this time.

3.3 Specialized Knowledge

UST at Northeast corner:

According to the ESA Phase I report provided Merit Engineering on June, 2004. Merit Engineering identified two USTs documented as “closed-in-place” at 119 N Commercial Street. Merit Engineering were unable to locate any documentation recording tank closure activities in year 2004. However, a letter dated January 5, 1999 from B.J. Westra (Hollander Investments, Inc.) to Planners Shared Equity was found regarding the tank closure. The letter states that two underground gasoline tanks buried in the northeast corner of the space. Upon further research, the space had been occupied for several years as a gas station. According to the letter, and subsequent invoice, Hollander Investments contracted with Fuel Tank Services to perform tank closure procedures on the subject property. The procedures included:

- 1) Pump out any liquids remaining in tanks;
- 2) Test surrounding soil for contamination;
- 3) After negative results on contamination, cut open tanks, clean interior and fill with solid inert material.

Copies of the letter and invoice are provided in the appendix of this report.

UST at South Parking Lot:

According to the ESA Phase II Ground Penetration Radar and Soil Sampling Investigation report provided by Stratum Group dated on October 12, 2012. Stratum Group presented the results of the GPR survey and soil sampling conducted in the Parking Lot at southern portion of the subject site. The investigation was performed to evaluate the site for potential hydrocarbon contamination due to the site’s former use as a gasoline station and auto repair

facility. Stratum Group states that based on the results of the sampling and investigation, the site has not been negatively impacted by petroleum hydrocarbons associated with its former use as gasoline station and auto repair facility.

Merit Engineering confirmed tanks status via email with Stratum Group on January 18, 2021. According to the email, a phase II investigation was conducted to the south of the Towers building (currently a parking lot), where a gas station had previously been located. Two anomalies were identified and Stratum Group did 4 borings around the anomalies and suspected fueling areas. Site was underlain by fine grained, very dense glaciomarine drift. Stratum Group found no detections of any petroleum in the soil samples collected. Looks like the borings were extended to ~12 feet depth and no groundwater was encountered. No follow-up work was completed to further evaluate or remove the anomalies.

UST in the Basement Boiler Room:

According to the Permanent Closure of Underground Storage Tank report by Stratum Group dated on November 14, 2012. One 3,000-gallon heating oil tank located in the boiler room, beneath the concrete floor in the basement was permanently closed-in-place by WL Repair of Ferndale, Washington on October 27, 2012. The tank closure included removal of approximately 1,500-gallons of oil, cleaning of the interior of the tank, inspection by the local fire department, and refilling tank with concrete slurry.

Merit Engineering confirmed tanks status via email with Stratum Group on January 18, 2021. According to the email, the tank was estimated to be 3,000-gallons and had ~1,500-gallons of oil prior to closure in place. No soil sample was collected for test at the time of the tank closure.

3.4 Common Information

Mark Hollander of Hollander Investments, Inc., is not aware of any other commonly known or reasonably ascertainable information pertaining to site history or recognized environmental conditions.

3.5 Value Reduction for Environmental Issues

Mark Hollander of Hollander Investments, Inc., is not aware of any reduction in fair market value for the subject property due to environmental conditions, either actual or presumed.

3.6 Owner, Property Manager, Occupant Information

Hollander Investments, Inc., is current owner of the site.

3.7 Reason for Performing Phase 1 ESA

Mark Hollander of Hollander Investments, Inc., stated the reason for having this ESA Phase 1 performed is to preparing for marketing and sale of the property, and obtain No further Action letter from EPA. No other reasons were expressed by the client.

3.8 Providing of Previous Documentation

The following documentations were provided by the owner:

- Phase I ESA by Merit Engineering, Inc on June 2, 2004.
- ESA: Transaction Screen by Stratum Group on August 17, 2012
- GPR and ESA Phase II Soil Sampling Investigation by Stratum Group on October 12, 2012
- Permanent Closure of Underground Storage Tank by Stratum Group on November 14, 2012

4. RECORDS REVIEW

Records review performed for this study is in compliance with ASTM E1527-13 guidelines.

The scope and limiting parameters of records review are summarized in the table below.

4.1 Standard Environmental Record Sources

4.1.1 Definition of EPA Information Systems

SEMS and RCRIS are companion databases maintained by the United States Environmental Protection Agency. SEMS and RCRIS represent Superfund Enterprise Management System (SEMS) and Resource Conservation and Recovery Act Information System (RCRIS), respectively.

RECORDS SEARCH DISTANCES	
<i>Record Source / Database</i>	<i>Search Radius - miles (km)</i>
Federal NPL Site List	1.0 (1.6)
Federal Delisted NPL Site List	0.5 (0.8)
Federal SEMS List	0.5 (0.8)
Federal SEMS NFRAP Site List	0.5 (0.8)
Federal RCRA CORRACTS List	1.0 (1.6)
Federal RCRA non-CORRACTS TSD List	0.5 (0.8)
Federal RCRA Generator List (LQG/SQG/CEG)	property and adjoining properties
Federal Toxic Release Inventory (TRI)	1.0 (1.6)
ICIS-Air	0.5 (0.8)
Federal ERNS List	property only
State Lists for Hazardous Sites - Washington: WA HSL - Prioritized Sites List (NPL equiv.) CSCS - Confirmed/Suspected Contaminated Sites NFA - No Further Action Sites (formerly CSCS)	1.0 (1.6) 0.5 (0.8) 0.5 (0.8)
State Leaking Storage Tank (LUST) List	0.5 (0.8)
State List of Registered USTs	property and adjoining properties
State Voluntary Cleanup Sites	0.5 (0.8)
State Institutional/Engineering Control Registries	property only
State Landfill/Solid Waste Sites - WA DoE Atlas	0.5 (0.8)
State List of Brownfield Sites	0.5 (0.8)

SEMS is the list of sites indexed by the EPA presently or in the past for potential contamination issues and possible nomination for NPL status after further study, including superfund sites and abandoned contaminated sites.

RCRIS is the database used by the EPA to track sites that currently generate, transport, store, or treat/dispose of hazardous waste as well as petroleum products.

Once a site has been added to the SEMS database, it is not removed even if designated NFRAP (*No Further Remedial Action Planned*) after cleanup or study. Therefore, a site listed with SEMS and RCRIS is not necessarily contaminated.

4.1.2 Review of Federal Sources

We reviewed the Environmental Protection Agency Envirofacts Data Warehouse and Applications Database on 12/04/2020 regarding the subject property and vicinity. This database includes National Priorities List (NPL), SEMS, and RCRIS databases. Additional databases for Toxic Release Inventory (TRI) and Integrated Compliance Information System (ICIS) were also reviewed for sites within specified proximity to the subject property. We reviewed the latest updated data of various databases contained in Envirofacts. At the time of this review, the Superfund Enterprise Management System (SEMS) was updated as of 11/25/2019; the Resource Conservation and Recovery Act Information (RCRAInfo) was updated as of 10/05/2020; the Toxics Release Inventory (TRI) was updated as of 10/14/2020; and the Assessment, Cleanup and Redevelopment Exchange System (ICIS-Air) was updated as of 12/04/2020. Our findings are summarized below:

◇ **National Priorities List (NPL)**

We did not locate any facilities on the National Priorities List within a 1.0-mile distance of the subject property.

◇ **Delisted NPL List**

We did not locate any facilities on the Delisted NPL site list within a 0.5-mile distance of the subject property.

◇ **SEMS List**

We did not locate any facilities on the SEMS list within a 0.5-mile distance of the subject property.

◇ **SEMS NFRAP Site List**

No facility on the SEMS NFRAP list within a 0.5-mile distance of the subject property.

◇ **RCRA CORRACTS Facilities List**

Sites appearing on the RCRA CORRACTS Facilities list are subject to or have had corrective action activities. We conducted a search of RCRA CORRACTS Facilities. No sites were located within the 1.0-mile radius of concern for the subject property.

◇ **RCRA non-CORRACTS TSD Facilities List**

We conducted a search and found no sites within the 0.5-mile radius of the subject property on the RCRA non-CORRACTS TSD (Treatment-Storage-Disposal).

◇ RCRA Large (LQ) and Small (SQ) Generators List

We conducted a search for active registered RCRA Generators located on the property and adjoining properties. No site was found for Hazardous Waste Generator.

◇ Toxic Release Inventory (TRI)

The Toxic Release Inventory (TRI) contains information on toxic chemicals that are used, manufactured, treated, transported, or released into the environment. Three facilities were identified within a 1.0-mile radius of the subject property.

TRI Facility ID	Facility Name	Address
98225GRGPC300WL	GEORGIA-PACIFIC WEST INC	300 W LAUREL ST, BELLINGHAM, WA 98225
9822WTKNRG8CRNW	ITEK ENERGY	800 CORNWALL AVE, BELLINGHAM, WA 98225
98225NCGNN915CO	PSE ENCOGEN	915 CORNWALL AVE, BELLINGHAM, WA 982255030

Above sites have lower elevation compare to the subject site. Substance generally do not travel upgradient. Based on the location of the property, it is our opinion that these sites do not pose a significant risk of contamination to the subject site.

◇ ICIS-AIR

ICIS-AIR contains compliance and permit data for stationary sources of air pollution (such as electric power plants, steel mills, factories, and universities) regulated by EPA, state and local air pollution agencies. The information in ICIS-AIR is used by the states to prepare State Implementation Plans (SIPs) and to track the compliance status of point sources with various regulatory

programs under Clean Air Act. There were no sites identified within a 0.5-mile radius of the subject property in the ICIS- Air database.

◇ **Federal ERNS List**

The Emergency Response Notification System (ERNS) is a database used to store information on notifications of oil discharges and hazardous substances releases. The subject property was not identified in the Federal ERNS list.

4.1.3 Review of State Sources

Washington State DoE databases were researched on December 4, 2020. Databases referenced in this report contain information on both suspected and prioritized State Hazardous Sites, Leaking Underground Storage Tank (LUST) sites, registered Underground Storage Tank (UST) facilities, Solid Waste/Landfill locations, and Brownfield sites. Also included in our search were sites in the Washington Voluntary Cleanup Program (VCP) and sites listed within state institutional control or engineering control registries.

The Washington Master Hazardous Sites List (HSL) of prioritized contaminated sites was accessed as a PDF, last updated December 4, 2020. Database query results for HSL CSCS & NFA, LUST, UST, and Brownfield sites were generated and downloaded for the project area on December 4, 2020. Additional Solid Waste/Landfill site research was conducted using the Washington DoE Facility Atlas application online, accessed December 4, 2020. Our findings are summarized below:

◇ **Hazardous Sites: State Master List (HSL)**

The Hazardous Sites List is maintained by the Washington State DoE, representing contaminated sites which have been assessed and priority ranked,

possibly undergoing current or planned remediation and monitoring. Repeated in the WA HSL are Federal NPL sites. No site was found located within a 1.0-mile distance from the subject property as listed on the Washington HSL.

◇ **Hazardous Sites: State Confirmed & Suspected Contaminated Sites (CSCS)**

The Washington DoE maintains the broader CSCS List, tracking all hazardous sites undergoing cleanup and sites reported awaiting further investigation and/or cleanup (includes sites on the HSL and petroleum-affected sites.)

Twenty-one sites within a 0.5-mile distance from the subject property are listed on the Washington CSCS List.

Number	CSID	Site Name	Site Status	Address
1	10698	Bellingham Marine Industries	Awaiting Cleanup	1001 C St Bldg B
2	11698	BNSF Switchyard Bellingham Station	Awaiting Cleanup	1200 1250 D St
3	12026	PCE Plume 1430 Cornwall	Awaiting Cleanup	1430 Cornwall Ave
4	12101	Union Foundry	Awaiting Cleanup	1900 Grant St
5	12544	W & A MARKET	Awaiting Cleanup	1422 N Forest St
6	13254	Sammys Place	Awaiting Cleanup	1715 N State St
7	253	HOLLY ST LANDFILL	CC-Perf. Monitoring	600 W Holly St
8	170	Chevron Bellingham Terminal 100-1350	Cleanup Started	1020 C St
9	1794	Cornwall Building	Cleanup Started	1616 Cornwall Ave
10	2279	Georgia Pacific West Bellingham	Cleanup Started	300 W Laurel St
11	2716	Emerald Bay Events	Cleanup Started	1013 W Holly St
12	5205	Colony Wharf	Cleanup Started	1001 C St
13	7858	WECU Real Estate Center Bldg	Cleanup Started	516 E Holly St
14	8956	GULL 264	Cleanup Started	1526 Ellis St
15	9213	FAST WAY GAS GROCERY NEELUM	Cleanup Started	1008 W Holly St
16	9288	RAY'S STATION	Cleanup Started	1058 N State St
17	9635	SHELL - MILNE'S	Cleanup Started	415 E Holly St
18	10671	MR CABINET	Cleanup Started	1701 Ellis St
19	11853	Cascade Laundry	Cleanup Started	205 Prospect St
20	12378	401 Central Ave LUST	Cleanup Started	401 Central Ave
21	13174	Bellingham SD Ohio Street	Cleanup Started	310 Iowa St

1. Bellingham Marine Industries, 3. PCE Plume, 4. Union Foundry, 6. Sammys Place, 8. Chevron Bellingham Terminal, 11. Emerald Bay Events, 12. Colony Wharf, 15. Fast Way Gas Grocery Neelum, 18. Mr Cabinet, 21. Bellingham SD Ohio street were located at another side of Whatcom Creek and at least 1230 feet away from the subject site. Therefore, these sites may not pose a significant risk of contamination to the subject site.

9. Cornwall Building, 13. WECU Real Estate Center Bldg, 14. Gull 264, 16. Ray's Station, 17. Shell-milne's were far from the subject property with least 1,200 ft distance from the subject site. Based on the distance separating the sites from the subject property it is our opinion that the sites may not pose a significant risk of contamination to the subject property.

Rest sites were having a lower elevation compare to the subject site, substance generally do not travel upgradient. Based on the location of the property, it is our opinion that these sites do not pose a significant risk of contamination to the subject site.

◇ **Hazardous Sites: State No Further Action Sites (NFA)**

Sites on the NFA list have received a No Further Action decision from the DoE, after hazard assessment and/or remediation. Consists only of sites formerly on the CSCS List that have been delisted. Thirty-one sites within a 0.5-mile distance from the subject property are listed on the Washington NFA List.

Number	CSID	Site Name	Site Status	Address
1	103	TIFFANY APARTMENTS	NFA	203 N Commercial St
2	1256	Bellingham Legal Center LLC	NFA	805 Dupont St
3	2754	Skagit State Bank	NFA	1501 Cornwall Ave
4	3216	Washington State Building	NFA	1720 Ellis St

5	3286	1810 Dean Ave Property	NFA	1810 Dean Ave
6	3965	Alternative Corrections Building	NFA	401 Grand Ave
7	4148	Midas Muffler	NFA	500 E Holly
8	5203	BFS Retail & Commercial Ops Bellingham	NFA	1530 N State St
9	5722	BELLINGHAM WA LINE SEG PRINT 454455	NFA	Roeder Ave & F St
10	6039	Northwest Aluminum Products	NFA	1803 N State St
11	6380	Cornwall Shell	NFA	2019 Cornwall Ave
12	6423	Lighthouse Mission	NFA	1208-1210 Bay St
13	6615	Pogo's	NFA	Franklin & N State St 1701 State St
14	6736	Walton Beverage Company	NFA	1511 N State St
15	6782	Minit Lube 1118 Oil Plume	NFA	1430 Cornwall Ave
16	6918	Morse Hardware Company	NFA	1025 N State St
17	7330	GP Bellingham LUST	NFA	300 W Laurel St
18	8127	WHATCOM COUNTY TRANSIT SERVICE	NFA	313 Central Ave
19	8768	RENTALS INC	NFA	601 W Holly St
20	9139	Meridian Tire	NFA	1812 N State St
21	9225	MID STATES LAND CO WAREHOUSE	NFA	1713 Franklin
22	11070	PARBERRY INC	NFA	1419 C St
23	12214	Car Quest Auto Parts	NFA	405 E Holly St
24	12528	Hens Tooth Video	NFA	1304 N Garden St
25	12549	Catholic Housing Services	NFA	1122 Cornwall Ave
26	12553	Wilson Motors	NFA	405 E Champion St
27	12560	211 East Champion St Parking Lot	NFA	211 E Champion St
28	12576	State Street Building	NFA	1500 N State St
29	13072	FedEx Office	NFA	501 E Holly St
30	13175	Bellingham SD 317 Iowa Street	NFA	317 Iowa St
31	14512	Parberry Property	NFA	900 W Holly St

◇ State Leaking Underground Storage Tanks (LUST) List

The Washington State list of Leaking Underground Storage Tanks (LUST), including both active and remediated sites, was researched for the site area.

Three sites were identified within a 0.5-mile distance of the subject property on the Washington DoE LUST List.

Site Name	UST ID	SITE ID	Address	Status
GP Bellingham LUST	7482	7330	300 W LAUREL ST	NFA

Bellingham Marine Industries	12016	10698	1001 C ST BLDG B	Awaiting cleanup
401 Central Ave Lust	620096	12378	401 CENTRAL AVE	Cleanup started

Whatcom Creek is in between of Bellingham Marine Industries and Bellingham Tower. 401 Central Ave Lust has a lower elevation ~54', and substance generally do not travel upgradient. Based on the location of the property, it is our opinion that Marine Industries and 401 Central Ave Lust do not pose a significant risk of contamination to the subject site.

◇ **State Registered Underground Storage Tanks (UST) List**

The Washington State list of registered Underground Storage Tanks (USTs) including active, inactive, and data summary was researched for the site and immediate vicinity. One registered UST location was found on the property and adjoining properties.

Tank Name	UST ID	SITE ID	Address	Tank Status	Closed Date
Tank 1	490867	61727874	119 N COMMERCIAL ST	Closed in Place	11/1/1997

The subject property is listed as an Underground Storage Tank site with Ecology. According to the DoE Underground Storage Tank System Summary with UST ID: 490867, one tank was permanently closed on 11/1/1997. The Tank status is closed in place. However, according to ESA Phase I by Merit Engineering back to 2004, two tanks were closed-in-place and reported to DoE in 1997.

However, based on the information we collected from Bellingham Public Record Center; Pinner Engineering's report states two (2) tanks were actually permanently closed on 11/1/1997.

◇ **State Voluntary Cleanup Sites**

Washington DoE Voluntary Cleanup Program (VCP) records were reviewed to find sites that are currently or have in the past undergone voluntary cleanup action in the project vicinity. This designation includes sites occurring on other lists. Twenty-one sites were found located within a 0.5-mile distance from the subject property as listed on the Washington VCP list.

CSID	FSID	Site Name	Site Status	Cleanup Type	Address
13174	13806	Bellingham SD Ohio Street	Cleanup Started	Standard Voluntary Cleanup Program, No Process	310 Iowa St
3286	6325475	1810 Dean Ave Property	NFA	Standard Voluntary Cleanup Program	1810 Dean Ave
12378	10851	401 Central Ave LUST	Cleanup Started	Standard Voluntary Cleanup Program	401 Central Ave
3965	45943712	Alternative Corrections Building	NFA	Standard Voluntary Cleanup Program	401 Grand Ave
1256	37819319	Bellingham Legal Center LLC	NFA	Standard Voluntary Cleanup Program	805 Dupont St
13175	11945	Bellingham SD 317 Iowa Street	NFA	Standard Voluntary Cleanup Program	317 Iowa St
11853	21786898	Cascade Laundry	Cleanup Started	Standard Voluntary Cleanup Program	205 Prospect St
1794	53954864	Cornwall Building	Cleanup Started	Standard Voluntary Cleanup Program	1616 Cornwall Ave
6380	61739141	Cornwall Shell	NFA	Standard Voluntary Cleanup Program	2019 Cornwall Ave
12528	21764	Hens Tooth Video	NFA	Standard Voluntary Cleanup Program	1304 N Garden St
6423	63963632	Lighthouse Mission	NFA	Standard Voluntary Cleanup Program	1208-1210 Bay St
9139	42682239	Meridian Tire	NFA	Standard Voluntary Cleanup Program	1812 N State St
4148	31777841	Midas Muffler	NFA	Standard Voluntary Cleanup Program	500 E Holly
6782	86273236	Minit Lube 1118 Oil Plume	NFA	Standard Voluntary Cleanup Program	1430 Cornwall Ave
6918	94923128	Morse Hardware Company	NFA	Standard Voluntary Cleanup Program	1025 N State St
6039	41497365	Northwest Aluminum Products	NFA	Standard Voluntary Cleanup Program	1803 N State St
6615	74683659	Pogo's	NFA	Standard Voluntary Cleanup Program	Franklin & N State St 1701 State St
2754	88433544	Skagit State Bank	NFA	Standard Voluntary Cleanup Program	1501 Cornwall Ave
12576	88244558	State Street Building	NFA	Standard Voluntary Cleanup Program	1500 N State St

6736	83691774	Walton Beverage Company	NFA	Standard Voluntary Cleanup Program	1511 N State St
3216	4195725	Washington State Building	NFA	Standard Voluntary Cleanup Program	1720 Ellis St

Bellingham SD Ohio street was located at another side of Whatcom Creek and at least 1230 feet away from the subject site. Therefore, this site may not pose a significant risk of contamination to the subject site.

401 Central Ave LUST and Cascade Laundry sites were having a lower elevation compare to the subject site, substance generally do not travel upgradient. Based on the location of the property, it is our opinion that these sites do not pose a significant risk of contamination to the subject site.

Cornwall Building was far from the subject property with least 1,200 ft distance from the subject site. Based on the distance separating the site from the subject property it is our opinion that the site may not pose a significant risk of contamination to the subject property.

◇ **State Institutional Control/Engineering Control Registries**

Washington State Institutional and Engineering Control Registries were queried. No records were found for the subject property or vicinity.

◇ **State Landfill/Solid Waste Facilities**

The Washington DoE Online Facility Atlas and Master Hazardous Sites List were researched for active or past Landfill/Solid Waste facilities in the site area. We did not identify any Landfill sites within a 0.5-mile distance of the subject property. One site was identified within the search radius relating to storage/handling/transfer of solid waste.

SITE NAME	CSID	SITE ID	Address	STATUS	CLEANUP TYPE
HOLLY ST LANDFILL	253	2825	600 W HOLLY ST	CC-Perf, Monitoring	ECOLOGY-SUPERVISED

Holly St Landfill is located at northwest of Bellingham Tower, the elevation is ~36'. Bellingham Tower has an elevation ~74'. The substance generally does not travel upgradient.

◇ **State Brownfield Sites**

The Washington State Brownfield Inventory was researched for cataloged locations in Whatcom County. No sites within a 0.5-mile distance of the subject property were found with Brownfield status.

4.2 Physical Setting Source(s)

We reviewed the USGS (*US Geological Survey*) topo map for topographic data for the project area. The map indicates that the site is located at Woodlawn, and is relatively flat with immediate vicinity.

4.2.1 Geologic Conditions

Geologic History

The following descriptions of the surficial deposits in the vicinity of the subject property were interpreted from the Geologic Map of the Bellingham 1:100,000 Quadrangle, Washington (Lapen, 2000). According to Lapen (2000) The subject property is underlain by glaciomarine drift. The glaciomarine drift is associated with the Everson Interstade and was deposited approximately 11,000 to 13,000 years ago. The drift deposits consist of pebbly, sandy silt and pebbly clay. The glaciomarine drift in the vicinity of the subject property is a clay/silt unit that was deposited by melting glacial ice that was floating on the sea at a time near the end of the

last glacial period when relative sea level was higher than the present (the weight of thick glacial ice in the area had depressed the surface of the earth in the northern Puget Sound region hundreds of feet).

Soils Documentation

We have reviewed the USGS Soil Conservation Service “Soil Survey of Whatcom County Area, Washington” for the soils in the western part of the survey area, along the Nooksack River and its tributaries with slope 0 to 2 percent.

Our borings at the site indicate that the soil profile generally consists of 4 inches concrete slab, underlain by brown stiff clay to about 10ft depth. Soft blue clay beneath to the depth from 10 to 18ft. The sandstone bedrock was encountered at about 18ft depth.

Critical Area Considerations

Critical Areas - Geologically Hazardous Areas was considered by review the site conditions and our knowledge of the area. There is no critical area near the site.

4.3 Historical Use Information on the Property

4.3.1 Review of Documentation

One permit regards to tank closure located at northeast of parcel was found from City of Bellingham Public Records Center with attached lab result for two UST’s that closed in 1997.

The Permit was issue by Bellingham Fire Department for Tank Abandonment or Removal with inspection date on November 14, 1997. Total number of 2 tanks were proposed to properly fill and abandon the tanks on the site. Soil samples were collected in accordance with Ecology’s Guidance for site checks and Site Assessments for Underground Storage Tanks and

site sampling analysis plan. Two soil samples were tested for WTPH-Gasoline. The laboratory result for both samples were below action level.

We contacted Whatcom County Health Department at 360-778-6000 on 12/29/2020 for information regarding any environmental health records, complaints, or actions on file for the subject property parcel. No record was available from Health Department.

4.3.2 Review of Documentation - Photos, Maps, Listings

Aerial Photos

Aerial photographs year 1950, 1963, 1975, 1988, 1997, 1998, 2002, 2004, 2008, 2013 were available on City of Bellingham Aerial Imagery Viewer.

The 1950 Aerial photo indicates that a gas and oil station is present in the southwest portion of the site. The station was removed by 1963 and the southern portion of the site has since remained a paved parking lot.

In addition to stratum Group report dated on 08/05/2012: The subject property has been developed since at least 1904. Approximately 10 residential homes were located on the property in 1904. By 1913, the residence in the corner of Commercial and Champion Street had changed its use to a store. All of the residences were removed by 1933. The Bellingham Hotel building was constructed in the central portion of the property in 1930. An auto service and tires building were located in the northern end of the site and the southern portion of the property was undeveloped in 1933. A gasoline station was constructed in the southern portion of the site in 1938 (208 Champion Street) and utilized the property through 1956.

4.4 Historical Use Information on Adjoining Properties

North to Flora Street, an apartment building has present since 1950, and the building continue to be present use as apartments.

A theater was located east to the subject site since 1950, the building structure has remained the same until now.

The west commercial building was existing since 1950, one small structure was removed by the mid 1970s, the area was later turned into a parking lot.

According to stratum Group report dated on 08/05/2012: Polk city directories indicate that the gasoline station was utilized as Shell Service Station, Bowman's Shell Service, and Jansen's Shell Service at 208 Champion Street between 1938 and 1956. The directory also identifies Reliable Cleaners at 200 W Champion Street in 1925, but the address is not listed in 1920 or 1933.

5. SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

Judy Zhu as environmental scientist of Merit Engineering, Inc. visited the site on December 10, 2020 to perform the site reconnaissance. The main purpose was to fulfill reconnaissance requirements for site use practices and to identify any recognized environmental conditions. Methodology and diligence of site observations as described is intended to conform with ASTM E1527-13 guidelines.

Weather conditions were clear and temperatures in the mid 47°'s F. There was no adverse conditions or concerns observed on site and the site contains one commercial tower and

uncovered parking lot. There were no limiting factors encountered in our site reconnaissance. The site appeared very clean and in good order.

5.2 General Site Setting

Upon arrival for our site reconnaissance, we briefly observed and confirmed site vicinity conditions and adjacent property usage as described above. Within the property itself, we confirmed the site is occupied by one commercial tower and uncovered parking lot.

Topography of the property itself appears relatively flat. USGS (United States Geological Survey) indicates that the site is in an elevation approximately 74'. Based on field observation, it appears that the area is flat.

6. INTERVIEWS

6.1 Interview with Owner

The current property owner Mark Holland of Holland Investments, Inc, our study questionnaire with information as stated above.

6.2 Interviews with Tenant

Property currently has Tenant, our study questionnaire with information as stated above.

6.3 Interviews with Local Government Officials

We did database search results during this assessment during Covid-19. However, we inquired documentation from Whatcom County Public Records Clark office.

7. FINDINGS

Findings from federal database research performed in this study are summarized as follows:

- **National Priorities List (NPL):** No sites within 1 mile of the subject property.
- **Delisted NPL:** No sites within 0.5 miles of the subject property.
- **SEMS:** No sites within 0.5 miles of the subject property.
- **SEMS NFRAP:** No sites within 0.5 miles of the subject property.
- **RCRA CORRACTS:** No sites within 1 mile of the subject property.
- **RCRA non-CORRACTS TSD:** No sites within 0.5 miles of the subject property.
- **RCRA Generators (LQ + SQ):** No site was found for Hazardous Waste Generator on adjoining properties.
- **Toxic Release Inventory (TRI):** Three sites within 1 mile of the subject property.

TRI Facility ID	Facility Name	Address
98225GRGPC300WL	GEORGIA-PACIFIC WEST INC	300 W LAUREL ST, BELLINGHAM, WA 98225
9822WTKNRG8CRNW	ITEK ENERGY	800 CORNWALL AVE, BELLINGHAM, WA 98225
98225NCGNN915CO	PSE ENCOGEN	915 CORNWALL AVE, BELLINGHAM, WA 982255030

Above sites have lower elevation compare to the subject site. Substance generally do not travel upgradient. Based on the location of the property, it is our opinion that these sites do not pose a significant risk of contamination to the subject site.

- **Air Facility System (ICIS-Air):** No sites within 0.5 miles of the subject property.
- **Federal ERNS List:** No recorded responses for the subject property.

Findings from Washington state database research in this study are summarized as follows:

- **WA Hazardous Sites List (HSL):** No sites within 1 mile of the subject property.
- **WA Suspected or Confirmed Sites List (CSCS):** 21 sites within 0.5 miles of the property.

Number	CSID	Site Name	Site Status	Address
1	10698	Bellingham Marine Industries	Awaiting Cleanup	1001 C St Bldg B
2	11698	BNSF Switchyard Bellingham Station	Awaiting Cleanup	1200 1250 D St
3	12026	PCE Plume 1430 Cornwall	Awaiting Cleanup	1430 Cornwall Ave
4	12101	Union Foundry	Awaiting Cleanup	1900 Grant St
5	12544	W & A MARKET	Awaiting Cleanup	1422 N Forest St
6	13254	Sammys Place	Awaiting Cleanup	1715 N State St

7	253	HOLLY ST LANDFILL	CC-Perf. Monitoring	600 W Holly St
8	170	Chevron Bellingham Terminal 100-1350	Cleanup Started	1020 C St
9	1794	Cornwall Building	Cleanup Started	1616 Cornwall Ave
10	2279	Georgia Pacific West Bellingham	Cleanup Started	300 W Laurel St
11	2716	Emerald Bay Events	Cleanup Started	1013 W Holly St
12	5205	Colony Wharf	Cleanup Started	1001 C St
13	7858	WECU Real Estate Center Bldg	Cleanup Started	516 E Holly St
14	8956	GULL 264	Cleanup Started	1526 Ellis St
15	9213	FAST WAY GAS GROCERY NEELUM	Cleanup Started	1008 W Holly St
16	9288	RAY'S STATION	Cleanup Started	1058 N State St
17	9635	SHELL - MILNE'S	Cleanup Started	415 E Holly St
18	10671	MR CABINET	Cleanup Started	1701 Ellis St
19	11853	Cascade Laundry	Cleanup Started	205 Prospect St
20	12378	401 Central Ave LUST	Cleanup Started	401 Central Ave
21	13174	Bellingham SD Ohio Street	Cleanup Started	310 Iowa St

1. Bellingham Marine Industries, 3. PCE Plume, 4. Union Foundry, 6. Sammys Place, 8. Chevron Bellingham Terminal, 11. Emerald Bay Events, 12. Colony Wharf, 15. Fast Way Gas Grocery Neelum, 18. Mr Cabinet, 21. Bellingham SD Ohio street were located at another side of Whatcom Creek and at least 1230 feet away from the subject site. Therefore, these sites may not pose a significant risk of contamination to the subject site.

9. Cornwall Building, 13. WECU Real Estate Center Bldg, 14. Gull 264, 16. Ray's Station, 17. Shell-milne's were far from the subject property with least 1,200 ft distance from the subject site. Based on the distance separating the sites from the subject property it is our opinion that the sites may not pose a significant risk of contamination to the subject property.

Rest sites were having a lower elevation compare to the subject site, substance generally do not travel upgradient. Based on the location of the property, it is

our opinion that these sites do not pose a significant risk of contamination to the subject site.

· ***WA No Further Action List (NFA):*** 31 sites within 0.5 miles of the property.

Number	CSID	Site Name	Site Status	Address
1	103	TIFFANY APARTMENTS	NFA	203 N Commercial St
2	1256	Bellingham Legal Center LLC	NFA	805 Dupont St
3	2754	Skagit State Bank	NFA	1501 Cornwall Ave
4	3216	Washington State Building	NFA	1720 Ellis St
5	3286	1810 Dean Ave Property	NFA	1810 Dean Ave
6	3965	Alternative Corrections Building	NFA	401 Grand Ave
7	4148	Midas Muffler	NFA	500 E Holly
8	5203	BFS Retail & Commercial Ops Bellingham	NFA	1530 N State St
9	5722	BELLINGHAM WA LINE SEG PRINT 454455	NFA	Roeder Ave & F St
10	6039	Northwest Aluminum Products	NFA	1803 N State St
11	6380	Cornwall Shell	NFA	2019 Cornwall Ave
12	6423	Lighthouse Mission	NFA	1208-1210 Bay St
13	6615	Pogo's	NFA	Franklin & N State St 1701 State St
14	6736	Walton Beverage Company	NFA	1511 N State St
15	6782	Minit Lube 1118 Oil Plume	NFA	1430 Cornwall Ave
16	6918	Morse Hardware Company	NFA	1025 N State St
17	7330	GP Bellingham LUST	NFA	300 W Laurel St
18	8127	WHATCOM COUNTY TRANSIT SERVICE	NFA	313 Central Ave
19	8768	RENTALS INC	NFA	601 W Holly St
20	9139	Meridian Tire	NFA	1812 N State St
21	9225	MID STATES LAND CO WAREHOUSE	NFA	1713 Franklin
22	11070	PARBERRY INC	NFA	1419 C St
23	12214	Car Quest Auto Parts	NFA	405 E Holly St
24	12528	Hens Tooth Video	NFA	1304 N Garden St
25	12549	Catholic Housing Services	NFA	1122 Cornwall Ave
26	12553	Wilson Motors	NFA	405 E Champion St
27	12560	211 East Champion St Parking Lot	NFA	211 E Champion St
28	12576	State Street Building	NFA	1500 N State St
29	13072	FedEx Office	NFA	501 E Holly St
30	13175	Bellingham SD 317 Iowa Street	NFA	317 Iowa St
31	14512	Parberry Property	NFA	900 W Holly St

· **WA Leaking UST (LUST) List:** 3 sites within 0.5 miles of the subject property.

Site Name	UST ID	SITE ID	Address	Status
GP Bellingham LUST	7482	7330	300 W LAUREL ST	NFA
Bellingham Marine Industries	12016	10698	1001 C ST BLDG B	Awaiting cleanup
401 Central Ave Lust	620096	12378	401 CENTRAL AVE	Cleanup started

Whatcom Creek is in between of Bellingham Marine Industries and Bellingham Tower. 401 Central Ave Lust has a lower elevation ~54', and substance generally do not travel upgradient. Based on the location of the property, it is our opinion that Marine Industries and 401 Central Ave Lust do not pose a significant risk of contamination to the subject site.

· **WA Registered UST List:** one USTs recorded on the adjoining property.

Tank Name	UST ID	SITE ID	Address	Tank Status	Closed Date
Tank 1	490867	61727874	119 N COMMERCIAL ST	Closed in Place	11/1/1997

The subject property is listed as an Underground Storage Tank site with Ecology. According to the DoE Underground Storage Tank System Summary with UST ID: 490867, one tank was permanently closed on 11/1/1997. The Tank status is closed in place. However, according to ESA Phase I by Merit Engineering back to 2004, two tanks were closed-in-place and reported to DoE in 1997.

However, based on the information we collected from Bellingham Public Record Center; Pinner Engineering's report states two (2) tanks were actually permanently closed on 11/1/1997.

· **WA VCP Sites List:** 21 sites within 0.5 miles of the subject property.

CSID	FSID	Site Name	Site Status	Cleanup Type	Address
13174	13806	Bellingham SD Ohio Street	Cleanup Started	Standard Voluntary Cleanup Program, No Process	310 Iowa St
3286	6325475	1810 Dean Ave Property	NFA	Standard Voluntary Cleanup Program	1810 Dean Ave
12378	10851	401 Central Ave LUST	Cleanup Started	Standard Voluntary Cleanup Program	401 Central Ave
3965	45943712	Alternative Corrections Building	NFA	Standard Voluntary Cleanup Program	401 Grand Ave
1256	37819319	Bellingham Legal Center LLC	NFA	Standard Voluntary Cleanup Program	805 Dupont St
13175	11945	Bellingham SD 317 Iowa Street	NFA	Standard Voluntary Cleanup Program	317 Iowa St
11853	21786898	Cascade Laundry	Cleanup Started	Standard Voluntary Cleanup Program	205 Prospect St
1794	53954864	Cornwall Building	Cleanup Started	Standard Voluntary Cleanup Program	1616 Cornwall Ave
6380	61739141	Cornwall Shell	NFA	Standard Voluntary Cleanup Program	2019 Cornwall Ave
12528	21764	Hens Tooth Video	NFA	Standard Voluntary Cleanup Program	1304 N Garden St
6423	63963632	Lighthouse Mission	NFA	Standard Voluntary Cleanup Program	1208-1210 Bay St
9139	42682239	Meridian Tire	NFA	Standard Voluntary Cleanup Program	1812 N State St
4148	31777841	Midas Muffler	NFA	Standard Voluntary Cleanup Program	500 E Holly
6782	86273236	Minit Lube 1118 Oil Plume	NFA	Standard Voluntary Cleanup Program	1430 Cornwall Ave
6918	94923128	Morse Hardware Company	NFA	Standard Voluntary Cleanup Program	1025 N State St
6039	41497365	Northwest Aluminum Products	NFA	Standard Voluntary Cleanup Program	1803 N State St
6615	74683659	Pogo's	NFA	Standard Voluntary Cleanup Program	Franklin & N State St 1701 State St
2754	88433544	Skagit State Bank	NFA	Standard Voluntary Cleanup Program	1501 Cornwall Ave
12576	88244558	State Street Building	NFA	Standard Voluntary Cleanup Program	1500 N State St
6736	83691774	Walton Beverage Company	NFA	Standard Voluntary Cleanup Program	1511 N State St
3216	4195725	Washington State Building	NFA	Standard Voluntary Cleanup Program	1720 Ellis St

Bellingham SD Ohio street was located at another side of Whatcom Creek and at least 1230 feet away from the subject site. Therefore, this site may not pose a significant risk of contamination to the subject site.

401 Central Ave LUST and Cascade Laundry sites were having a lower elevation compare to the subject site, substance generally do not travel upgradient. Based on the location of the property, it is our opinion that these sites do not pose a significant risk of contamination to the subject site.

Cornwall Building was far from the subject property with least 1,200 ft distance from the subject site. Based on the distance separating the site from the subject property it is our opinion that the site may not pose a significant risk of contamination to the subject property.

· ***Washington State IC/EC Registries:*** No listings for the subject property.

· ***WA Landfill/Solid Waste Sites:*** 1 Landfill sites within 0.5 miles of the property.

SITE NAME	CSID	SITE ID	Address	STATUS	CLEANUP TYPE
HOLLY ST LANDFILL	253	2825	600 W HOLLY ST	CC-Perf, Monitoring	ECOLOGY-SUPERVISED

Holly St Landfill is located at northwest of Bellingham Tower, the elevation is ~36'. Bellingham Tower has an elevation ~74'. The substance generally does not travel upgradient.

· ***WA Brownfield Sites:*** no sites within 0.5 miles of the property.

South Parking:

According to Stratum Group ESA Phase II dated on 08/15/2012, specifically for south portion of the site. Based on the results of the GPR and soil sampling investigation, the site has not been negatively impacted by petroleum hydrocarbons associated with its former use as gasoline station and auto repair facility.

Merit Engineering confirmed tanks status via email with Stratum Group on January 18, 2021. According to the email, a phase II investigation was conducted to the south of the Towers building (currently a parking lot), where a gas station had previously been located. Two anomalies were identified and four borings around the anomalies and suspected fueling areas. Site was underlain by fine grained, very dense glaciomarine drift. Stratum Group found no

detections of any petroleum in the soil samples collected. It appears that the borings were extended to ~12 feet depth and no groundwater was encountered. No follow-up work was completed to further evaluate or remove the anomalies.

Boiler Room:

Report regards to Permanent Closure of Underground Storage Tank dated on November 14, 2012 states that one 3,000-gallon heating oil tank was permanently closed-in-place by WL Repair of Ferndale. The heating oil tank is located in the boiler room, beneath the concrete floor in the basement of the Bellingham Tower.

Merit Engineering confirmed tanks status via email with Stratum Group on January 18, 2021. According to the email, the tank was estimated to be 3,000-gallons and had ~1,500-gallons of oil prior to closure in place. No sampling was completed at the time of the tank closure.

Northeast:

According to the ESA Phase I report provided Merit Engineering on June, 2004. Merit Engineering identified two USTs documented as “closed-in-place” at 119 N Commercial Street. Merit Engineering were unable to locate any documentation recording tank closure activities in year 2004. However, a letter dated January 5, 1999 from B.J. Westra (Hollander Investments, Inc.) to Planners Shared Equity regarding the tank closure. The letter states that two underground gasoline tanks buried in the northeast corner of the space. Upon further research, the space had been occupied for several years as a gas station. According to the letter, and subsequent invoice, Hollander Investments contracted with Fuel Tank Services to perform tank closure procedures on the subject property. The procedures included:

- 1) Pump out any liquids remaining in tanks;
- 2) Test surrounding soil for contamination;

3) After negative results on contamination, cut open tanks, clean interior and fill with solid inert material.

Merit Engineering retrieved lab data report for the two (2) tanks closure back to 1997 from Bellingham Public Record center in December, 2020. The lab report is attached to the appendix with gasoline below cleanup level.

Our recent geotechnical drilling at Bellingham Towers revealed obvious Gas or Diesel smell at depths of 10 through 15 ft, located at two (2) test borings in north garage. Merit Engineering sent soil samples collected during geotechnical drilling to lab testing on NWTPH-HCID, the results come back undetected.

8. OPINIONS

In summary, the above environmental and historical research and present observable conditions exist within the subject property, its vicinity, or the search radius as presented. It is not uncommon to find facilities listed in State and Federal environmental databases within the search radius of a site, especially in a commercial area with a relatively long development history.

UST located at Boiler Room

According to Stratum Group email response on Jan 19, 2021. A heating oil UST was found beneath the basement of the Towers building and was subsequently closed-in-place. The tank was estimated to be 3,000-gallons and had ~1,500-gallons of oil prior to closure in place. No sampling was completed at the time of the tank closure in 2012. Therefore, a soil sampling and testing is needed for the tank located at boiler room in order to assure the soil is not contaminated.

USTs located at south parking lot

All information we know is Stratum Group found two places of previous excavated areas. It is unclear about tanks whether closed-in-place or removed. Therefore, a further investigation may propose to determine the tank status in south parking lot.

General

It is our opinion that the risk of soil contamination is low because all soil test results at different time were came back undetected or below clean up level. Along with three (3) well documented permanently closed-in-place tanks, one located at boiler room, two located at northeast corner. During geotechnical investigation in November 2020, we found brown stiff clay at 4 to 10ft depth and soft blue clay at 10 to 18ft depth underlain by sandstone bedrock. Since the clay is generally consider impermeable, it will limit leaking down gradient.

Because all tanks were closed-in-place on site, and it is hard to determine if the past soil samples could represent the bottom soil under the tank. If future development takes place that involves soil excavation, soil conditions should be monitored and if any petroleum contaminated soils are encountered or other deleterious materials, they should be removed and properly disposed; however, it is our opinion that the risk of contamination on the site is low since our recent geotechnical exploration reveals the soils at the site are clay, which is practically impermeable. Therefore, it is our opinion that even if the soils under the tanks would be contaminated, it would be confined in the surrounding clayey soils.

Therefore, it is our opinion that past and present site usage of the property and immediate surrounding area, as we understand it at this time by the results of this study, does not present any obvious concern for contamination and adverse effect to subject property environmental conditions.

9. CONCLUSIONS

We have performed a *Phase I Environmental Site Assessment* in conformance with the scope and limitations of ASTM Practice E 1527-13 for the subject property and is legally described as: CENTRAL WHATCOM LOTS 1 THRU 8-S 1/2 OF LOT 9 BLK 9. The following parcel number and street address is listed with the Whatcom County Assessor's office:

119 N Commercial St, Bellingham, WA 98225

Property ID: 74984

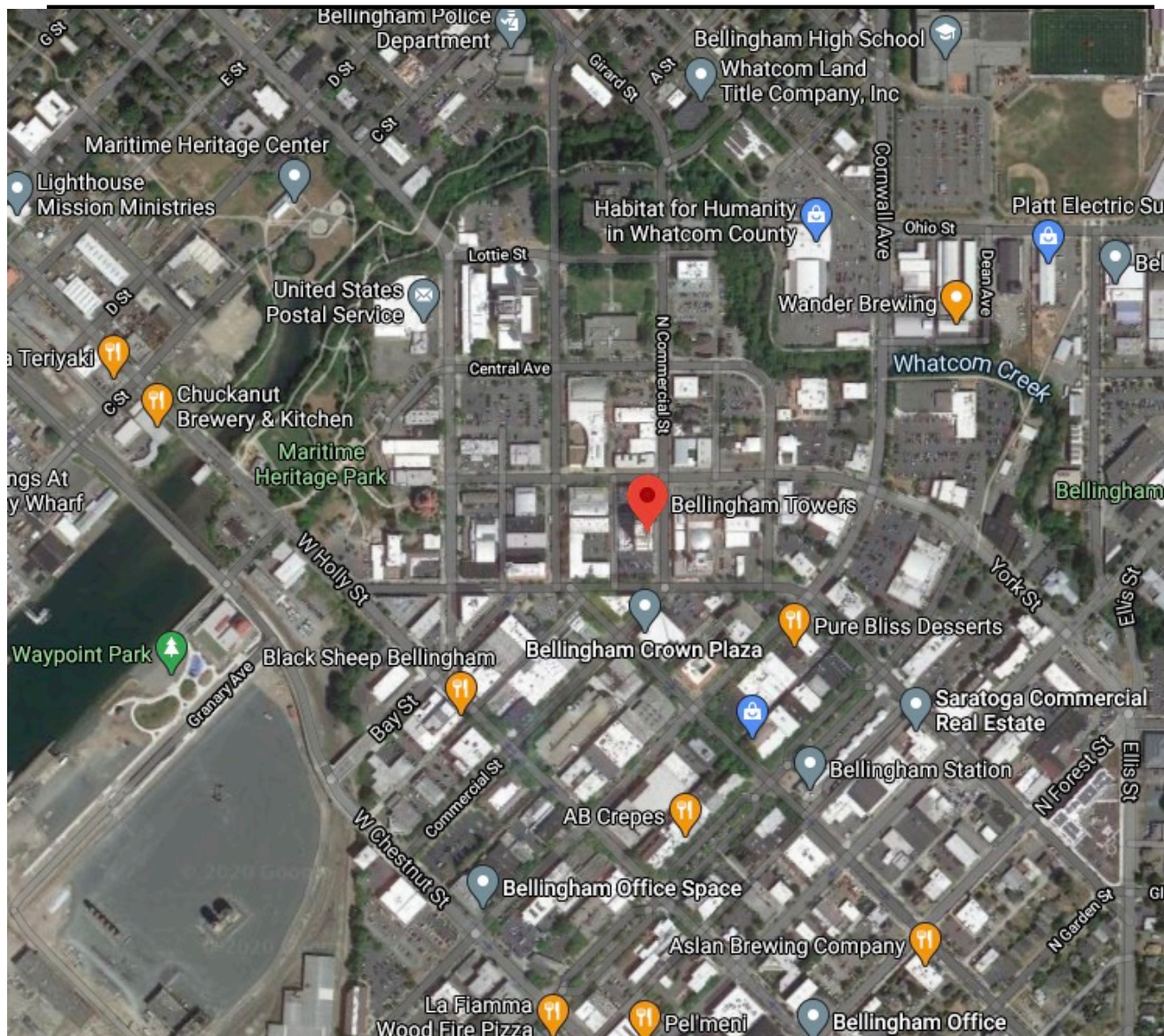
Parcel # : 3803301852180000

Any exceptions to, or deletions from, this practice are described in Sections 1.2 and 1.4. This assessment has revealed no evidence of *recognized environmental conditions* in connection with the *property*.

Due to the limitations of such an assessment as discussed herein, existing or potential for environmental conditions may occur within the area of concern of the subject property that were not discovered in the course of this study. This is a Phase I Environmental Site Assessment report and is prepared in accordance with generally accepted Phase I site assessment practices in this area. No other warranty, expressed or implied, is made.

10. STATEMENT OF ENVIRONMENTAL PROFESSIONAL

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



Project No. 2BJ0216915

PROJECT LOCATION & VICINITY MAP

Date: 01/14/21

Figure 1

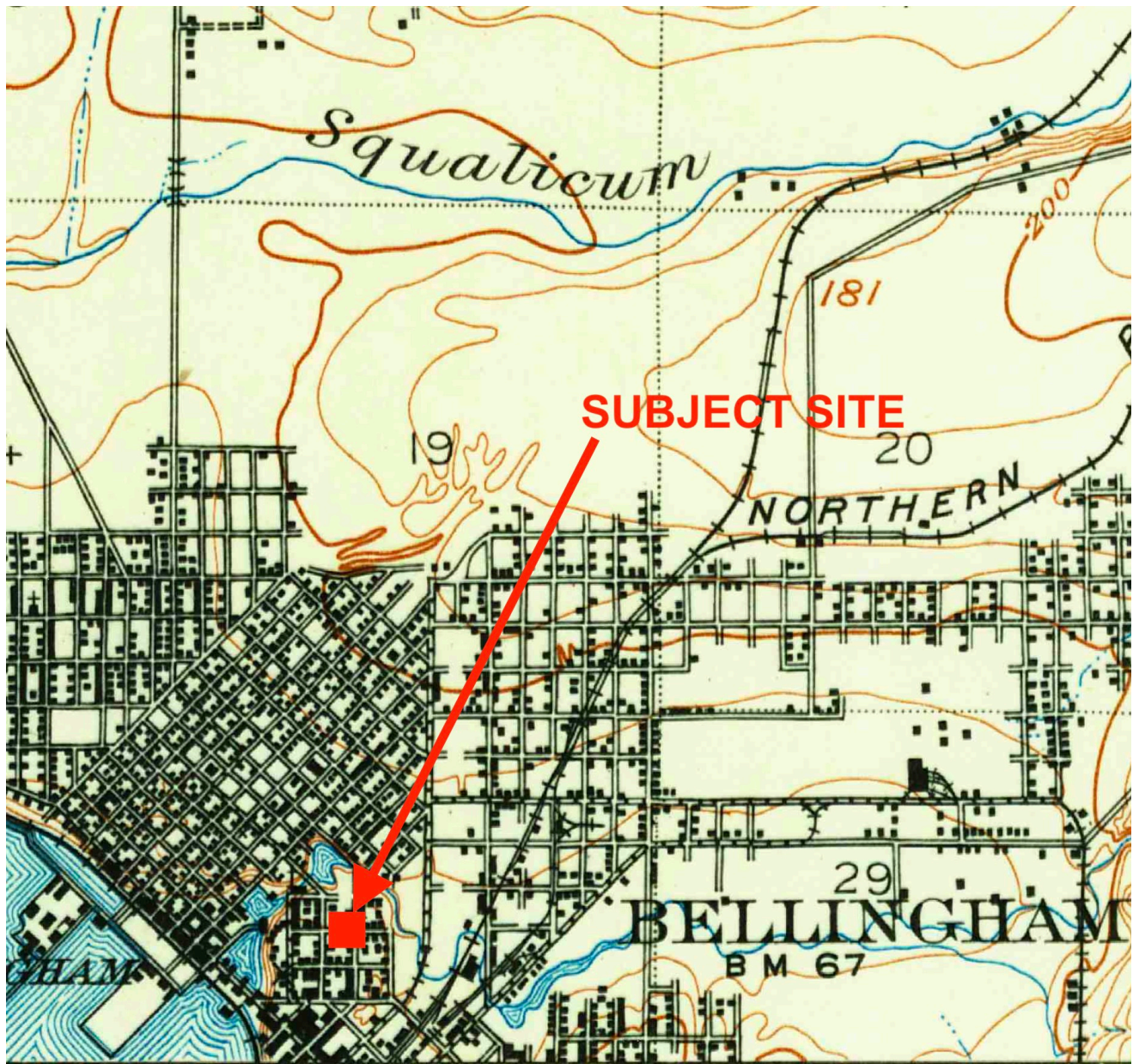
Phase 1 ESA
119 N Commercial St
Parcel #380330185218
Bellingham, Washington

For: Mark Hollander



MERIT ENGINEERING INC.

10129 Main Street #201
Bellevue, Washington 98004
Telephone: (425) 454-2133
Fax: (425) 454-2133
[Http://www.MeritEngineering.com](http://www.MeritEngineering.com)



Project No. 2BJ0216915

US Historical Topo Map

Date: 01/14/21

Figure 2

Phase 1 ESA
119 N Commercial St
Parcel #380330185218
Bellingham, Washington

For: Mark Hollander



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EXHIBIT C

January 5, 1999

Planners Shared Cash Equity

Re: Lease agreement-Suite 110

Dear Tom, Wayne, Dear and Scott,

This letter is to inform you that during the renovation of Suite 110 in the Bellingham Towers, we discovered two underground gasoline tanks buried in the northeast corner of the space. Upon further research, we discovered, the space had been occupied for several years as a gas station.

We contracted with Fuel Tank Services, Inc. to perform the following work:

1. Pump out any liquids remaining in tanks;
2. Test surrounding soil for contamination;
3. After negative results on contamination, cut open tanks, clean interior and fill with solid inert material.

If you have any questions concerning this work, please feel free to contact me.

Sincerely,

B.J. Westra

BELLINGHAM FIRE DEPARTMENT

UFC 97-0091

PERMIT

TANK ABANDONMENT OR REMOVAL

HAVE THIS PERMIT ON SITE DURING FIRE DEPARTMENT INSPECTION

Site Address <u>119 N. Commercial Ave</u>	
Tenant <u>Hollander investments</u>	Telephone <u>734-3420</u>
Property Owner <u>Same (MARK Hollander)</u>	Telephone <u>734-3420</u>
Contractor <u>Full Tank Sres Inc</u>	Telephone <u>360-757-2402</u>
Number of tanks to be filled <u>2</u> Removed 2000 2000 2000 - <u>1,500 gallons</u>	
<p>** The Washington State Dept. of Ecology must be notified in writing 30 days in advance to tank closure.</p> <p>** A State-approved site assessment must be performed by a licensed tank services provider.</p> <p>** Contact the Community Hazards Management Division of the Fire Department at 676-6832 at least 24 hours in advance to arrange to have an inspector witness the filling or removal.</p>	

NOTE: Signatures below confirm only tank closure was performed to satisfy requirements of the Uniform Fire Code, and do not confirm presence or absence of product in the ground.

ABANDONMENT IN PLACE	
<p>** Comply with the attached procedures for abandoning and filling tanks in place.</p> <p>** A Fire Department employee signature below constitutes confirmation the tank filling occurred and was inspected.</p>	
INSPECTION DATE <u>Nov 14 1997</u>	WITNESSED BY <u>[Signature]</u>

TANK REMOVAL	
<p>** Comply with the attached procedures for abandoning and removing tanks.</p> <p>** A Fire Department employee signature below constitutes confirmation the tank removal occurred.</p>	
INSPECTION DATE _____	WITNESSED BY <u>[Signature]</u>

Copies: White-Fire Department Yellow - Owner/Tenant Pink-Contractor Gold- Dept. of Ecology





PINNER ENGINEERING, INC

5070 Pacific Highway
Ferndale, Washington 98248

Civil, Structural and Foundation Engineering

UFC 97 - 00091

November 14, 1997

Mr. Bill Nightingale
Fuel Tank Services
P.O. Box 462
Burlington, WA. 98233

RE: UST Removal & Soil Sampling
Bellingham Towers
119 Commercial
Bellingham, Washington

Dear Mr. Nightingale,

Enclosed you will find the results of the Underground Storage Tank soil samples. This also includes a field inspection report, laboratory test results, photographs, vicinity map and site assessment check list.

The site, located in downtown Bellingham is served with all utilities. The surrounding area is commercial use.

Due to the location of the tanks within the building structure, project manager proposes to properly fill and abandon the tanks on site.

Site soil is imported fill, a gravel-soil mix. Ground water was found at minus four feet.

Soil samples were collected in accordance with Ecology's Guidance for Site Checks and Site Assessments for Underground Storage Tanks and the site Sampling Analysis plan. Soil samples were collected into a glass jar with Teflon lid liner, using a decontaminated stainless steel spoon. All soil samples were labeled and stored on ice until transported to the C.C.I. Laboratories in Everett, Washington using proper chain of custody procedures. The following are the test results:

Soil Sample #1 Sample taken from stock pile at northwest corner of site:

Sample tested for WTPH- Gasoline

Results: WTPH-G ND (<5) MG/KG **BELOW ACTION LEVEL**

Soil Sample #2 Sample taken at southeast side of excavation pit.

At - 3 feet

Sample tested for WTPH-Gasoline

Results: WTPH-G 78 MG/KG **BELOW ACTION LEVEL**

It is our conclusion, from the laboratory test results reported by C.C.I. Laboratories, the site soil sampled is below action levels. All supportive information is enclosed with this report. We have provided you with two copies. A third copy has been sent to the Department of Ecology Underground Storage Tank Section in Olympia, Washington.

Conclusion and recommendations are professional opinions only. No warranty is expressed or implied. As a condition of our services, it is understood that to the fullest extent permitted by the law, our clients agree to defend, indemnify and hold harmless Pinner Engineering, Inc. its owners, employees, subcontractors and agents, from any future claims or damages at the site, including potential claims from third parties that may name Pinner Engineering, Inc. its owners, employees, subcontractors and agents as a claimant. It is further understood, Pinner Engineering, Inc. its owners or employees are not responsible for any cleanup of contamination at the site and may not be held responsible for any clean up activities performed by the owners or his agents.

Sincerely,



John A. Pinner

Licensed UST Supervisor

enc: Field Inspection Report
 Laboratory Test Results
 Action Level Guide
 Photographs
 Vicinity Map
 Site Assessment Checklist



Fremont
Analytical

3600 Fremont Ave. N.
Seattle, WA 98103
T: (206) 352-3790
F: (206) 352-7178
info@fremontanalytical.com

Merit Engineering
Austin Huang
10129 Main St #201
Bellevue, WA 98004

RE: Soil Samples
Work Order Number: 2011249

November 17, 2020

Attention Austin Huang:

Fremont Analytical, Inc. received 3 sample(s) on 11/13/2020 for the analyses presented in the following report.

Hydrocarbon Identification by NWTPH-HCID
Sample Moisture (Percent Moisture)

This report consists of the following:

- Case Narrative
- Analytical Results
- Applicable Quality Control Summary Reports
- Chain of Custody

All analyses were performed consistent with the Quality Assurance program of Fremont Analytical, Inc. Please contact the laboratory if you should have any questions about the results.

Thank you for using Fremont Analytical.

Sincerely,

Brianna Barnes
Project Manager

DoD-ELAP Accreditation #79636 by PJLA, ISO/IEC 17025:2017 and QSM 5.3 for Environmental Testing
ORELAP Certification: WA 100009 (NELAP Recognized) for Environmental Testing
Washington State Department of Ecology Accredited for Environmental Testing, Lab ID C910

Original

www.fremontanalytical.com

CLIENT: Merit Engineering
Project: Soil Samples
Work Order: 2011249

Work Order Sample Summary

Lab Sample ID	Client Sample ID	Date/Time Collected	Date/Time Received
2011249-001	B#2(1)	11/05/2020 7:30 AM	11/13/2020 10:32 AM
2011249-002	B#2(2)	11/05/2020 7:30 AM	11/13/2020 10:32 AM
2011249-003	B#1	11/05/2020 8:30 AM	11/13/2020 10:32 AM

Note: If no "Time Collected" is supplied, a default of 12:00AM is assigned

CLIENT: Merit Engineering
Project: Soil Samples

I. SAMPLE RECEIPT:

Samples receipt information is recorded on the attached Sample Receipt Checklist.

II. GENERAL REPORTING COMMENTS:

Results are reported on a wet weight basis unless dry-weight correction is denoted in the units field on the analytical report ("mg/kg-dry" or "ug/kg-dry").

The validity of the analytical procedures for which data is reported in this analytical report is determined by the Laboratory Control Sample (LCS) and the Method Blank (MB). The LCS and the MB are processed with the samples to ensure method criteria are achieved throughout the entire analytical process.

III. ANALYSES AND EXCEPTIONS:

Exceptions associated with this report will be footnoted in the analytical results page(s) or the quality control summary page(s) and/or noted below.

Qualifiers:

- * - Flagged value is not within established control limits
- B - Analyte detected in the associated Method Blank
- D - Dilution was required
- E - Value above quantitation range
- H - Holding times for preparation or analysis exceeded
- I - Analyte with an internal standard that does not meet established acceptance criteria
- J - Analyte detected below Reporting Limit
- N - Tentatively Identified Compound (TIC)
- Q - Analyte with an initial or continuing calibration that does not meet established acceptance criteria (<20%RSD, <20% Drift or minimum RRF)
- S - Spike recovery outside accepted recovery limits
- ND - Not detected at the Reporting Limit
- R - High relative percent difference observed

Acronyms:

- %Rec - Percent Recovery
- CCB - Continued Calibration Blank
- CCV - Continued Calibration Verification
- DF - Dilution Factor
- DUP - Sample Duplicate
- HEM - Hexane Extractable Material
- ICV - Initial Calibration Verification
- LCS/LCSD - Laboratory Control Sample / Laboratory Control Sample Duplicate
- MB or MBLANK - Method Blank
- MDL - Method Detection Limit
- MS/MSD - Matrix Spike / Matrix Spike Duplicate
- PDS - Post Digestion Spike
- Ref Val - Reference Value
- REP - Sample Replicate
- RL - Reporting Limit
- RPD - Relative Percent Difference
- SD - Serial Dilution
- SGT - Silica Gel Treatment
- SPK - Spike
- Surr - Surrogate



Analytical Report

Work Order: 2011249

Date Reported: 11/17/2020

CLIENT: Merit Engineering

Project: Soil Samples

Lab ID: 2011249-001

Client Sample ID: B#2(1)

Collection Date: 11/5/2020 7:30:00 AM

Matrix: Soil

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
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Hydrocarbon Identification by NWTPH-HCID

Batch ID: 30409

Analyst: DW

Gasoline	ND	28.0		mg/Kg-dry	1	11/14/2020 5:18:02 AM
Mineral Spirits	ND	70.0		mg/Kg-dry	1	11/14/2020 5:18:02 AM
Kerosene	ND	70.0		mg/Kg-dry	1	11/14/2020 5:18:02 AM
Diesel (Fuel Oil)	ND	70.0		mg/Kg-dry	1	11/14/2020 5:18:02 AM
Heavy Oil	ND	140		mg/Kg-dry	1	11/14/2020 5:18:02 AM
Mineral Oil	ND	140		mg/Kg-dry	1	11/14/2020 5:18:02 AM
Surr: 2-Fluorobiphenyl	139	50 - 150		%Rec	1	11/14/2020 5:18:02 AM
Surr: o-Terphenyl	115	50 - 150		%Rec	1	11/14/2020 5:18:02 AM

Sample Moisture (Percent Moisture)

Batch ID: R63417

Analyst: LB

Percent Moisture	31.2	0.500		wt%	1	11/16/2020 10:35:50 AM
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Lab ID: 2011249-002

Client Sample ID: B#2(2)

Collection Date: 11/5/2020 7:30:00 AM

Matrix: Soil

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
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Hydrocarbon Identification by NWTPH-HCID

Batch ID: 30409

Analyst: DW

Gasoline	ND	26.4		mg/Kg-dry	1	11/14/2020 5:47:32 AM
Mineral Spirits	ND	39.7		mg/Kg-dry	1	11/14/2020 5:47:32 AM
Kerosene	ND	66.1		mg/Kg-dry	1	11/14/2020 5:47:32 AM
Diesel (Fuel Oil)	ND	66.1		mg/Kg-dry	1	11/14/2020 5:47:32 AM
Heavy Oil	ND	132		mg/Kg-dry	1	11/14/2020 5:47:32 AM
Mineral Oil	ND	132		mg/Kg-dry	1	11/14/2020 5:47:32 AM
Surr: 2-Fluorobiphenyl	103	50 - 150		%Rec	1	11/14/2020 5:47:32 AM
Surr: o-Terphenyl	86.3	50 - 150		%Rec	1	11/14/2020 5:47:32 AM

Sample Moisture (Percent Moisture)

Batch ID: R63417

Analyst: LB

Percent Moisture	25.6	0.500		wt%	1	11/16/2020 10:35:50 AM
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Analytical Report

Work Order: 2011249
Date Reported: 11/17/2020

CLIENT: Merit Engineering
Project: Soil Samples

Lab ID: 2011249-003
Client Sample ID: B#1

Collection Date: 11/5/2020 8:30:00 AM
Matrix: Soil

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
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Hydrocarbon Identification by NWTPH-HCID

Batch ID: 30409 Analyst: DW

Gasoline	ND	22.6	mg/Kg-dry	1	11/14/2020 6:17:09 AM
Mineral Spirits	ND	33.9	mg/Kg-dry	1	11/14/2020 6:17:09 AM
Kerosene	ND	56.4	mg/Kg-dry	1	11/14/2020 6:17:09 AM
Diesel (Fuel Oil)	ND	56.4	mg/Kg-dry	1	11/14/2020 6:17:09 AM
Heavy Oil	ND	113	mg/Kg-dry	1	11/14/2020 6:17:09 AM
Mineral Oil	ND	113	mg/Kg-dry	1	11/14/2020 6:17:09 AM
Surr: 2-Fluorobiphenyl	107	50 - 150	%Rec	1	11/14/2020 6:17:09 AM
Surr: o-Terphenyl	89.9	50 - 150	%Rec	1	11/14/2020 6:17:09 AM

Sample Moisture (Percent Moisture)

Batch ID: R63417 Analyst: LB

Percent Moisture	21.0	0.500	wt%	1	11/16/2020 10:35:50 AM
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Fremont

Analytical

Date: 11/17/2020

Work Order: 2011249

CLIENT: Merit Engineering

Project: Soil Samples

QC SUMMARY REPORT

Hydrocarbon Identification by NWTPH-HCID

Sample ID: MB-30409	SamptType: MBLK	Units: mg/Kg	Prep Date: 11/13/2020	RunNo: 63414							
Client ID: MBLKS	Batch ID: 30409		Analysis Date: 11/13/2020	SeqNo: 1272597							
Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Gasoline	ND	20.0									
Mineral Spirits	ND	30.0									
Kerosene	ND	50.0									
Diesel (Fuel Oil)	ND	50.0									
Heavy Oil	ND	100									
Mineral Oil	ND	100									
Surr: 2-Fluorobiphenyl	21.9		20.00		110	50	150				
Surr: o-Terphenyl	18.1		20.00		90.4	50	150				

Sample ID: LCS-30409	SamplType: LCS	Units: mg/Kg			Prep Date: 11/13/2020		RunNo: 63414				
Client ID: LCSS	Batch ID: 30409				Analysis Date: 11/13/2020		SeqNo: 1272598				
Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel (Fuel Oil)	492	50.0	500.0	0	98.4	65	135				
Surr: 2-Fluorobiphenyl	22.2		20.00		111	50	150				
Surr: o-Terphenyl	20.5		20.00		103	50	150				

Client Name: **MERITE**

Work Order Number: **2011249**

Logged by: **Clare Griggs**

Date Received: **11/13/2020 10:32:00 AM**

Chain of Custody

1. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
2. How was the sample delivered? Client

Log In

3. Coolers are present? Yes ☐ No ☒ NA ☐
No cooler present.
4. Shipping container/cooler in good condition? Yes ☒ No ☐
5. Custody Seals present on shipping container/cooler?
 (Refer to comments for Custody Seals not intact) Yes ☐ No ☐ Not Present ☒
6. Was an attempt made to cool the samples? Yes ☐ No ☒ NA ☐
Unknown prior to receipt.
7. Were all items received at a temperature of >2°C to 6°C * Yes ☐ No ☐ NA ☒
8. Sample(s) in proper container(s)? Yes ☒ No ☐
9. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
10. Are samples properly preserved? Yes ☒ No ☐
11. Was preservative added to bottles? Yes ☒ No ☐ NA ☐
 MeOH
 NA ☒
12. Is there headspace in the VOA vials? Yes ☐ No ☐ NA ☒
13. Did all samples containers arrive in good condition(unbroken)? Yes ☒ No ☐
14. Does paperwork match bottle labels? Yes ☒ No ☐
15. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
16. Is it clear what analyses were requested? Yes ☒ No ☐
17. Were all holding times able to be met? Yes ☒ No ☐

Special Handling (if applicable)

18. Was client notified of all discrepancies with this order? Yes ☒ No ☐ NA ☐

Person Notified:	<u>Alex</u>	Date:	<u>11/13/2020</u>
By Whom:	<u>Clare Griggs</u>	Via:	<input type="checkbox"/> eMail <input checked="" type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:	<u>Confirming COC.</u>		
Client Instructions:	<u>See revised COC.</u>		

19. Additional remarks:

Item Information

Item #	Temp °C
Sample	15.6

* Note: DoD/ELAP and TNI require items to be received at 4°C +/- 2°C



Fremont

Analytical

3600 Fremont Ave N.
Seattle, WA 98103
Tel: 206-352-3790
Fax: 206-352-7178

Chain of Custody Record & Laboratory Services Agreement

Client: Ment Engineering

Date: _____

Page: _____

of: _____

Project Name: _____

Project No: _____

Collected by: _____

Location: _____

Report To (PM): _____

PM Email: ment@mentengineering.com

Sample Disposal: ☐ Return to client ☐ Disposal by lab (after 30 days)

Laboratory Project No (internal): 2011249

Special Remarks: _____

Address: 10129 Main Street #201

City, State, Zip: Bellevue WA 98004

Telephone: 360-389-7893

Fax: _____

Sample Name	Sample Date	Sample Time	Sample Type (Matrix)*	VOCS (EPA 8260 / 624)	GX/BTEX	BTEX	Gasoline Range Organics (GX)	Hydrocarbon Identification (HID)	Diesel/heavy Oil Range Organics (DO)	SVOCs (EPA 8270 / 625)	PAHs (EPA 8270 - SIM)	PCBs (EPA 8082 / 608)	Metals** (EPA 6020 / 200.8)	Total (T) Dissolved (D)	Anions (IC)***	EDB (8011)	Comments
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1	B #241	Nov 5, 2012	7:30 AM	S													
2	B #2 (2)	Nov 5, 2012	7:30 AM	S													
3	B #1	Nov 5, 2012	8:30 AM	S													
4																	
5																	
6																	
7																	
8																	
9																	
10																	

*Matrix: A = Air, AQ = Aqueous, B = Bulk, O = Other, P = Product, S = Soil, SD = Sediment, SL = Solid, W = Water, DW = Drinking Water, GW = Ground Water, SW = Storm Water, WW = Waste Water

**Metals (Circle): MTCA-5 RCRA-8 Priority Pollutants TAL Individual: Ag Al As B Ba Be Ca Cd Co Cr Cu Fe Hg K Mg Mn Mo Na Ni Pb Sb Se Sr Sn Tl U V Zn

***Anions (Circle): Nitrate Nitrite Chloride Sulfate Bromide O-Phosphate Fluoride Nitrate+Nitrite

I represent that I am authorized to enter into this Agreement with Fremont Analytical on behalf of the Client named above and that I have verified Client's agreement to each of the terms on the front and backside of this Agreement.

Relinquished Date/Time: Nov 13 2012 12:19 PM Received Date/Time: 11/13/20 @ 1032

Relinquished Date/Time: _____ Received Date/Time: _____

Turn-around Time: ☐ Standard ☒ 2 Day ☐ 3 Day ☐ Next Day ☐ Same Day (specify) _____



Fremont
Analytical

3600 Fremont Ave N.
Seattle, WA 98103
Tel: 206-352-3790
Fax: 206-352-7178

Chain of Custody Record & Laboratory Services Agreement

Date: _____ of: _____
Project Name: _____
Project No: _____
Collected by: _____
Location: _____

Laboratory Project No (internal): **2011249**
Special Remarks: **Edits per Alex w/ Merit Eng. HCID with follow-up on detections 11/13/20 -CG**

Client: **Merit Engineering**

Address: **10129 Main Street #201**

City, State, Zip: **Bellevue WA 98004**

Telephone: **360-389-7893**

Fax: _____

Report To (PM): _____

PM Email: **merit@meriteng.com**

Sample Disposal: ☐ Return to client ☐ Disposal by lab (after 30 days)

Sample Name	Sample Date	Sample Time	Sample Type (Matrix)*	VOCS (EPA 8260 / 624)	GX/BTEX	BTEX	Gasoline Range Organics (GX)	Hydrocarbon Identification (HCID)	Diesel/heavy Oil Range Organics (DO)	SVOCs (EPA 8270 / 625)	PAHs (EPA 8270 - SIM)	PCBs (EPA 8082 / 608)	Metals** (EPA 6020 / 200.8)	Total (T) Dissolved (D)	Anions (IC)***	EDB (8011)	Comments
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Turn-around Time:

☐ Standard

☐ 3 Day

☒ 2 Day

☐ Next Day

Same Day (specify) _____

[Signature]
USER QUESTIONNAIRE

Responder: Mark Hollander

Date: 1/11/21

*This questionnaire is intended to be given to the User (Client) that is requesting the ESA be performed. It is based on the template provided in ASTM E1527-13, and has been adapted for applicability to this project; the intent remains the same. The questions are formed as a guide in order to help the User qualify for *Landowner Liability Protections* (LLPs), as well as to assist in our Phase 1 Study. Failure to provide known information in good faith may exclude this qualification, and could result in determination that "all appropriate inquiry" for the ESA is not complete.

Your answers will be used to help complete the ESA, and will be paraphrased within the final report per ASTM guidelines. Please answer as thoroughly as possible. If the question is unclear, please contact us for clarification. In order for us to use your provided information in our site research, we request this form be returned completed within 1 week. Please inform us if this is not possible given circumstances.

Standard ASTM User Questions:

1. *Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25)*

Are you aware of any environmental cleanup liens against the property that are filed or recorded under federal, tribal, state or local law?

No

2. *Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry (40 CFR 312.26).*

Are you aware of any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law?

No

3. *Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).*

As the user of this ESA do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?

No

4. *Relationship of the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29). (NOTE: ESA standard does not require real estate appraisal)*

Does the purchase price being paid for this property reasonably reflect the fair market value of the property? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?

Not Applicable

[Signature]

5. Commonly known or reasonably ascertainable information about the property (40 CFR 312.30).

Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example, as user,

- Do you know the past uses of the property?
- Do you know of specific chemicals that are present or once were present at the property?
- Do you know of spills or other chemical releases that have taken place at the property?
- Do you know of any environmental cleanups that have taken place at the property?

Yes to some of these - and all info
has been given to Merit Engineering.

6. The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).

As the user of this ESA, based on your knowledge and experience related to the property are there any obvious indicators that point to the presence or likely presence of contamination at the property?

None likely

7. Proceedings involving the Property.

As the user of this ESA, are you aware of:

- Any pending, threatened, or past litigation or administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the property?
- Any notices from a governmental entity regarding possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products?

No

8. User's reason for Assessment.

Please state the reason for having the ESA performed. [If not identified or unknown, according to ASTM guidelines we assume "the purpose is to qualify for an LLP to CERCLA liability"]. Your reason will be stated in the report.

Preparing for marketing + sale of
property.

Just

ADDITIONS and USER INTERVIEW QUESTIONS

Do you have Actual Knowledge of any environmental conditions within or near the property?

Yes

Are you aware of any Storage Tanks or USTs on the property or adjacent properties?

Yes

Are you aware of any hazardous spills or releases on the property or adjacent properties?

No

To your knowledge, have any chemicals been used on site (such as Fertilizers, herb/pesticides)?

No

To your knowledge, does the site have a history of manufacturing or industrial use? Do you know of any chemicals used, presently or in the past, on the site for manufacturing/industrial purposes?

No

Are you aware of past buildings on the site that were demolished? If so, do you know of the use?

Yes - gas station

If known, please identify the Site Owner, Site Manager(s), and Occupant(s) for our use in this ESA.

*Site Owner - Hollander Inv. / Many occupants
& Manager -*

Helpful Documents: Please let us know if you are aware of any site documents on the following list, or similar items. If so, are copies available for our use within reasonable time and cost constraints for the purpose of this ESA? You can exclude items which you know we are aware of (i.e. items we have prepared in the past, or of which we have already been given/informed).

- Environmental Site Assessment reports ✓
- Environment compliance audit reports ?
- Environmental Permits (for example, solid waste or hazardous waste disposal permits, wastewater permits, NPDES permits, underground injection permits) ?
- Registrations for underground and above-ground storage tanks ?
- Registrations for underground injection systems *No*
- Material Safety data sheets *No*
- Community right-to-know plans *No*
- Safety Plans, spill prevention and control plans *No*
- Hydrogeologic reports on property or surrounding area *No*
- Notices from any govt. agency relating to past or current violations of environmental laws *No*
- Hazardous Waste generator notices or reports *No*
- Geotechnical studies on property *Yes - Merit has*
- Risk Assessments *No*
- Recorded AULs ?



Merit Engineering Inc.

Geotechnical, Geological, Hydrogeological, Environmental and Geosciences Services.

[Signature]

Phase 1 ESA - TENANT QUESTIONNAIRE

Name: Emile Diffley Business: ANIMLY CAFE Date: 2/26/2020

We are conducting a Phase 1 Environmental Site Assessment (ESA) for the property as a whole, at the request of or with approval of the property owner. To fulfill a requirement of the study that we investigate current and past use, your occupancy location has been selected for interview and reconnaissance. Please respond to all following items as thoroughly and truthfully as possible (at minimum YES / NO / UNKNOWN). Please provide explanations for affirmative answers. You may write on the back, or attach additional sheets if necessary. Your responses will be used to help complete the ESA, and may be paraphrased or duplicated in original entirety within the final report.

1. What is your business type, years occupied, and general usage (storage, manufac., retail etc.):

Restaurant — in business 2 years, previous
tenant/restaurant operator 10+ years

2. Do you have any knowledge of Prior Occupancy at your location?

Torre Cafe (10-15 years is what I hear)

3. Does your business conduct any Manufacturing or Industrial practices on site?

No

4. Any chemicals used on site? If yes, please describe type, purpose, and regularity of use.

Yes - lots of cleaning & sanitizing, occasionally
a drain-declogger

5. Does your business have any permits or registrations for generation, use, storage, transport, or release of hazardous materials or petroleum products on site? If yes, please list and describe.

No

6. Any known or suspected USTs or hazardous spills/releases on or adjacent to your occupancy? Any indications that suggest the presence or likely presence of contamination at the property?

No

7. Other information on environmental conditions/concerns of your space / property as a whole?

No

CAROLINE CHAPLEMAN

Phase 1 ESA - TENANT QUESTIONNAIRE

Name: BNS Accounting Business: BNS ACCOUNTING Date: 12/9/2020

We are conducting a Phase 1 Environmental Site Assessment (ESA) for the property as a whole, at the request of or with approval of the property owner. To fulfill a requirement of the study that we investigate current and past use, your occupancy location has been selected for interview and reconnaissance. Please respond to all following items as thoroughly and truthfully as possible (at minimum YES / NO / UNKNOWN). Please provide explanations for affirmative answers. You may write on the back, or attach additional sheets if necessary. Your responses will be used to help complete the ESA, and may be paraphrased or duplicated in original entirety within the final report.

1. What is your business type, years occupied, and general usage (storage, manufac., retail etc.):

ACCOUNTING
1 YEAR 4 MONTHS

2. Do you have any knowledge of Prior Occupancy at your location?

NO

3. Does your business conduct any Manufacturing or Industrial practices on site?

NO

4. Any chemicals used on site? If yes, please describe type, purpose, and regularity of use.

NO

5. Does your business have any permits or registrations for generation, use, storage, transport, or release of hazardous materials or petroleum products on site? If yes, please list and describe.

NO

6. Any known or suspected USTs or hazardous spills/releases on or adjacent to your occupancy? Any indications that suggest the presence or likely presence of contamination at the property?

NO

7. Other information on environmental conditions/concerns of your space / property as a whole?

NO