HCMP Law Offices | Hillis Clark Martin & Peterson P.S.

July 1, 2021

Via Email (NWROERTS@ECY.WA.GOV)

Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue Southeast
Bellevue, Washington 98008

Re: Release Report
Vacant Former Firestone Complete Auto Care
351 Rainier Avenue South
Renton, Washington 98057

To Whom it May Concern:

Pursuant to WAC 173-340-300(2)(a) and Department of Ecology ("Ecology") Policy 300, we are reporting a release of hazardous substances that was identified at the vacant former Firestone Complete Auto Care property located at 351 Rainier Avenue South in Renton, Washington on behalf of our client Toula Properties, LLC ("Toula"). Below is the information required for a "Release Report" as specified in Ecology's Policy 300:

A. Name and Address of Site Owner: Toula Properties, LLC, c/o Andy F. Rigel, 999 Third Avenue, Suite 4600, Seattle, WA 98104.

B. Site Location: Vacant former Firestone Complete Auto Care, 351 Rainier Avenue South, Renton, WA (see Attachment 1).

C. Hazardous Substances and their Location: Diesel total petroleum hydrocarbons ("TPH") to soil and groundwater, gasoline TPH to soil, tetrachloroethene ("PCE") to soil and soil vapor, arsenic to soil, and naphthalene to soil vapor centrally located at the property in the location of the former auto service area (see Attachment 2). The releases of PCE and naphthalene to soil vapor were detected in sub-slab soil vapor samples collected at the property.

D. Circumstances of Discovery: In anticipation of building demolition and potential redevelopment, Toula engaged Environmental Associates, Inc. ("EAI") to conduct a Phase I Environmental Site Assessment of the property, which identified that Firestone Complete Auto Care had formerly utilized the property for long-term on-site automotive service and repair. EAI subsequently performed a follow-up investigation that discovered diesel TPH in soil and groundwater, gasoline TPH in soil, PCE in soil and

soil vapor, arsenic in soil, and naphthalene in soil vapor as documented in the appended data tables (Attachment 3). The extent of impacts have been delineated to the two "contamination zones" centrally located on the property as shown in the appended Site Plan (Attachment 2).

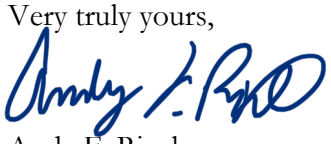
E. Results of Remedial Investigations: Subsurface investigation results that identify the releases of hazardous substances discussed herein are set forth in the appended data tables (Attachment 3).

F. Planned Compliance Monitoring: Toula is in the process of working with an environmental consultant to develop a cleanup plan, which may include compliance monitoring. A remedial action will be performed following the demolition of the building at the property and prior to redevelopment of the property. The commencement of the remedial action is anticipated in the near future.

G. Restrictive Covenant on Property: No restrictive covenant has been recorded.

Please contact me with any questions you may have regarding this Release Report.

Very truly yours,



Andy F. Rigel

AFR:dlc

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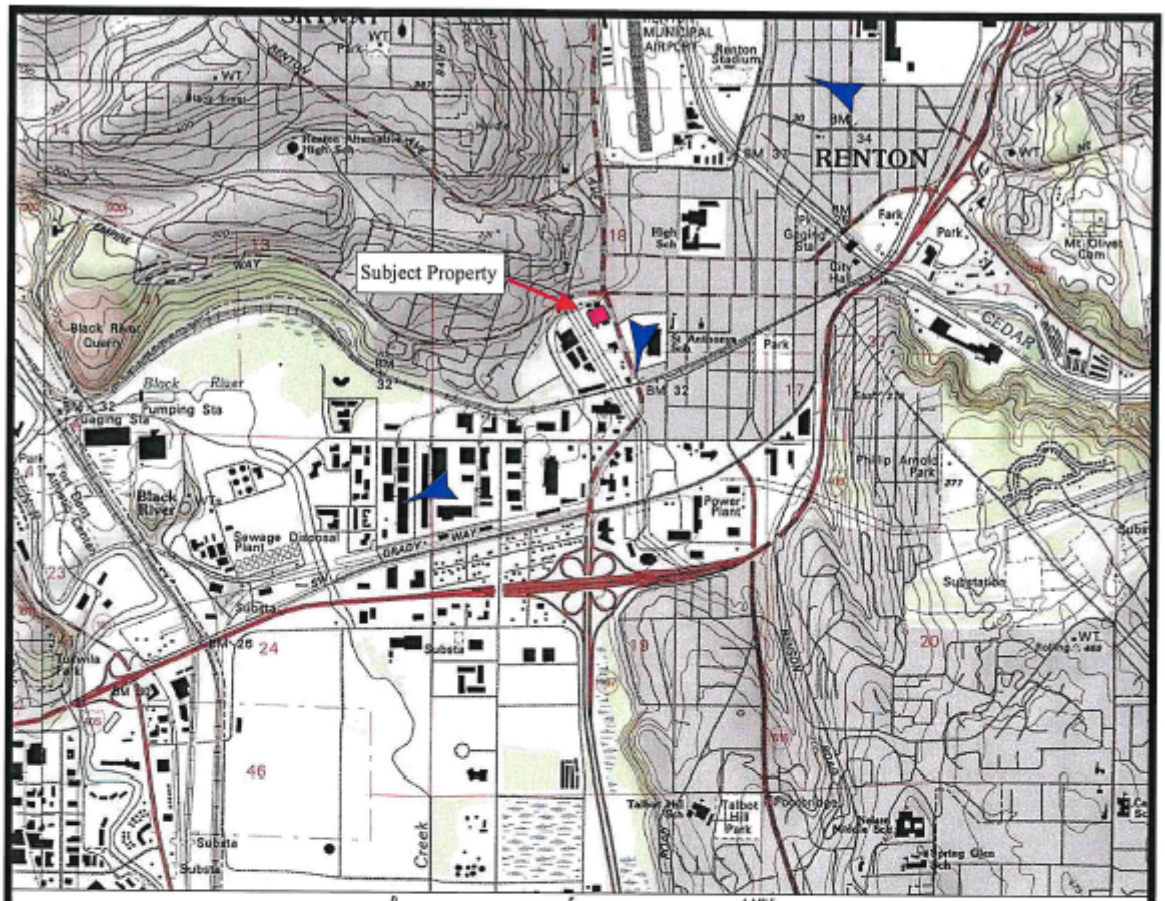
ATTACHMENT 1



Approximate Site Location

Inferred Approximate Direction of Groundwater Flow

N

ENVIRONMENTAL ASSOCIATES, INC.

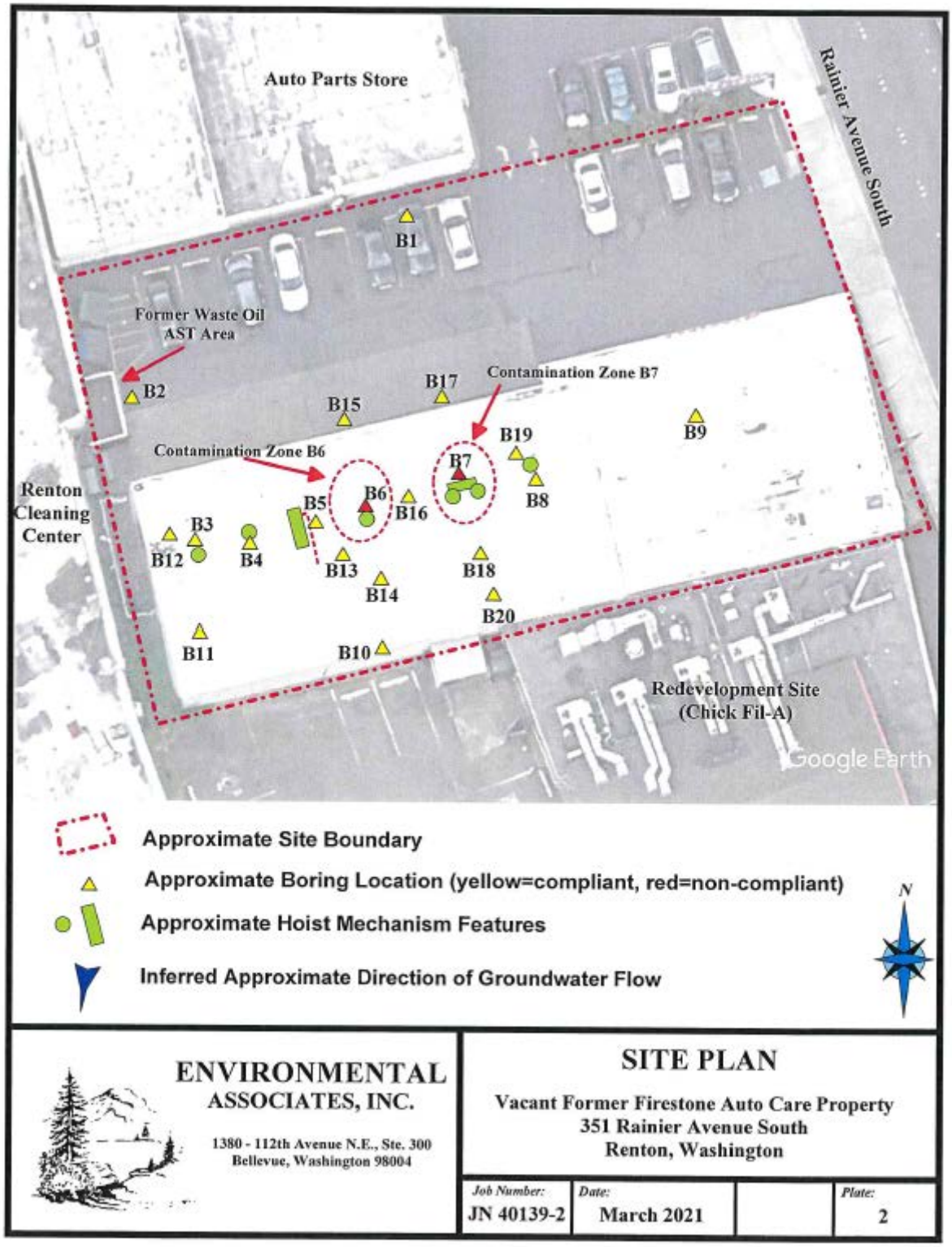
1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

VICINITY/TOPOGRAPHIC MAP

Vacant Former Firestone Auto Care Property
351 Rainier Avenue South
Renton, Washington

Job Number:	*Date:*		*Plate:*
JN 40139-1	February 2021		1

ATTACHMENT 2



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

SITE PLAN

Vacant Former Firestone Auto Care Property
351 Rainier Avenue South
Renton, Washington

Job Number:	Date:		Plate:
JN 40139-2	March 2021		2

ATTACHMENT 3

TABLE 1 - Petroleum Hydrocarbons and BTEX - Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Date	Sample & Depth	Gasoline (TPH)	Diesel	Heavy Oil	Benzene	Toluene	Ethylbenzene	Total Xylenes
Feb-21	B1-10 @ 10' BGS	ND	ND	ND	ND	ND	ND	ND
Feb-21	B2-2.5 BGS	ND	ND	ND	ND	ND	ND	ND
Feb-21	B3-10 @ 10' BGS	ND	ND	ND	ND	ND	ND	ND
Feb-21	B4-4 @ 4' BGS	ND	ND	ND	ND	ND	ND	ND
Feb-21	B5-3 @ 3' BGS	ND	ND	ND	ND	ND	ND	ND
Mar-21	B6A-4 @ 4' BGS	ND	NA	NA	ND	ND	ND	ND
Feb-21	B6-10 @ 10' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B6A-10 @ 10' BGS	***160***	450x	ND	ND	ND	0.18	0.29
Feb-21	B6-15 @ 15' BGS	ND	ND	ND	ND	ND	ND	ND
Feb-21	B7-4 @ 4' BGS	NA	ND	ND	NA	NA	NA	NA
Feb-21	B7-9-10 @ 9' TO 10' BGS	ND	***7,200***	ND	ND	ND	ND	ND
Feb-21	B7-16 @ 16' BGS	NA	ND	ND	NA	NA	NA	NA
Feb-21	B8-8 @ 8' BGS	ND	ND	ND	ND	ND	ND	ND
Feb-21	B8-8 @ 8' BGS DUPLICATE	ND	NA	NA	NA	NA	NA	NA
Feb-21	B9-2 @ 2' BGS	ND	ND	ND	ND	ND	ND	ND
Feb-21	B10-8 @ 8' BGS	ND	ND	ND	ND	ND	ND	ND
Mar-21	B13-10 @ 10' BGS	ND	NA	NA	ND	ND	ND	ND
Mar-21	B13-20 @ 20' BGS	ND	ND	ND	ND	ND	ND	ND
Mar-21	B14-10 @ 10' BGS	ND	NA	NA	ND	ND	ND	ND
Mar-21	B14-12 @ 12' BGS	ND	ND	ND	ND	ND	ND	ND
Mar-21	B14-15 @ 15' BGS	ND	NA	NA	ND	ND	ND	ND
Mar-21	B15-10 @ 10' BGS	ND	NA	NA	ND	ND	ND	ND
Mar-21	B15-15 @ 15' BGS	ND	NA	NA	ND	ND	ND	ND
Mar-21	B16-4 @ 4' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B16-10 @ 10' BGS	ND	ND	ND	ND	ND	ND	ND
Mar-21	B16-15 @ 15' BGS	ND	ND	ND	ND	ND	ND	ND
Mar-21	B17-3 @ 3' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B17-9-10 @ 9-10' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B17-15 @ 15' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B18-3 @ 3' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B18-10 @ 10' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B18-15 @ 15' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B19-3 @ 3' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B19-10 @ 10' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B19-15 @ 15' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B20-6 @ 6' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B20-9-10 @ 9' TO 10' BGS	NA	ND	ND	NA	NA	NA	NA
Mar-21	B20-14 @ 14' BGS	NA	ND	ND	NA	NA	NA	NA
Reporting Limit [3]		5 to 10	50	100 to 250	0.02	0.05/.02	0.05/.02	0.15/.06
WDOE Target Compliance Level[4]		**30 or 100 [5]**	**2000**	**2000**	**0.03**	**7**	**6**	**9**

Notes:
1- "ND" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Soil samples were field screened using a GasTech combustible gas meter to measure the concentration of combustible gas, such as petroleum VOCs. Headspace VOC concentrations were measured after placing the soil sample in a sealed plastic bag and allowing soil and air inside the bag to equilibrate.
5- The MTCA gasoline TPH cleanup level is 30 ppm for soils with benzene or toluene, ethylbenzene, and xylenes = more than 1% of gas detections otherwise it is 100 ppm.
x- The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

Bold and Italics denotes concentrations above MTCA Method A soil cleanup levels.

BGS - Below ground surface.

TABLE 2- Petroleum Hydrocarbons and BTEX- Groundwater Sampling Results
All results and limits in parts per billion (ppb)

Sample Date	Sample	Gasoline (TPH)	Diesel (TPH)	Heavy Oil (TPH)	Benzene	Toluene	thylbenzer	Total Xylenes
Feb-21	B1	ND	ND	ND	ND	ND	ND	ND
Feb-21	B2	ND	ND	ND	ND	ND	ND	ND
Feb-21	B3	ND	ND	ND	ND	ND	ND	ND
Feb-21	B4	ND	ND	ND	ND	ND	ND	ND
Feb-21	B5	ND	ND	ND	ND	ND	ND	ND
Feb-21	B6	240	***2,400***	ND	ND	ND	ND	ND
Feb-21	B7	ND	***16,000***	ND	ND	2.3	ND	ND
Feb-21	B8	ND	ND	ND	ND	2.1	1.0	ND
Feb-21	B9	ND	ND	ND	ND	1.3	ND	ND
Feb-21	B10	ND	ND	ND	ND	ND	ND	ND
Mar-21	B13	NA	81 x	ND	NA	NA	NA	NA
Mar-21	B14	NA	ND	ND	NA	NA	NA	NA
Mar-21	B15	NA	130 x	ND	NA	NA	NA	NA
Mar-21	B16	NA	79x	ND	NA	NA	NA	NA
Mar-21	B17	NA	86 x	ND	NA	NA	NA	NA
Mar-21	B18	NA	62 x	ND	NA	NA	NA	NA
Mar-21	B19	NA	ND	ND	NA	NA	NA	NA
Mar-21	B20	NA	ND	ND	NA	NA	NA	NA
Reporting Limit [3]		100	50 to 53	100	1	1	1	3
MTCA-Method-A Cleanup Levels[4]		**800 or 1000[5]**	**500**	**500**	**5**	**1000**	**700**	**1000**

Notes:
1 - "ND" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A groundwater cleanup levels as published in the Model Toxics Control Act (MTCA) 173-340-WAC.
5- The MTCA gasoline TPH cleanup level is 800 ppb for groundwater with benzene. Otherwise, the cleanup level is 1000 ppb.
x- The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

Bold and Italics denotes concentrations above existing or proposed MTCA Method A groundwater cleanup levels.

TABLE 3- Select VOCs - Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Date	Sample	Tetrachloroethene (PCE)	Trichloroethene (TCE)	(cis) 1,2 Dichloroethene	(trans) 1,2 Dichloroethene	Vinyl Chloride
Feb-21	B1-10	ND	ND	ND	ND	ND
Feb-21	B2-2.5	ND	ND	ND	ND	ND
Feb-21	B3-10	0.05	ND	ND	ND	ND
Feb-21	B4-4	ND	ND	ND	ND	ND
Feb-21	B5-3	ND	ND	ND	ND	ND
Feb-21	B5-15	ND	ND	ND	ND	ND
Feb-21	B6-4	***0.06***	ND	ND	ND	ND
Feb-21	B6-10	0.05	ND	ND	ND	ND
Feb-21	B6-15	***0.08***	ND	ND	ND	ND
Mar-21	B6A-15	ND	ND	ND	ND	ND
Mar-21	B6A-15 (RE-EXTRACT)	ND	ND	ND	ND	ND
Mar-21	B6A-20	ND	ND	ND	ND	ND
Mar-21	B6A-30	ND	ND	ND	ND	ND
Feb-21	B7-9-10	ND	ND	ND	ND	ND
Feb-21	B7-16	ND	ND	ND	ND	ND
Feb-21	B8-8	ND	ND	ND	ND	ND
Feb-21	B9-2	ND	ND	ND	ND	ND
Feb-21	B10-8	ND	ND	ND	ND	ND
Mar-21	B11-2.5	ND	ND	ND	ND	ND
Mar-21	B11-10	ND	ND	ND	ND	ND
Mar-21	B11-20	ND	ND	ND	ND	ND
Mar-21	B12-3	ND	ND	ND	ND	ND
Mar-21	B12-10	ND	ND	ND	ND	ND
Mar-21	B12-30	ND	ND	ND	ND	ND
Mar-21	B13-4	ND	ND	ND	ND	ND
Mar-21	B13-13	ND	ND	ND	ND	ND
Mar-21	B13-20	ND	ND	ND	ND	ND
Mar-21	B14-4	ND	ND	ND	ND	ND
Mar-21	B14-10	ND	ND	ND	ND	ND
Mar-21	B14-12	ND	ND	ND	ND	ND
Mar-21	B14-20	ND	ND	ND	ND	ND
Mar-21	B15-4	ND	ND	ND	ND	ND
Mar-21	B15-10	ND	ND	ND	ND	ND
Mar-21	B15-25	ND	ND	ND	ND	ND
Mar-21	B16-4	ND	ND	ND	ND	ND
Mar-21	B16-10	ND	ND	ND	ND	ND
Mar-21	B16-25	ND	ND	ND	ND	ND
Reporting Limit [3]		0.02/.025	0.02	0.05	0.05	0.05
Cleanup Level for Unrestricted Land Use (Method-A)[4]		0.05	0.03	---	---	---
Cleanup Level - (Method-B)[5]		480	12	160	1600.0	0.667

Notes:
1- "ND" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A soil cleanup levels for unrestricted land use as published in the Model Toxics Control Act (MTCA) 173-340-WAC, Table 740-1.
5- Method-B soil cleanup levels for the "direct contact pathway", as published in Ecology's CLARC database.

Bold and Italics denotes concentrations above existing MTCA Method A or B soil cleanup levels.

TABLE 5 - MTCA-5 Metals - Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Name & Sample Date	Arsenic	Cadmium	Chromium	Lead	Mercury
B2-2.5 (February 2021)	4	ND	23.9	9.5	ND
B6A-4 (March 2021)	5.18	NA	NA	NA	NA
B6A-10 (March 2021)	***32.4***	ND	26.6	7.14	ND
B6A-15 (March 2021)	ND	NA	NA	NA	NA
B13-10 (March 2021)	3.35	NA	NA	NA	NA
B13-20 (March 2021)	ND	NA	NA	NA	NA
B14-10 (March 2021)	2.85	NA	NA	NA	NA
B14-15 (March 2021)	1.08	NA	NA	NA	NA
B15-10 (March 2021)	2.82	NA	NA	NA	NA
B15-15 (March 2021)	4.03	NA	NA	NA	NA
B16-10 (March 2021)	3.9	NA	NA	NA	NA
B16-15 (March 201)	6.31	NA	NA	NA	NA
Reporting Limit [3]	1	1	1	1	1
WDOE-Method-A Cleanup Level (unrestricted land use)	20	2	19 / 2000 [5]	250	2

Notes:
1 - "ND" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A or B cleanup levels as published in the Model Toxics Control Act (MTCA) 173-340-WAC.
5- Results reported as total chromium. The Method A target compliance level for chromium III is 2,000 ppm, while the Method-A compliance level for chromium VI is 19 ppm. Additional testing of sample B6A-10 revealed no detections of chromium VI (hexavalent chromium) .

Bold and Italics denotes concentrations above existing MTCA Method A soil cleanup levels.

TABLE 11 - APH and Select VOCs - Soil Vapor Sampling Results
All results and limits in micro-grams per cubic meter (ug/M^3)

Sample Name	Location	APH EC5-8 aliphatics	APH EC9-12 aliphatics	APH EC9-10 aromatics	Benzene	Toluene	Ethylbenzene	Total Xylenes	Naphthalene	TOTAL PETROLEUM HYDROCARBONS (TPH)	Tetrachloroethene (PCE)	Trichloroethene (TCE)	Chloroethane	1,1-Dichloroethane	1,2-Dichloroethane (EDC)	cis-1,2-Dichloroethene	trans-1,2-Drichloroethene	1,1,1 Trichloroethane	Vinyl Chloride
B5	Adjacent to former in-ground hoist and oil line	1900	510	180.000	4.7	<98	16.0	117.0	***3.1***	2,730.8	***440.0***	<0.56	<14	<2.1	<0.21	<2.1	<2.1	49.0	<1.3
B9	Within former service bay in eastern half of the	910 fb	460	170	5.4	<62	15.0	109.0	***3.4***	1,672.8	<22	<0.35	<8.7	<1.3	<0.13	<1.3	<1.3	3.6	<0.84
B10	margin of the property in former material storage	710 fb	410	190.000	5.6	63.0	18.0	126.0	***3.6***	1,526.2	<21	<0.33	<8.2	<1.3	<0.13	<1.2	<1.2	<1.7	<0.79
WDOE - Soil Vapor Screening Levels[1]		90000*	4700*	6000*	11	76,000	15,000	1,500	2.50	4,700	320	12	152,000	52	3.2	---	---		9.4

Bold and Italics indicate concentrations of compounds that exceed the WDOE Standard Method-B Air Target Compliance Levels.

1 - Soil gas screening level that concentrations in the soil gas just beneath a building expected to not result in exceedance of the air cleanup level in the overlying structure, per the WDOE's Guidance For Evaluating Soil Vapor Intrusion - (April, 2015).

ve - The analyte response exceeded the valid instrument calibration range. The value reported is an estimate.

fb - The analyte was detected in the method blank.

* - Individual petroleum fraction hydrocarbon compliance levels no longer in use and replaced with Total Petroleum Hydrocarbon (TPH) Compliance Limit per WDOE Memorandum 18 document published January 10, 2018.