Delta Environmental Consultants, Inc.

PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT COMMUNICATION

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Kimberly-Clark Worldwide, Inc.
Riverside Woodyard
Everett, Washington

28 December 2005

Prepared for:

Kimberly–Clark Corporation
1400 Holcomb Bridge Road
Roswell, GA 30076

Prepared by:

Delta Environmental Consultants, Inc.
185 Jordan Road
Troy, New York 12180

Delta Project No. 0510545P

Inogen® Environmental Alliance

TABLE OF CONTENTS

Table of Contents (continued)

Table of Contents (continued)

TABLES

FIGURES

APPENDICES

1.0 INTRODUCTION

1.1 PURPOSE

This report represents the findings and conclusions of a Phase I Environmental Site Assessment (Phase I ESA) at the Kimberly-Clark Worldwide, Inc. (KCWW) Riverside Woodyard in Everett, Washington. This Phase I ESA was performed in support of a potential property transaction between KCWW and the City of Everett. In general, the purpose of this Phase I ESA was to determine any obvious areas of recognized environmental conditions (RECs), as defined by the American Society of Testing and Materials (ASTM) Standard E 1527-05, *Standard Practice for Environmental Site Assessments, Phase I Environmental Site Assessment Process* (the "Standard"). A copy of this Standard has been provided in Appendix A.

The purpose of the Phase I ESA was threefold:

1. To observe the subject property for any recognized environmental conditions (RECs) or historic recognized environmental conditions (HRECs), as defined in the Standard, that may be present;
2. To evaluate the extent to which the current RECs may have impacted the subject property; and
3. To present a written report of findings, which will assist the Client in evaluating the need for further investigations to more accurately define the nature and extent of any identified RECs.

1.2 SPECIAL TERMS AND CONDITIONS

The Phase I ESA was conducted in accordance with the Scope of Work established by Delta Environmental Consultants, Inc. (Delta) Proposal No. 0510545Rev dated 13 December 2005, and in conformance with the scope and limitations of the Standard. Any exceptions or deletions from this practice are described in Section 1.3 of this report and the aforementioned proposal.

For the purposes of this Phase I ESA, both KCWW and the City of Everett have been afforded sole use of the benefits of this report, and are defined as "users" in accordance with the Standard. As such, appropriate inquiries were made with both parties during the course of this Phase I ESA to satisfy the intent of the Standard.

1.3 *METHODOLOGIES AND LIMITING CONDITIONS*

Delta performed the Phase I ESA and other associated tasks as well as preparation of the report. The Phase I ESA was conducted in accordance with the ASTM Standard E 1527-05 (as modified by the aforementioned proposal). In general, the Phase I ESA scope of work included a site observation visit; general site characterization; a review of readily available records; an environmental database search; an evaluation of historical aerial photographs and topographic maps; discussions with individuals familiar with the site and site history; and interviews with regulatory agencies regarding the subject property as well as neighboring parcels culminating in the preparation of this report. In addition to the identification of RECs, several business environmental risks (BERs) were evaluated as a matter of course during this Phase I ESA, including wetland areas, floodplain areas, and potential asbestos containing materials (ACM). The scope of the selected BER evaluations is not intended to represent a licensed survey by certain qualified professionals (e.g., wetland survey by a qualified wetland biologist, etc.). Rather, the BER items reported herein were recorded during the Phase I ESA within the judgment, experience and stated qualifications of Delta's on-site professionals, and were noted as a matter of course and not as part of a dedicated licensed survey.

The Phase I ESA site visit was conducted on 17 through 19 December 2005. The on-site activities were conducted by Mr. Scott Bryant, Due Diligence Auditor, and the project was completed under the direction of Mr. Matt Bell, Project Director. Messrs. Tim Browning and John North, Due Diligence Auditors, assisted with

local due diligence and records review in support of this Phase I ESA. Mr. Gary Sitzman, KCWW Operations Consultant, provided unlimited access to the property, records and other information, and was interviewed during the course of this assessment. In addition, Mr. Fred Hodge, former Riverside Woodyard Supervisor (retired), Mr. Ray Jones, Asset Team Leader, Chips & Riverside, Mr. Mike Thorpe, Riverside Equipment Operator and Mr. Sam Cover, Riverside Equipment Operator, also provided information pertaining to the site. Information provided by these individuals is presented throughout this report.

Local weather conditions during the site visit ranged from sunny and clear to overcast with intermittent, light rain showers with temperatures ranging between 35° F and 45° F.

Details of the Phase I ESA are discussed in Sections 2.0 through 4.0 with the findings summarized in Section 5.1 on Tables 5-1 through Table 5-3. Section 4.7 provides a site locator map (Figure 4-1) as well as a general site layout depicting on-site buildings/structures and other onsite features (Figure 4-2). Figures 4-3 and 4-4 depict RECs identified during this assessment on the northern and southern portions of the property, respectively. Figures 4-5 and 4-6 depict HRECs and BERs identified in previous Phase I ESAs performed on the site along with any pertinent information/observations with respect to the HRECs made during the course of this Phase I ESA, for the northern and southern portions of the site, respectively. Section 5.2 provides photo-documentation of selected items. Sections 6.0 and 7.0 provide qualifications of the environmental professionals that participated in the Phase I ESA and provide references specific to this site, respectively.

No limiting conditions were encountered during the course of this assessment. Similarly, no data gaps and/or data failures as defined in the ASTM Standard (Appendix A) were encountered during the course of this Phase I ESA.

2.0 SITE DESCRIPTION

2.1 LOCATION AND DESCRIPTION

As depicted on the Site Location Map, presented as Figure 4-1 in Section 4.7, the Riverside property was located at 3700 Railway Avenue, in the City of Everett, Snohomish County, Washington (hereinafter referred to as the Riverside Woodyard). The Riverside Woodyard consisted of an approximately 101-acre fenced parcel situated between the Snohomish River and the Burlington Northern Railroad tracks. As further described in Section 2.3, a number of buildings and structures were present across the site along with concrete foundations and other remnants of former structures associated with previous onsite operations (i.e., sawmill, chip mill, etc.). Paved and/or gravel parking areas and roadways were present throughout the subject property along with wood chip and hog fuel storage piles, exterior materials storage areas, minor landscaped areas around the buildings and a former dredge spoils area in the southern portion of the property. The property reviewed is described below with a more detailed depiction of the property boundaries and on-site features provided on Figure 4-2 in Section 4.7.

The subject property was an irregular-shaped parcel on the western side of the Snohomish River at the northern end of Railway Avenue as well as north and east of the intersection of Railway Avenue and 26th Place. In general, the Riverside Woodyard was bordered to the east, north and southeast by the Snohomish River, on the west by Burlington Northern Railroad tracks and to the south by Canyon Lumber Company and various industrial/commercial establishments (e.g., marine repair facilities, truck maintenance shops, heavy equipment dealership, etc.). A more detailed description of the neighboring properties is provided in Section 2.7.

2.2 SITE VICINITY AND CHARACTERISTICS

The Riverside Woodyard was located in a developed industrial area in the east-central portion of the City of Everett. Topographically, the property was generally flat and graded slightly to allow surface water to flow to various storm

water drainage swales in the south-central portion of the property as well as along the western property line. Collected water from the Riverside Woodyard was directed to the City of Everett combined sewer outfall (CSO) system and was conveyed to the local publicly-owned treatment works (POTW), located to the northeast on the eastern side of the Snohomish River. A more detailed discussion of topographic, geologic, hydrogeologic, surface water, wetlands, and floodplain characteristics/features of the Riverside Woodyard and nearby vicinity is provided in Section 3.2.

2.3 *DESCRIPTION OF STRUCTURES, ROADS AND IMPROVEMENTS*

At the time of the site visit, the Riverside Woodyard was more than 80 percent developed including numerous buildings/structures and exterior operations areas including wood chip and hog fuel processing/storage areas, exterior equipment/materials storage areas and associated paved and/or gravel roadways/parking areas. The remainder of the property consisted of overgrown vegetated areas in the northern, east-central and southeastern portions of the property as well as along the drainage swale along the western property boundary. In addition to the buildings/structures observed during the Phase I ESA site visit, numerous other buildings/structures were reportedly present onsite over the past 100 years. These former buildings/structures were primarily associated with former sawmill, wood chip production (i.e., chip mill) and production support and maintenance activities. A more detailed description of the past uses of the property is presented in Section 2.6.

The number of structures present onsite, either currently or historically, did not allow for a detailed building-by-building description of these buildings/structures. However, a listing of current and former on-site buildings/structures, including the estimated dates of construction and other relevant information along with any pertinent observations made during the course of this Phase I ESA is presented in Table 2-1. Figure 4-2, in Section 4.7, depicts the location of the existing and former buildings/structures. At the time of the Phase I ESA site visit, a total of 14

buildings were observed onsite as listed below and in Table 2-1 and also on Figure 4-2.

- CSO Pumphouse (Building 2);
- KCWW Riverside Mill Office (Building 3);
- Heavy Equipment Garage (Building 15);
- Storage Building (Building 16);
- Bundle Launching Building (Building 24);
- Bundle Launching Storage Building (Building 24A);
- Scale house (Building 26);
- Old Mill Office (Building 29);
- Sigh's Shop (Building 30);
- Electric Shop (Building 33);
- Enclosed Fabrication Shop (Building 37);
- Yard Office (Building 41);
- Lean-to Pavilion (Building 42); and
- Oil Storage Building (Building 43).

In general, these buildings consisted of slab on grade construction with wood, metal and/or concrete block frames, corrugated metal and/or wood exterior siding and pitched corrugated metal or shingle or flat built-up roofing. Interior building materials generally consisted of wood stud and sheetrock walls, drop tile ceilings and concrete, vinyl tile or carpeted floors. The only other structures observed onsite consisted of metal storage trailers or small wood structures for housing fire hydrants and/or fire fighting equipment/materials.

TABLE 2-1 RIVERSIDE WOODYARD BUILDINGS/STRUCTURES

Bldg No.	Occupancy	Approximate Date of Construction	Remarks
1.	Chip Conveyor/Bunker	1969	Demolished in 2004
2.	CSO Pumphouse	1995	Concrete block, 400 sq. ft.
3.	KCWW Riverside Mill Office	1969	Metal on steel frame, 2,600 sq. ft., offices, locker room, break room, bathrooms, etc.
4.	Chip mill	1969	Demolished in 2004
5.	Log Conveyor/Debarker	1969	Demolished in 2004
6.	Millwright Shop	1970's	Demolished in 2004
7.	Oil Storage Building	1970's	Demolished in 2004
8.	Hogged Fuel Deck	1969	Demolished in 2004
9.	Hog	1969	Demolished in 2004
10.	Hog Fuel Bunker	1969	Demolished in 2004
11.	Slasher Deck/Log Splitter	1969	Demolished in 2004
12.	Former Conveyor/Knuckle Boom Crane	1969	Demolished in 2004
13.	KCWW Substation (North)	Not Applicable	Demolished in 2004
14.	PUD Station	Not Applicable	Pad-mounted transformer
15.	Heavy Equipment Garage	1969	Metal on steel frame, 5,600 sq. ft., three service bays, storage areas and offices
16.	Storage Building	1970's	Near truck wash, 800 sq. ft., parts and equipment storage
17.	10,000-gallon Diesel AST	1970's	Includes containment
18.	Storage Building	1970's	Demolished in 2004
19.	Crew Shack	Late 1980's	Demolished in 2004
20.	Storage Building*	1970's	Demolished/removed
21.	Electric Truck Dumper	1997	Lifts chip trucks to dump wood chips
22.	Motor Control Center	1969	Demolished/removed
23.	Sorting Deck Building*	1969	Demolished/removed
24.	Bundle Launching Building	1969	500 sq. ft., vacant – offices and break room
24A.	Bundle Launching Storage Building	1969	100 sq. ft., spill containment material storage
25.	Transformer Area	Not Applicable	Near Bundle Launching area, three pole-mounted transformers
26.	Scale house	1970's	400 sq. ft., office and bathrooms
27.	Scale house Shed	1970's	Demolished in 2003
28.	Red Shed	1907	Demolished in 2004
29.	Old Mill Office	1950's	Unoccupied, 3,600 sq. ft., vacant – offices, bathroom, break room, etc.
30.	Sigh's Shop	Early 1900's	Unoccupied, 1,600 sq. ft., vacant – some equipment/materials storage
31.	Metal Truck Box	Not Applicable	Removed from site
32.	KCWW Substation (South)	Not Applicable	Three inactive pad-mounted transformers
33.	Electric Shop	Early 1900's	Associated with former sawmill, 1,400 sq. ft., vacant – some leftover equipment storage

Bldg No.	Occupancy	Approximate Date of Construction	Remarks
34.	Diesel/Container Storage	1995	Demolished/removed
35.	Outdoor Fabrication Pavilion	1995	Demolished/removed
36.	Metal Storage Container	Not Applicable	Removed from site
37.	Enclosed Fabrication Shop	1990	Unoccupied, 3,750 sq. ft., vacant – bulldozer storage
38.	Paint Shed	1995	Removed from site
39.	Storage Building	Not Applicable	Removed from site
40.	Storage Building	Not Applicable	Removed from site
41.	Yard Office	1940's	Unoccupied, 380 sq. ft., vacant office
42.	Wood Lean-To Pavilion	1995	Unoccupied, vacant
43.	Oil Storage Building	1995	Unoccupied, 380 sq. ft., vacant
44.	Metal Storage Container	Not Applicable	Demolished/removed
45.	Metal Storage Trailer	Not Applicable	Demolished/removed
46.	Former Sawmill Location	Early 1900's	Demolished Mid-1980's
47.	Former Planning Mill Location	Early 1900's	Demolished Mid-1980's
48.	Former Dry Kilns Location	Early 1900's	Demolished Mid-1980's
49.	Former Chipper Plant Location	Early 1900's	Associated with former sawmill, demolished Mid-1980's
50.	Former Boilerhouse Location	Early 1900's	Associated with former sawmill, demolished Mid-1980's
51.	Former Oil House Location	Early 1900's	Associated with former sawmill, demolished Mid-1980's
52.	Former Garage Location	Early 1900's	Associated with former sawmill, demolished Mid-1980's
53.	Former Hog Fuel Area	Early 1900's	Associated with former sawmill

Note: Total area under roof approximately 21,000 sq. ft.

Access to the Riverside Woodyard was via two gated entrances, one in the south-central portion of the property at the northern end of Railway Avenue, and one in the southwestern corner of the property off Railroad Avenue. Railroad access was also observed via a rail spur from the Burlington Northern railroad tracks along the western property boundary. The rail spur transected the property from west to east and entered the property just north of the scale house through a gate in the west-central portion of the property. The railroad access was formerly used for receiving various wood materials (i.e., railroad ties, dock material, light poles, etc.) for processing into hog fuel. This spur is reportedly no longer used. In addition to the road and rail access, the property could also be accessed via the Snohomish River along the eastern side of the property.

Potable water was provided to the Riverside Woodyard by the City of Everett. Sanitary wastewater from the Riverside Woodyard was discharged to either the City of Everett municipal collection system or to three on-site septic systems. Section 4.1.2 provides further description of the facility's wastewater and storm water management systems. Electric service was provided by the Snohomish County Public Utility District (PUD) No. 1. Building heat was provided by electric baseboard and/or radiant systems, natural gas and/or oil fired heating systems were not present onsite. The site did not have access to back-up electrical power or generators at the time of the Phase I ESA Update site visit.

2.4 *INFORMATION REPORTED BY THE USER REGARDING ENVIRONMENTAL LIENS OR SPECIALIZED KNOWLEDGE OF ENVIRONMENTAL ISSUES*

According to conversations with KCWW and selected City of Everett personnel, there are no known environmental liens in connection with the Riverside Woodyard. KCWW and City of Everett personnel were also not aware of any pending, threatened or past litigation or administrative proceedings relevant to hazardous substances or petroleum products on or from the property and they were not aware of any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous

substances or petroleum products. Specialized knowledge of environmental issues provided by KCWW and the City of Everett is described throughout this report.

According to available information, a number of previous assessments have been conducted at the Riverside Woodyard. These previous investigations included three prior Phase I ESAs as listed below.

- Adirondack Environmental Services, Inc., Phase I ESA, February 1998;
- InteGreyted Consultants, LLC, Phase I ESA Update, December 2000; and
- InteGreyted Consultants, LLC, Phase I ESA Update, 14 July 2003.

Each of the above-listed investigations was performed in support of potential property transactions involving all, or a portion of, the property. The February 1998 Phase I ESA and the December 2000 Phase I Update were performed on the entire Riverside Woodyard whereas the July 2003 Phase I ESA Update focused on a smaller parcel in the west-central portion of the property. Pertinent information from each of these three previous investigations is presented throughout this Phase I ESA report.

RECs were identified in each of these three previous Phase I ESAs. All of these previously identified RECs were re-examined during the course of this Phase I ESA. As discussed in Section 5.1, for the purposes of this report, each of these previous RECs were considered HRECs. The findings presented in Table 5-1 include new RECs pursuant to this Phase I ESA as well as any previously identified RECs pursuant to the previous Phase I ESAs that, based on the findings and observations made during the course of this Phase I ESA, continue to be considered RECs with respect to the Riverside Woodyard. Table 5-2 presents a summary of any previously identified RECs pursuant to the previous Phase I ESAs that, based on the findings and observations made during the course of this Phase I ESA, are no longer considered to present a REC with respect to the Riverside Woodyard (i.e., HRECs). Table 5-3 presents a summary of any

previously identified RECs that, based on the findings and observations made during the course of this Phase I ESA, remain as concerns, but have since been re-classified as BERs.

In addition to the previous Phase I ESAs, a geotechnical investigation was also performed onsite by GeoEngineers in June 1994 (Appendix B). This investigation involved the installation of 12 soil borings and two ground water monitoring wells as part of a geotechnical investigation associated with a number of proposed upgrades to the site. According to this report, soil encountered beneath the site consisted of a mix of silt, sand, gravel and some fill material (i.e., wood fragments) and groundwater was encountered between three and eight feet below ground surface. Additional detail pertaining to the subsurface materials is presented in Section 3.2.4. No odors, stains or other evidence of any potential sources of subsurface contamination were reported. As part of this investigation, ground water samples were collected from the two monitoring wells installed during this investigation in September 1993. These samples were reportedly analyzed for various metals, oil and grease, total petroleum hydrocarbons, cyanide and a number of other inorganic parameters to determine if the water would meet discharge requirements for the Snohomosh County POTW. The analytical results for these samples showed low concentrations of some metals and other inorganic parameters; however, oil and grease and TPH were reported as not detected in both ground water samples. No other pertinent information was available in this report and these wells are further discussed in Section 4.6.1.

2.5 *CURRENT USE OF THE PROPERTY*

At the time of this Phase I ESA site visit, KCWW onsite operations were limited to management of both a wood chip pile and a hog fuel pile. Wood chips and hog fuel were reportedly no longer generated onsite and were purchased from outside vendors. These materials were delivered to the property by truck and stored in large piles in the west-central portion of the property. The chips and hog fuel were delivered to the KCWW Everett pulp and paper mill (located across town)

via truck on an as needed basis. Support activities associated with these operations included an office with a break room and locker room, a scale house and a fuel dispensing location.

In addition to these operations, KCWW was also leasing space on the property to three tenants through informal, month to month lease agreements. A description of these tenants along with their respective use of the property is described below.

- *Kane Equipment:* The heavy equipment garage and adjacent storage building (Figure 4-2, Buildings 15 and 16) in the northern portion of the property have been leased to Kane Equipment for the past two and a half years. Onsite operations include heavy equipment and/or truck maintenance activities within the garage as well as cleaning activities on the paved area immediately south of the equipment garage and exterior staging of the heavy equipment/trucks in this area.

- *Rubatino's Refuse:* Approximately one acre of property has been leased to Rubatinos Refuse for empty municipal waste dumpster storage since the early 1990s. During the Phase I ESA, approximately 70 to 75 municipal waste dumpsters were noted immediately south of the former Red Shed (Figure 4-2, Building 28) in the central portion of the property. An additional 15 to 20 smaller dumpsters were observed in the east-central portion of the property. These dumpsters are further described in Section 4.5.

- *Washington Trucking:* Approximately one acre in the south-central portion of the property has been leased to Washington Trucking for the past several years for truck and/or tractor-trailer parking. At the time of the site visit, approximately 10 to 15 trailers and several trucks were observed parked in this portion of the property. Some tractor-trailer washing activities were also performed onsite as further discussed in Section 4.1.2.

In addition to the above lease agreements, KCWW was also permitting General Contracting (the contractor for an ongoing Snohomish River dredging project northeast of the property) to use a small area in the northeastern portion of the property for personal vehicle parking.

At the time of this Phase I ESA site visit, two other companies were using the property without permission. Cobra Construction and Puget Sound Trucking were using areas in the east-central and southeastern portions of the property,

respectively, for vehicle and/or tractor-trailer parking. According to individuals interviewed, both of these companies have been asked to remove their vehicles from the Riverside Woodyard.

2.6 *PAST USES OF THE PROPERTY*

Historic use information for the Riverside Woodyard was obtained through review of various historical resources (i.e., aerial photographs, Sanborn Fire Insurance Maps, historical topographic maps, etc.) and the previous Phase I ESA reports. According to available documentation, the site was undeveloped wooded land and/or fields until approximately 100 years ago. In 1907, the Hambidge Family constructed a sawmill on the east-central portion of the property along the Snohomish River. The sawmill reportedly operated from 1907 until 1983 or 1984. Site buildings to support sawmill operations included:

- a log haul, sawmill, resaw and timber deck;
- a chipping plant, chip bin and hogged fuel shed;
- a boilerhouse;
- a pumphouse;
- a garage building for plant operations;
- several oil houses;
- a planing mill, resaw cooling shed, crane shed and storage shed;
- two dry kilns;
- five lumber sheds; and
- an office building and two associated garages.

The majority of these buildings were reportedly built on pier systems, as the ground in this area was soft and, in some locations, standing water was present. According to available information, filling of low areas occurred over time, using off-site fill, demolition debris or dredge spoils from the Snohomish River.

Logs were historically gathered in a large, approximately four-acre pond (Figure 4-2) and were brought to the sawmill for processing. Lumber was typically dried in kilns prior to shipping; however, at times some lumber was shipped "green".

From about 1945 to the early 1970's, material for wood gutters was produced and treated on-site with a preservative called "Woodlife". The gutter material was placed on a conveyor and passed through cascading preservative, which flowed over and treated the gutter. The preservative was stored in a 500-gallon underground storage tank (UST) at the planing mill and pumped to the cascade box. Excess preservative and any spillage fell onto a wooden floor, beneath was an exposed ground surface under the building. The gutter material was placed outside to drip dry and await shipment. For approximately one year (in the early 1970's), treatment with "Woodlife" also occurred by dipping gutters in a dip trough approximately four feet wide by 40 feet long. This operation occurred immediately south of the sawmill's large storage shed.

For about nine months, in the early 1980's, green wood was shipped directly to foreign customers. To inhibit molding, the wood was treated at the sawmill with a compound called Permatox. This operation was conducted outdoors directly above earthen material, just south of the log chain. Permatox and water (reportedly approximately one part Permatox to 50 parts water) were mixed in watering cans and poured over the surfaces of the green wood. The excess material and spillage flowed directly to the ground surface. The treated wood was allowed to dry and stored prior to shipping.

The sawmill was reportedly decommissioned in 1983 to 1984 and was demolished by Scott Paper Company in 1985 to 1986. Most of the wooden buildings were reportedly chipped and used as hog fuel. According to available documentation, approximately two cubic yards of asbestos containing material (ACM) was buried beneath the timber deck and the material was covered with fill during mill closure. Low areas remaining from the demolition of the sawmill as well as the associated log pond were reportedly filled with up to ten to 15 feet of

construction and demolition waste and dredge spoils.

Past use of the northern portion of the property, prior to the chip mill, included small shacks and docks along the western bank of the Snohomish River. These areas reportedly served as mooring and docking locations for local fishing and logging vessels. The central portion of the property was marshy and remained vegetated and undeveloped until the late 1960s when the chip mill and woodyard facility was constructed.

According to available documentation, the chip mill and associated buildings were constructed by KCWW's predecessor Scott Paper Company in the late 1960s. The chip mill buildings were principally constructed of corrugated metal on steel frames typically referred to as "Butler Buildings".

Prior to ceasing chip mill operations, the Riverside Woodyard produced and stored wood chips for use by the KCWW Everett pulp and paper mill and non-KCWW facilities. Principal manufacturing raw materials included various types, grades and sizes of timber. Support activities associated with the former operations included administrative offices, vehicle and equipment maintenance shops, fuel dispensing locations and oil/chemical storage areas.

In addition to the former sawmill and chip mill operations, KCWW also leased space onsite to various tenants over the past ten to fifteen years. These former tenants and any pertinent information pertaining to their operations are presented in the paragraphs below.

- *Tri-State Construction:* Tri-State Construction was present onsite from June 2003 through January 2004. They were a subcontractor for the City of Everett for the deep water outfall line installed under the roadway along the western side of the property. Property use involved primarily equipment, materials and vehicle staging.
- *Advanced American Diving Service, Inc.:* Advanced American Diving Service was present onsite from June through September 2003. They were a

subcontractor for the City of Everett for the deep water outfall line and used the property to stage and assemble sections of the outfall line. Once assembled, the pipe sections were floated down the Snohomish River to the Pigeon Creek area, submerged and installed in the desired location. Property use involved primarily equipment, materials and vehicle staging and pipeline assembly.

- *AMIX Demolition, Inc.:* AMIX Demolition was present onsite during the summer and fall of 2004. They were a subcontractor for KCWW for the demolition of the former chip mill buildings/structures in the northern portion of the site as well as the Red Shed (Figure 4-2, Building 28) in the central portion of the site.

- *United Wood Products Company:* United Wood Products was present onsite from September 2003 through October 2004 and was a subcontractor for KCWW for hog fuel operations. United Wood Products was responsible for the acquisition of hog fuel as well as the onsite inventory management and transportation of hog fuel from the site to the Everett Mill. According to individuals interviewed, United Wood Products contract was terminated and there is reportedly ongoing litigation between United Wood Products and KCWW.

- *Pacific Topsoil, Inc.:* Pacific Topsoil was present onsite from January through June 2005 and was a subcontractor for KCWW for hog fuel operations. Specifically, Pacific Topsoil was contracted to grind and haul wood waste and construction/demolition debris abandoned onsite by United Wood Products. This material was reportedly used as hog fuel or was properly disposed.

- *The Marine Group (also known as Stabbert & Associates and/or Venture Pacific Marine):* Approximately four acres in the east-central and southeastern portions of the site was formerly leased to The Marine Group, a boat fabrication company (this portion of the property was formerly known as Emerald Fabricators and Venture Pacific Marine). The Marine Group was reportedly onsite from the mid to late 1990s.

- *Manson Construction:* Manson Construction leased approximately one acre of property in the late 1990s for storing dredging equipment. This property was situated in the east-central portion of the property along the Snohomish River. Manson Construction used the property primarily for storing water-tight metal structures used for flotation of dredging equipment.

- *Guildersleeve Logging Company:* Guildersleeve Logging Company leased approximately one-acre of property for storing heavy equipment for timber operations in the late 1990s. This heavy equipment was reportedly brought to the site via barge, off-loaded in the east-central portion of the property and temporarily stored on-site.

- *Mr. Doug Pohl (office space):* Approximately 500 square feet of office space in the Old Mill Office (Figure 4-2, Building 29) was leased to Mr. Doug Pohl in the late 1990s to early 2000s. Mr. Pohl owned a boat computer equipment installation and repair company. This space is reportedly used as office space only. The vast majority of his work is performed on location (i.e., boat, marina, dock, etc.).

2.7 *CURRENT AND PAST USES OF ADJOINING PROPERTIES*

The Riverside Woodyard was situated in a well-developed area comprised of mixed residential, commercial and industrial properties. The commercial/industrial properties were primarily observed to the south and southwest and residential development was generally observed to the west. Specifically, adjacent properties included those parcels described by the following paragraphs.

North: The property was bordered to the north by the Snohomish River, which flows to the northwest, and the Burlington Northern Railroad tracks.

East:. The Snohomish River also comprised the eastern property boundary. The City of Everett POTW was present across the river to the northeast and three rivers (Deadwater Slough, Union Slough and Steamboat Slough) discharged into the eastern side of the Snohomish River east and southeast of the site.

South: Canyon Lumber, the Snohomish River and a marine facility were present along the southern property boundary. Further south was a mix of commercial, industrial and residential parcels along 26th Place and Railway Avenue followed by the Snohomish River. Specific adjacent properties included Schaffer Crane & Rigging, Chapman Truck Sales and other various marine related operations (i.e., Nexus Marine Construction, Sno River Drydock & Charter, Compamy, Deep Sea Fisheries, Bering Sea, etc.).

West: The western property boundary was consisted of a storm water drainage swale and the Burlington Northern Railroad tracks and right-of-way. A second,

smaller drainage swale was present west of the railroad tracks followed by a steep, wooded upslope rising approximately 20 feet in elevation to a residential area.

Available information concerning past use of adjacent properties was obtained from interviews with persons knowledgeable about the subject property as well as from a review of historic aerial photographs and topographic maps, as discussed in Section 3.3 below. Observations indicative of RECs were identified at one of the adjacent properties as described in the paragraph below.

- *Locomotive Accident:* According to available information, in the 1980's, two light locomotives collided along the railroad tracks immediately west of the scale house (Figure 4-4, Item No. ADJ-12). This collision reportedly resulted in a release of approximately 1,000 to 2,000 gallons of diesel fuel to the soils below/near the railroad tracks. Soil removal and/or other surface/subsurface clean up did not occur. No surficial evidence of this spill (i.e., stressed vegetation, staining) was observed during this Phase I ESA and no new information was obtained. For this reason, this accident continues to represent a REC with respect to the site.

In addition to the above-mentioned adjacent property REC, several additional adjacent property RECs were identified in the previous Phase I ESAs conducted at the Riverside Woodyard. Specifically, 12 additional adjacent properties were identified, primarily in the Phase I ESA completed by Adirondack Environmental Services (Adirondack, 1998). Based on information obtained through the course of the Phase I ESA Update (InteGreyted Consultants, 2000), Phase I ESA Update (InteGreyted Consultants, 2003) and this December 2005 Phase I ESA (i.e., sites have been cleaned up, documented ground water flow direction suggesting a given site is down gradient or cross gradient with respect to the Riverside Woodyard, etc.), these 12 previously identified adjacent property RECs are no longer considered RECs with respect to the site. For the purposes of this report, these previous findings are considered HRECs and are summarized in Table 5-2 in Section 5.1 and depicted on Figure 4-6.

3.0 ENVIRONMENTAL RECORDS REVIEW

3.1 STANDARD ENVIRONMENTAL RECORD SOURCES, FEDERAL AND STATE

A regulatory database search meeting or exceeding the ASTM E 1527-05 search radii was conducted for the subject property. Environmental Data Resources (EDR), a nationally recognized database search service, conducted the regulatory database search. The database search report is included in Appendix C. A limited summary of the databases searched is provided below.

Federal Databases

United States Environmental Protection Agency (USEPA) National Priorities List (NPL), updated November 2005, 1.5-mile search radius: NPL, also known as the Superfund list, is USEPA's inventory of uncontrolled or abandoned hazardous waste sites that are targeted for possible long-term remedial action under CERCLA.

USEPA Delisted National Priorities List (NPL), updated November 2005, 1.5-mile search radius: This database contains summary information pertaining to sites that have been removed from the NPL or require no further action.

USEPA Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List, updated October 2005, 1-mile search radius: CERCLIS is USEPA's database of known and suspected abandoned hazardous waste sites. Listed sites have been investigated, or are currently under investigation by USEPA, for release or threatened release of hazardous substances. Sites placed on CERCLIS are subjected to review and evaluation and may be determined to be of little or no concern or may be subjected to additional levels of review and evaluation possibly leading to placement on the NPL.

USEPA No Further Remedial Action Planned Sites (CERC-NFRAP), updated September 2005, 1-mile search radius: The NFRAP database contains information pertaining to sites which have been removed from the CERCLIS database.

USEPA RCRIS Corrective Action (CORRACTS) Sites, updated October 2005, 1.5-mile search radius: The CORRACTS database contains information pertaining to hazardous waste treatment, storage and disposal facilities which

have conducted, or are currently conducting, a corrective action under the Resource Conservation and Recovery Act (RCRA).

USEPA Resource Conservation Recovery Information System (RCRIS) Database, updated October 2005, 0.75-mile search radius for RCRA generators/ transporters and a 1-mile search radius for Treatment, Storage and Disposal (TSD) Facilities: RCRIS contains information on facilities that generate, treat, store or dispose of hazardous waste including: Treatment, Storage and Disposal Facilities (TSDF); Large Quantity Generators (LQG); and Small Quantity Generators (SQG). The database also reports regulatory inspections conducted at a facility and resultant violations, if any, during these inspections.

US Engineering Controls (US ENG CONTROLS), updated August 2005, 1-mile search radius: This database is a listing of sites with engineering controls in place. Engineering controls include various forms of caps, buildings, foundations, liners and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

US Institutional Controls (US INST CONTROLS), updated February 2005, 1-mile search radius: This database is a listing of sites with institutional controls in place. Institutional controls include administrative measures, such as ground water use restrictions, construction restrictions, property use restrictions and post remediation care requirements intended to prevent exposure to contaminants remaining onsite.

USEPA Emergency Response Notification System (ERNS), updated January 2005, property search only (0.5-mile search radius): The ERNS database records information on the sudden and/or accidental release of hazardous substances and petroleum into the environment.

State Databases

Washington Confirmed and Suspected Contaminated Sites List (CSCSL), updated August 2005, 1.5-mile search radius: The CSCSL database contains State hazardous waste site records, which are equivalent to the CERCLIS database. These sites may or may not be listed on the federal CERCLIS List.

Washington Hazardous Sites List (HSL), updated September 2005, 1.5-mile search radius: The HSL database is a subset of the CSCSL Report and includes sites which have been assessed and ranked using the Washington Ranking Method.

Washington Solid Waste Facility Database (LF), updated January 2005, 1.0-mile search radius: The LF report contains summary information pertaining to solid waste disposal facilities and landfills in the State of Washington.

Washington Underground Storage Tank Database (UST), updated July 2005, 0.75-mile radius: The UST database is a comprehensive listing of all USTs regulated under Subtitle I of the RCRA and registered with the State Department responsible for administering the UST program.

Washington Leaking Underground Storage Tank Database (LUST), updated July 2005, 1.0-mile radius: The LUST list contains summary information pertaining to all reported leaking USTs located within the State of Washington.

Washington Institutional Control List (WA INST CONTROLS), updated September 2005, 1-mile search radius: This database is a listing of sites that have institutional controls.

Washington Voluntary Cleanup Program (WA VCP), updated August 2005, 1-mile search radius: This database is a listing of sites that have entered either the voluntary cleanup program or its predecessor, the Independent Remedial Action Program.

State Engineering Control Registries: The Standard specifies the review of State Engineering Control Registries; however, the State of Washington does not currently maintain such a database. Therefore, the intent of the Standard was satisfied otherwise, through appropriate due diligence inquiries with various regulatory officials as described elsewhere in this report.

Tribal Databases

In addition to the above described federal and state databases, the ASTM Standard also requires a search of tribal databases for hazardous waste sites, landfills, underground and leaking underground storage tanks, institutional/engineering control sites, voluntary cleanup sites and brownfields sites on native american/tribal lands. According to EDR, in the State of Washington, only registered underground storage tanks and leaking underground storage documentation for sites on tribal lands has been compiled into databases. As indicated in the EDR Report, there were no tribal UST or LUST sites within the specified search radii. As of the date of this report, information pertaining to

other sites has reportedly not been compiled into database for search purposes. According to the EDR Report and available information, there are no tribal lands within two to three miles of the Riverside Woodyard. As such, no tribal hazardous waste sites, landfills, institutional/engineering sites or other potentially listed sites on tribal lands were expected to be located in the vicinity of the Riverside Woodyard.

Plottable Sites

The Riverside Woodyard (i.e., Target Property in the EDR Report) was listed as an active landfill/solid waste disposal facility. No details pertaining to this listing were provided; however, the database search reports associated with the previous Phase I ESA reports also listed the site as an active landfill/solid waste disposal facility. According to available information, various fill materials including dredge spoils, sand and gravel, construction/demolition debris and secondary wastewater treatment plant sludge from the KCWW Everett pulp and paper mill have historically been used as fill material at the site (Section 4.5). The Riverside Woodyard was also listed as a RCRA small quantity generator. According to the EDR Report, there were two separate listings for the site on this database, Kimberly-Clark Riverside Wood Mill and Venture Pacific Marine (a former tenant in the east-central portion of the site). No violations were reported and no further pertinent information for either of these listings was available.

The EDR Report contained a total of 27 additional plottable listings within the search radii specified in the Standard. A summary of the information pertaining to these listing provided in the EDR Report is described below.

CERC-NFRAP

One CERC-NFRAP site was mapped within one-half mile of the Riverside Woodyard. This site was the Canyon Lumber facility immediately south of the site. According to the EDR Report, a preliminary assessment was performed in

1990 and a site inspection was completed in September 1994. This site was reported as archived on the same date the site inspection was completed and this site was not placed on the NPL. No further pertinent information was available. Based on available information, expected ground water flow direction and fact that this site was listed as a NFRAP site, this site was not expected to present a REC with respect to the Riverside Woodyard.

RCRIS-SQG

In addition to the Riverside Woodyard, there were five other RCRIS-SQG sites mapped within one-half mile of the property. These sites included Deep Sea Fisheries at 3922 Railway Avenue, Rubatino's Truckcare at 2730 Harrison Avenue, Puget Sound Energy at 3630 Railway Avenue, Jerry's Motor Service at 3402B Everett Avenue and Prime Equipment at 3409 Everett Avenue, all of which were located south to southwest of the Riverside Woodyard. According to the EDR Report, no violations were reported for any of these facilities. Based on the information in the EDR Report (i.e., no reported violations), proximity with respect to the subject property and/or expected ground water flow direction, these listings were not expected to present a REC to the subject property.

ERNS

Two ERNS sites were mapped within one-half mile of the property. These sites included an unidentified properties at 3816 and 3820 Railway Avenue, both of which were located south to southwest of the Riverside Woodyard. No further information was provided in the EDR Report. Based on the proximity with respect to the subject property and/or expected ground water flow direction, these listings were not expected to present a REC to the subject property.

CSCSL (equivalent to HWS)

Six CSCSL sites were mapped within a one mile radius of the Riverside

Woodyard. Pertinent information for each of these sites is presented in the paragraphs below.

- *Chapman Truck Repair Ditch* - located at 3821 Railway Avenue, approximately one-tenth of a mile south of the Riverside Woodyard, was listed as a Hazardous Waste Site "awaiting remedial action". According to the EDR Report, petroleum constituents have been confirmed in soil and are suspected in ground water, surface water and sediments. In addition, metals and/or cyanide are also suspected in each of these media. No further pertinent information was available.

- *Rubatinos Refuse* - located at 2730 Harrison Street, approximately one-fifth of a mile southwest of the Riverside Woodyard, was listed as a Hazardous Waste Site undergoing independent remedial action. According to available information, remedial efforts were underway at the time of the site visit to address heavy metals, cyanide and petroleum products present in soil and ground water beneath this property. This site has been assigned the lowest assessed risk to human health and the environment. Investigations to date have confirmed priority pollutants (metals and/or cyanide) and petroleum products above applicable cleanup levels. No further pertinent information was available.

- *Puget Sound Energy* - located at 3630 Railway Avenue was reportedly a coal gasification plant from the early 1900's to the mid-1960's and was listed as a Hazardous Waste Site undergoing independent remedial action. According to the EDR Report, soil and ground water at this facility site have been affected by polynuclear aromatic hydrocarbons (PAH), phenolic compounds, non-halogenated solvents, metals, cyanide and/or petroleum compounds above applicable cleanup levels. Remediation was reportedly underway and an Interim Remedial Action Report has been submitted to the Washington Department of Ecology (WADOE). No further pertinent information was available.

- *Prime Equipment* - located at 2810 Highland Avenue, approximately one-half mile southwest of the Riverside Woodyard, was listed as a State Hazardous Waste Site undergoing independent remedial action. According to available information, investigations to date have confirmed priority pollutants (metals and/or cyanide) above applicable cleanup levels and a remedial action report has been submitted to the WADOE. No further pertinent information was available.

- *Nelson Distributing* - located at 2815 Highland, approximately one-half of a mile southwest of the Riverside Woodyard, was listed as a Hazardous Waste Site undergoing independent remedial action. According to the EDR Report, investigations to date have confirmed petroleum products in surface water and soil and metals and/or cyanide in ground water above applicable cleanup

levels and a remedial action report has been submitted to the WADOE. No further pertinent information was available.

- *Washington DOT Parcel 1-911 Ebey Slough* - located immediately south of 2814 Highland Avenue, approximately one-half mile southwest of the Riverside Woodyard, was listed as a Hazardous Waste Site undergoing independent remedial action. According to the EDR Report, investigations to date have confirmed metals and/or cyanide in the soil and ground water above applicable cleanup levels and a remedial action report has been submitted to the WADOE. No further pertinent information was available.

Based on the information in the EDR Report, proximity with respect to the Riverside Woodyard and/or expected ground water flow direction, none of these CSCSL sites were expected to present a REC to the subject property.

UST

Four UST sites were mapped within one-half mile of the Riverside Woodyard. These sites included Canyon Lumber at 3821 26th Place, Schaffer Crane 3826 26th Place, Puget Sound Energy at 3630 Railway Avenue and Rental Service Corporation at 3409 Everett Avenue, all of which were located south to southwest of the Riverside Woodyard. According to the EDR Report, Rental Service Corporation is the only facility with active underground tanks. The underground tanks at the remaining facilities were reported as removed or temporarily closed. As discussed below, three of these four facilities (Canyon Lumber, Schaffer Crane and Rental Service Corporation) were also listed as having leaking USTs. Based on the information in the EDR Report, proximity with respect to the subject property and/or expected ground water flow direction, these listings were not expected to present a REC to the subject property.

LUST

A total of eight LUST sites were mapped within one mile of the Riverside Woodyard. The following paragraphs provide relevant information on each of these neighboring properties.

- *Canyon Lumber Company* - located at 3821 26th Place immediately adjacent to the south end of the Riverside Woodyard. According to the EDR Report, two USTs were removed from this site and soil contamination associated with these USTs was encountered. Soil cleanup was reported as complete.

- *Puget Sound Energy* - located at 3630 Railway Avenue, approximately two-tenths of a mile southwest of the Riverside Woodyard. According to the EDR Report, two USTs were removed from this site and soil contamination associated with these USTs was encountered. Soil cleanup was reported as complete.

- *Rental Service Corporation* - located at 3409 Everett Avenue, approximately three-tenths of a mile southwest of the Riverside Woodyard. According to the EDR Report, two USTs were removed from this site and soil contamination associated with these USTs was encountered. Soil cleanup was reported as complete.

- *Nelson Distributing* - located at 2815 Highland Avenue, approximately one-half of a mile southwest of the Riverside Woodyard. According to the EDR Report, ground water contamination was encountered during the removal of a UST at this site and the facility status was reported as "cleanup started" in December 1998. No further information was available in the database search report.

- *Johnson Associates* - located at 3217 Hewitt Avenue, approximately one-half of a mile southwest of the Riverside Woodyard. According to the EDR Report, two USTs were removed from this site and soil and ground water contamination associated with these USTs was encountered. The facility was reported as "cleaned up" as of June 1995.

- *Washington State Patrol* - located at 3202 20th Street, approximately six-tenths of a mile northwest of the Riverside Woodyard. According to the EDR Report, soil contamination was encountered during the removal of a UST at this site and the site was reported as cleaned up as of April 2002. A second UST at this location was reported as "closure in progress" and additional soil contamination was encountered and reported as "cleanup started". No further information was available in the database search report.

- *Exxon Service Station* - located at 3015 Everett Avenue, approximately one-half of a mile west-southwest of the Riverside Woodyard. According to the EDR Report, four USTs were removed from this site and soil and ground water contamination associated with these USTs was encountered. The facility was reported as "cleaned started" with ongoing monitoring as of June 1995. No further information was available in the database search report.

- *Ted's Union U-Haul* - located at 1831 Walnut Avenue, approximately three-quarters of a mile northwest of the Riverside Woodyard. According to the

EDR Report, five USTs were removed from this site and soil contamination associated with these USTs was encountered. Soil cleanup was reported as complete. No further information was available in the database search report.

Of the above-listed LUST sites, only the Canyon Lumber, Puget Sound Energy and Rental Service Corporation sites were in the immediate vicinity of the Riverside Woodyard. According to the EDR Report, each of these LUST incidents was reported as cleaned up. The remaining sites were either further away and or topographically isolated with respect to the subject property. Based on the information in the EDR Report, proximity with respect to the Riverside Woodyard and/or expected ground water flow direction, none of these LUST sites were expected to present a REC to the subject property.

Unplottable Sites

The EDR database search cannot always accurately locate a facility listed in a given database due to incomplete or faulty addresses and/or longitude and latitude coordinates. In these cases, EDR has supplied a list of unplottable (orphan) sites. Based upon the information provided and the required search radius for a given database, it is sometimes not possible to determine if an unplottable site falls within the given search radius or if it may be removed from consideration. In order to determine which unplottable sites were within the specified search radii, listed properties were field checked by reconnaissance of the surrounding properties as well as discussions with KCWW personnel.

According to the EDR Report, a total of 39 unplottable sites were identified in the vicinity of the Riverside Woodyard. Based on a review of these sites and field reconnaissance, all of the 36 unplottable sites were determined to be outside the specified search radii. The three remaining listings all pertained to the same site, the Everett Transfer Depot located at 3850 and 3862 Railway Avenue south of the Riverside Woodyard. This site was listed as a CSCSL no further action and a voluntary cleanup site; however, no specific details were provided in the EDR

Report. Based on the information in the EDR Report (i.e., site was listed as no further action required), proximity with respect to the subject property and/or expected ground water flow direction, this unplottable site was not expected to present a REC to the subject property.

3.2 *PHYSICAL SETTING SOURCES*

Various informational resources were reviewed for the physical characterization of the property, including topographical maps, floodplain maps, wetlands maps, soil survey maps, the EDR Report and available previous site investigation reports as listed below. Information from each of these sources pertaining to the property was extracted and is presented in the following paragraphs.

- Adirondack Environmental Services, Inc., Phase I Environmental Site Assessment, February 1998;
- EDR Database Search Report, Inquiry Number 1577418.2s, 16 December 2005;
- GeoEngineers, Inc., Report, Geotechnical and Hydrogeological Services, Proposed Riverside Operations Improvements, July 1, 1994;
- InteGreyted Consultants, LLC, Phase I Environmental Site Assessment, December 2000;
- National Wetland Inventory Map, Everett, Washington Quadrangle, 1987;
- US Army Corps of Engineers, Floodplain Map, District File No. E-2-6-487, 1973;
- USDA Soil Survey of Snohomish County, Washington, July 1983;
- USGS Everett, Washington Quadrangle, 7.5' Minute Series (Topographic), 1956 Photo-revised 1968 and 1973; and
- USGS Marysville, Washington Quadrangle, 7.5' Minute Series (Topographic), 1953 Photo-revised 1968 and 1973.

3.2.1 *Climate of the Area*

The climate in Everett is greatly tempered by winds from the Pacific Ocean. Summers are fairly warm and winters are cool; however, extremes in temperature

(i.e., very hot or cold days) are not common. Average winter temperature is 40 degrees Fahrenheit; average summer temperature is 62 degrees Fahrenheit. Total annual precipitation is 36 inches; average seasonal snowfall is eight inches.

3.2.2 *Topography*

The site was located along the banks of the Snohomish River. The western boundary of the site was marked by an access road (informally referred to as Railroad Avenue), railroad tracks and then a steep bank, which rose from an elevation of ten to 15 feet above mean sea level (MSL) at the base of the slope to 40 feet above MSL at the top of slope. From this western edge, the site sloped gently to the east from an elevation of ten to 15 feet above MSL to five to ten feet above MSL. As such, the site was generally flat with an average elevation of approximately 10 to 15 feet above MSL.

Regional topography within the immediate vicinity also gently slopes to the east and southeast. Elevations range from a high of over 100 feet above MSL on top of small hills to the northwest and west of the site to a low of sea level at the Snohomish along the eastern property boundary.

Site elevation and topography has changed somewhat since 1959. As part of site development, significant amounts of fill have been brought to the property and graded. Fill material consisted primarily of construction and demolition material, dredging from the Snohomish River and wood fiber waste from the Everett Mill secondary wastewater treatment plant. Some soil and excavation spoils from various local construction projects have also been brought to the property.

3.2.3 *Surface Water*

There were no major surface water bodies on the Riverside Woodyard; however, there were two surface water features observed along the property boundaries. The Snohomish River was present along the northern, eastern and southeastern

property boundary and a long, straight, man-made drainage swale was present along the western property boundary. The Snohomish River flows generally to the north-northwest and discharges into Possession Sound approximately three miles northwest of the site. Three other surface water features (Deadwater Slough, Steamboat Slough and Union Slough) discharge into the eastern side of the Snohomish River east and southeast of the subject property.

At the time of the Phase I ESA site visit, the drainage swale was approximately ten feet wide and six feet deep and was overgrown with vegetation. Flow in the drainage swale was to the north and terminated near the north end of the subject property. A pump station (Figure 4-2, Building 2) transports water from the swale to the City of Everett POTW on the eastern side of the Snohomish River, northeast of the site.

At the time of the Phase I ESA site visit, numerous puddles of standing water associated with recent precipitation were observed throughout the site. Surface water flow at the site generally flowed site topography with storm water in the eastern portion and southern portions of the property directed to the Snohomish River as sheet flow. In the south-central portion of the site, surface water was directed to a drainage swale around the western and northern perimeters of the dredge spoils area. Water in this drainage swale is directed to a corrugated metal pipe in the south-central portion of the property, which directs flow into the municipal culvert system and ultimately discharges to the river south of the subject property. Storm water in the central, north and northwest portions of the site was controlled by a network of catch basins that directed flow to the western drainage swale mentioned above.

3.2.4 Soils and Geology/Hydrogeology

The uppermost soil overburden present at the subject property has been mapped by the United States Department of Agriculture Natural Resources Conservation Service (NRCS). According to the NRCS, the primary soil type mapped at the

subject property was Urban Land. This soil consisted of nearly level to gently sloping areas covered by streets, buildings, parking lots and other structures that obscure or alter the soil such that identification was not feasible. According to the previous Phase I ESA reports, the general soil in the area consisted of the Puget-Sultan-Pilchuck unit, described as poorly drained to moderately well drained, nearly level floodplain soil. As previously described, soil at some areas of this site consisted of extensive (five to 15 feet) imported fill material and dredge spoils. Fill material identified included construction/demolition debris, uniform medium sands from dredging, wood scrap and sawdust and imported soil. Natural soil underlying fill was expected to be gray silt with organic material and peat.

Shallow ground water at the site was expected to be six to ten feet below grade. It is likely that ground water levels vary somewhat with tidal variation, and also vary seasonally. As indicated in the previous Phase I ESA reports, ground water flow direction was documented to be to the southeast at the Puget Sound Energy property located approximately two-tenths of a mile southwest of the site. Based on this information, topography, and presence of surface water features, shallow ground water flow at the site was expected to be generally to be east/southeast, towards the Snohomish River.

Site specific geologic and hydrogeologic information was provided in a geotechnical investigation report completed by GeoEngineers in July 1994 (Appendix B). A total of 14 soil borings were drilled to depths ranging from 9 to 14 feet below ground surface, two of which were completed as ground water monitoring wells. Subsurface soil encountered during drilling was reported to consist of several feet of fill material (i.e., wood, sand, gravel, etc.) overlying a clean sand and gravel with varying amounts of silt. Ground water was reportedly encountered between approximately three and eight feet below ground surface and was reported to fluctuate seasonally as well as with possible tidal influences.

3.2.5 *Floodplain*

In addition to the identification of RECs, specific BERs were evaluated as a matter of course during this Phase I ESA, including floodplain areas. The scope of the selected BER evaluations was not intended to represent a licensed survey by certain qualified professionals. Within the judgment, experience and stated qualifications of Delta's on-site professional, the following floodplain information was documented during the course of the December 2005 Phase I ESA.

According to an Army Corps of Engineers floodplain map as well as other documentation, approximately 20 percent of the site was within the 100-year floodplain. These areas were generally located along the riverbank in the eastern and northeast portion of the site and in a low area near the southern property boundary. Previous site maps indicate that a significantly greater portion of the property could have been within designated floodplain areas prior to on-site filling (described in Section 4.5). Future property development could be affected by this flood zone designation, representing a BER but not a REC as defined in the Standard.

3.2.6 *Wetlands*

As stated above, in addition to the identification of RECs, several BERs were also evaluated including wetland areas. The scope of the selected BER evaluations is not intended to represent a licensed survey by certain qualified professionals (e.g., wetland survey by a qualified wetland biologist, etc.).

A review of the National Wetland Inventory map for the subject property indicated that there were no mapped Federal wetlands located on the subject property. With the exception of the storm water drainage swales and along the Snohomish River, no characteristic wetland features (i.e., vegetation, etc.) were observed at the subject property at the time of the Phase I ESA; however, note that a comprehensive wetland survey by a qualified wetland biologist was not

conducted within the scope of this Phase I ESA.

While there are no regulatory agency mapped wetlands on the site, approximately three acres of potential wetlands (characteristic vegetation, potentially hydric soils and standing water) were identified in the 1998 Phase I ESA report (Figure 4-6, Item WET-1). At the time of this December 2005 Phase I ESA however, the majority of this area had been filled with sand and gravel, construction/demolition debris and wood fiber waste such that little to no evidence of potential wetlands remained on-site.

3.3 *HISTORICAL USE INFORMATION*

3.3.1 *Aerial Photograph Review*

Delta reviewed available aerial photographs of the property as well as immediately surrounding properties. The photographs reviewed for the property covered the years 1941, 1947, 1955, 1965, 1969, 1974, 1978, 1984, 1991 and 2002. The following provides a summary of relevant information provided by each photograph.

- *1941:* This photograph showed that the central and southeastern portions of the subject property were developed as a sawmill. Numerous buildings associated with the former sawmill operations were present in these portions of the property and a series of buildings/sheds were noted along the eastern side of the site along the Snohomish River. Railway Avenue was present along with the railroad tracks and onsite rail spur, the former log pond and groups of logs secured to the shore along the river. The northern and west-central portions of the site remained undeveloped and appeared to be a vacant fields and/or wooded land. The southern portion of the site (i.e., dredge spoils area) was also largely undeveloped; however, some roadways that appeared to be related to river access were observed. Some minor development was observed on adjacent properties to the south and southwest and dense residential development was observed to the west.
- *1947:* This photograph showed no significant changes to the subject property; however, some development was observed on adjacent properties. Specifically, some of the marine-related properties along the Snohomish River

to the south and southwest were present. No other significant changes to the surrounding properties were noted.

- *1955:* This photograph showed no significant changes to the subject property; however, some additional development was observed along the Snohomish River to the south and southwest. No other significant changes to the surrounding properties were noted.

- *1965:* This photograph showed that the majority of the northern and west-central portions of the site had been cleared for log storage. No buildings were visible on these portions of the property and the only structure appeared to be a dock feature along the river. Some expansion to the sawmill buildings was also noted and log storage was visible in the east-central portion of the site immediately north of the sawmill. The Canyon Lumber property to the south had also been cleared; however, no structures were noted. No other significant changes to the surrounding properties were noted.

- *1969:* This photograph showed that the northern and west-central portions of the property were being used for log storage. The Canyon Lumber facility to the south was present along with the Chapman Truck Sales building. No other significant changes to the site or immediately surrounding properties were noted.

- *1974:* This photograph showed that the entire property had been cleared and the vast majority of the site was being used for log storage. The chip mill was present on the northern portion of the site along with the office building, equipment maintenance building, sorting deck, scale house and diesel fuel aboveground storage tank. Most of the sheds/structures along the river in the northeastern portion of the site were no longer present. The Schaffer Crane & Rigging property to the southwest was present. No other significant changes to the site or immediately surrounding properties were noted.

- *1978:* This photograph shows no significant changes to the subject property. The only noticeable change to the surrounding properties was the presence of log storage on the Canyon Lumber site to the south. No other significant changes to the surrounding properties were noted.

- *1984:* This photograph shows that many of the building associated with the former sawmill have been removed from the site; however, some still remain. The vast majority of the property appears to be used for log storage associated with chip mill operations. The only noticeable change to the surrounding properties was additional development/expansion of the properties to the south and southwest of the site. No other significant changes to the surrounding properties were noted.

- *1991:* This photograph shows that the remainder of the large buildings associated with the former sawmill have been removed. Several small buildings are still present in the east-central portion of the property. No other

significant changes to the site or immediately surrounding properties were noted.

- *2002:* This photograph shows that the chip mill operation has ceased and that the majority of the property is vacant. The chip mill structures and associated support buildings are present along with the hog fuel and wood chip piles in the northern and west-central portions of the site, respectively. The southern portion of the site (i.e., dredge spoils area) has been filled in and it appears that deposition of material in this area was ongoing. Property use in the north eastern and east-central portions of the property appear to be consistent with reported uses (i.e., leased to others for dumpster, tractor-trailer, vehicle parking/staging, etc.). No other significant changes to the site or immediately surrounding properties were noted.

Historic Topographic Maps

To further evaluate historical use of the subject property, Delta retained EDR to conduct a search of available historic topographic maps. A summary of the information provided on these maps is discussed below and these maps are included in Appendix C.

- *1953:* This map showed that the sawmill was present in the east-central portion of the site along with the log pond, rail spur and sheds along the Snohomish River in the northeastern portion of the site. The remainder of the property appears to be undeveloped wooded land or fields with a mapped "wet" area in the north-central portion of the site. Railway Avenue was present to the south and southwest along with some property development along the southern side of Railway Avenue. The railroad tracks were present to the west followed by dense residential development. No other significant features were noted.
- *1953 (photo-revised 1968):* This map showed that a couple of new buildings/structures associated with the sawmill were present onsite. The previously mapped "wet" area on the northern end of the site was no longer present. No other significant changes to the site or the surrounding properties were noted.
- *1953 (photo-revised 1973):* This map shows that the entire property has been cleared and that the chip mill structures and associated office and equipment maintenance buildings were present. The Canyon Lumber, Chapman Truck Sales and Schaffer Crane & Rigging buildings to the south and southwest were also noted. No other significant changes to the site or the surrounding properties were noted.

3.3.2 *Fire Insurance Map Review*

During this Phase I ESA, EDR was retained to perform a search of available Sanborn Fire Insurance Maps for the subject property. In general, this search resulted in the same maps obtained during the Sanborn search conducted during the previous Phase I ESAs. Specifically, Sanborn Maps were provided for the following years: 1914, 1950, 1957 and 1968 (Appendix C). Each of the four maps show that the east-central and southeastern portions of the property were occupied by a sawmill and associated log storage space. In the 1914 and 1950 maps, the site is identified as Canyon Lumber Company Saw & Planing Mill and the 1957 and 1968 maps identify the site as the Everett Lumber Company Saw & Planing Mill. The central and northern portions of the site and majority of the adjacent properties were not depicted on the map. The only exception to this was the presence of the Canyon Wood Company's Box Factory along Railway Avenue southwest of the sawmill in the 1914 map.

3.4 *ADDITIONAL RECORDS SOURCES AND INTERVIEWS WITH GOVERNMENT OFFICIALS*

In recognition of the due diligence component of this Phase I ESA Update, Delta contacted pertinent regulatory agencies in an effort to obtain information regarding environmental conditions at the site. A file review at the Washington Department of Ecology (WADOE) was performed to review any files pertinent to the Riverside Woodyard and to obtain copies of available documents associated with the subject property. Delta also interviewed available state and local government officials to obtain updated information concerning the subject property and nearby properties. Interview questions were directed at ascertaining whether incidents of environmental significance had occurred on or around the property. Persons contacted and relevant comments are summarized below.

Mr. Gary Sitzman, Operations Consultant, KCWW (425-259-7311) and Mr. Larry Crawford, Chief Administrative Assistant, City of Everett (425-257-8728):

Inquiries were made with Messrs. Sitzman and Crawford specific to "user" information requirements as referenced in Appendix X3 of the Standard to appropriately qualify both KCWW and the City of Everett as "users" of this Phase I ESA Report. Both individuals reported that they were not aware of any environmental cleanup liens, activity and/or land use restrictions, engineering and/or institutional controls or any other specialized knowledge of any potential environmental issues pertaining to the Riverside Woodyard. They further reported that they were not aware of any conditions indicative of releases or threatened releases and were not aware of any obvious indicators that point to the presence or likely presence of contamination at the property. Lastly, both individuals reported that they believed the potential purchase price for the property reasonably reflected the fair market value of the property.

Ms. Georgia Malinsky, KCWW Mill File Review, (425-259-7437): Ms. Malinsky provided access to KCWW files pertaining to the Riverside Woodyard and these files were reviewed during the course of the December 2005 Phase I ESA. In general, these files pertained environmental related issues (i.e., hazardous waste manifests, storm water documentation, drum disposal, etc.). The only document of particular interest with respect to the December 2005 Phase I ESA was a Geotechnical Report prepared by GeoEngineers (Appendix B). Pertinent information obtained from the document was previously described in Section 3.2.

Washington Department of Ecology (WADOE) File Review: During the course of the December 2005 Phase I ESA, available files maintained by the WADOE were reviewed for any pertinent information regarding the Riverside Woodyard. Available files for the site were filed under the Hazardous Waste Program and the Solid Waste Program. These files included a 1999 WADOE compliance inspection form noting minor issues related to the handling and disposal of certain materials as well as recordkeeping issues. In addition, Solid Waste Facility Permit (#SW-119) was issued to the Riverside Woodyard for recycling creosote treated wood along with a couple of permit renewal documents. No other pertinent documents were available.

Mr. Warren Walton, Inspector, Washington Department of Ecology, (425) 649-7137, and Mr. Jack Boller, US Environmental Protection Agency, Region 10, (360) 753-9428. Messrs. Walton and Boller were contacted for any information or recent inspections pertaining to the subject property. The DOE and EPA conducted a multimedia compliance inspection on the property in 1997 and reported that site personnel were cooperative and provided all the information requested in a timely manner. According to Messrs. Walton and Boller, that was the last compliance inspection. They are also not aware of any recent complaints or unresolved compliance issues.

Mr. Chris Dew, Stormwater Inspector, Washington Department of Ecology, (425) 649-4484: Mr. Dew was contacted to inquire about the vehicle washing operations performed on the portion of the site currently leased by Washington Trucking. Information provided by Mr. Dew is presented in Section 4.1.2.

Chris Mewth-Schulz, City Risk Manager, City of Everett, (425) 257-8700. Ms. Mewth-Schulz was contacted during this Phase I ESA. She was not aware of any torts or litigation between the Riverside Woodyard and the City of Everett and she not aware of any incidents of potential environmental significance on, or in the immediate vicinity of, the subject property.

Mr. Brad Olsen, Assistant Chief, City of Everett Fire Department, (425) 257-8100. The City of Everett Fire Department was contacted during this Phase I ESA for any information pertaining to fires, emergency responses, hazardous materials responses or any other incidents of potential environmental concern. Mr. Olsen indicated that he were not aware of any incidents of potential environmental significance on, or in the immediate vicinity of, the subject property. He did mention that there were several responses in late 2004 related to minor fires on the hog fuel pile. Since late 2004 and 2005, there have been no fire responses or compliance issues.

Mr. Jerry Ervine, Planner, and Mr. Steve Ingalsbe, Planner, City Planning, City of Everett, (425) 257-8731. Messrs. Ervine and Ingalsbe were contacted regarding any complaints or unresolved issues pertaining to the site. Both individuals stated that they have no knowledge of any complaints or issues related to environmental conditions at the site and that KCWW personnel have always been very cooperative with the City Planning office. They mentioned that, in September 2004, a State Environmental Policy Act (SEPA) determination was completed relative to the demolition of several industrial buildings. The SEPA decision determined that the proposed demolition did not have a probable adverse impact on the environment and a formal Environmental Impact Statement was not required (Determination of Non Significance).

Mr. Tom Thetford, City of Everett Department of Public Works, (425) 257- 8800. Mr. Thetford was contacted for information about dredge spoils removed from the subject property for use by the City. Mr. Thetford indicated that the City used some of the dredge spoils from the southern portion of the subject property at the City landfill. The dredge spoils were reportedly used as landfill cover material to attain the two feet of cover required by the WADOE to promote vegetative growth following closure of the landfill. He also indicated that some of the material was used to bury the remnants of a former tire fire on the landfill property, which had been extinguished several years ago. He was not aware of any complaints or unresolved issues between the City and the subject property.

Mr. Geoff Short, Snohomish County Public Utilities Department (PUD), (425) 347- 4314. Mr. Short provided information regarding three PUD transformers formerly located on KCWW property near the chip mill. He stated that the three transformers were tested for PCBs in 1981 and the analytical results showed less than 1 part per million (ppm) in each unit. Mr. Short indicated that the transformers were removed and replaced with a non-PCB transformer in 2000. He mentioned that the leakage was noted near the transformer pad and that it was removed during the upgrade. He does not recall any sampling or analytical results related to the removal of the stained soil.

Mr. Stanley Surridge, Acting Environmental Coordinator, Bureau of Indian Affairs, (425) 258-2651: Mr. Surridge was contacted for any information pertaining to the site as well as to any information pertaining to tribal lands in the vicinity of the site. Mr. Surridge indicated that he was not aware of any tribal hazardous waste sites, landfills, institutional controls, voluntary cleanup or brownfield sites within one and a half miles of the Riverside Woodyard. He stated that all tribal lands in the area were at least one and a half miles or more away from the subject property.

Mr. Kris Wright, President, Washington Trucking, (425) 259-5115: At the time of the Phase I ESA site visit, Washington Trucking was leasing space in the east-central portion of the site for tractor-trailer parking/staging. Mr. Wright indicated that they have been staging tractor-trailers on the property for the past eight to ten years. He was not aware of any incidents of potential environmental significance on, or in the immediate vicinity of, the subject property. Mr. Wright was also asked about the onsite truck washing activities observed during the Phase I ESA site visit. According to Mr. Wright, the truck washing activities used a pH-balanced brightener rather than a detergent. The purpose of the brightener was to remove particulate cement from the trucks and, to his knowledge, discharging this wash water to the ground surface was allowed by the WADOE. He stated that the onsite washing operations have been ongoing for the past six months and he planned to cease these activities onsite in the near future.

Mr. Larry Rubatino, Office Manager, and Mr. Ed Rubatino, President, Rubatino's Refuse, (425) 259-0044: At the time of the Phase I ESA site visit, Rubatino's Refuse was leasing space in the central portion of the site for empty dumpster storage. Messrs. Rubatino indicated that they have been staging empty dumpsters on the property since the early 1990s. They were not aware of any incidents of potential environmental significance on, or in the immediate vicinity of, the subject property.

4.0 INFORMATION FROM SITE RECONNAISSANCE AND INTERVIEWS

4.1 HAZARDOUS SUBSTANCES IN CONNECTION WITH IDENTIFIED USES

4.1.1 Liquid Materials

At the time of the December 2005 Phase I ESA, onsite operations were limited to the management of the onsite hog fuel and wood chip piles. In addition, heavy equipment maintenance (Kane Equipment), tractor-trailer parking/staging (Washington Trucking) and empty solid waste dumpster staging (Rubatino's) was also conducted onsite through informal lease agreements with KCWW. In general, liquid materials used and/or stored onsite included quantities of fuel, lubricating and hydraulic oils, antifreeze/coolants, degreasing solvents and various maintenance-type materials. In addition to bulk quantities of materials (Section 4.3), various petroleum products were also maintained in drums (55-gallon and 30-gallon) and small container (five-gallons or less) quantities. These materials were generally maintained at or near the point of use within designated storage areas and the vast majority of these materials were observed in the northern end of the site.

During this Phase I ESA, management practices associated with the use and storage of liquid materials were examined to identify RECs in association with petroleum and hazardous substances maintained on-site. Specifically, the Riverside Woodyard, associated KCWW operations and tenants' operations were reviewed for evidence of spills, stains and/or leaks to site soil, surface water, ground water or structures connected to the use or storage of these materials. Containers, aboveground tanks, equipment reservoirs, storage areas in developed and undeveloped areas of the site were reviewed to confirm the presence or absence of these conditions. Table 4-1 summarizes the results of this review and presents the following:

- area/building of observed storage/use;

- areas where certain recognized conditions were identified (Figure and photographic identification numbers have been also been included);
- type of container (e.g., container, AST, reservoir);
- number of containers, ASTs, etc. present;
- volume of the container/tank;
- contents of the container;
- type of containment provided; and
- a description of evidence of leaks/spills and associated comments.

During the previous Phase I ESA and subsequent updates, stains or affected surface waters (discoloration, sheens, etc.) indicating potential releases of petroleum and/or hazardous substances to the environment and/or to structures on-site were observed. As part of the December 2005 Phase I ESA, these areas were re-inspected to evaluate current onsite conditions and additional stained areas were identified. A more specific description of these stains/surface waters (and estimates of affected media) observed during the previous assessments as well as the December 2005 Phase I ESA are provided are described below.

Stains on Earthen Materials and Affected Surface Waters

Several areas of surficial staining on earthen materials were observed during the course of the December 2005 Phase I ESA. These stained areas are described in the paragraphs below and are depicted on Figures 4-3 and 4-4.

TABLE 4-1
IDENTIFIED PETROLEUM AND HAZARDOUS SUBSTANCE CONTAINERS

Area/Bldg.	Figure 4-3 through 4-7, Item No. and/or Photograph ID No. (as applicable)	AST or Other Container Type	No. of Containers or ASTs	Approx. Volume (gals)	Contents	Containment Type (if any)	Evidence of Leaks/Spills and Associated Comments
CSO Pumphouse, Building 2	--	Container	11	43	8 x 5-gallon paint 3 x 1-gallon paint	Building provided containment.	No evidence of spills or leaks.
Former Chip Mill – North-Central Portion of the Site, Building	–	Container	1	5	1 x 5-gallon PCB waste	None.	Five-gallon labeled "Caution – Contains PCBs". No evidence of spills or leaks.
Southeast Exterior Corner of Heavy Equipment Garage, Building 15	–	Container	7	475	1 x 200-gallon waste antifreeze 2 x 55-gallon antifreeze (1 empty) 1 x 55-gallon used oil filters 2 x 55-gallon oil 1 x 55-gallon soap	None.	No evidence of spills or leaks.
West Exterior of Heavy Equipment Garage, Building 15	–	AST	1	500	1 x 500-gallon waste oil	Concrete containment structure.	No evidence of spills or leaks.
West Building Attached to Heavy Equipment Garage, Building 15 (KCWW maintained storage)	--	AST Container	7	525	1 x 275-gallon unleaded gasoline 2 x 55-gallon unleaded gasoline 1 x 55-gallon antifreeze 1 x 55-gallon kerosene 1 x 55-gallon mixed gas 1 x 30-gallon grease	Building provided containment.	During the December 2005 Phase I ESA, approximately 50 to 100 square feet of staining was observed on the concrete containment dike. No stains observed outside dike.
West Building Attached to Heavy Equipment Garage, Building 15	--	Container	16	240	2 x 55-gallon antifreeze 2 x 55-gallon transmission fluid 2 x 5-gallon antifreeze 10 x 1 -gallon lead acid batteries	Building provided containment.	No evidence of spills or leaks.
West Extension of Heavy Equipment - Garage, Building 15	Figure 4-6, Item No. S-8	Container	3	165	3 x 55-gallon soap	None.	No evidence of spills or leaks.
Heavy Equipment Garage, Building 15	--	Container	9	395	4 x 55-gallon oil 1 x 55-gallon transmission fluid 1 x 30-gallon grease 2 x 30-gallon parts washers 1 x 30-gallon oil filter drain	Building provided containment.	Minor staining was observed on the concrete floor throughout the heavy equipment garage.
Heavy Equipment Garage, Building 15	--	AST Container	20	2030	3 x 500-gallon lube oil 1 x 250-gallon lube oil 1 x 55-gallon motor oil 1 x 55-gallon antifreeze	Building provided containment.	During the Phase I ESA, staining totaling approximately 50 square feet was present on the concrete floor around and beneath the ASTs.

TABLE 4-1
IDENTIFIED PETROLEUM AND HAZARDOUS SUBSTANCE CONTAINERS

Area/Bldg.	Figure 4-3 through 4-7, Item No. and/or Photograph ID No. (as applicable)	AST or Other Container Type	No. of Containers or ASTs	Approx. Volume (gals)	Contents	Containment Type (if any)	Evidence of Leaks/Spills and Associated Comments
					2 x 55-gallon grease 4 x 5-gallon gasoline 1 x 5-gallon pearl solvent 1 x 5-gallon brake fluid 1 x 5-gallon diesel fuel 5 x 5-gallon oil		
South of the Heavy Equipment Garage, Building 15	Figure 4-3, Item Nos. S-11 and S-45	AST	2	10,055	1 x 10,000-gallon diesel fuel 1 x 55-gallon used oil filters	Concrete containment dike provided.	Petroleum staining was observed on the soil adjacent to the northeastern corner of the containment structure as well as on the concrete containment structure. Stained soil noted in previous Phase I ESAs was reportedly excavated and removed.
East Side Exterior, Storage Building, Building 16	–	Container	5	250	4 x 55-gallon oil 1 x 30-gallon grease	None.	No evidence of spills or leaks.
Electric Truck Dumper, Building 21	–	AST	1	250	1 x 250-gallon diesel fuel tank electricity generator	None.	No evidence of spills or leaks.
Building 33	–	Container	10	50	10 x 5-gallon various oils (most empty)	None.	Approximately 200 to 400 square feet of petroleum staining on soil was noted around and beneath the truck lift hydraulic oil cylinders.

- Approximately 100 square feet of petroleum staining was observed on the ground surface around near the southeastern corner of the Mill Office and beneath one of the onsite loaders (Figure 4-3, Item No. S-52, Photograph No. 1). According to Riverside Woodyard personnel, this staining was leaking transmission fluid from the loader.

- Approximately five to ten feet of petroleum staining was observed on the concrete and ground surface adjacent to the fuel pump on the northeastern corner of the secondary containment structure for the aboveground diesel fuel tank (Figure 4-3, Item No. S-53, Photograph No. 2). This staining appears to be the result of minor overfills and/or careless fueling of vehicles and/or onsite equipment.

- Approximately ten to 20 square feet of staining was observed on the ground surface around and beneath a piece of heavy equipment (Figure 4-3, Item No. S-54, Photograph No. 3). The exact nature and source of this staining could not be determined; however, the staining appeared to be related to minor leaks from the heavy equipment.

- Approximately 200 to 400 square feet of petroleum staining was observed on the ground surface around and beneath the truck lift in the west-central portion of the site (Figure 4-3, Item No. S-55, Photograph No. 4). The staining appeared to be hydraulic oil leaking from the hydraulic cylinders associated with this equipment. Staining was also observed in this area during the 1998 Phase I ESA (Figure 4-3, Item No. S-2); however, the staining was not observed in the 2000 Phase I ESA Update.

- Approximately 100 to 300 square feet of brown staining was observed on the ground surface adjacent to the piles of secondary wastewater treatment plant sludge from the Everett Mill in the southern portion of the site (i.e., dredge spoils area). This staining appeared to be migrating with surface water flow toward a drainage swale along the western perimeter of this area and into the municipal stormwater collection system (Figure 4-4, Item No. S-56, Photograph No. 5).

During the previous Phase I ESAs and subsequent updates, numerous stains on earthen materials and affected surface waters (discoloration, sheen, etc.) indicating potential releases of petroleum and/or hazardous substances to the environment were observed onsite. The majority of these areas were located in the northern portion of the site in the vicinity of the former chip mill or in the east-central portion of the site associated with the former boat/metal fabrication activities. As part of the December 2005 Phase I ESA site visit, these areas were

inspected to confirm the previous findings. The vast majority of the previously identified stained areas were not observed during this Phase I ESA. According to individuals interviewed, no soil remediation (i.e., excavation and proper disposal) has been performed with respect to these areas. As such, the fate of the affected soil and/or surface water is unknown and these previously identified items continue to represent RECs to the Riverside Woodyard. A more specific description of these stains/surface waters (and estimates of affected media) observed during the 1998 Phase I ESA and associated updates is provided in Table 5-1 and these stained areas are depicted on Figures 4-3 and 4-4.

Stains Within Containment Areas, On Concrete Floors and In Areas Drained by the Process Sewer

The Standard requires recording of stains within containment structures and on concrete surfaces. A number of such stained areas were observed during the December 2005 Phase I ESA site visit as described below.

- Approximately 100 to 150 square feet of petroleum staining was observed on the concrete floor around and beneath a bulldozer in the Enclosed Fabrication Shop (Figure 4-2, Building 37). This staining appeared to be related to minor leaks associated with the bulldozer and was limited to the floor in the immediate vicinity of the bulldozer.
- Minor petroleum staining (5 to 10 square feet) was observed on the concrete secondary containment structure for the aboveground diesel fuel tank in the northwestern portion of the site. Specifically, the staining was noted immediately beneath the fill port associated with this tank and appeared to be limited to the concrete surface in this area.
- A petroleum sheen and red staining consistent with the dye used for off-road diesel fuel was observed on water within the concrete secondary containment structure for the aboveground diesel fuel tank in the northwestern portion of the site. The exact source of this staining was not known but appeared to be related to minor spills within the containment structure.
- Minor petroleum staining (10 to 15 square feet) and sheen was observed within a concrete lined collection sump on the southern side of the storage building (Figure 4-2, Building 16). Surface water and heavy equipment wash water is reportedly directed to this sump then to an underground oil/water separator on the southern side of this building (Section 4.1.2). The exact

source of this staining was not known but appeared to be related to accumulated petroleum within this feature.

- Minor petroleum staining (10 to 15 square feet) was observed on the concrete floor around and beneath four aboveground petroleum tanks in a store room on the northwestern corner of the Heavy Equipment Garage. This staining appeared to be related to minor spills associated with these tanks and was contained on the concrete floor within this store room.

In general, the stained areas were limited in extent and appeared to be contained on or within concrete floors and/or containment structures and are considered to be de minimis.

4.1.2 Liquid Waste Storage And Disposal

At the time of the December 2005 Phase I ESA, liquid wastewaters and storm water discharged from the Riverside Woodyard via:

- a sanitary sewer system connected to the City of Everett POTW;
- a combined sewer outfall (CSO) system connected to the Everett POTW;
- ground water through one active septic tank/leachfield system;
- outfalls/sheet flow to the City of Everett storm sewer and/or the Snohomish River; and
- a concrete lined exterior sump and underground oil/water separator on the southern side of the storage building (Figure 4-2, Building 16) in the northwestern portion of the site.

The following paragraphs describe the various wastewater/storm water discharge systems observed on-site. In general, these discharge systems were the same as described in the previous Phase I ESA Reports. Pertinent observations and any additional information obtained during the December 2005 Phase I ESA are presented as appropriate.

Sanitary Sewer

Sanitary wastewater generated by KCWW was collected and discharged to the City of Everett POTW. The gravity fed sewer system collected sanitary wastewater from onsite restrooms in the Riverside Mill Office (Building 3) and Heavy Equipment Garage (Building 15). Sanitary wastewaters from these areas drained to a sub-grade lift station located at the northwestern corner of the Heavy Equipment Garage. The wastewater was pumped from the lift station westward (off-site) under the railroad tracks and up a hill to the municipal sanitary sewer serving the residential neighborhood to the west of the KCWW property and into the municipal collection system.

Process/Storm Water Flows to the CSO

At the time of the December 2005 Phase I ESA, storm water generated on the northern and western portions of the site discharged to a 72-inch diameter CSO connected to the City of Everett POTW. Upstream of the CSO connection, discharge waters entered an earthen drainage swale that flowed northward toward the CSO Pumphouse (Building 2). A level indicator in the swale controlled the CSO pump cycles to prevent swale overflow. The system did not include an oil/water separator, but was designed so that absorbent booms could be placed on the water surface while the pumps draw from the lower part of the swale. The CSO exited the KCWW property beneath the Snohomish River terminating at the POTW, northeast of the Riverside Woodyard.

According to individuals interviewed, a deep water outfall pipe has been installed to convey effluent from the POTW to a discharge point in Puget Sound. This outfall reportedly returns from the POTW, under the river and onto the northern portion of the Riverside Woodyard. The outfall was installed along the western side of the property beneath the access driveway from the northern end to the southwestern corner of the Riverside Woodyard. The pipe then turns east through the City of Everett and out into Puget Sound.

The earthen portion of the CSO collection system was visually examined for the presence of petroleum or hazardous substance releases which may have been associated with flows directed to the swale. Specifically, discharges to the swale included:

- runoff from active outdoor production areas (i.e., hog fuel and wood chip piles);
- flows from exterior collection/catch basin systems (where significant oil staining was noted in the previous Phase I ESA reports) particularly in areas below the former chip mill; and
- discharges related to a heavy equipment vehicle washing operation to the exterior sump.

During the previous Phase I ESAs, evidence of petroleum products and solid waste debris were observed in the drainage swale. Although these discharges ultimately flow to the Everett POTW, sediments within the drainage swale along the western property line appeared were reportedly affected by oil, representing a recognized environmental condition (Figure 4-3, Item No. WW-1). At the time of the 2000 Phase I ESA Update site visit, discharges to the drainage swale and associated observations were generally consistent with those described above for the 1998 Phase I ESA. In addition, the following observations were made during the 2000 Phase I ESA Update.

- Unidentified white and black substances were observed floating on the water throughout the drainage swale; and,
- a minor amount of surficial debris was found in the drainage swale in the west central portion of the property.

During the course of the December 2005 Phase I ESA, the previously described white and black staining was not observed; however, the previously described surficial debris was observed in the drainage swale. It is important to note that the majority of the swale was overgrown such that a complete inspection could not be

completed. Based on available information and onsite observations, historic discharges to this feature continue to represent a REC to the site.

Septic Systems

According to available information, three septic systems were identified on the Riverside property. These systems included:

- an active septic tank and leachfield associated with restrooms at the Scale house (Figure 4-2, Building 26);
- an inactive septic tank and leachfield system connected to restrooms and a breakroom sink at the Old Mill Office (Figure 4-2, Building 29); and
- an inactive system related to Building 33, the Electric Shop (associated with the former sawmill operation).

One of the three septic tank/leachfield systems identified on-site, an inactive system at the Electric Shop, may have served as a potential discharge location for non-sanitary flows (Figure 4-4, Item No. SEP-1). While the system was reportedly cleaned out and backfilled (when the sawmill was closed) evidence of potential non-sanitary flows was identified during the 1998 Phase I ESA site visit as follows:

- there were no sanitary facilities present in the Shop;
- a small earthen sump and floor drain system was present within the structure (the drain terminus point could not be determined); and
- floor staining and evidence of historic solvent use (including a full one-gallon container of chlorinated solvent and two partial five-gallon xylene containers) was apparent within the structure.

Observations during the 2000 Phase I ESA Update were consistent with those of the 1998 Phase I ESA. According to KCWW personnel, this septic system was associated with the former sawmill. The suspect features within the Shop (i.e., floor drains, sump) were reportedly not connected to the old septic system; however, this could not be confirmed. No new information pertaining to this

feature was available during the December 2005 Phase I ESA and, as such, this former septic system continues to represent a REC with respect to the site.

Other Discharges

During the 1998 Phase I ESA, the discharge location for a number of liquid waste streams appeared to be directly to the ground, surface waters, and/or earthen ditches that did not flow to the CSO/POTW. Observations made during the 2000 Phase I ESA Update and December 2005 Phase I ESA were generally consistent with those of the 1998 Phase I ESA. During the December 2005 Phase I ESA, current and historic discharge practices were reviewed for any RECs with respect to the site. Wastewater discharge points observed onsite that are considered to represent RECs with respect to the Riverside Woodyard are summarized below.

- *Previous Finding:* An earthen drainage ditch system was observed along the north perimeter of the large dredge spoil area and west of an area leased to the boat/metal fabricating company (Figure 4-4, Item No. WW-3). The ditch collected storm water runoff from operating portions of the leased area as well as flows from the perimeter of the large dredge spoils area. At the time of the site visit, the ditch system ultimately drained to the Everett municipal storm sewer along Railway Avenue. At the time of the 2000 Phase I ESA Update, this drainage ditch system was present and continued to direct surface water to a culvert in the south-central portion of the property. According to KCWW personnel, this culvert directs flow to a culvert system on the western side of Railway Avenue, which directs flow to the south and discharges directly into the Snohomish River south of the subject property. No new information pertaining to this feature was obtained during the course of the December 2005 Phase I ESA and, as such, this feature continues to represent a REC with respect to the site.

- *Previous Finding:* A concrete collection sump and associated pump system discharged truck scale runoff waters directly to the ground near the scale house (Figure 4-4, Item No. WW-4). While no evidence of staining was observed on the ground below the discharge point, an oily sheen was visible on the surface of the collection sump. Furthermore, the integrity of the collection sump could not be determined. No additional information was obtained for this discharge point during the 2000 or 2003 Phase I ESA Updates. Observations made during this Phase I ESA were consistent with those made during the previous assessment. During the December 2005 Phase I ESA, a trash pump was utilized to discharge water from the sump, which discharged to the ground

surface southwest of the scale house. No staining or stressed vegetation was observed; however, the presence of this discharge to the ground continues to represent a REC with respect to the site.

- *Previous Finding:* While not a discharge source, one operating subsurface sump was noted during the site visit. This sump (with dimensions of approximately 1.5 feet square by eight feet deep) served to collect waste oil from the Heavy Equipment Garage. According to KCWW personnel, accumulated oil in the sump is periodically pumped to an aboveground waste oil tank (no engineering drawings were available documenting system configuration). The integrity of this concrete sump was not known (Figure 4-3, Item No. WW-8). Observations made during the 2000 Phase I ESA Update were consistent with those made during the previous assessment. According to KCWW personnel, a floor drain in the southwestern bay of this building waste liquid to this sump. The integrity of the piping to the sump was not known. No further information was obtained during the course of the December 2005 Phase I ESA and, as such, this feature continues to represent a REC with respect to the site.

- *Previous Finding:* At the time of the 1998 Phase I ESA, a former sawmill employee indicated that engines and other parts were historically cleaned and degreased (by steam cleaning) at a location south of Sigh's Shop, Building 30 (Figure 4-4, Item No. WW-9). The exact dates of this activity could not be determined. Information obtained during the 2000 Phase I ESA Update and the December 2005 Phase I ESA pertaining to this waste liquid discharge activity was consistent with the information obtained during the previous assessment. No staining or stressed vegetation was observed in this area; however, these historic discharge activities continue to represent a REC with respect to the site.

- *New Finding:* During the December 2005 Phase I ESA, truck washing operations were observed on the space leased by Washington Trucking in the central portion of the site (Figure 4-4, Item No. WW-10, Photograph No. 6). Wash water associated with the truck washing activities reportedly used a pH-balanced brightener rather than a detergent and the purpose of the brightener was to remove particulate cement from the trucks. Discharging of this wash water to the ground surface represented a REC with respect to the site.

In addition to the above-mentioned wastewater discharge RECs, four additional RECs related to former discharge practices were identified in the 1998 Phase I ESA and/or associated 2000 and 2003 Phase I ESA Updates conducted at the Riverside Woodyard. Based on observations and/or available information obtained during the course of the December 2005 Phase I ESA, these previously identified RECs are no longer considered to represent a REC to the site. For the

purposes of this report, these previous findings are considered HRECs and are summarized in Table 5-2 in Section 5.1 and depicted on Figures 4-5 and/or 4-6.

During the December 2005 Phase I ESA, two additional concrete-lined sumps were observed onsite. One of these sumps was located in the Electric Shop (Figure 4-2, Building 33). This sump was cylindrical with a diameter of approximately 18 inches and was approximately two to three feet deep. The second sump was located in Sigh's Shop (Figure 4-2, Building30). This sump was rectangular-shaped with dimensions of approximately three feet wide, nine feet long and four feet deep. At the time of the December 2005 Phase I ESA, both sumps were full of water with no sheen, odors or other evidence of a potential release to these features. According to individuals interviewed, these sumps did not have any discharge points. The exact purpose of the cylindrical sump could not be determined and the rectangular sump was reportedly used for oil changing and/or other equipment maintenance activities when the sawmill was operating. Based on available information and site observations, these features were not expected to represent RECs to the site.

4.1.3 Reported Releases

According to available information, a number of historic spill-related releases had occurred at the Riverside Woodyard. Based on conversations and documentation available at the subject property, a total of four historic spill-related releases had occurred on-site as summarized below.

- In the late 1980's, approximately 100 to 200 gallons of fuel was released to the ground near the facility's 10,000-gallon diesel AST. The spill was associated with overfilling of a vehicle fuel tank (Figure 4-3, Item No. S-30). Soil removal and/or other surface/subsurface clean up did not occur.
- According to KCWW personnel, three releases of hydraulic oil to the river had occurred during the 1980s. Riverside personnel indicated that these releases were reported to regulatory officials.

No additional information pertaining to these releases was available during the course of the December 2005 Phase I ESA and, as such, these incidents continue to represent RECs with respect to the site. No additional reported releases were identified during the December 2005 Phase I ESA.

4.2 *HAZARDOUS SUBSTANCE CONTAINERS AND UNIDENTIFIED SUBSTANCE STORAGE CONTAINERS*

Historic and ongoing operations on the Riverside Woodyard receive and manage liquid materials in bulk as well as in individual containers, which were stored/managed as discussed in Section 4.1. As part of this Phase I ESA, any containers with unidentified contents must be noted with a record of their location and condition. During the December 2005 Phase I ESA, no containers with unidentified contents were observed.

During the 1998 Phase I ESA and subsequent 2000 Phase I ESA Update, a number of containers with unidentified contents were observed onsite. Surficial staining or other evidence of a release associated with the unidentified containers was observed at three locations during these previous assessments. At the time of the December 2005 Phase I ESA, none of these containers remained onsite; however, no soil remediation (i.e., excavation and proper disposal) has been performed with respect to these areas. As such, the fate of the affected soil or other media is unknown and these previously identified items continue to represent RECs to the Riverside Woodyard as described below.

- *Previous Finding:* During the 1998 Phase I ESA, approximately 20 unlabeled containers were noted within a steel containment structure (Building 34, fabricated from a boat shelter deck) near the northeast corner of the leased area. The contents of these containers could not be verified; however, a fuel oil odor was detected. There was no evidence of leaks outside of the containment structure (Figure 4-4, Item No. UC-4). At the time of the 2000 Phase I ESA Update site visit, only 13 one- to five-gallon containers remained within the secondary containment structure all of which were labeled; however, immediately south of the structure there were numerous five- to 55-gallon containers on the ground surface. A total of 28

55-gallon drums and 32 five-gallon containers were present of which approximately five 55-gallon drums and 20 five-gallon containers were not labeled. Surficial staining was observed around the 55-gallon drums and waste shot blast media was observed on the ground surface in this area. The containers were reportedly cleaned up and properly disposed by Emerald Services in 2001. At the time of the December 2005 Phase I ESA, no containers were observed in the area and no staining or stressed vegetation was noted; however, since the fate of the affected soil in this area is unknown, the former presence of these containers continue to represent RECs to the Riverside Woodyard.

- *Previous Finding:* During the 1998 Phase I ESA, one 55-gallon drum labeled "No Good Water" was identified within the Chip mill (near the northwest interior wall). Staining was evident on the concrete floor throughout this area, trench drains in the area were connected to the western perimeter drainage swale as described above (Figure 4-5, Item No. UC-7). Observations made during the 2000 Phase I ESA Update were consistent with those made during the previous assessment. This drum was present along with three other drums, each of which was labeled. Surficial staining was observed on the concrete floor in this area. At the time of the December 2005 Phase I ESA, this drum was not observed in the area and no staining or stressed vegetation was noted; however, since the fate of the affected soil in this area is unknown, the former presence of this drum continues to represent a REC to the Riverside Woodyard.

- *Previous Finding:* One unlabeled 55-gallon drum was observed in the northern portion of the Chip mill/Debarker (Building 4) on the concrete floor (Figure 4-3, Item No. UC-14). This drum was full of an unidentified liquid and a minor amount (ten square feet) of surficial staining was observed on the concrete floor around this container. At the time of the December 2005 Phase I ESA, this drum was not observed in the area and no staining or stressed vegetation was noted; however, since the fate of the affected soil in this area is unknown, the former presence of these containers continue to represent RECs to the Riverside Woodyard.

In addition to the above-mentioned unidentified container RECs, 11 additional RECs related to unidentified containers were identified in the 1998 Phase I ESA and/or associated 2000 and 2003 Phase I ESA Updates conducted at the Riverside Woodyard. Based on observations and/or available information obtained during the course of the December 2005 Phase I ESA, these previously identified RECs are no longer considered to represent a REC to the site. For the purposes of this report, these previous findings are considered HRECs and are summarized in Table 5-2 in Section 5.1 and depicted on Figures 4-5 and/or 4-6.

4.3 STORAGE TANKS

4.3.1 *Underground Storage Tanks (USTs)*

According to available information, two USTs were removed from the Riverside Woodyard in the late 1980's. These tanks reportedly included a 400-gallon gasoline UST (Figure 4-4, Item No. UST-1) and a 2,000-gallon diesel fuel UST (Figure 4-4, Item No. UST-2). During removal activities, "pinholes" were reportedly observed in the gasoline UST, whereas the integrity of the diesel tank was reportedly sound. Documentation describing removal activities (e.g., closure reports, field notes, photographs and/or confirmation sampling) was not available during the previous assessments or during the December 2005 Phase I ESA.

In addition to the above tanks, a 500-gallon process UST (Figure 4-4, Item No. UST-3) was also present on-site. This UST was used for storing a wood preservative called "Woodlife" which was historically applied to lumber between 1945 and the early 1970's. This UST was reportedly removed in approximately 1975. No evidence of a release from this tank was reported; however, documentation describing removal activities was not available during the previous assessments or the December 2005 Phase I ESA.

Based on available information, lack of closure documentation and the documented presence of pinhole leaks in the gasoline UST, each of these features continue to represent a REC to the property.

In addition to the above-mentioned underground tanks, another subsurface feature was observed during the course of the December 2005 Phase I ESA. This feature is described in the paragraph below.

An underground oil/water separator was observed near the southern end of this storage building (Figure 4-3, Item No. O/W-1, Photograph No. 7). According to

available information, stormwater and vehicle/truck/equipment wash water from washing activities on the southern side of the Heavy Equipment Garage is directed via sheet flow to a concrete-lined exterior collection sump on the southern side of the storage building. The discharge from this sump is reportedly directed to a concrete underground holding tank (i.e., oil/water separator), which is periodically pumped out by Emerald Services. No other details pertaining to this feature were available and the integrity of the holding tank is unknown and, as such, this subsurface feature represents a REC to the site.

4.3.2 Aboveground Storage Tanks (ASTs)

At the time of the December 2005 Phase I ESA site visit, a total of eight ASTs were present onsite. These ASTs ranged in size from 250 to 10,000 gallons and were used for storing various petroleum products including gasoline, diesel fuel, lubricating fluids and waste oil. Six of these eight tanks were located in the Heavy Equipment Garage, the seventh was associated with the onsite fueling location south of the garage and the last tank was associated with the truck lift in the west-central portion of the site. Management practices associated with AST and other container storage/use were examined during this Phase I ESA to identify any RECs in association with petroleum and hazardous substances maintained on-site. RECs related to these tanks included spillage, leaks and overfills are described in Section 4.1 and summarized on Table 4-1.

According to the previous Phase I ESAs, a number of other ASTS were formerly located onsite. All of these tanks were reportedly removed from the site and were not observed onsite during the course of the December 2005 Phase I ESA.

4.4 INDICATIONS OF POLYCHLORINATED BIPHENYLS (PCBS)

A total of 27 transformers containing dielectric fluids were identified on-site (Figures 4-3 and 4-4) during the course of this Phase I ESA. Of these 27 transformers, 23 were owned by KCWW and were active, three were owned by

KCWW and were inactive and one was owned by the local utility company and was active. Of these transformers, 22 were labeled as non-PCB containing and the remaining five were not labeled. According to individuals interviewed, none of the onsite transformers contained PCBs. No weeps, staining, stressed vegetation or other evidence of any potential leaks associated with these transformers was observed.

Evidence of weeps/leaks from five transformers was noted on-site during the 1998 Phase I ESA and the 2000 Phase I ESA Update. These areas were revisited during the December 2005 Phase I ESA to review previous observations. Pertinent observations are described below.

- *Previous Finding:* An approximate 100 square foot stain was noted on a concrete slab and adjacent soils below a pad-mounted transformer at the KCWW Substation (North), Building 13 (Figure 4-3, Item No. E-1). Analytical results from 1991 indicated that PCB concentrations within the transformer's dielectric fluid were equal to 35 ppm; however, historic analyses (1987) noted PCB concentrations of 413 ppm. There was no available information documenting spills or leaks of dielectric fluid from this transformer. Observations during the 2000 Phase I ESA Update site visit were consistent with those from the previous assessment. At the time of the December 2005 Phase I ESA, the transformer had been removed as part of the chip mill demolition project. The transformer was no longer present and no staining was observed; however, since the fate of any affected soil was unknown, the stained area continues to represent a REC to the site.

- *Previous Finding:* Approximately ten square feet of stained soil was noted below a wall-mounted transformer at the KCWW Substation (North), Building 13 (Figure 4-3, Item No. E-2). KCWW provided documentation that a sample collected from this transformer in December 1997 contained 6.5 ppm PCBs. This transformer was no longer present at the time of the 2000 Phase I ESA Update; however, observations pertaining to staining on the ground surface beneath the former unit were consistent with those from the previous assessment. At the time of the December 2005 Phase I ESA, the transformer had been removed as part of the chip mill demolition project. A five-gallon bucket labeled "Caution – Contains PCBs" was present on the concrete pad adjacent to the former transformer. The transformer was no longer present and no staining was observed; however, since the fate of any affected soil was unknown, the stained area continues to represent a REC to the site.

- *Previous Finding:* An approximate 100 square feet stain was noted on a concrete slab below three pad-mounted transformers owned by the local utility

company (PUD Substation, Building 14) (Figure 4-3, Item No. E-6). Although these units reportedly did not contain PCBs at the time of the 1998 Phase I ESA site visit, there were no written records available documenting the cause of the stain and/or the concentration of PCBs within the transformer when the stain occurred. At the time of the 2000 Phase I ESA Update, the three pad-mounted transformers were actively being replaced by one larger unit. Representatives of the local utility company (PUD) indicated that they had not cleaned or replaced the concrete pad or gravel surface within the fenced area surrounding the unit. Minor surficial staining (approximately ten to 20 square feet) was observed on the western side of the concrete pad and ground surface immediately west of the unit. No other staining was observed in this area. At the time of the December 2005 Phase I ESA, one large pad-mounted transformer was present in this area. Minor staining was observed on the concrete pad and ground surface. The current and historic presence of this staining continues to represent a REC with respect to the site.

In addition to the above-mentioned RECs, four additional RECs related to onsite transformers were identified in the 1998 Phase I ESA and/or associated 2000 and 2003 Phase I ESA Updates conducted at the Riverside Woodyard. Based on observations and/or available information obtained during the course of the December 2005 Phase I ESA, these previously identified RECs are no longer considered to represent a REC to the site. For the purposes of this report, these previous findings are considered HRECs and are summarized in Table 5-2 in Section 5.1 and depicted on Figures 4-5 and/or 4-6.

The only other evidence of onsite PCBs was the presence of a five-gallon plastic bucket labeled "Caution – Contains PCBs". This bucket was secured and situated on a concrete pad on the northern end of the site adjacent to the former transformer station. The source of this container was not known. No odors, stains or other evidence of any potential release from this container were observed during the site visit.

4.5 INDICATIONS OF SOLID WASTE DISPOSAL

At the time of the December 2005 Phase I ESA, onsite operations were limited to the management of the onsite hog fuel and wood chip piles, heavy equipment maintenance, tractor-trailer parking/staging and empty solid waste dumpster

staging. As such, the volume of solid waste materials generated onsite have been reduced since that observed during the completion of prior Phase I ESAs in 1998, 2000, and 2003; however, some waste materials were still generated as a result of onsite activities. These waste materials were generally consistent with those previously generated (as noted and observed during the 1998, 2000, and 2003 Phase I ESAs) and were managed in the same manner. Wastestreams identified and associated disposal methods are further described on Table 4-2 below.

Hazardous Waste

At the time of the December 2005 Phase I ESA, hazardous waste generated onsite was limited to the two parts washers in the Heavy Equipment Maintenance Garage. These parts washers are operated by Kane Equipment, the current occupant of the garage, and are maintained by Safety Kleen on an as needed basis. No problems with the parts washers were reported and no other hazardous waste materials were generated or observed onsite during the December 2005 Phase I ESA site visit.

Non-Hazardous Waste

At the time of the December 2005 Phase I ESA, non-hazardous wastes were generally shipped for off-site disposal as described in Table 4-2. According to available information, several waste streams have historically been deposited onsite for temporary staging or for use as fill material. The following paragraphs describe these waste streams along with any RECs associated with the onsite disposal of these materials.

TABLE 4-2
WASTES GENERATED ON-SITE

PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT COMMUNICATION

Wastestream	Managed as Haz. or Non-Haz.	Generated as a Result of:	Observed/Historic Disposal Location
Aluminum Cans	Non-Hazardous	Beverage Consumption	Local recycling center.
Antifreeze	Non-Hazardous	Vehicle and Equipment Maintenance	Stored in a polyethylene container and managed by Emerald Services.
Asbestos	Non-Hazardous	Former Sawmill - Building Demolition	Reportedly buried with demolished structures in the area of the former sawmill.
Asbestos	Non-Hazardous	Former Chip Mill - Building Demolition	Reportedly disposed of off-site prior to building demolition of the former chip mill.
Cardboard, Paper, Newsprint, etc.	Non-Hazardous	Administrative Activities	Recycled by Rubatino Refuse, Everett Washington.
Demolition Debris	Non-Hazardous	On-site and Off-site Properties - Demolition Projects	Used as fill along low-lying areas of the property.
Domestic Waste, Food, etc.	Non-Hazardous	Lunch Room	Collected by Rubatino Refuse, Everett Washington
Empty Containers (e.g., totes and drums)	Non-Hazardous	Vehicle Maintenance and Mill Operations	Oil drums returned to vendor.
Fluorescent Bulbs	Unclassified	Building Maintenance	KCWW Everett pulp and paper mill electricians replace and manage.
Fluorescent Light Ballasts	Unclassified	Building Maintenance	KCWW Everett pulp and paper mill electricians replace and manage.
Grinding Wastes (e.g., Babbit)	N/A	Chip mill and Former Sawmill - Equipment Maintenance	Reportedly, no longer generated on-site. Historically placed skimmings from meltdown on hog fuel pile.
Mercury Lamps	Unclassified	Building Maintenance	KCWW Everett pulp and paper mill electricians replace and manage.
Mercury Light Ballasts and/or Switches	Unclassified	Building Maintenance	KCWW Everett pulp and paper mill electricians replace and manage.
Oil Filters	Non-Hazardous	Vehicle and Equipment Maintenance	Off-site recycler.

TABLE 4-2
WASTES GENERATED ON-SITE

PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT COMMUNICATION

Wastestream	Managed as Haz. or Non-Haz.	Generated as a Result of:	Observed/Historic Disposal Location
Parts Washer Solvent	Non-Hazardous	Vehicle and Equipment Maintenance	Managed by Safety Kleen
Radioactive Waste	N/A	Scale house - Measurement Device	Radioactive source located in scale. The source is checked annually. Disposal has not been required.
Scrap Metal	Non-Hazardous	Container Disposal, Building and Equipment Demolition	Recycled.
Scrap Wood	Non-Hazardous	Log Yard Waste, Pallets and Building Demolition	Waste wood products have generally been chipped and used for hog fuel at the KCWW Everett pulp -and paper mill.
Used Heavy Equipment and Light Vehicle Tires	Non-Hazardous	Vehicle and Equipment Maintenance	Heavy equipment tires returned to vendor. Smaller vehicle tires taken to local garage.
Used Oil	Non-Hazardous	Vehicle and Equipment Maintenance	Emerald Services manages
Wet Cell Batteries	Non-Hazardous	Vehicle and Equipment Maintenance	Recycled off-site.

Former Sawmill Operations

According to several former sawmill employees interviewed during the 1998 Phase I ESA, a wood preservative, "Woodlife" (i.e., a preservative likely consisting of pentachlorophenol and petroleum distillates), was used to treat lumber/lumber products from about 1945 to the early 1970's. A reddish tint (delivered in a "paste" form and diluted with mineral spirits) was added to the preservative, which was then sprayed onto lumber within the former Planer Mill, Building 47 (Figure 4-4, Item No. OSD-1A). According to the former employees, spillage of the preservative to the wooden floor and surrounding ground was common. Furthermore, a "dip trough" was used for this operation for approximately one year in the early 1970's (Figure 4-4, Item No. OSD-1B). Lumber would be dipped into this four-foot by 40-foot trough, which was located near the Red Shed, Building 28.

The former employees also noted that for about nine months in the 1980's, "green" wood was treated near the eastern extent of former sawmill. The preservative, Permatox (containing sodium tetrachlorophenate, phenylmercuric acetate, and sodium pentachlorophenate), was reportedly diluted (50 water: 1 Permatox) and spray-applied to the wood outdoors near the former log chain (east-central portion of the site). Reportedly, spillage from this operation went directly onto the ground (Figure 4-4, Item No. OSD-1C). Former employees indicated that a total of five to six 55-gallon drums of Permatox was used.

Information obtained during the 2000 Phase I ESA Update as well as the December 2005 Phase I ESA was consistent with information obtained during the 1998 Phase I ESA. No staining, stressed vegetation or other evidence of these past practices was observed; however, these reported historic disposal practices continue to represent a REC with respect to the site.

Other operations at the former sawmill included oil changes and vehicle maintenance in the garage ("Sigh's Shop", Building 30), oil storage in several

structures and large waste wood piles used as hog fuel for boilers formerly on-site. A 1959 engineering drawing also depicted several "mill refuse" areas. Site contacts reported that waste wood, sawdust and timber edgings were disposed at these locations. Reportedly, numerous hydraulic oil spills occurred at the former sawmill (and were unrecorded). Former employees and site personnel indicated that following closure of the sawmill, many of the structures were demolished and either chipped for hog fuel or used for fill on-site.

Dredge Spoils/Construction and Demolition Debris

During the 1998 Phase I ESA, available information suggested that disposal of dredge spoils and construction/demolition debris has occurred throughout most of the Riverside Woodyard. Information obtained during the 2000 Phase I ESA Update was generally consistent with information from the previous assessment. Information obtained during these two previous assessments along with any pertinent observations associated with the December 2005 Phase I ESA are presented below.

- *Previous Finding:* Based on information collected during the site visit, it appears that at least 50 percent of the Riverside Woodyard has been filled with dredge spoils. At the time of the 1998 site visit, an area of dredge spoils encompassing approximately ten acres was visible near the southeastern boundary of the property (Figure 4-4, Item No. OSD-2A). According to a 1988 draft report prepared for the USEPA (provided by KCWW), contaminated sediments have been identified in the lower reaches of the Snohomish River (the likely source of the spoils deposited on-site) and other areas of Everett Harbor. According to this report, sediments contain heavy metals, petroleum residuals, PCBs and other organic compounds. The composition of dredge spoils on the site was not known at the time of the 1998 Phase I ESA. During the 2000 Phase I ESA Update, KCWW personnel indicated that dredge spoils were placed on the property; however, deposition was limited to the southern portion of the property encompassing approximately ten to 20 percent of the site. The dredging was reportedly conducted by Manson Construction and the spoils placed on the site were from dredging in the Snohomish River along the eastern property boundary. KCWW personnel further indicated that more than 50 percent of the dredge spoils placed on the property had recently been removed by the City of Everett to extinguish and bury a tire fire within the City limits. At the time of the 2000 Phase I ESA Update, numerous piles of sand and gravel fill were present on the southern portion of the property to replace the removed material. This fill

material was principally from construction/excavation activities the nearby KCWW Everett Mill. No additional information pertaining to the composition or potential chemical content of the dredge spoils was obtained during the 2000 Phase I ESA Update. During the course of the December 2005 Phase I ESA, this area continues to be used for the deposition of construction/demolition debris as well as secondary wastewater treatment plant sludge from the KCWW Everett Pulp and Paper Mill. No further information pertaining to the historic fill operations and/or composition of the fill materials was obtained and, as such, the historic fill operations continue to represent a REC with respect to the site.

- *Previous Finding:* During the 1998 Phase I ESA, KCWW personnel indicated that construction and demolition debris had been historically used for fill and was pervasive throughout the site. Areas where fill was extensively placed included the former sawmill and associated log pond where up to 15 feet of this material may have been deposited on a four-acre area (Figure 4-4, Item No. OSD-2B). In addition, site contacts reported that excavation spoils from a recent municipal sewer line installation were placed on Riverside Woodyard property as fill. The composition of this soil was not determined prior to filling. Information obtained during the 2000 Phase I ESA Update and December 2005 Phase I ESA was consistent with the information obtained during the 1998 Phase I ESA and, as such, the historic fill operations continue to represent a REC with respect to the site.

Other Evidence of On-site Disposal

During the 1998 Phase I ESA, evidence of solid waste disposal was noted at several locations onsite. Observations made during the 2000 Phase I ESA Update site visit varied for each of the areas identified during the 1998 Phase I ESA. These areas are described below along with any pertinent observations associated with the December 2005 Phase I ESA.

- *Previous Finding:* At the time of the 1998 Phase I ESA, debris and various scrap materials (e.g., metal, conduit, a fractured oil-filled transformer, waste dimensional lumber, one crushed, empty 275-gallon fuel oil AST, an empty 35-gallon grease container, two crushed and empty five-gallon lacquer thinner containers, scrap fabric, fluorescent lights, etc.) were accumulated in several piles (totaling approximately 200 cubic yards) near the north perimeter of the leased area (Figure 4-4, Item No. OSD-4). At the time of the 2000 Phase I ESA Update, the majority of these materials were removed from the site. Specifically, the fractured transformer, crushed fuel oil AST, crushed drums, fabric and light ballasts were not observed on the property. The only remaining materials consisted of approximately 20 cubic yards of scrap metal and wood. At the time of the December 2005 Phase I ESA, little to no debris

was observed in this area; however, the exact fate of these materials was not known and, as such, the former presence of this debris continues to represent a REC with respect to the site.

- *Previous Finding:* At the time of the 1998 Phase I ESA an accumulation of obsolete equipment, scrap tires, creosote-treated utility poles, scrap metal, etc., was noted around the entire perimeter of the Red Shed, Building 28 (Figure 4-4, Item No. OSD-5). Observations made during the 2000 Phase I ESA Update were consistent with observations from the previous assessment. These materials were not observed onsite during the December 2005 Phase I ESA. According to individual interviewed, creosote utility poles and other treated lumber was formerly chipped for hog fuel; however, the exact fate of these materials was not known and, as such, the former presence of these materials onsite continues to represent a REC with respect to the site.

- *Previous Finding:* Stored municipal trash dumpsters were observed on-site south of the Red Shed (the dumpsters were property of KCWW's local trash vendor, Rubatinos Refuse) and have been stored onsite through an informal lease arrangement for over ten years. At the time of the 1998 Phase I ESA, approximately 75 dumpsters were present onsite. While most dumpsters were empty, approximately 20 gallons of an oily, sludge-like material was present in one container and two automotive batteries were observed in another. The dumpsters were arranged in a manner that prevented the inspection of earthen materials below all containers (Figure 4-4, Item No. OSD-6). At the time of the 2000 Phase I ESA Update as well as the December 2005 Phase I ESA, the dumpsters were present in approximately the same number and in the same location. The arrangement of the dumpsters prevented an inspection of the ground surface for any potential releases associated with any residual materials in the dumpsters and, as such, the presence of these dumpsters continues to represent a REC with respect to the site.

- *Previous Finding:* An empty automobile gas tank was observed in a remote area near the southeast comer property near the fence line along Railroad Avenue (Figure 4-4, Item No. OSD-7). This feature was not observed during the 2000 Phase I ESA Update or the December 2005 Phase I ESA and the fate of this feature is unknown. The former presence of this gas tank continues to represent a REC with respect to the site.

- *Previous Finding:* During the 1998 Phase I ESA, a large accumulation of equipment and debris (approximately one-acre in size) was observed along the west perimeter of the leased area. Portions of this area resembled a "salvage yard" including waste materials and miscellaneous debris such as: approximately two cubic yards of spent shot blast media; scrap tires; creosote-treated utility poles; scrap metal; scrap wood; a soil pile (approximately 100 cubic yards); five ASTs including a 100-gallon tank, three 250-gallon tanks (staining was evident below one of the three tanks), and one 500-gallon tank; three empty, partially crushed five-gallon containers; seven 55-gallon drums containing spent shot blast media; one partially full (approximately 20 percent)

55-gallon fiberglass resin drum; one full five-gallon container of oil; one liquid-filled transformer (fluid capacity was approximately five-gallons, labeled non-PCB); and other miscellaneous debris. A similar debris pile was noted near the southern perimeter of the leased area and included mostly scrap steel and wood. Other materials observed included rope, hoses, engine parts, large heater coils, an old crane (a sheen on standing water was noted in the area), a dredge bucket, several electrical boxes, several empty five-gallon pails, metal roof covers, a diesel-powered lumber saw and three full 55-gallon oil drums with no evidence of staining (Figure 4-4, Item No. OSD-8). At the time of the 2000 Phase I ESA Update site visit, a significant portion of the above-described debris was removed by the occupant of the leased area. Specifically, the aboveground tanks, partially full to full drums, transformer, shot blast media and some of the scrap metal were not observed in this area; however, there was still a significant amount of waste debris on-site. This debris consisted of several hundred cubic yards of scrap metal, scrap wood, creosote treated utility poles, various parts of ships, plastic, concrete reinforcing mesh, tires, pallets, rope, piping, approximately 25 empty corroded 55-gallon drums, dimensional lumber, netting and other miscellaneous debris. Surficial staining was observed in various areas as above. At the time of the December 2005 Phase I ESA, nearly all of the remaining materials had been removed from the site. According to individuals interviewed a large scale cleanup effort was performed in 2001 to remove the materials associated with the former tenant in this area. No staining, stressed vegetation or other evidence of a potential release was observed; however, the former presence of these materials and previously identified stained soil continues to represent a REC with respect to the site.

- *Previous Finding:* At the time of the 2000 Phase I ESA Update, miscellaneous surficial debris was observed was observed in the southern portion of the drainage swale along the western property boundary (Figure 4-3, Item No. OSD-15). This debris consisted of one to two cubic yards of scrap wood, metal, tires and an old shopping cart among other debris. At the time of the December 2005 Phase I ESA Update, similar observations were made with respect to debris in this drainage swale. The exact nature of this material could be determined due to heavy overgrowth and, as such, the presence of this debris continues to represent a REC with respect to the site.

- *Previous Finding:* At the time of the 2000 Phase I ESA Update, A large pile (2,000 to 3,000 cubic yards) of boiler ash was observed in the central portion of the site. According to KCWW personnel, this material was from the hog fuel boiler at the KCWW Everett Pulp and Paper Mill and was being stockpiled onsite. The composition and chemical nature of this material was not known. During the December 2005 Phase I ESA, three piles of boiler ash totaling approximately 2,000 cubic yards were present on site (Figure 4-3, Item No. OSD-16). According to individuals interviewed, these piles have been screened to a specific size and are being staged onsite. No additional information was obtained and the presence of this material onsite continues to represent a REC with respect to the site.

- *Previous Finding:* At the time of the 2003 Phase I ESA Update, the KCWW Riverside Woodyard was accepting and processing creosote treated wood (i.e., railroad ties, telephone poles, dock material, etc.). This wood was off-loaded from railcars and staged along the northern boundary of the Site (Figure 4-4, Item No. OSD-19). A contractor (Rainier Recycling) was retained to grind the creosote treated wood for use as hog fuel at the KCC Everett Mill. The grinding operation occurred along the rail spur in the central portion of the site. This process involved inspecting and removing any foreign objects (i.e., metal plates, spikes, etc.) prior to grinding. The wood was then loaded into a grinder and the grindings were placed directly into tractor-trailers for transport to the Mill. According to individuals interviewed, creosote treated wood grindings were not stored on the Site. Since this process occurs outdoors and the grindings are exposed to the elements, there is a possibility that creosote may have been released to the ground surface onsite via wind and/or precipitation representing a REC. At the time of the December 2005 Phase I ESA, the grinding operations had ceased; however, a significant amount of creosote treated wood remained onsite. The presence of this material and historic grinding operations continue to represent a REC with respect to the site.

- *New Finding:* During the 2005 Phase I ESA, evidence of illegal dumping was observed primarily in the southeastern portion of the Riverside Woodyard. Specifically, an approximately five to ten cubic yard pile of asphalt shingles was observed along with some domestic waste in the east-central portion of the property (Figure 4-4, Item No. OSD-20). Similarly, a second, larger pile of asphalt shingles, scrap wood, scrap metal and domestic waste was also observed along the eastern side of a large wood waste pile in the central portion of the property (Figure 4-4, Item No OSD-21, Photograph No. 8). The exact nature of these piles of debris could not be determined and, as such, they represent RECs with respect to the site.

In addition to the above-mentioned RECs, several additional RECs related to onsite disposal of various materials were identified in the previous Phase I ESA and associated updates conducted at the Riverside Woodyard. Based on information and observations made during the course of the December 2005 Phase I ESA, these previously identified adjacent property RECs are no longer considered RECs with respect to the site. For the purposes of this report, these previous findings are considered HRECs and are summarized in Table 5-2 in Section 5.1 and depicted on Figures 4-5 or 4-6.

4.6 OTHER CONDITIONS OR CONCERNS

4.6.1 On-Site Well

A total of four ground water monitoring wells have been installed on the Riverside Woodyard. According to individuals interviewed and available documentation, wells W-1 and W-2 were installed in 1993 and wells W-3 and W-4 were installed in 2002. These wells were reportedly installed for geotechnical purposes as part of proposed construction projects (i.e., property upgrades in 1993 to 1994 and installation of the deep water outfall in 2002). Pertinent information, including ground water sample results pertaining to wells W-1 and W-2 was previously discussed in Section 2.4. At the time of the December 2005 Phase I ESA site visit, monitoring wells W-1 and W-2 were destroyed such that no surficial expression of these wells was noted.

No specific construction details were available with respect to W-3 and W-4 other than they were reportedly installed for ground water measurements only (i.e., piezometers). At the time of the December 2005 Phase I ESA, well W-3 was no longer present and had reportedly been inadvertently run over by a truck such that this well was destroyed. Well W-4 was observed during the December 2005 Phase I ESA in the northwestern portion of the site and this well appeared to be in good condition. According to individuals interviewed, these wells were never sampled and no further details pertaining to these wells was available.

4.6.2 Asbestos

In addition to the identification of RECs, several BERs were evaluated as a matter of course during this Phase I ESA including potential asbestos containing materials (ACM). The ACM items reported herein were recorded during the December 2005 Phase I ESA within the judgment, experience and stated qualifications of Delta's on-site professional.

According to available information, with the exception of the recent demolition of

the chip mill, KCTWW had not conducted a formal survey for the presence of ACM at the Riverside Woodyard. Prior to the demolition activities, ACM was reportedly identified, removed and properly disposed off-site. Based on the reported construction dates of many of the remaining site structures, building materials (insulation, wallboard, etc.) may contain ACM.

According to the previous Phase I ESA Reports, potential ACM was observed at several locations onsite during the previous Phase I ESA and associated updates. These materials generally consisted of pipe insulation, masonry building panels, floor tiles, brake lining material, etc. These materials were reportedly either disposed of off-site or buried onsite; however, the exact fate of these materials could not be confirmed. For the purposes of the December 2005 Phase I ESA, previously identified RECs associated with ACM have been re-classified as BER and are summarized on Table 5-3.

4.7 SITE MAPS

4.7.1 Site Location Map

Figure 4-1 provides a general site location map for the subject property.

4.7.2 Site Layout and Building Description

Figure 4-2 provides a general site layout with existing and former onsite buildings/structures and nearby areas.

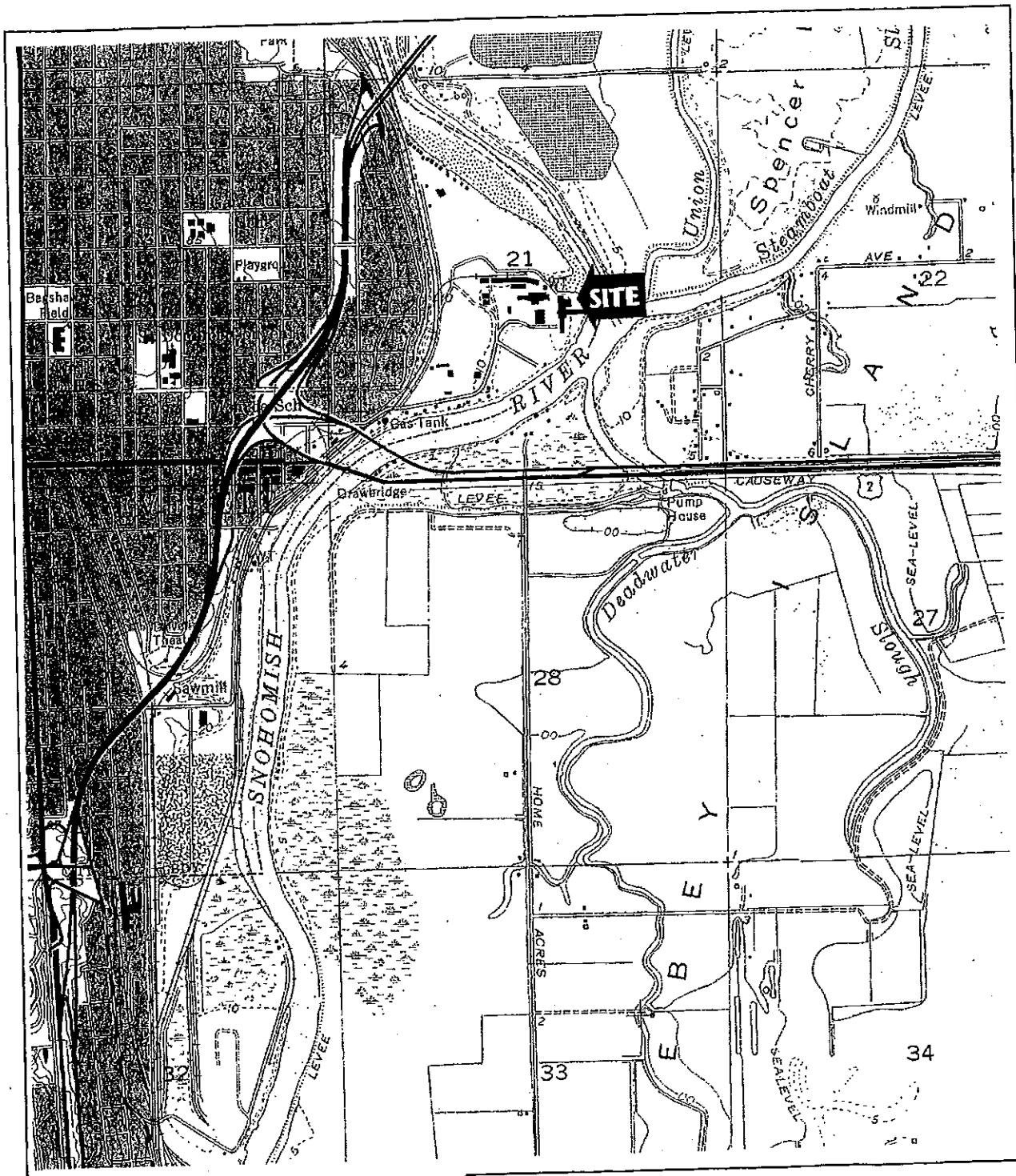
4.7.3 Recognized/Historic Recognized Environmental Conditions

Figures 4-3 and 4-4 illustrate RECs identified onsite during the course of this Phase I ESA. In addition, any RECs identified in previous Phase I ESAs conducted onsite (i.e., HRECs) that continue to represent a REC to the site based on the findings/observations of this Phase I ESA are also presented on these figures. Figures 4-5 and 4-6 illustrate HRECs, previously identified RECs

associated with the previous Phase I ESAs conducted onsite that, based on the findings/observations of this Phase I ESA, were either not present or no longer present a REC with respect to the site. Also shown on Figures 4-5 and 4-6 are previously identified RECs pertaining to wetlands, floodplains, and PACM that continue to pose a concern, but which have since been reclassified for the purposes of this Phase I ESA report as BERs.

Designations on map legends are defined below.

- ADJ : adjacent property issue.
- ACM : potentially asbestos containing material.
- E : issue associated with electrical equipment.
- OSD : on-site disposal.
- O/W: Oil/water separator.
- S: sheen or stain.
- SEP : septic tank or septic system.
- UC : container with unidentified contents.
- UST : underground storage tank issue.
- W : well.
- WET : wetland or potential wetland.
- WW : wastewater issue.

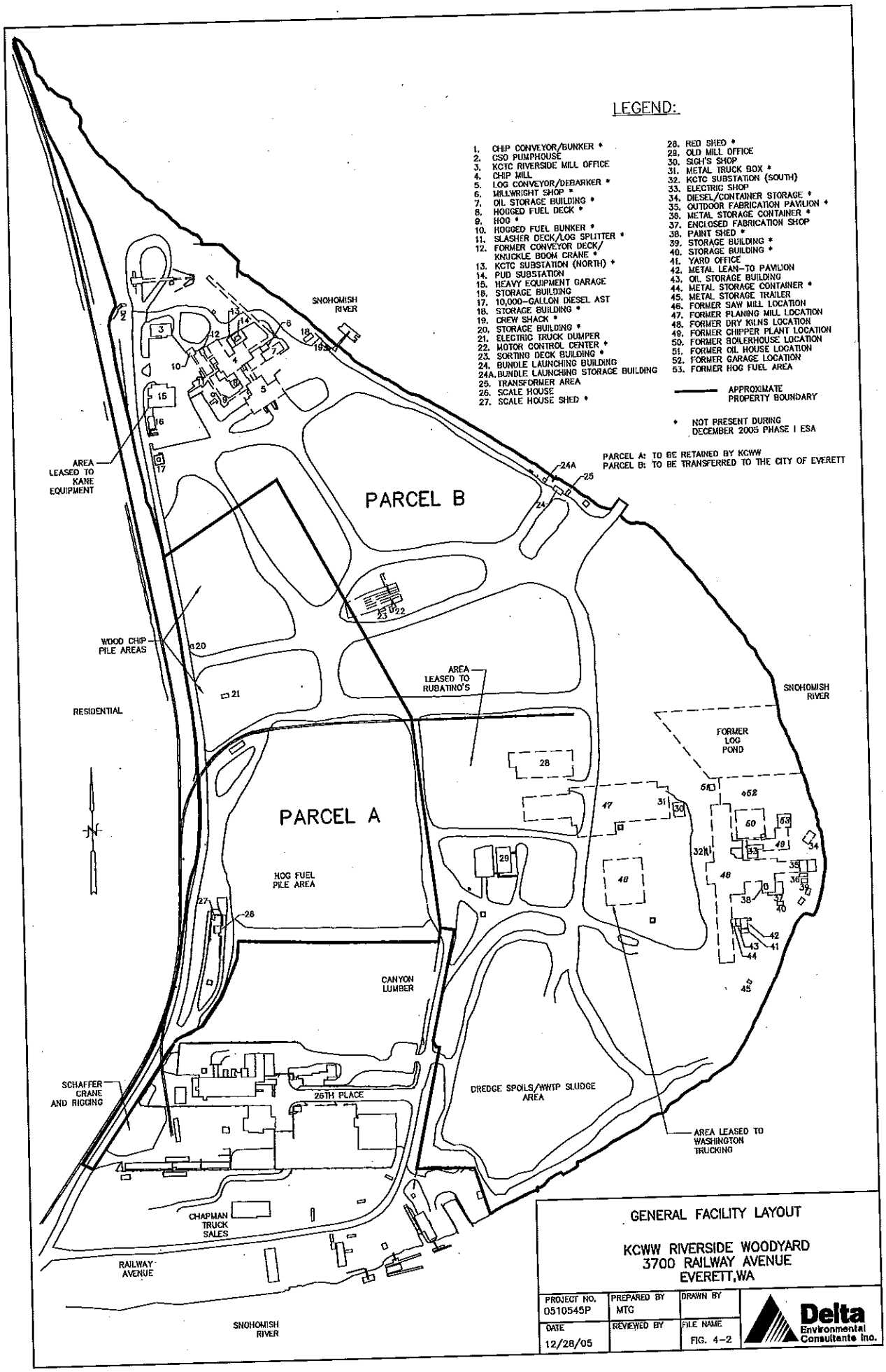


SITE LOCATOR

KCWW RIVERSIDE WOODYARD
3700 RAILWAY AVENUE
EVERETT, WA

PROJECT NO.	PREPARED BY	DRAWN BY
0510545P	MTG	
DATE	REVIEWED BY	FILE NAME
12/23/05		FIG. 4-1

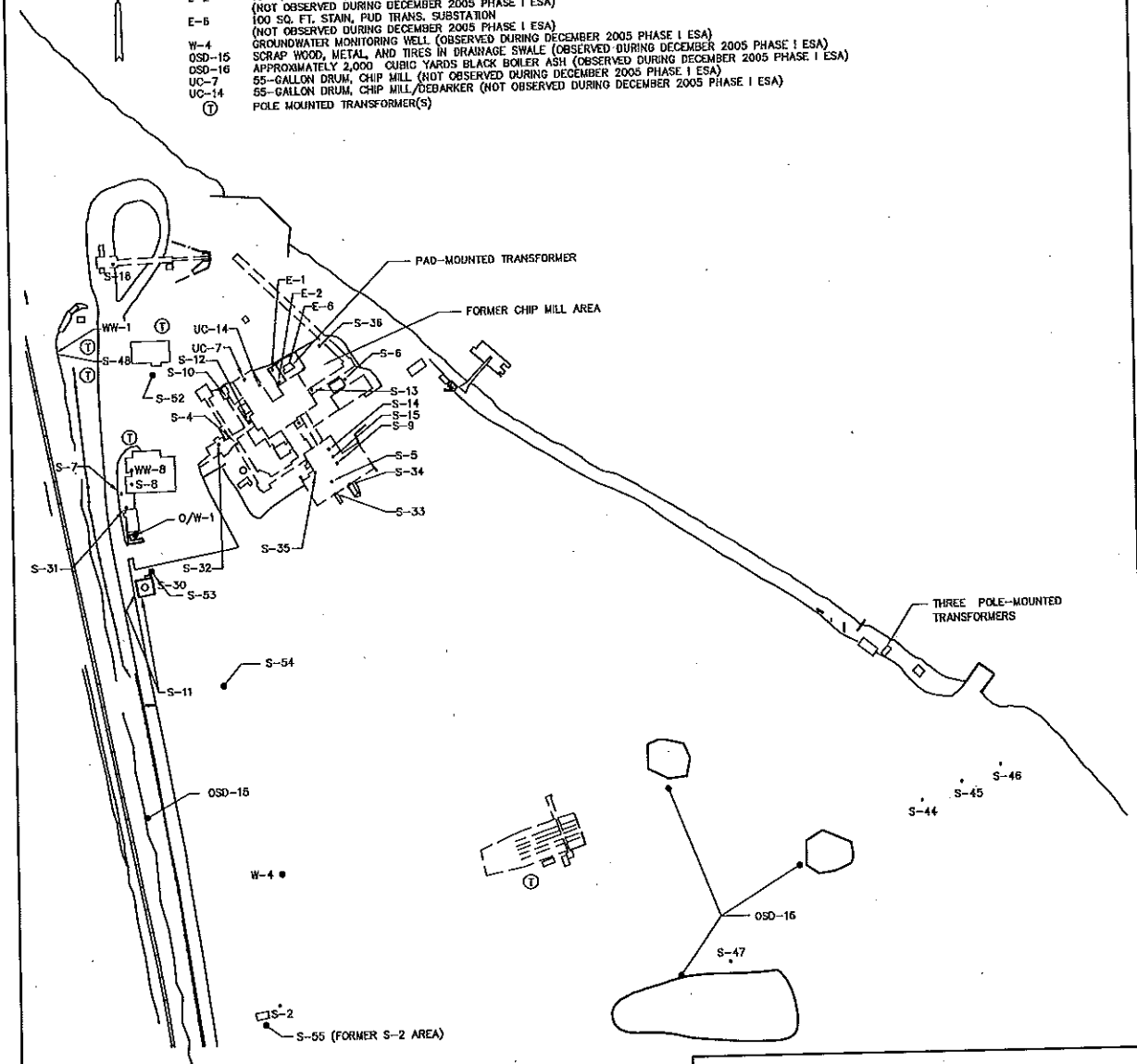
Delta Environmental Consultants Inc.


LEGEND:
1. CHIP CONVEYOR/BUNKER *
2. CSO PUMPHOUSE
3. KCTC RIVERSIDE MILL OFFICE
4. CHIP MILL
5. LOG CONVEYOR/DEBARKER *
6. MILLWRIGHT SHOP *
7. OIL STORAGE BUILDING *
8. HOGGED FUEL DECK *
9. HOG *
10. HOGGED FUEL BUNKER *
11. SLASHER DECK/LOG SPLITTER *
12. FORMER CONVEYOR DECK/ KNUCKLE BOOM CRANE *
13. KCTC SUBSTATION (NORTH) *
14. PUD SUBSTATION
15. HEAVY EQUIPMENT GARAGE
16. STORAGE BUILDING
17. 10,000-GALLON DIESEL AST
18. STORAGE BUILDING *
19. CREW SHACK *
20. STORAGE BUILDING *
21. ELECTRIC TRUCK DUMPER
22. MOTOR CONTROL CENTER *
23. SORTING DECK BUILDING *
24. BUNDLE LAUNCHING BUILDING
24A. BUNDLE LAUNCHING STORAGE BUILDING
25. TRANSFORMER AREA
26. SCALE HOUSE
27. SCALE HOUSE SHED *
28. RED SHED *
29. OLD MILL OFFICE
30. SIGH'S SHOP
31. METAL TRUCK BOX *
32. KCTC SUBSTATION (SOUTH)
33. ELECTRIC SHOP
34. DIESEL/CONTAINER STORAGE *
35. OUTDOOR FABRICATION PAVILION *
36. METAL STORAGE CONTAINER *
37. ENCLOSED FABRICATION SHOP
38. PAINT SHED *
39. STORAGE BUILDING *
40. STORAGE BUILDING *
41. YARD OFFICE
42. METAL LEAN-TO PAVILION
43. OIL STORAGE BUILDING
44. METAL STORAGE CONTAINER *
45. METAL STORAGE TRAILER
46. FORMER SAW MILL LOCATION
47. FORMER PLANING MILL LOCATION
48. FORMER DRY KILNS LOCATION
49. FORMER CHIPPER PLANT LOCATION
50. FORMER BOILERHOUSE LOCATION
51. FORMER OIL HOUSE LOCATION
52. FORMER GARAGE LOCATION
53. FORMER HOG FUEL AREA
APPROXIMATE PROPERTY BOUNDARY
* NOT PRESENT DURING DECEMBER 2005 PHASE I ESA
PARCEL A: TO BE RETAINED BY KCWW
PARCEL B: TO BE TRANSFERRED TO THE CITY OF EVERETT
PARCEL A
PARCEL B
SNOHOMISH RIVER
AREA LEASED TO KANE EQUIPMENT
WOOD CHIP PILE AREAS
RESIDENTIAL
AREA LEASED TO RUBATINO'S
FORMER LOG POND
HOG FUEL PILE AREA
CANYON LUMBER
SCHAFFER CRANE AND RIGGING
26TH PLACE
DREDGE SPOILS/WWTP SLUDGE AREA
AREA LEASED TO WASHINGTON TRUCKING
CHAPMAN TRUCK SALES
RAILWAY AVENUE
SNOHOMISH RIVER
GENERAL FACILITY LAYOUT
KCWW RIVERSIDE WOODYARD
3700 RAILWAY AVENUE
EVERETT, WA
PROJECT NO. 0510545P
PREPARED BY MTG
DRAWN BY
DATE 12/28/05
REVIEWED BY
FILE NAME FIG. 4-2
Delta Environmental Consultants Inc.

LEGEND:

PREVIOUS FINDINGS WITH DECEMBER 2005 PHASE I ESA OBSERVATIONS IN PARENTHESES:

S-2	2,000 SQ. FT. SHEEN, TRUCK DUMPER (OBSERVED DURING DECEMBER 2005 PHASE I ESA–SEE FINDING S-55)
S-4	750 SQ. FT. SHEEN BELOW HOGGED FUEL CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-5	500 SQ. FT. STAIN, LOG CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-6	500 SQ. FT. STAIN, CHIP MILL OIL STORAGE BLDG. (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-7	20 SQ. FT. STAIN, HEAVY EQUIPMENT GARAGE (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-8	10 SQ. FT. STAIN, HEAVY EQUIPMENT GARAGE (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-9	10 SQ. FT. STAIN, DITCH BELOW LOG CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-10	10 SQ. FT. STAIN UNDER FORMER CONVEYOR/KNUCKLE BOOM CRANE (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-11	TWO 8 SQ. FT. STAINS, 10,000-GALLON DIESEL TANK (MINOR STAINING ON CONCRETE OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-12	5 SQ. FT. STAIN, CHIP MILL (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-13	2 SQ. FT. STAIN, CHIP MILL (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-14	3 CU. YD. OIL/SAWDUST, LOG CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-15	STAINED SOIL, LOG CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-16	POTENTIAL SOIL STAIN, HYDRAULIC RESERVOIR, CHIP CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-30	SPILL, 10,000-GALLON DIESEL AST (NO NEW INFORMATION AVAILABLE)
S-31	5 TO 10 SQ. FT. STAIN AROUND FIVE 55-GALLON DRUMS (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-32	TWO AREAS (350 TO 400 SQ. FT. TOTAL) OF STAINING BELOW SLASHER DECK/LOG SPLITTER (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-33	200 TO 250 SQ. FT. STAINING BENEATH SMALL LOG CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-34	150 TO 200 SQ. FT. STAINING BENEATH LARGE LOG CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-35	250 TO 300 SQ. FT. STAINING BENEATH SMALL LOG CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-36	100 SQ. FT. STAINING BENEATH THE CHIP CONVEYOR (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-44	200 SQ. FT. STAINING BENEATH TIMBER EQUIPMENT (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-45	50 SQ. FT. STAINING, SOURCE UNKNOWN (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-46	25 SQ. FT. STAINING, SOURCE UNKNOWN (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-47	BLACK STAINING AROUND BOILER ASH PILE (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-48	UNIDENTIFIED BLACK AND WHITE SUBSTANCES FLOATING IN THE DRAINAGE SWALE (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
WW-1	SWALE, WESTERN PERIMETER (STILL PRESENT, NO UNIDENTIFIED SUBSTANCES OBSERVED IN THE SWALE, SOME DEBRIS OBSERVED)
WW-8	SUMP, HEAVY EQUIPMENT GARAGE (SUMP STILL PRESENT, FLOOR DRAIN IN SHOP DISCHARGE TO SUMP)
E-1	100 SQ. FT. STAIN, TRANS. KCTC SUBSTATION NORTH (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
E-2	10 SQ. FT. STAIN, WALL MOUNTED TRANSFORMER KCTC SUBSTATION NORTH (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
E-6	100 SQ. FT. STAIN, PUD TRANS. SUBSTATION (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
W-4	GROUNDWATER MONITORING WELL (OBSERVED DURING DECEMBER 2005 PHASE I ESA)
OSD-15	SCRAP WOOD, METAL, AND TIRES IN DRAINAGE SWALE (OBSERVED DURING DECEMBER 2005 PHASE I ESA)
OSD-16	APPROXIMATELY 2,000 CUBIC YARDS BLACK BOILER ASH (OBSERVED DURING DECEMBER 2005 PHASE I ESA)
UC-7	55-GALLON DRUM, CHIP MILL (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
UC-14	55-GALLON DRUM, CHIP MILL/DEBARKER (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
Ⓣ	POLE MOUNTED TRANSFORMER(S)



LEGEND:

NEW FINDINGS – DECEMBER 2005 PHASE I ESA :

S-52	100 SQ. FT. PETROLEUM STAIN FROM LEAKING LOADER
S-53	5- 10 SQ. FT. PETROLEUM STAINING, ADJACENT TO DIESEL FUEL PUMP
S-54	10- 20 SQ. FT. STAINED AREA UNDER HEAVY EQUIPMENT
S-55	200- 400 SQ. FT. STAINED AREA UNDER AND AROUND TRUCK LIFT (FORMER LOCATION OF S-2 IDENTIFIED IN 1998 REPORT BUT NOT OBSERVED IN 2000 UPDATE REPORT)
O/W-1	UNDERGROUND OIL/ WATER SEPARATOR

RECOGNIZED ENVIRONMENTAL CONDITIONS
DECEMBER 2005

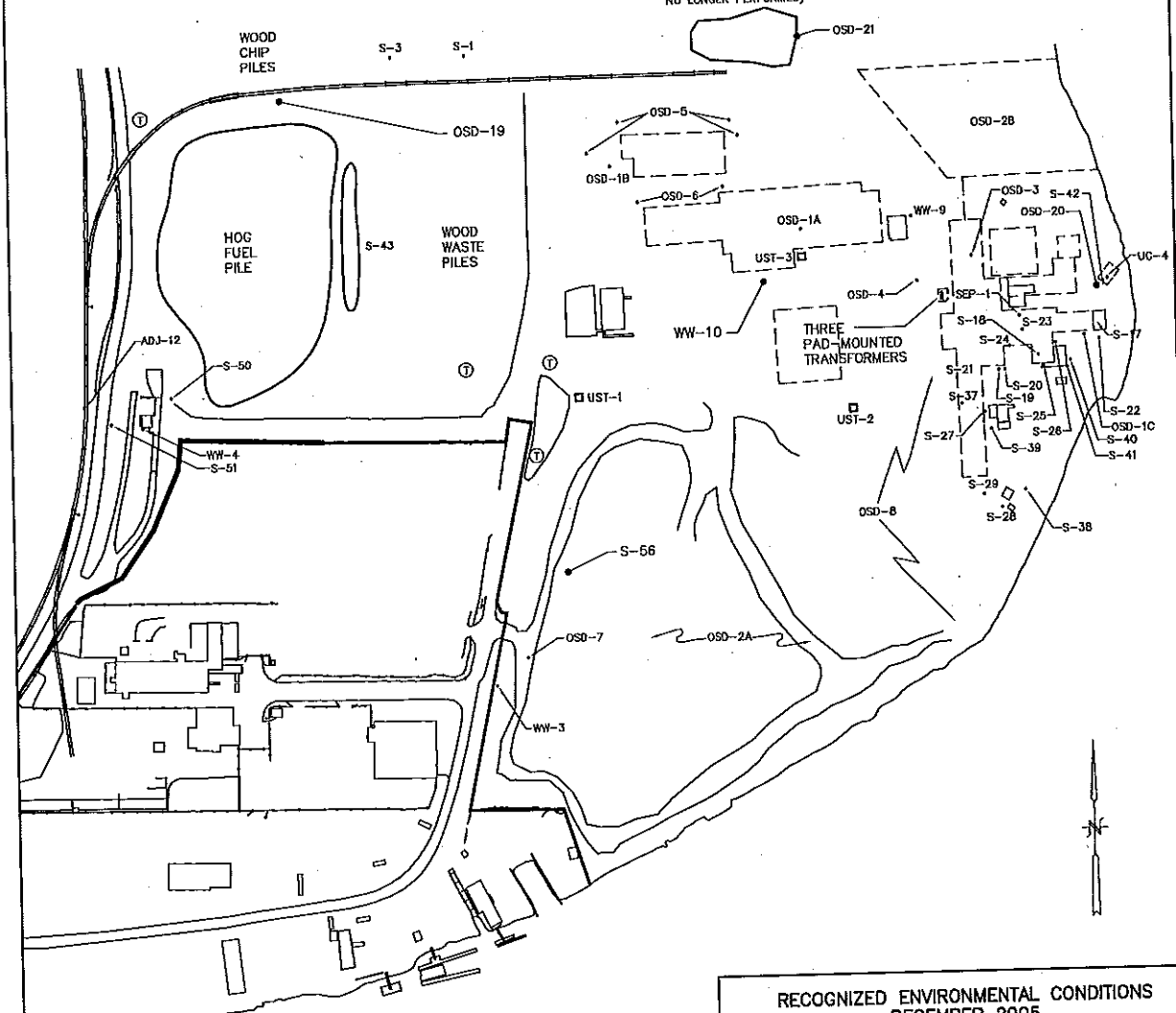
KCWW RIVERSIDE WOODYARD (NORTH)
3700 RAILWAY AVENUE
EVERETT, WA

PROJECT NO.	PREPARED BY	DRAWN BY	
0510545P	MTG		Delta Environmental Consultants Inc.
DATE	REVIEWED BY	FILE NAME	
12/28/05		FIG. 4-3	

LEGEND: PREVIOUS FINDINGS WITH DECEMBER 2005 PHASE I ESA OBSERVATIONS IN PARENTHESES:

S-1	3,000 SQ. FT. SHEEN, HOG FUEL PILE (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-3	1,500 SQ. FT. SHEEN, N OF RR SPUR (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-17	1,500 SQ. FT. STAIN, BELOW FAB SHOP (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-18	100 SQ. FT. STAIN, PAINT SHED (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-19	30 SQ. FT. STAIN, LEASED AREA (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-20	25 SQ. FT. STAIN, LEASED AREA (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-21	25 SQ. FT. STAIN, DEBRIS PILE (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-22	20 SQ. FT. STAIN ON WOODEN FLOOR, EARTH BELOW METAL SHED (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-23	15 SQ. FT. STAIN UNDER CRANE, NEAR ELECTRIC SHOP (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-24	10 SQ. FT. STAIN, LEASED AREA (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-25	10 SQ. FT. STAIN, FAB. BLDG. (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-26	2 SQ. FT. STAIN, FAB. BLDG. (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-27	5 SQ. FT. STAIN, LEASED AREA (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-28	OIL SHEEN, DRAINAGE DITCH, LEASED AREA (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-29	OIL SHEEN, DEBRIS PILE, LEASED AREA (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-37	TWO AREAS (100 SQ. FT. TOTAL) OF STAINING IN THE CENTRAL PORTION OF THE LEASE AREA (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-38	500 SQ. FT. ASSOCIATED WITH PUNCTURED DRUM (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-39	5 SQ. FT. WHITE STAINING (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-40	15 SQ. FT. STAINING AROUND ENGINE PART (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-41	100 SQ. FT. STAINING AROUND POLYETHYLENE DRUM (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-42	100 TO 150 SQ. FT. STAINING AROUND DRUMS (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-43	1000 TO 1500 SQ. FT. STAINING ON EAST SIDE OF HOG PILE (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-49	MINOR (DE MINIMUS) PETROLEUM STAINING FROM HEAVY EQUIPMENT (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-50	STAINING AND STRESSED VEGETATION NEAR CULVERT (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
S-51	STAINING AND STRESSED VEGETATION NEAR CATCH BASIN (STAINING NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
SEP-1	SEPTIC, OLD ELECTRICAL SHOP (NO NEW INFORMATION AVAILABLE)
WW-3	DITCH OUTFALL TO CITY STORM SEWER, DREDGE SPOIL AREA (STILL PRESENT)
WW-4	SUMP, SCALEHOUSE AREA (STILL PRESENT)
WW-9	STEAM CLEANING AREA, SIGH'S SHOP (NO NEW INFORMATION AVAILABLE)
UC-4	CONTAINERS, AST LOCATION (NO LONGER PRESENT)
UST-1	FORMER GASOLINE UST (NO NEW INFORMATION AVAILABLE)
UST-2	FORMER DIESEL UST (NO NEW INFORMATION AVAILABLE)
UST-3	FORMER WOODLIFE UST (NO NEW INFORMATION AVAILABLE)
ADJ-12	LOCOMOTIVE COLLISION, DIESEL FUEL SPILL (NO NEW INFORMATION AVAILABLE)

OSD-1A	SPILL, FORMER WOODLIFE TREATMENT AREA (NO NEW INFORMATION AVAILABLE)
OSD-1B	FORMER DIP TROUGH; SAW MILL (NO NEW INFORMATION AVAILABLE)
OSD-1C	PERMATOX AREA, FORMER SAWMILL (NO NEW INFORMATION AVAILABLE)
OSD-2A	DREDGE SPOILS AREA (SOME DREDGE SPOILS REMOVED – NO OTHER INFORMATION AVAILABLE)
OSD-2B	FORMER LOG POND (NO NEW INFORMATION AVAILABLE)
OSD-3	DEMOLITION DEBRIS PILE (NO LONGER PRESENT)
OSD-4	DEBRIS PILE (NO LONGER PRESENT)
OSD-5	SCRAP PILE NEAR RED SHED (NO LONGER PRESENT)
OSD-6	DUMPSTERS (STILL PRESENT)
OSD-7	EMPTY AUTOMOBILE GAS TANK, SW CORNER OF SITE (NO LONGER PRESENT)
OSD-8	DEBRIS AREA (NO LONGER PRESENT)
OSD-19	RAILROAD TIE GRINDING AREA (STILL PRESENT BUT GRINDING OPERATION NO LONGER PERFORMED)



LEGEND:

NEW FINDINGS – DECEMBER 2005 PHASE I ESA :

S-56	100-300 SQ. FT. BROWN STAINING FROM SLUDGE PILE TO DRAINAGE SWALE
WW-10	TRUCK WASH WATER DISCHARGED TO GROUND SURFACE
OSD-20	SURFICIAL DEBRIS (SHINGLES, WOOD, DOMESTIC WASTE, ETC.)
OSD-21	SURFICIAL DEBRIS (SHINGLES, WOOD, DOMESTIC WASTE, METAL, ETC.) ILLEGALLY DUMPED ADJACENT TO LARGE PILE OF WOOD WASTE
Ⓣ	POLE MOUNTED TRANSFORMER(S)

RECOGNIZED ENVIRONMENTAL CONDITIONS DECEMBER 2005

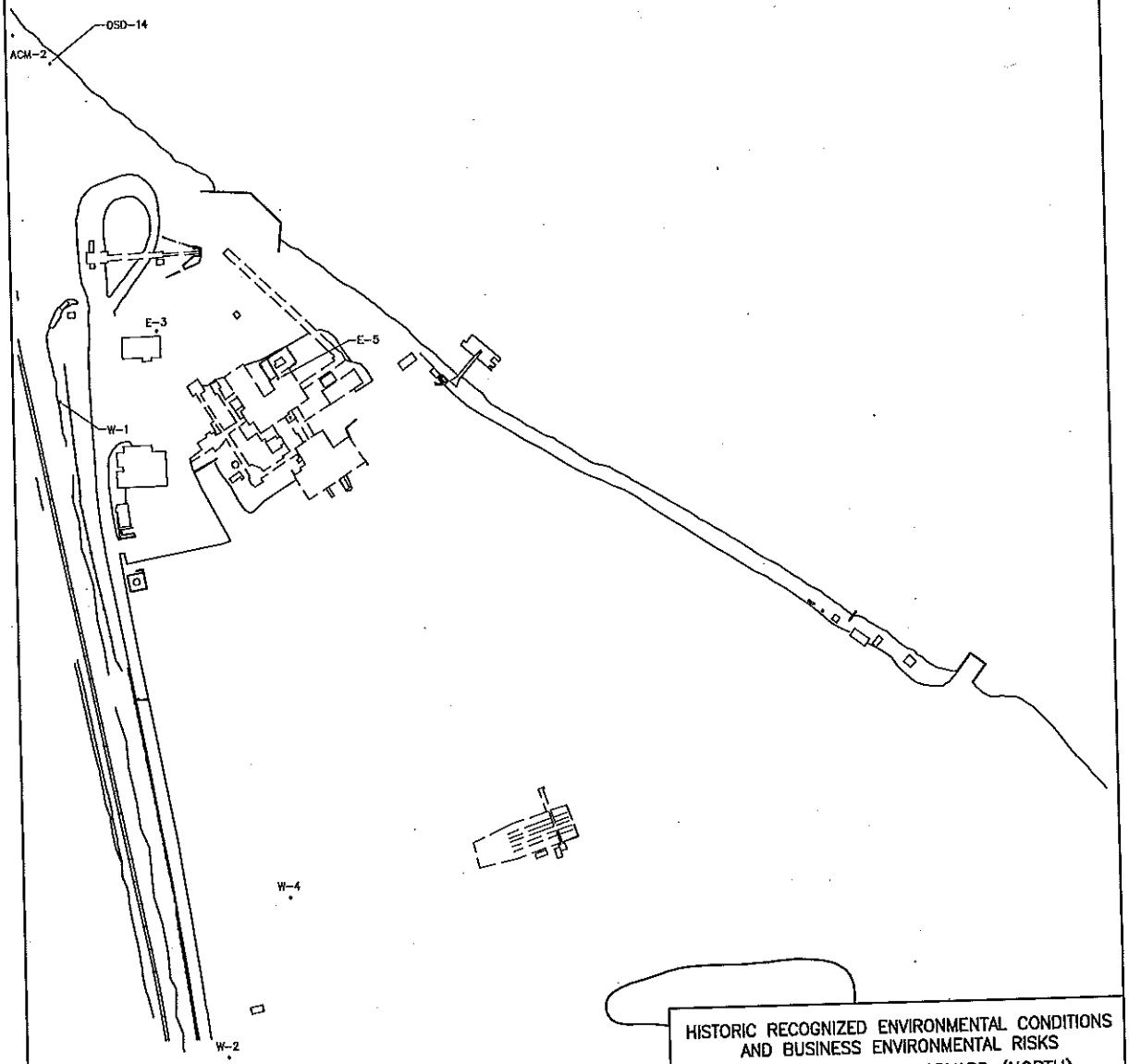
KCWW RIVERSIDE WOODYARD (SOUTH) 3700 RAILWAY AVENUE EVERETT, WA

PROJECT NO.	PREPARED BY	DRAWN BY	
0510545P	MTG		Delta Environmental Consultants Inc.
DATE	REVIEWED BY	FILE NAME	
12/28/05		FIG. 4-4	

LEGEND:

PREVIOUS FINDINGS WITH DECEMBER 2005 PHASE I ESA OBSERVATIONS IN PARENTHESES:

ACM-2	ACM ON PIPING (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
E-3	STAINS, POLE TRANSFORMER, RIVERSIDE MILL OFFICE (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
E-5	2 SQ. FT. STAIN BELOW TRANSFORMER, CHIP MILL MCC ROOM (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
W-1	MONITORING WELL (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
W-2	MONITORING WELL (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)
W-4	GROUNDWATER MONITORING WELL (OBSERVED DURING DECEMBER 2005 PHASE I ESA)
OSD-14	MISCELLANEOUS SURFICIAL DEBRIS NORTHERN PORTION OF PROPERTY (NOT OBSERVED DURING DECEMBER 2005 PHASE I ESA)



HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS
AND BUSINESS ENVIRONMENTAL RISKS
KCWW RIVERSIDE WOODYARD (NORTH)
3700 RAILWAY AVENUE
EVERETT, WA

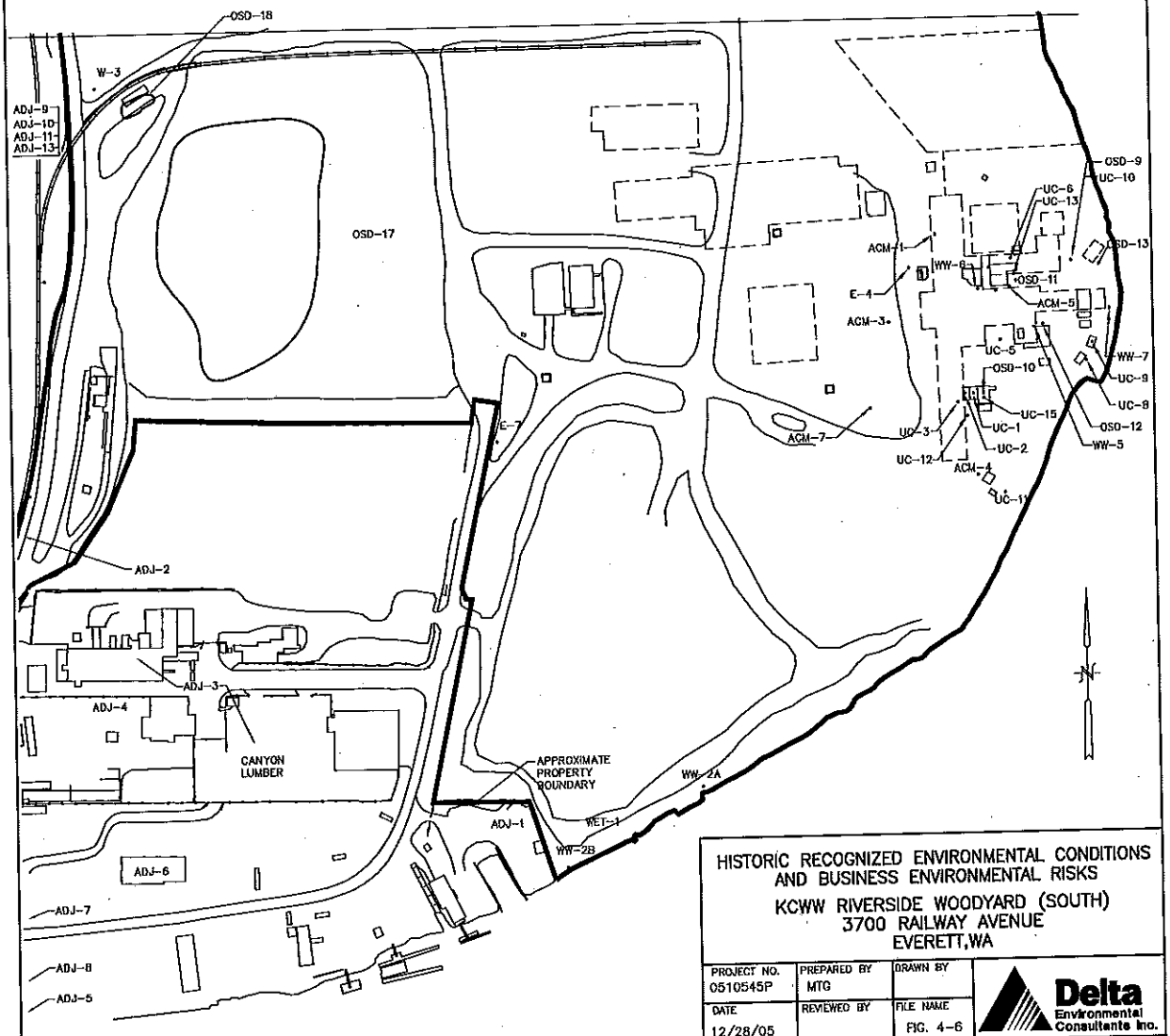
PROJECT NO.	PREPARED BY	DRAWN BY	
0510545P	MTG		Delta Environmental Consultants Inc.
DATE	REVIEWED BY	FILE NAME	
12/27/05		FIG. 4-5	

LEGEND:

PREVIOUS FINDINGS WITH DECEMBER 2005 PHASE I OBSERVATIONS IN PARENTHESES:

WW-2 DRAIN PIPES (WW-2A & WW-2B) REMOVED IN LATE 1990: (NO NEW INFORMATION AVAILABLE)
WW-5 SUMP, NW CORNER FAB. SHOP (STILL PRESENT AND DRY, DISCHARGE POINT REPORTEDLY REMOVED)
WW-6 SUMP, SW CORNER ELEC. SHOP (COULD NOT INSPECT, DISCHARGE POINT REPORTEDLY REMOVED)
WW-7 FORMER SINK (NO LONGER PRESENT)
UC-1 DRUMS, OIL STORAGE BLDG. (NO LONGER PRESENT)
UC-2 CONTAINERS, METAL SHIPPING CONTAINER (NO LONGER PRESENT)
UC-3 FUEL TANK (NO LONGER PRESENT)
UC-5 AST, LEASED AREA (NO LONGER PRESENT)
UC-6 5-GALLON PAIL, ELECTRIC SHOP (NO LONGER PRESENT)
UC-8 THREE 55-GALLON DRUMS (NO LONGER PRESENT)
UC-9 VARIOUS CONTAINERS (NO LONGER PRESENT)
UC-10 55-GALLON DRUM (NO LONGER PRESENT)
UC-11 THREE 55-GALLON DRUMS (NO LONGER PRESENT)
UC-12 THREE CONTAINERS IN THE CENTRAL PORTION OF THE FORMER LEASE AREA
UC-13 ONE 55-GALLON DRUM IN THE SOUTHEASTERN CORNER OF THE ELECTRICAL SHOP (NO LONGER PRESENT)
UC-15 SEVERAL UNLABELED CONTAINERS IN THE LEAN-TO BUILDING (NO LONGER PRESENT)
WET-1 WETLAND AREA (MOSTLY FILLED IN WITH SAND, GRAVEL AND OTHER MATERIALS)
ACM-1 ACM IN WASTE PILE (NO LONGER PRESENT)
ACM-3 ACM FLOOR TILES IN TRAILER (NO LONGER PRESENT)
ACM-4 ACM ON AST (NO LONGER PRESENT)
ACM-5 ACM BRAKE LININGS (NO LONGER PRESENT)
ACM-7 100 LINEAR FEET ACM PIPE SHEATHING (NO LONGER PRESENT)

OSD-9 DRUMS OF BILGE SCRAPINGS/USED SAND BLAST MATERIAL (NO LONGER PRESENT)
OSD-10 USED SAND BLAST MATERIAL (NO LONGER PRESENT)
OSD-11 USED SAND BLAST MATERIAL (NO LONGER PRESENT)
OSD-12 GRINDING WASTE (NO LONGER PRESENT)
OSD-13 SURFICIAL SCRAP METAL, PIPING, WOOD AND OTHER DEBRIS (NO LONGER PRESENT)
OSD-17 MULTIPLE PILES OF SOLID WASTE (FORMER PILES REMOVED OR GROUND FOR HOG FUEL, SOME WOOD WASTE PILES PRESENT)
OSD-18 TEMPORARY SLUDGE STAGING AREA (NO LONGER PRESENT)
ADJ-1 ADJACENT MARINE FACILITY (STILL PRESENT, MOST DEBRIS REMOVED)
ADJ-2 METAL STAND PIPE, B-N RIGHT OF WAY (STILL PRESENT, NO LONGER POTENTIAL/RECOGNIZED ENVIRONMENTAL CONDITION)
ADJ-3 CANYON LUMBER MILL (NO NEW INFORMATION AVAILABLE)
ADJ-4 SHAFFER EQUIPMENT (NO NEW INFORMATION AVAILABLE)
ADJ-5 PUGET SOUND ENERGY, 1/5 MILE SOUTHWEST OF SITE (STILL PRESENT)
ADJ-6 CHAPMAN TRUCK SALES (STILL PRESENT, LISTED AS CHAPMAN TRUCK DITCH IN DECEMBER 2005 DATABASE)
ADJ-7 RUBATINOS REFUSE, 1/5 MILE SOUTHEAST OF SITE (STILL PRESENT)
ADJ-8 NELSON DISTRIBUTING 1/2 MILE SOUTHEAST OF SITE (STILL PRESENT)
ADJ-9 PRIME EQUIPMENT, 3/10 MILE SOUTHEAST OF SITE (STILL PRESENT)
ADJ-10 EXXON, 1/2 MILE SOUTHWEST OF SITE (STILL PRESENT, CLOSED)
ADJ-11 WESTERN POWER AND EQUIPMENT, 1/2 MILE SOUTHWEST OF SITE (STILL PRESENT, NOW McEVOY OIL)
ADJ-13 SECOND PRIME EQUIPMENT FACILITY, ONE-QUARTER MILE SOUTHWEST (STILL PRESENT)
E-4 TRANS. IN DEBRIS PILE, LEASED AREA (REMOVED FROM SITE)
E-7 POLE-MOUNTED TRANSFORMER (STILL PRESENT, NO STAINING)
W-3 MONITORING WELL (REPORTEDLY HIT BY TRUCK AND DESTROYED)



HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS AND BUSINESS ENVIRONMENTAL RISKS
KCWW RIVERSIDE WOODYARD (SOUTH)
3700 RAILWAY AVENUE
EVERETT, WA

PROJECT NO.	PREPARED BY	DRAWN BY	
0510545P	MTG		Delta Environmental Consultants Inc.
DATE	REVIEWED BY	FILE NAME	
12/28/05		FIG. 4-6	

5.0 FINDINGS AND CONCLUSIONS

Delta has undertaken a Phase I ESA of the KCWW Riverside Woodyard at 3700 Railway Avenue, Everett, Washington in conformance with the scope and limitations of ASTM Practice E 1527-05, *Standard Practice for Environmental Site Assessments*. Any exception or deletions from this practice are described in Section 1.2 and 1.3 of this report and Delta's Proposal No. 0510545Rev dated 13 December 2005. A summary of the findings is presented below along with Delta's opinions based on these findings.

5.1 SUMMARY OF FINDINGS

This Phase I ESA has revealed no evidence of RECs in connection with the subject property, except for those identified on Table 5-1. The findings presented in Table 5-1 include new RECs pursuant to this Phase I ESA as well as any previously identified RECs pursuant to the previous Phase I ESAs that, based on the findings and observations made during the course of this Phase I ESA, continue to be considered RECs with respect to the Riverside Woodyard. Table 5-2 presents a summary of any previously identified RECs pursuant to the previous Phase I ESAs that, based on the findings and observations made during the course of this Phase I ESA, are no longer considered to present a REC with respect to the Riverside Woodyard (i.e., HRECs). Table 5-3 presents a summary of any previously identified RECs that, based on the findings and observations made during the course of this Phase I ESA, remain as concerns, but have since been re-classified as BERs.

OPINIONS

The Standard requires that opinions based on the findings of a Phase I ESA be provided. Delta has provided opinions for each of the RECs identified during the course of this Phase I ESA on Table 5-1.

TABLE 5-1
RECOGNIZED ENVIRONMENTAL CONDITIONS

Location Of Finding	Topic	Finding Summary	Opinions
Property Boundary West of the Scale house. Figure 4-4, Item No. ADJ-12.	Adjacent Property	According to available information, in the 1980's, two light locomotives collided along the railroad tracks immediately west of the scale house (Figure 4-4, Item No. ADJ-12). This collision reportedly resulted in a release of approximately 1,000 to 2,000 gallons of diesel fuel to the soils below/near the railroad tracks. Soil removal and/or other surface/subsurface clean up did not occur. No surficial evidence of this spill (i.e., stressed vegetation, staining) was observed during this Phase I ESA and no new information was obtained. For this reason, this accident continues to represent a REC with respect to the site.	The magnitude of this identified petroleum release has the potential to represent affected soil and ground water quality beneath the southwestern portion of the site above applicable regulatory thresholds. The extent of affected soil or ground water is not known at this time.
Figures 4-3 and 4-4, S-1 through S-51	Hazardous Substances In Connection With Identified Uses - Liquid Waste Storage and Disposal	During the previous Phase I ESAs, numerous stains on earthen materials and affected surface waters (discoloration, sheen, etc.) indicating potential releases of petroleum and/or hazardous substances to the environment were observed onsite. The majority of these areas were located in the northern portion of the site in the vicinity of the former chip mill or in the east-central portion of the site associated with the former boat/metal fabrication activities. As part of the December 2005 Phase I ESA site visit, these areas were inspected to confirm the previous findings. Unless otherwise noted below, none of the previously identified stained areas or affected surface waters were observed during the Phase I ESA site visit. According to individuals interviewed, no soil remediation (i.e., excavation and proper disposal) has been performed with respect to these areas. As such, the fate of the affected soil and/or surface water is unknown and these previously identified items continue to represent RECs to the Riverside Woodyard. A more specific description of these stains/surface waters (and estimates of affected media) observed during the previous Phase I ESA and associated Updates is provided below. • *Previous Finding:* A 3,000 square foot area of sheen on ponded water above soil was observed the in south-central portion of the property near the hog fuel pile (Figure 4-4, Item No. S-1). • *Previous Finding:* A 2,000 square foot area of sheen on ponded water above soil was observed near the Electric Truck Dumper (Figure 4-3, Item No. S-2). Surficial staining was observed in this area during the December 2005 Phase I ESA (Figure 4-3, S-55), as discussed below. • *Previous Finding:* An approximate 1,500 square foot area of sheen on ponded water above soil was noted in the south-central portion of the property north of the railroad spur (Figure 4-4, Item No. S-3). • *Previous Finding:* A 750 square foot area of sheen on ponded water above soil was observed below the Hog Fuel Conveyor, Building 9 (Figure 4-3, Item No. S-4). At the time of the 2000 Phase I ESA Update, no ponded water was observed in this area; however, approximately 200 square feet of petroleum stained soil was observed. • *Previous Finding:* Approximately 500 square feet of soil staining was observed around a containment structure below the Log Conveyer, Building 5 (Figure 4-3, Item No. S-5). • *Previous Finding:* Two stained soil areas totaling approximately 500 square feet were observed east of the Chip mill (Figure 4-3, Item No. S-6). During the 2000 Phase I ESA Update, a minor amount of petroleum stained soil and stressed vegetation, approximately ten to 20 square feet.	The number and size of these previously identified stained areas has the potential to represent affected soil and ground water quality beneath the site. The extent of affected soil or ground water is not known at this time.

Location Of Finding	Topic	Finding Summary	Opinions
		• *Previous Finding:* Approximately 20 square feet of stained soil (from oil stored inside the building) was observed along the west exterior wall of the Heavy Equipment Garage, Building 15 (Figure 4-3, Item No. S-7). At the time of the 2000 Phase I ESA Update, the staining in this area was limited to less than ten square feet on the concrete foundation of the building. Stained soil from this area was reportedly excavated and disposed off-site by CSR Construction of Seattle, Washington, and was replaced with clean gravel fill. No confirmation sampling or documentation was available for review. • *Previous Finding*: A ten square foot stain was noted on the ground along west exterior wall of a building near the Heavy Equipment Garage (Figure 4-3, Item No. S-8). At the time of the 2000 Phase I ESA Update, the staining in this area was no longer present and the stained soil was reportedly excavated and disposed off-site by CSR Construction of Seattle, Washington, and was replaced with clean fill. No confirmation sampling or documentation was available for review. • *Previous Finding:* An approximate ten square foot stain was noted in an earthen ditch below the Log Conveyor (Figure 4-3, Item No. S-9). • *Previous Finding:* A ten square foot area of stained soil was observed under the Former Conveyor/Knuckle Boom Crane (Building 12) housing (Figure 4-3, Item No. S- 10). • *Previous Finding:* Two five square foot stains were observed on soil near the 10,000-gallon diesel tank (Building 17), below the delivery port and at the storm water pump out discharge (Figure 4-3, Item No. S-11). At the time of the 2000 Phase I ESA Update, the staining on the ground surface in this area was no longer present; however, a small amount of staining was still present on the concrete wall beneath the delivery port. Stained soil from this area was reportedly excavated and disposed off-site by CSR Construction of Seattle, Washington and replaced with clean fill and a new concrete containment structure to contain any future incidental spills during delivery. • *Previous Finding:* An approximately five square foot stain on soil was observed outside the west exterior wall of the Chip mill (Figure 4-3, Item No. S-12). • *Previous Finding:* A two square foot stain was observed on the ground below a conveyer near the east exterior wall of the Chip mill (Figure 4-3, Item No. S- 13). • *Previous Finding:* Three cubic yards of oil/sawdust with drainage over an earthen area (to a catch basin) was present beneath the Log Conveyer (Figure 4-3, Item No. S-14). Observations made during the 2000 Phase I ESA Update were reportedly consistent with those made during the 1998 Phase I ESA; however, the actual amount of stained sawdust observed during the 2000 Phase I ESA Update was approximately one cubic yard. • *Previous Finding:* A small area of stained soil was noted outside a hydraulic oil reservoir associated with Log Conveyor (Figure 4-3, Item No. S- 15). • *Previous Finding:* Potential small area of oil-stained soil was observed next to a hydraulic oil	

Location Of Finding	Topic	Finding Summary	Opinions
		reservoir associated with the Chip Conveyor/Bunker, Building 1 (Figure 4-3, Item No. S-16). • *Previous Finding:* Approximately 1,500 square feet of stained soil was observed below an outdoor Fabrication Pavilion (Building 35) in the area KCWW leased to the boat/metal fabrication company (Figure 4-4, Item No. S-17). Staining appeared to be associated with petroleum-based primers used by the tenant. • *Previous Finding:* Staining was noted throughout the 100 square foot wooden floor (earthen materials below) of a paint (latex and oil-based)/solvent (xylene and other paint thinners) storage and clean up shed (Building 38) located within the leased area (Figure 4-4, Item No. S-18). At the time of the 2000 Phase I ESA Update, this structure was reportedly no longer present. The occupant of the leased area was not available during the 2000 Phase I ESA Update to provide access to the various storage trailers on-site. Consequently, it could not be determined if this structure had been relocated. No surficial staining was observed in the former location of the structure. • *Previous Finding:* A 30 square foot stain on soil was noted beneath a hydraulic oil reservoir in an outdoor storage yard within the leased area (Figure 4-4, Item No. S-19). The hydraulic oil reservoir and surficial staining were not observed during the 2000 Phase I ESA Update and the fate of this hydraulic reservoir could not be determined. • *Previous Finding:* An approximately 25 square foot stain was noted below three hydraulic reservoirs which were located west of a former fish processing boat shelter deck in the leased area (Figure 4-4, Item No. S-20). The hydraulic reservoirs and surficial staining were not observed during the 2000 Phase I ESA Update. The fate of these hydraulic reservoirs could not be determined. • *Previous Finding:* A 25 square foot stain was noted beneath a 250-gallon AST located within a large accumulation of equipment and debris (approximately one acre in size) near the west perimeter of the leased area (Figure 4-4, Item No. S-21). The AST and surficial staining were not observed during the 2000 Phase I ESA Update. The fate of this 250-gallon AST and stained soil could not be determined • *Previous Finding:* A 20 square foot stain existed on a wooden floor of a metal storage container (Building 36) in the leased area with (presumably) earthen materials below (Figure 4-4, Item No. S-22). The occupant of the leased area was not available during the 2000 Phase I ESA Update site visit to provide access to the various storage trailers on-site such that inspection of the interior portion of this structure was not possible. • *Previous Finding:* A total of 15 square feet of stained soil was observed under a crane south of the Electric Shop, Building 33 (Figure 4-4, Item No. S-23). • *Previous Finding:* A ten square foot stain on soil was noted in the leased area south of a portion of a former fish processing boat shelter deck, two partially full five-gallon oil cans were also noted in the area (Figure 4-4, Item No. S-24). At the time of the 2000 Phase I ESA Update, this structure was no longer present in this area. The occupant of the leased area was not available during the 2000 Phase I ESA Update site visit to provide access to the various	

Location Of Finding	Topic	Finding Summary	Opinions
		storage trailers on-site such that it could not be determined if this structure had been relocated. No surficial staining was observed in the former location of the structure. • *Previous Finding:* A ten square foot stain on soil was observed along the interior perimeter and near a cutting fluid tank within the Fabrication Shop in the leased area (Figure 4-4, Item S-25). • *Previous Finding:* A two square foot stain was noted along the northern exterior wall of the Fabrication Shop (associated with an air compressor) in the leased area (Figure 4-4, Item No. S-26). • *Previous Finding:* A five square foot stain was noted near the south end of a metal shipping container (Building 44) adjacent to the Oil Storage Building in the leased area (Figure 4-4, Item No. S-27). A partially full 100-gallon boat fuel tank was also present near the stain and liquid materials were stored within the metal container. This stained area was not observed during the 2000 Phase I ESA Update site visit. The fate of this 100-gallon boat fuel tank could not be determined. • *Previous Finding:* A slight oil sheen was noted along a 25 foot reach of a small (one foot wide) drainage ditch near the south perimeter of the leased area (Figure 4-4, Item No. S-28). A full five-gallon lube oil container was noted nearby. • *Previous Finding:* A slight sheen was noted on standing water (approximately 60 square feet) near an old crane and other materials/debris stored near the southern perimeter of the leased area (Figure 4-4, Item No. S-29). • *Previous Finding:* A minor amount, approximately five to ten square feet, of surficial staining was observed on soil beneath and around five empty 55-gallon drums on the northern side of the Storage Building (Building 16) in the northern portion of the site (Figure 4-4, Item No. S-31). • *Previous Finding:* Two areas totaling approximately 350 to 400 square feet of surficial staining was observed on a concrete pad and the ground surface beneath Building 11 (Figure 4-4, Item No. S-32). These stained areas appeared to be related to leakage from a hydraulic motor and various hydraulic lines. • *Previous Finding:* Approximately 200 to 250 square feet of surficial staining was observed under the small log conveyor beneath Building 5. This staining was present on both sides of a concrete support structure, on the ground surface and was migrating toward one of the storm water catch basins under this structure (Figure 4-3, Item No. S-33). According to the KCWW Riverside Woodyard supervisor, this catch basin ultimately discharges to the Everett POTW. • *Previous Finding:* Approximately 150 to 200 square feet of surficial staining was observed on concrete and the ground surface under the large log conveyor beneath Building 5 (Figure 4-3, Item No. S-34). • *Previous Finding:* Approximately 250 to 300 square feet of surficial staining was observed	

Location Of Finding	Topic	Finding Summary	Opinions
		under the small log conveyor beneath Building 5. This staining was present on the ground surface and concrete in a linear pattern beneath the conveyor and around the fire equipment shed beneath the conveyor (Figure 4-3, Item No. S-35). In addition, there was also approximately one cubic yard of petroleum stained sawdust and wood chips in this area. • *Previous Finding:* Approximately 100 square feet of surficial staining was observed on a conveyor motor, concrete pad and the ground surface beneath the Chip Conveyor northwest of the Chip mill (Figure 4-3, Item No. S-36). • *Previous Finding:* Two areas totaling approximately 100 square feet of surficial staining was observed on the ground surface in the central portion of the lease area (Item No. S-37). No containers or other potential sources of this staining were observed. • *Previous Finding:* Approximately 500 square feet of surficial staining was observed on asphalt around several 55-gallon drums in the southeastern portion of the lease area (Figure 4-4, Item No. S-38). This staining appeared to be the result of leakage from a punctured drum and was migrating to the ground surface along the riverbank. • *Previous Finding:* Approximately five square feet of white surficial staining was observed around two paint cans immediately south of Building 43 in the lease area (Figure 4-4, Item No. S-39). • *Previous Finding:* Approximately 15 square feet of surficial petroleum staining was observed on the ground surface on the eastern side of the Fabrication Shop (Building 37) near an engine part (Figure 4-4, Item No. S-40). The exact source of this staining was not confirmed. • *Previous Finding:* Approximately 100 square feet of surficial petroleum staining was observed on concrete and on the ground surface in the southeastern corner of the Fabrication Shop (Building 37) around an 85-gallon polyethylene waste oil drum (Figure 4-4, Item No. S-41). • *Previous Finding:* Approximately 100 to 150 square feet of surficial staining was observed on the ground surface immediately southwest of the Container Storage structure (Building 34) around a number of 55-gallon drums and five-gallon containers (Figure 4-4, Item No. S-42). The exact amount of staining could not be determined due to the presence of surficial material (i.e., containers and scrap metal). • *Previous Finding:* Approximately 1000 to 1500 square feet of surficial staining and brown stained ponded water was observed on the ground surface in an along the eastern side of the hog fuel pile in the west-central portion of the property (Figure 4-4, Item No. S-43). This staining was reportedly the result of runoff from water used recently to extinguish fires within the hog fuel pile. • *Previous Finding:* Approximately 200 square feet of surficial petroleum staining was observed on the ground surface beneath and around a piece of timber equipment in the east-central portion of the property (Figure 4-3, Item No. S-44). The source of the stains appeared to be related to incidental leaks on the equipment hydraulic lines.	

Location Of Finding	Topic	Finding Summary	Opinions
		• *Previous Finding:* Approximately 50 square feet of surficial petroleum staining was observed on the ground surface immediately west of the timber equipment in the east-central portion of the property (Figure 4-3, Item No. S-45). The stains appeared to be related to leaks from the timber equipment; however, this could not be confirmed. • *Previous Finding:* Several small petroleum stained areas, totaling approximately 25 square feet, were observed on the ground surface west of the timber equipment in the east-central portion of the property (Figure 4-3, Item No. S-46). The stains appeared to be related to leaks from the timber equipment; however, this could not be confirmed. • *Previous Finding:* Approximately 1000 to 1500 square feet of surficial staining and black stained ponded water was observed on the ground surface around a boiler ash pile in the central portion of the site (Figure 4-3, Item No. S-47). • *Previous Finding:* Unidentified black and white substances were observed floating on standing water in the drainage swale along the western property boundary (Figure 4-3, Item No. S-48). • *Previous Finding:* Minor petroleum staining was observed in the northwestern corner of the Site beneath two pieces of heavy equipment used to remove railroad ties from railcars (Figure 4-4, Item No. S-49). Approximately six to eight petroleum stained areas ranging from two to three square feet were observed and appeared to be the results of leakage from the equipment. This staining was observed on the ground surface and is considered de minimis. • *Previous Finding:* An approximately 50 to 100 square foot area of brown staining and stressed vegetation was observed around a culvert immediately northeast of the Scale house in the southwestern portion of the Site (Figure 4-4, Item No. S-50). This staining and stressed vegetation appeared to be similar to the staining around the hog fuel pile. • *Previous Finding:* An approximately 200 square foot area of brown staining and stressed vegetation was observed near a catch basin along the entrance road to the KCWW Riverside Woodyard and northwest of the Scale house in the southwestern portion of the Site (Figure 4-4, Item No. S-51). This staining and stressed vegetation appeared to be similar to the staining around the hog fuel pile and the staining around the culvert described above (S-50).	
Figure 4-3, Item No. S-30	Hazardous Substances In Connection With Identified Uses - Reported Releases	*Previous Finding:* According to available informatio, a number of historic spill-related releases had occurred on-site as summarized below. No new information pertaining to these incidents was obtained during the course of the December 2005 Phase I ESA and, as such, these incidents continue to represent RECs with respect to the Riverside Woodyard. • In the late 1980's, approximately 100 to 200 gallons of fuel was released to the ground near the facility's 10,000-gallon diesel AST. The spill was associated with overfilling of a vehicle fuel tank. Soil removal and/or other surface/subsurface clean up did not occur (Figure 4-3, Item No. S-30). • According to KCWW personnel, three releases of hydraulic oil to the river had occurred during the 1980s. Riverside personnel indicated that these releases were reported to regulatory	The magnitude of these identified petroleum releases have the potential to represent affected soil, surface water and/or ground water quality at these portions of the site above applicable regulatory thresholds. The extent of affected soil or ground water is not known at this time.

Location Of Finding	Topic	Finding Summary	Opinions
		officials.	
Figures 4-3 and 4-4, Item Nos. S-52 through S-56	Hazardous Substances In Connection With Identified Uses - Liquid Waste Storage and Disposal	During the course of the December 2005 Phase I ESA, several areas of surficial staining were noted on the Riverside Woodyard. These areas are further described in the paragraphs below. • Approximately 100 square feet of petroleum staining was observed on the ground surface around near the southeastern corner of the Mill Office and beneath one of the onsite loaders (Figure 4-3, Item No. S-52). According to Riverside Woodyard personnel, this staining was leaking transmission fluid from the loader. • Approximately five to ten feet of petroleum staining was observed on the concrete and ground surface adjacent to the fuel pump on the northeastern corner of the secondary containment structure for the aboveground diesel fuel tank (Figure 4-3, Item No. S-53). This staining appears to be the result of minor overfills and/or careless fueling of vehicles and/or onsite equipment. • Approximately ten to 20 square feet of staining was observed on the ground surface around and beneath a piece of heavy equipment (Figure 4-3, Item No. S-54). The exact nature and source of this staining could not be determined; however, the staining appeared to be related to minor leaks from the heavy equipment. • Approximately 200 to 400 square feet of petroleum staining was observed on the ground surface around and beneath the truck lift in the west-central portion of the site (Figure 4-3, Item No. S-55). The staining appeared to be hydraulic oil leaking from the hydraulic cylinders associated with this equipment. Staining was also observed in this area during the 1998 Phase I ESA (Figure 4-3, Item No. S-2); however, the staining was not observed in the 2000 Phase I ESA Update. • Approximately 100 to 300 square feet of brown staining was observed on the ground surface adjacent to the piles of secondary wastewater treatment plant sludge from the Everett Mill in the southern portion of the site (i.e., dredge spoils area). This staining appeared to be migrating with surface water flow toward a drainage swale along the western perimeter of this area and into the municipal stormwater collection system (Figure 4-4, Item No. S-56).	The extent of affected soil or ground water quality beneath the site as a result of the identified RECs is unknown; however, the limited areal extent of the observed staining, in conjunction with any identified sources, suggests that only relatively minor impacts are likely in association with each identified REC.
Storage Building – Northwestern Portion of the Site (Building 16) Figure 4-3, Item O/W-1	Hazardous Substances In Connection With Identified Uses - Liquid Waste Storage and Disposal	An underground oil/water separator was observed near the southern end of this storage building. According to available information, stormwater and vehicle/truck/equipment wash water from washing activities on the southern side of the Heavy Equipment Garage is directed via sheet flow to a concrete-lined exterior collection sump on the southern side of the storage building. The discharge from this sump is reportedly directed to a concrete underground holding tank (i.e., oil/water separator), which is periodically pumped out by Emerald Services. No other details pertaining to this feature were available and the integrity of the holding tank is unknown.	Based on the presence of petroleum stained material and a petroleum sheen on the liquid within the collection sump, it is likely that petroleum constituents have been directed into this underground feature. The integrity of this feature is unknown and, as such, these constituents may be affecting soil or ground water quality beneath the site.
Northeastern Corner of the Leased Area – Building 34 Figures 4-3 and 4-4, Item Nos. UC-4, UC-7 and UC-14	Liquid Materials, Wastes, and AST Storage	During the 1998 Phase I ESA and subsequent 2000 Phase I ESA Update, a number of containers with unidentified contents were observed onsite. Surficial staining or other evidence of a release associated with the unidentified containers was observed at three location during these previous assessments. At the time of the December 2005 Phase I ESA, none of these containers remained onsite; however, no soil remediation (i.e., excavation and proper disposal) has been performed with respect to these areas. As such, the fate of the affected soil or other media is unknown and these previously identified items continue to represent RECs to the Riverside Woodyard as described below.	The identified RECs have the potential to represent affected soil, surface water and/or ground water quality at these portions of the site. The extent of affected soil or ground water is not known at this time.

Location Of Finding	Topic	Finding Summary	Opinions
		• *Previous Finding:* During the 1998 Phase I ESA, approximately 20 unlabeled containers were noted within a steel containment structure (Building 34, fabricated from a boat shelter deck) near the northeast corner of the leased area. The contents of these containers could not be verified; however, a fuel oil odor was detected. There was no evidence of leaks outside of the containment structure (Figure 4-4, Item No. UC-4). At the time of the 2000 Phase I ESA Update site visit, only 13 one- to five-gallon containers remained within the secondary containment structure all of which were labeled; however, immediately south of the structure there were numerous five- to 55-gallon containers on the ground surface. A total of 28 55-gallon drums and 32 five-gallon containers were present of which approximately five 55-gallon drums and 20 five-gallon containers were not labeled. Surficial staining was observed around the 55-gallon drums and waste shot blast media was observed on the ground surface in this area. The containers were reportedly cleaned up and properly disposed by Emerald Services in 2001. At the time of the December 2005 Phase I ESA, no containers were observed in the area and no staining or stressed vegetation was noted; however, since the fate of the affected soil in this area is unknown, the former presence of these containers continue to represent RECs to the Riverside Woodyard. • *Previous Finding:* During the 1998 Phase I ESA, one 55-gallon drum labeled "No Good Water" was identified within the Chip mill (near the northwest interior wall). Staining was evident on the concrete floor throughout this area, trench drains in the area were connected to the western perimeter drainage swale as described above (Figure 4-5, Item No. UC-7). Observations made during the 2000 Phase I ESA Update were consistent with those made during the previous assessment. This drum was present along with three other drums, each of which was labeled. Surficial staining was observed on the concrete floor in this area. At the time of the December 2005 Phase, this drum was not observed in the area and no staining or stressed vegetation was noted; however, since the fate of the affected soil in this area is unknown, the former presence of this drum continues to represent a REC to the Riverside Woodyard. • *Previous Finding:* One unlabeled 55-gallon drum was observed in the northern portion of the Chip mill/Debarker (Building 4) on the concrete floor (Figure 4-3, Item No. UC-14). This drum was full of an unidentified liquid and a minor amount (ten square feet) of surficial staining was observed on the concrete floor around this container. At the time of the December 2005 Phase I ESA, this drum was not observed in the area and no staining or stressed vegetation was noted; however, since the fate of the affected soil in this area is unknown, the former presence of these containers continue to represent RECs to the Riverside Woodyard.	
East-Central Portion of the Site Figure 4-4, Item No. SEP-1	Hazardous Substances In Connection With Identified Uses - Liquid Waste Storage and Disposal	One of the three septic tank/leachfield systems identified on-site, an inactive system at the Electric Shop, may have served as a potential discharge location for non-sanitary flows. While the system was reportedly cleaned out and backfilled (when the sawmill was closed) evidence of potential non-sanitary flows was identified during the site visit as follows: • there were no sanitary facilities present in the Shop; • a small earthen sump and floor drain system was present within the structure (the drain terminus point could not be determined); and • floor staining and evidence of historic solvent use (including a full one-gallon container of	Potential non-sanitary wastewater flow to a septic system with identified hazardous substance storage and evidence of staining represents the potential for hazardous substances to have been discharged to the subsurface. The extent of affected soil or groundwater quality, if any, as a result of the historical presence of any septic system(s) is unknown.

Location Of Finding	Topic	Finding Summary	Opinions
		chlorinated solvent and two partial five-gallon xylene containers) was apparent within the structure. Observations during the 2000 Phase I ESA Update were consistent with those of the previous assessment. According to KCWW personnel, this septic system was associated with the former sawmill. The suspect features within the Shop (i.e., floor drains, sump) were reportedly not connected to the old septic system; however, this could not be confirmed. No new information pertaining to this feature was available during the December 2005 Phase I ESA and, as such, this former septic system continues to represent a REC with respect to the site.	
Central Portion of Site Figure 4-4, Item No. OSD-1A through OSD-1C	On-Site Disposal	According to several former sawmill employees interviewed during the 1998 Phase I ESA, a wood preservative, "Woodlife", was used to treat lumber/lumber products from about 1945 to the early 1970's. A reddish tint (delivered in a "paste" form and diluted with mineral spirits) was added to the preservative, which was then sprayed onto lumber within the former Planer Mill, Building 47 (Figure 4-4, Item No. OSD-1A). According to the former employees, spillage of the preservative to the wooden floor and surrounding ground was common. Furthermore, a "dip trough" was used for this operation for approximately one year in the early 1970's (Figure 4-4, Item No. OSD-1B). Lumber would be dipped into this four-foot by 40-foot trough, which was located near the Red Shed, Building 28. The former employees also noted that for about nine months in the 1980's, "green" wood was treated near the eastern extent of former sawmill. The preservative, Permatox (containing sodium tetrachlorophenate, phenylmercuric acetate, and sodium pentachlorophenate), was reportedly diluted (50 water: 1 Permatox) and spray-applied to the wood outdoors near the former log chain (east-central portion of the site). Reportedly, spillage from this operation went directly onto the ground (Figure 4-4, Item No. OSD-1C). Former employees indicated that a total of five to six 55-gallon drums of Permatox was used. Information obtained during the 2000 Phase I ESA Update as well as the December 2005 Phase I ESA was consistent with information obtained during the 1998 Phase I ESA. No staining, stressed vegetation or other evidence of these past practices was observed; however, these reported historic disposal practices continue to represent a REC with respect to the site.	The nature of the observed handling and use practices of the wood preservative at the facility represents the considerable potential for soil and groundwater quality to be affected beneath the site. The extent of affected soil or groundwater quality is unknown at this time.
OSD-2A through OSD-2B	On-Site Disposal	During the 1998 Phase I ESA, available information suggested that disposal of dredge spoils and construction/demolition debris has occurred throughout most of the Riverside Woodayrd. Information obtained during the 2000 Phase I ESA Update was generally consistent with information from the previous assessment. Information obtained during these two previous assessments along with any pertinent observations associated with the December 2005 Phase I ESA are presented below. • *Previous Finding:* Based on information collected during the site visit, it appears that at least 50 percent of the Riverside Woodyard has been filled with dredge spoils. At the time of the 1998 site visit, an area of dredge spoils encompassing approximately ten acres was visible near the southeastern boundary of the property (Figure 4-4, Item No. OSD-2A). According to a 1988 draft report prepared for the USEPA (provided by KCWW), contaminated sediments have been identified in the lower reaches of the Snohomish River (the likely source of the spoils deposited on-site) and other areas of Everett Harbor. According to this report, sediments contain heavy metals, petroleum residuals, PCBs and other organic compounds. The composition of dredge spoils on the site was not known at the time of the 1998 Phase I	Although not specifically identified as containing hazardous substances or petroleum products during this Phase I ESA, the exact nature and extent of the various fill materials historically deposited onsite is unknown. Further, the likelihood of these fill materials to contain foreign constituents is considerable. Due to the magnitude of the historical fill operations using these fill materials, there is a potential for effects on soil or ground water quality beneath the site as a result of the presence of these fill materials.

Location Of Finding	Topic	Finding Summary	Opinions
		ESA. During the 2000 Phase I ESA Update, KCWW personnel indicated that dredge spoils were placed on the property; however, deposition was limited to the southern portion of the property encompassing approximately ten to 20 percent of the site. The dredging was reportedly conducted by Manson Construction and the spoils placed on the site were from dredging in the Snohomish River along the eastern property boundary. KCWW personnel further indicated that more than 50 percent of the dredge spoils placed on the property had recently been removed by the City of Everett to extinguish and bury a tire fire within the City limits. At the time of the 2000 Phase I ESA Update, numerous piles of sand and gravel fill were present on the southern portion of the property to replace the removed material. This fill material was principally from construction/excavation activities the nearby KCWW Everett Mill. No additional information pertaining to the composition or potential chemical content of the dredge spoils was obtained during the 2000 Phase I ESA Update. During the course of the December 2005 Phase I ESA, this area continues to be used for the deposition of construction/demolition debris as well as secondary wastewater treatment plant sludge from the KCWW Everett Pulp and Paper Mill. No further information pertaining to the historic fill operations and/or composition of the fill materials was obtained and, as such, the historic fill operations continue to represent a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, KCWW personnel indicated that construction and demolition debris had been historically used for fill and was pervasive throughout the site. Areas where fill was extensively placed included the former sawmill and associated log pond where up to 15 feet of this material may have been deposited on a four-acre area (Figure 4-4, Item No. OSD-2B). In addition, site contacts reported that excavation spoils from a recent municipal sewer line installation were placed on Riverside Woodyard property as fill. The composition of this soil was not determined prior to filling. Information obtained during the 2000 Phase I ESA Update and December 2005 Phase I ESA was consistent with the information obtained during the 1998 Phase I ESA and, as such, the historic fill operations continue to represent a REC with respect to the site.	
Various Figures 4-3 and 4-4, Item Nos. OSD-4 through OSD-8, OSD-15, OSD-16 and OSD-19 through OSD-21	On-Site Disposal	During the 1998 Phase I ESA, evidence of solid waste disposal was noted at several locations. Observations made during the 2000 Phase I ESA Update site visit varied for each of the areas identified during the 1998 Phase I ESA. These areas are described below along with any pertinent observations associated with the December 2005 Phase I ESA. • *Previous Finding:* At the time of the 1998 Phase I ESA, debris and various scrap materials (e.g., metal, conduit, a fractured oil-filled transformer, waste dimensional lumber, one crushed, empty 275-gallon fuel oil AST, an empty 35-gallon grease container, two crushed and empty five-gallon lacquer thinner containers, scrap fabric, fluorescent lights, etc.) were accumulated in several piles (totaling approximately 200 cubic yards) near the north perimeter of the leased area (Figure 4-4, Item No. OSD-4). At the time of the 2000 Phase I ESA Update, the majority of these materials were removed from the site. Specifically, the fractured transformer, crushed fuel oil AST, crushed drums, fabric and light ballasts were not observed on the property. The only remaining materials consisted of approximately 20 cubic yards of scrap metal and wood. At the time of the December 2005 Phase I ESA, little to no debris was observed in this area; however, the exact fate of these materials was not known and, as such, the former presence of this debris continues to represent a REC with respect to the site. • *Previous Finding:* At the time of the 1998 Phase I ESA an accumulation of obsolete	Although not specifically identified as containing or potentially releasing hazardous substances or petroleum products during this Phase I ESA, the exact nature and extent of the various materials historically staged and/or disposed of (i.e., used as fill material) onsite deposited onsite is unknown. Further, the likelihood of these materials (i.e., fill, creosote treated wood, debris containing ASTs, drums and other containers, etc., to contain foreign constituents is considerable. Due to the magnitude of the historical onsite staging and/or fill operations using these materials, there is a potential for effects on soil or ground water quality beneath the site as a result of the presence of these materials.

Location Of Finding	Topic	Finding Summary	Opinions
		equipment, scrap tires, creosote-treated utility poles, scrap metal, etc., was noted around the entire perimeter of the Red Shed, Building 28 (Figure 4-4, Item No. OSD-5). Observations made during the 2000 Phase I ESA Update were consistent with observations from the previous assessment. These materials were not observed onsite during the December 2005 Phase I ESA. According to individual interviewed, creosote utility poles and other treated lumber was formerly chipped for hog fuel; however, the exact fate of these materials was not known and, as such, the former presence of these materials onsite continues to represent a REC with respect to the site. • *Previous Finding:* Stored municipal trash dumpsters were observed on-site south of the Red Shed (the dumpsters were property of KCWW's local trash vendor, Rubatinos Refuse) and have been stored onsite through an informal lease arrangement for over ten years. At the time of the 1998 Phase I ESA, approximately 75 dumpsters were present onsite. While most dumpsters were empty, approximately 20 gallons of an oily, sludge-like material was present in one container and two automotive batteries were observed in another. The dumpsters were arranged in a manner that prevented the inspection of earthen materials below all containers (Figure 4-4, Item No. OSD-6). At the time of the 2000 Phase I ESA Update as well as the December 2005 Phase I ESA, the dumpsters were present in approximately the same number and in the same location. The arrangement of the dumpsters prevented an inspection of the ground surface for any potential releases associated with any residual materials in the dumpsters and, as such, the presence of these dumpsters continues to represent a REC with respect to the site. • *Previous Finding:* An empty automobile gas tank was observed in a remote area near the southeast corner property near the fence line along Railroad Avenue (Figure 4-4, Item No. OSD-7). This feature was not observed during the 2000 Phase I ESA Update or the December 2005 Phase I ESA and the fate of this feature is unknown. The former presence of this gas tank continues to represent a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, a large accumulation of equipment and debris (approximately one-acre in size) was observed along the west perimeter of the leased area. Portions of this area resembled a "salvage yard" including waste materials and miscellaneous debris such as: approximately two cubic yards of spent shot blast media; scrap tires; creosote-treated utility poles; scrap metal; scrap wood; a soil pile (approximately 100 cubic yards); five ASTs including a 100-gallon tank, three 250-gallon tanks (staining was evident below one of the three tanks), and one 500-gallon tank; three empty, partially crushed five-gallon containers; seven 55-gallon drums containing spent shot blast media; one partially full (approximately 20 percent) 55-gallon fiberglass resin drum; one full five-gallon container of oil; one liquid-filled transformer (fluid capacity was approximately five-gallons, labeled non-PCB); and other miscellaneous debris. A similar debris pile was noted near the southern perimeter of the leased area and included mostly scrap steel and wood. Other materials observed included rope, hoses, engine parts, large heater coils, an old crane (a sheen on standing water was noted in the area), a dredge bucket, several electrical boxes, several empty five-gallon pails, metal roof covers, a diesel-powered lumber saw and three full 55-gallon oil drums with no evidence of staining (Figure 4-4, Item No. OSD-8). At the time of the 2000 Phase I ESA Update site visit, a significant portion of the above-described debris was removed by the occupant of the leased area. Specifically, the aboveground tanks, partially full to full	

Location Of Finding	Topic	Finding Summary	Opinions
		drums, transformer, shot blast media and some of the scrap metal were not observed in this area; however, there was still a significant amount of waste debris on-site. This debris consisted of several hundred cubic yards of scrap metal, scrap wood, creosote treated utility poles, various parts of ships, plastic, concrete reinforcing mesh, tires, pallets, rope, piping, approximately 25 empty corroded 55-gallon drums, dimensional lumber, netting and other miscellaneous debris. Surficial staining was observed in various areas as above. At the time of the December 2005 Phase I ESA, nearly all of the remaining materials had been removed from the site. According to individuals interviewed a large scale cleanup effort was performed in 2001 to remove the materials associated with the former tenant in this area. No staining, stressed vegetation or other evidence of a potential release was observed; however, the former presence of these materials and previously identified stained soil continues to represent a REC with respect to the site. • *Previous Finding:* At the time of the 2000 Phase I ESA Update, miscellaneous surficial debris was observed was observed in the southern portion of the drainage swale along the western property boundary (Figure 4-3, Item No. OSD-15). This debris consisted of one to two cubic yards of scrap wood, metal, tires and an old shopping cart among other debris. At the time of the December 2005 Phase I ESA Update, similar observations were made with respect to debris in this drainage swale. The exact nature of this material could be determined due to heavy overgrowth and, as such, the presence of this debris continues to represent a REC with respect to the site. • *Previous Finding:* At the time of the 2000 Phase I ESA Update, A large pile (2,000 to 3,000 cubic yards) of boiler ash was observed in the central portion of the site. According to KCWW personnel, this material was from the hog fuel boiler at the KCWW Everett Pulp and Paper Mill and was being stockpiled onsite. The composition and chemical nature of this material was not known. During the December 2005 Phase I ESA, three piles of boiler ash totaling approximately 2,000 cubic yards were present on site (Figure 4-3, Item No. OSD-16). According to individuals interviewed, these piles have been screened to a specific size and are being staged onsite. No additional information was obtained and the presence of this material onsite continues to represent a REC with respect to the site. • *Previous Finding:* At the time of the 2003 Phase I ESA Update, the KCWW Riverside Woodyard was accepting and processing creosote treated wood (i.e., railroad ties, telephone poles, dock material, etc.). This wood was off-loaded from railcars and staged along the northern boundary of the Site (Figure 4-4, Item No. OSD-19). A contractor (Rainier Recycling) was retained to grind the creosote treated wood for use as hog fuel at the KCC Everett Mill. The grinding operation occurred along the rail spur in the central portion of the site. This process involved inspecting and removing any foreign objects (i.e., metal plates, spikes, etc.) prior to grinding. The wood was then loaded into a grinder and the grindings were placed directly into tractor-trailers for transport to the Mill. According to individuals interviewed, creosote treated wood grindings were not stored on the Site. Since this process occurs outdoors and the grindings are exposed to the elements, there is a possibility that creosote may have been released to the ground surface onsite via wind and/or precipitation representing a REC. At the time of the December 2005 Phase I ESA, the grinding operations had ceased; however, a significant amount of creosote treated wood remained onsite. The presence of this material and historic grinding operations continue to represent a REC with	

Location Of Finding	Topic	Finding Summary	Opinions
		respect to the site. • *New Finding:* During the 2005 Phase I ESA, evidence of illegal dumping was observed primarily in the southeastern portion of the Riverside Woodyard. Specifically, an approximately five to ten cubic yard pile of asphalt shingles was observed along with some domestic waste in the east-central portion of the property (Figure 4-4, Item No. OSD-20). Similarly, a second, larger pile of asphalt shingles, scrap wood, scrap metal and domestic waste was also observed along the eastern side of a large wood waste pile in the central portion of the property (Figure 4-4, Item No OSD-21). The exact nature of these piles of debris could not be determined and, as such, they represent RECs with respect to the site.	
Northwestern Portion of the Site Figure 4-3, Item No. WW-1	Hazardous Substances In Connection With Identified Uses - Liquid Waste Storage and Disposal	*Previous Finding:* As part of the 1998 Phase I ESA, the earthen portion of the combined sewer outfall (CSO) collection system was visually examined for the presence of petroleum or hazardous substance releases which may have been associated with flows directed to the swale. Specifically, discharges to the swale included: • runoff from active outdoor production areas (hog fuel and wood chip piles); • flows from exterior collection/catch basin systems (where significant oil staining was noted in the previous Phase I ESA reports) particularly in areas below the former chip mill; and • discharges related to a heavy equipment vehicle washing operation to the exterior sump. Although these discharges ultimately flow to the Everett POTW, sediments within the drainage swale along the western property line appeared affected by oil. At the time of the 2000 Phase I ESA Update, discharges to the drainage swale and associated observations were generally consistent with those described above for the previous assessment. In addition, the following observations were made during the 2000 Phase I ESA Update. • Unidentified white and black substances were observed floating on the water throughout the drainage swale, and • a minor amount of surficial debris was found in the drainage swale in the west central portion of the property. During the course of the December 2005 Phase I ESA, the previously described white and black staining was not observed; however, the previously described surficial debris was observed in the drainage swale. It is important to note that the majority of the swale was overgrown such that a complete inspection could not be completed. Based on available information and onsite observations, historic discharges to this feature continue to represent a REC to the site.	Evidence of discharges of petroleum or hazardous substances to the earthen ditch suggests at a minimum, the potential for sediment quality within the ditch to be affected, and secondarily suggests the potential for soil and/or groundwater quality beneath the ditch to be affected. The chronic nature of the discharges to the ditch suggests the potential for significant discharges of petroleum or hazardous substances; however, it is unknown if any petroleum or hazardous substances that may have been discharged, exited the earthen ditch system into the subsurface.
Various Figures 4-3 and 4-4; Item Nos. WW-3, WW-4 and WW-8 through WW-10	Hazardous Substances In Connection With Identified Uses - Liquid Waste Storage and Disposal	During the 1998 Phase I ESA, the discharge location for a number of liquid waste streams appeared to be directly to the ground surface, surface waters, and/or earthen ditches that did not flow to the CSO/POTW. Observations made during the 2000 Phase I ESA Update as well as the December 2005 Phase I ESA were generally consistent with those of the 1998 Phase I ESA. During the December 2005 Phase I ESA, current and historic discharge practices were reviewed for any RECs with respect to the site. Wastewater discharge points observed onsite that are considered to represent RECs with respect to the Riverside Woodyard are summarized below. • *Previous Finding:* An earthen drainage ditch system was observed along the north perimeter of the large dredge spoil area and west of an area leased to the boat/metal fabricating company (Figure 4-4, Item No. WW-3). The ditch collected storm water runoff from operating portions	Evidence of discharges of petroleum or hazardous substances to the identified earthen ditch and/or other features and ground surfaces suggests at a minimum, the potential for sediment and surface soil quality within the immediate vicinity of the identified features to be affected, and secondarily suggests the potential for soil and/or groundwater quality beneath the identified features to be affected. The chronic nature of the identified discharges suggests the potential for significant discharges of petroleum or hazardous substances; however, it is unknown if any petroleum or hazardous substances that may have

Location Of Finding	Topic	Finding Summary	Opinions
		of the leased area as well as flows from the perimeter of the large dredge spoils area. At the time of the site visit, the ditch system ultimately drained to the Everett municipal storm sewer along Railway Avenue. At the time of the 2000 Phase I ESA Update, this drainage ditch system was present and continued to direct surface water to a culvert in the south-central portion of the property. According to KCWW personnel, this culvert directs flow to a culvert system on the western side of Railway Avenue, which directs flow to the south and discharges directly into the Snohomish River south of the subject property. No new information pertaining to this feature was obtained during the course of the December 2005 Phase I ESA and, as such, this feature continues to represent a REC with respect to the site. • *Previous Finding:* A concrete collection sump and associated pump system discharged truck scale runoff waters directly to the ground near the scale house (Figure 4-4, Item No. WW-4). While no evidence of staining was observed on the ground below the discharge point, an oily sheen was visible on the surface of the collection sump. Furthermore, the integrity of the collection sump could not be determined. No additional information was obtained for this discharge point during the 2000 or 2003 Phase I ESA Updates. Observations made during this Phase I ESA Updates were consistent with those made during the previous assessment. During the December 2005 Phase I ESA, a trash pump was utilized to discharge water from the sump, which discharged to the ground surface southwest of the scale house. No staining or stressed vegetation was observed; however, the presence of this discharge to the ground continues to represent a REC with respect to the site. • *Previous Finding:* While not a discharge source, one operating subsurface sump was noted during the site visit. This sump (with dimensions of approximately 1.5 feet square by eight feet deep) served to collect waste oil from the Heavy Equipment Garage. According to KCWW personnel, accumulated oil in the sump is periodically pumped to an aboveground waste oil tank (no engineering drawings were available documenting system configuration). The integrity of this concrete sump was not known (Figure 4-3, Item No. WW-8). Observations made during the 2000 Phase I ESA Update were consistent with those made during the previous assessment. According to KCWW personnel, a floor drain in the southwestern bay of this building waste liquid to this sump. The integrity of the piping to the sump was not known. No further information was obtained during the course of the December 2005 Phase I ESA and, as such, this feature continues to represent a REC with respect to the site. • *Previous Finding:* At the time of the 1998 Phase I ESA, a former sawmill employee indicated that engines and other parts were historically cleaned and degreased (by steam cleaning) at a location south of Sigh's Shop, Building 30 (Figure 4-4, Item No. WW-9). The exact dates of this activity could not be determined. Information obtained during the 2000 Phase I ESA Update and the December 2005 Phase I ESA pertaining to this waste liquid discharge activity was consistent with the information obtained during the previous assessment. No staining or stressed vegetation was observed in this area; however, these historic discharge activities continue to represent a REC with respect to the site. • *New Finding:* During the December 2005 Phase I ESA, truck washing operations were observed on the space leased by Washington Trucking in the central portion of the site (Figure 4-4, Item No. WW-10). Wash water associated with the truck washing activities reportedly used a pH-balanced brightener rather than a detergent and the purpose of the brightener was to	been discharged, exited the earthen ditch system or other identified features into the subsurface.

Location Of Finding	Topic	Finding Summary	Opinions
		remove particulate cement from the trucks. Discharging of this wash water to the ground surface represented a REC with respect to the site.	
Various Figure 4-3, E-1, E-2 and E-6	Indications of PCBs	Evidence of weeps/leaks from five transformers was noted on-site during the 1998 Phase I ESA and the 2000 Phase I ESA Update. These areas were revisited during the December 20005 Phase I ESA to review previous observations. Pertinent observations are described below. • *Previous Finding:* An approximate 100 square foot stain was noted on a concrete slab and adjacent soils below a pad-mounted transformer at the KCWW Substation (North), Building 13 (Figure 4-3, Item No. E-1). Analytical results from 1991 indicated that PCB concentrations within the transformer's dielectric fluid were equal to 35 ppm; however, historic analyses (1987) noted PCB concentrations of 413 ppm. There was no available information documenting spills or leaks of dielectric fluid from this transformer. Observations during the 2000 Phase I ESA Update site visit were consistent with those from the previous assessment. At the time of the December 2005 Phase I ESA, the transformer had been removed as part of the chip mill demolition project. The transformer was no longer present and no staining was observed; however, since the fate of any affected soil was unknown, the stained area continues to represent a REC to the site. • *Previous Finding:* Approximately ten square feet of stained soil was noted below a wall-mounted transformer at the KCWW Substation (North), Building 13 (Figure 4-3, Item No. E-2). KCWW provided documentation that a sample collected from this transformer in December 1997 contained 6.5 ppm PCBs. This transformer was no longer present at the time of the 2000 Phase I ESA Update; however, observations pertaining to staining on the ground surface beneath the former unit were consistent with those from the previous assessment. At the time of the December 2005 Phase I ESA, the transformer had been removed as part of the chip mill demolition project. A five-gallon bucket labeled "Caution – Contains PCBs" was present on the concrete pad adjacent to the former transformer. The transformer was no longer present and no staining was observed; however, since the fate of any affected soil was unknown, the stained area continues to represent a REC to the site. *Previous Finding:* An approximate 100 square feet stain was noted on a concrete slab below three pad-mounted transformers owned by the local utility company (PUD Substation, Building 14) (Figure 4-3, Item No. E-6). Although these units reportedly did not contain PCBs at the time of the 1998 Phase I ESA site visit, there were no written records available documenting the cause of the stain and/or the concentration of PCBs within the transformer when the stain occurred. At the time of the 2000 Phase I ESA Update, the three pad-mounted transformers were actively being replaced by one larger unit. Representatives of the local utility company (PUD) indicated that they had not cleaned or replaced the concrete pad or gravel surface within the fenced area surrounding the unit. Minor surficial staining (approximately ten to 20 square feet) was observed on the western side of the concrete pad and ground surface immediately west of the unit. No other staining was observed in this area. At the time of the December 2005 Phase I ESA, one large pad-mounted transformer was present in this area. Minor staining was observed on the concrete pad and ground surface. The current and historic presence of this staining continues to represent a REC with respect to the site.	The extent of affected soil or ground water quality beneath the site as a result of the identified RECs is unknown; however, the limited areal extent of the observed staining, suggests that only relatively minor impacts are likely in association with each identified REC.
Various	Storage Tanks - USTs	According to available information, two USTs were removed from the Riverside Woodyard in the late 1980's. These tanks reportedly included a 400-gallon gasoline UST (Figure 4-4, Item No. UST-	Little to no documentation pertaining to the former underground storage tanks was available during the course of

TABLE 5-1
RECOGNIZED ENVIRONMENTAL CONDITIONS

Location Of Finding	Topic	Finding Summary	Opinions
Figure 4-4, UST-1 through UST-3		1) and a 2,000-gallon diesel fuel UST (Figure 4-4, Item No. UST-2). During removal activities, "pinholes" were reportedly observed in the gasoline UST, whereas the integrity of the diesel tank was reportedly sound. Documentation describing removal activities (e.g., closure reports, field notes, photographs and/or confirmation sampling) was not available during the previous assessments or during the December 2005 Phase I ESA. In addition to the above tanks, a 500-gallon process UST (Figure 4-4, Item No. UST-3) was also present on-site. This UST was used for storing a wood preservative called "Woodlife" which was historically applied to lumber between 1945 and the early 1970's. This UST was reportedly removed in approximately 1975. No evidence of a release from this tank was reported; however, documentation describing removal activities was not available during the previous assessments or the December 2005 Phase I ESA. Based on available information, lack of closure documentation and the documented presence of pinhole leaks in the gasoline UST, each of these features continue to represent a REC to the property.	the Phase I ESAs and Phase I ESA Updates performed over the past several years. Pinhole leaks were documented in the former gasoline tank and no closure documentation associated with the removal of any of these three tanks was available for review. The historic presence of these underground storage tanks, specifically the gasoline tanks, likely resulted in the release of hazardous substances or petroleum products to the subsurface. Potential impacts to subsurface soil and/or ground water beneath the site are unknown.

TABLE 5-2
HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS

Location Of Finding	Topic	Finding Summary
Southeast of the Subject Property. Figure 4-6, Item No. ADJ-1.	Adjacent Property	*Previous Finding:* **Marine Facility** - During the 1998 Phase I ESA, aboveground oil storage containers, creosote utility pole storage, and approximately one-acre of scrap metal and debris were observed on the southeast property border with a neighboring marine-related operation (Figure 4-6, Item No. ADJ-1). Furthermore, it appeared some materials, including scrap metal, waste fishing nets, a scrap electrical motor, and a 1,000-gallon AST, with a possible asbestos-containing insulation jacket, had been placed on the Riverside Woodyard. At the time of the 2000 Phase I ESA Update, the utility poles and aboveground oil storage containers had been removed; however, some debris remained at this location. This debris appeared to consist of approximately one to two cubic yards of scrap wood and metal on the northern side of the fence between the subject property and the neighboring marine-related operation. The exact amount and nature of this material could not be determined due to dense vegetation along the property boundary. During the 2003 Phase I ESA Update, this facility was present and active and the majority of the debris appeared to have been removed; however, numerous lobster and king crab traps were observed in the area, which prevented a complete inspection of this area. At the time of the December 2005 Phase I ESA, no surficial debris/materials were observed encroaching on the Riverside Woodyard and many of the previously identified materials had been removed from this site. For this reason and based on expected ground water flow direction, this adjacent property was no longer considered a REC with respect to the site.
West of the Subject Property. Figure 4-6, Item No. ADJ-2.	Adjacent Property	*Previous Finding:* **Burlington Northern Railroad** - During the 2000 Phase I ESA, a four-inch diameter capped metal pipe was observed protruding from a drainage ditch parallel to the railroad tracks (Burlington-Northern Railroad right-of-way) immediately west of the Riverside Woodyard property boundary (Figure 4-6, Item ADJ-2). The metal pipe was observed during the 2000 and 2003 Phase I ESA Updates. According to KCWW personnel, the pipe was connected to a City of Everett water main, which directed potable water to a former Weyerhaeuser plant further north of the subject property. The exact purpose of this protruding pipe was unknown and it was not clear whether the water main was active at the time of the 2000 or 2003 Phase I ESA Updates. Based on this information, this pipe was no longer was no longer considered a REC with respect to the site. At the time of the December 2005 Phase I ESA, no further information pertaining to this feature was identified.
South of the Subject Property. Figure 4-6, Item No. ADJ-3.	Adjacent Property	*Previous Finding:* **Canyon Lumber** - During the 1998 Phase I ESA and subsequent 2000 and 2003 Phase I ESA Updates, the Canyon Lumber Company facility (3821 26th Place) was listed as having leaking underground tanks. This site was situated immediately adjacent to the south end of the Riverside Woodyard (Figure 4-6, Item No. ADJ-3). The database search reports for the previous assessment stated that USTs had been removed and that soil was the only affected media. Based on the 2003 Phase I ESA, the associated database search indicated that this LUST site was cleaned up as of 19 August 2002. The database search report for the December 2005 Phase I ESA also indicates that the identified soil contamination was reported as cleaned up. Based on this information, geographical location relative to the Site, expected ground water flow direction, and fact that the contamination was reported as cleaned up, this LUST site is no longer considered a REC with respect to the site.
South of the Subject Property. Figure 4-6, Item No. ADJ-4.	Adjacent Property	*Previous Finding:* **Schaffer Equipment** - During the 1998 Phase I ESA, aboveground and underground storage tanks and scrap metal accumulations were identified on Schaffer Equipment, a heavy equipment sales and service facility, nearly adjacent to the south end of the Riverside Woodyard (Figure 4-6, Item No. ADJ-4). The three USTs on this adjacent property were listed on the State's environmental database of registered storage tanks. At the time of the 2000 Phase I ESA Update, Schaffer Equipment was an active facility and similar observations were made. Bulk liquid storage tanks (i.e., aboveground and/or underground) were present along with accumulations of scrap metal. This property was also listed as having registered underground tanks in the updated environmental database search report. According to this report, two of the tanks had been removed and one was temporarily closed. This facility was present and active at the time of this 2003 Phase I ESA Update and was listed as a registered UST facility in the 2003 updated database search report. The majority of the scrap metal previously identified on this site was no longer present; however, bulk storage tanks were observed on this site. At the time of the December 2005 Phase I ESA, little to no accumulated debris was observed and only one aboveground tank was noted on this site. No further pertinent information was obtained Based on geographical location relative to the Site, expected ground water flow direction and fact that this facility was not listed as having leaking USTs, this site is no longer considered a REC with respect to the site.

TABLE 5-2
HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS

Location Of Finding	Topic	Finding Summary
Southwest of the Subject Property. Figure 4-6, Item No. ADJ-5.	Adjacent Property	*Previous Finding:* **Puget Sound Energy** - During the 1998 Phase I ESA, Puget Sound Energy, located at 3630 Railway Avenue, was identified as a state listed Hazardous Waste Site (Figure 4-5, Item No. ADJ-5). This nearby property once operated as a coal gasification facility. Remedial contractors for the site (RETEC) reported that soils and ground water have been affected by polynuclear aromatic hydrocarbons related to the former coal gasification operations. According to the remedial project manager, free product has been detected on the ground water (at about 20 feet below grade). Remediation, planned for the spring of 1998, was to include removal of approximately 1,800 cubic yards of contaminated soil, installation of a "slurry" containment wall (350 feet long by 40 feet deep) along the river bank, and free product recovery from ground water. While the presence of a Hazardous Waste Site near the facility represents a potential/recognized environmental condition, ground water flow at this site was documented to be southeast, towards the Snohomish River (and away from the KCWW Riverside Woodyard). The environmental database search conducted as part of the 2000 Phase I ESA Update also listed this facility as a State Hazardous Waste Site and the site was reported to have been assigned the lowest assessed risk to human health and the environment. Investigations to date have confirmed priority pollutants (metals and cyanide), petroleum products, phenolic compounds, non-halogenated solvents and polynuclear aromatic hydrocarbons above applicable cleanup levels. In addition, base/neutral/acid organics and halogenated organic compounds were also suspected. This facility was present and active at the time of the 2003 Phase I ESA Update and was listed as a SHWS; however, no further pertinent information was available. At the time of the December 2005 Phase I ESA, this facility was listed as a state hazardous waste site, an investigation was underway and a remedial action report had been submitted to the WADOE. Based on geographical location relative to the Site, expected ground water flow direction, and fact that this site was assigned the lowest assessed risk to human health and the environment, this site is no longer considered a REC with respect to the site.
Various Locations Southwest of the Subject Property. Figure 4-6, Item Nos. ADJ-6 through ADJ-11 and ADJ-13	Adjacent Property	During a previous Phase I ESA, several additional sites listed on State environmental databases were identified in close proximity to, and generally south or southwest of, the KCWW Riverside Woodyard. The majority of these sites were also listed on State environmental databases in the updated environmental database search report conducted during the 2000 and/or 2003 Phase I ESA Updates as well as in the database search conducted during the December 2005 Phase I ESA. Based on information presented in the December 2005 Phase I ESA database search report, expected ground water flow direction and/or fact that the contamination was reported as cleaned up, these sites are no longer considered RECs with respect to the Riverside Woodyard. These adjacent properties were as follows: • *Previous Finding:* **Chapman Truck Sales/Truck Repair Ditch** - located at 3827 Railway Avenue, approximately one-tenth of a mile south of the Riverside Woodyard (Figure 4-6, Item No. ADJ-6), was listed as a Hazardous Waste Site "awaiting evaluation" during the 1998 Phase I ESA. Large areas of scrap metal, engines and automotive parts were stored outdoors at this neighboring property. Based on the assumed direction of ground water flow in the area, this property was predicted to be side-gradient of the subject site such that only significant releases would be expected to affect the KCWW Riverside Woodyard. At the time of the 2000 Phase I ESA Update, this site was an active facility; however, it was not listed in the updated environmental database search conducted as part of this Phase I ESA Update. Large areas of scrap metal, engines and automotive parts remained on this property. This facility was also present and active at the time of this 2003 Phase I ESA Update; however, this facility was not listed in the 2003 updated database search report. Similar observations and notations were made with respect to the activities and materials on this facility during the 2003 Phase I ESA update. No new information was available. Based on geographical location relative to the Site, expected ground water flow direction (i.e., to the east and/or southeast) and fact that this facility was not listed in the 2003 updated database search report, this facility was not expected to represent a recognized environmental condition to the Site. During the course of the December 2005 Phase I ESA, this site was listed as Hazardous Waste Site "awaiting remedial action". According to the EDR Report, petroleum constituents have been confirmed in soil and are suspected in ground water, surface water and sediments. In addition, metals and/or cyanide are also suspected in each of these media. No further pertinent information was available. Based on available information and expected ground water flow direction, this site was no longer considered to represent a REC to the site. • *Previous Finding:* **Rubatino's Refuse** - During the 1998 Phase I ESA, Rubatinos Refuse, located at 2730 Harrison Street, approximately one-fifth of a mile southwest of the Riverside Woodyard (Figure 4-6, Item No. ADJ-7), was listed as a Hazardous Waste Site. According to available information, remedial efforts were underway at the time of the 1998 Phase I ESA to address heavy metals, cyanide and petroleum products present in soil and ground water beneath this property. During the 2000 Phase I ESA Update, the database search also listed the Rubatino's Truck Care facility as a State Hazardous Waste Site. This site has been assigned the lowest assessed risk to human health and the environment. Investigations to date have confirmed priority pollutants (metals and cyanide) and petroleum products above applicable cleanup levels. No further information was

Location Of Finding	Topic	Finding Summary
		available in the updated database search report. Based on this information, this site continues to represent a potential/recognized environmental condition. This facility was present and active at the time of this 2003 Phase I ESA Update and the December 2005 Phase I ESA; however, no new information was available in the 2003 updated database search. Based on geographical location relative to the Site, expected ground water flow direction (i.e., to the east and/or southeast) and fact that this site was assigned the lowest assessed risk to human health and the environment, this facility was no longer considered to represent a REC to the Site. • *Previous Finding:* **Nelson Distributing** - During the 1998 Phase I ESA, Nelson Distributing, located at 2815 Highland, approximately one-half of a mile southwest of the Riverside Woodyard (Figure 4-6, Item No. ADJ-8), was listed as a Hazardous Waste Site "awaiting site hazard assessment". According to available information, it was suspected that ground water quality had been affected by petroleum products from the site while soil contamination had already been confirmed. At the time of the 2000 Phase I ESA Update, this property was operated by Bowles Northwest Distributing; however, the updated database search listed the Nelson Distributing facility as a State Hazardous Waste Site and leaking UST site. This site has been assigned the lowest assessed risk to human health and the environment. Investigations to date have confirmed priority pollutants (metals and cyanide) and petroleum products above applicable cleanup levels. With respect to the USTs, the database search report indicated that during removal of a gasoline tank, ground water contamination was encountered. According to the database report, a ground water cleanup effort commenced in December 1998. No further information was available in the updated database search report. During the 2003 Phase I ESA Update and the December 2005 Phase I ESA, this facility was present, active. This facility was listed as a State hazardous waste site and leaking UST site in the 2003 Phase I ESA update database search. According to the December 2005 EDR Report, investigations to date have confirmed petroleum products in surface water and soil and metals and/or cyanide in ground water above applicable cleanup levels and a remedial action report has been submitted to the WADOE. Based on geographical location relative to the Site and expected ground water flow direction (i.e., to the east and/or southeast), this facility was no longer considered to represent a REC to the site. • *Previous Finding:* **Prime Equipment** - During the 1998 Phase I ESA, Prime Equipment, located at 3409 Everett Avenue, approximately three-tenths of a mile southwest of the Riverside site (Figure 4-6, Item No. ADJ-9), was listed as having a leaking UST with reported contaminated soil on the site which had been "cleaned up". The updated database search conducted during the 2000 Phase I ESA Update listed the Prime Equipment facility at 3409 Everett Avenue as a leaking UST site. The updated database search report indicated that two active USTs were present (one gasoline and one diesel fuel) and two tanks (one gasoline and one diesel fuel) had been removed. During removal of the tanks, soil and/or ground water contamination was encountered. According to the database report, the site was reported as having completed a ground water cleanup with respect to contamination from two removed tanks in September 1995. This facility was present and active at the time of this 2003 Phase I ESA Update; however, the facility was listed as Rental Service Corporation in the 2003 database search report. At the time of the December 2005 Phase I ESA, this property was occupied by John Deere Landscaping Equipment & Supply Company. According to the EDR Report for the December 2005 Phase I ESA, soil contamination was encountered during the removal of two USTs. The impacted soil was reported as cleaned up and no further information was available. Based on geographical location relative to the Site, expected ground water flow direction (i.e., to the east and/or southeast) and fact that this LUST site was reported as cleaned up, this facility was no longer considered to represent a REC to the Site. • *Previous Finding:* **Exxon Service Station** - During the 1998 Phase I ESA, Exxon Service Station, located at 3015 Everett Avenue, approximately one-half of a mile southwest of the Riverside Woodyard (Figure 4-6, Item No. ADJ-10); was listed as containing a leaking underground storage tank with reported contaminated soil and ground water, "cleanup underway". At the time of this Phase I ESA Update, this site remained a closed facility. According to the updated environmental database search conducted as part of this Phase I ESA Update, cleanup of contaminated soil and/or ground water was continuing along with periodic monitoring to evaluate cleanup efforts. This facility was present and active at the time of this 2003 Phase I ESA Update; however, the gasoline station had been converted to a drive-up espresso store (Espresso Time II) and an office building. A ground water remediation system was observed on this property along with a number of recovery wells and monitoring wells. This facility was listed as a leaking UST site in the 2003 database search report; however, no new pertinent information was available (i.e., remedial efforts and periodic monitoring were being performed). At the time of the December 2005 Phase I ESA, similar observations with respect to property use were made and the EDR Report indicated that remediation was ongoing. Based on the presence of the ground water remediation system, fact that this LUST site is not closed, geographical location relative to the Site and expected ground water flow direction (i.e., to the east and/or southeast), this facility was no longer considered to represent a REC to the Site.

Location Of Finding	Topic	Finding Summary
		• *Previous Finding:* **Western Power** - During the 1998 Phase I ESA, Western Power, located at 3217 Hewitt Avenue, approximately one-half of a mile southwest of the Riverside Woodyard (Figure 4-6, Item No. ADJ-11), was listed as containing a leaking underground storage tank with reported contaminated soil and ground water "cleaned up". At the time of the 2000 Phase I ESA Update, this property was operated by Johnston Petroleum; however, the updated database search listed the property address (3217 Hewitt Avenue) as a closed Case Power facility. This facility was identified as a leaking UST site and Western Power was not listed in the report. The database search report indicated that the soil and/or ground water contamination encountered during the removal of two USTs was cleaned up as of June 1995. This facility was present and active as Johnston Petroleum at the time of this 2003 Phase I ESA Update. The 2003 database search report listed this property, Johnston Petroleum Products, Inc., as having leaking underground tanks with soil and ground water contamination that had reportedly been cleaned up as of June 1995. At the time of the December 2005 Phase I ESA, this site was occupied by McEvoy Oil Company; however, the facility was still listed as Johnston Petroleum and no new information was available. Based on this information, geographical location relative to the Site, expected ground water flow direction (i.e., to the east and/or southeast), and fact that the contamination was reported as cleaned up, this LUST site is no longer considered to represent a REC to the Site. • *Previous Finding:* **Prime Equipment** - During the 2000 Phase I ESA Update, a second Prime Equipment facility at 2810 Highland Avenue was listed in the updated database search report as a State Hazardous Waste Site (Figure 4-6, Item No. ADJ-13). Investigations confirmed priority pollutants (metals and cyanide) and petroleum products above applicable cleanup levels. No further information was available in the database search report. This Prime Equipment facility was present and active at the time of this 2003 Phase I ESA Update; however, the facility was now occupied by Rental Service Corporation. This facility, listed as Prime Equipment in the 2003 database search report, was listed as a hazardous waste site; however, no new pertinent information was available. At the time of the December 2005 Phase I ESA, this property was still occupied by Rental Service Corporation and the site was still listed as a State Hazardous Waste Site. According to the EDR Report, a remedial action report for the site has been submitted to the WADOE. No further pertinent information was available. Based on geographical location relative to the Site and expected ground water flow direction (i.e., to the east and/or southeast), this facility was no longer expected to represent a REC to the Site.
Various Locations Figure 4-6, UC-1 through UC-3, UC-5 and UC-6, UC-8 through UC-13 and UC-15	Liquid Materials, Wastes, and AST Storage	During the 1998 Phase I ESA and subsequent 2000 Phase I ESA Update, a number of unlabeled drums and/or containers with unidentified contents were noted at several locations on-site. The majority of these containers were observed in the northern portion of the site around the chip mill or in the east-central portion of the site and were associated with the former boat/metal fabrication tenant. During the course of the December 2005 Phase I ESA, each of these areas were inspected and none of these former unidentified containers were observed onsite. According to individuals interviewed the majority of these containers (i.e., those associated with the former boat/metal fabrication tenant) were removed from the site and properly disposed by Emerald Services. The following paragraphs describe the former containers along with any pertinent information obtained during the course of the December 2005 Phase I ESA. • *Previous Finding:* During the 1998 Phase I ESA and subsequent 2000 Phase I ESA Update, three drums of unknown materials were noted within the Oil Storage Building (Building 43) operated by the boat/metal fabricating company (Figure 4-6, Item No. UC-1). The drums were suspected to contain solvents remaining from the former sawmill operations and staining was evident on the concrete floor throughout this 400 square foot structure. These drums were reportedly removed and disposed of by Emerald Services in 2001. At the time of the Phase I ESA, these drums were no longer present onsite and no staining was observed in the building. Based on this information, these drums no longer represent a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, more than 100 one- and five-gallon containers were noted on the wooden floor of a metal shipping container (Building 44) adjacent to the Oil Storage Building in the leased area (Figure 4-6, Item No. UC-2). While some containers were labeled, it was not clear that the label represented the contents. In addition, strong solvent odors were noted within the container and a black-stained area was observed near the south end of the trailer as previously described. This building reportedly could not be inspected during the 2000 Phase I ESA Update. These containers were reportedly removed and disposed of by Emerald Services in 2001. At the time of the Phase I ESA, these containers and the metal storage trailer were no longer present onsite. Based on this information, these containers no longer represent a REC with respect to the site.

TABLE 5-2
HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS

Location Of Finding	Topic	Finding Summary
		• *Previous Finding:* During the 1998 Phase I ESA, a partially full 100-gallon boat fuel tank was observed near the south exterior comer of the metal shipping container (Building 44) in the leased area. The contents of this tank could not be verified (Figure 4-6, Item No. UC-3). This fuel tank was not observed during the 2000 Phase I ESA Update and was reportedly disposed of with other debris. The fate of this tank has not been determined at the time of this report. No further information was obtained during the course of the December 2005 Phase I ESA and no staining, stressed vegetation or other evidence of a potential release associated with this container was observed. Based on site observations and available information, this container no longer represents a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, a portion of a former fish processing boat shelter deck was observed to include a 30-gallon AST that contained approximately ten gallons of an unknown liquid. There was no evidence of spills or leaks from the container (Figure 4-6, Item No. UC-5). This container was not observed during the 2000 Phase I ESA Update and the fate of the container was unknown. At the time of the December 2005 Phase I ESA, no new information pertaining to this container was available. Based on available information and fact that no staining, stressed vegetation or other evidence of a potential release associated with this tank was reported, this container no longer represents a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, one full five-gallon container of a gray mixture was observed near the northeast comer of the Electric Shop. There was no evidence of spills or leaks from the container (Figure 4-6, Item No. UC-6). This container was not observed during the 2000 Phase I ESA Update and the fate of the container was unknown. At the time of the December 2005 Phase I ESA, no new information pertaining to this container was available. Based on available information and fact that no staining, stressed vegetation or other evidence of a potential release associated with this tank was reported, this container no longer represents a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, three unlabeled 55-gallon drums were present outside a deck shelter storage building (Building 40) near the river in the eastern end of the boat/metal fabrication area. One of these drums was approximately 30 percent full and had a fuel oil odor. An area of stained soil (two square feet) was present near the container (Figure 4-6, Item No. UC-8). This storage building and three drums mentioned above were not observed at this location during the 2000 Phase I ESA Update site visit. No surficial staining or other evidence of a release from these containers was observed. No further information was obtained during the course of the December 2005 Phase I ESA and no staining, stressed vegetation or other evidence of a potential release associated with these containers was observed. Based on site observations and available information, these containers no longer represent a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, an enclosure formed by an old boat shelter deck (Building 39) contained numerous empty containers and several full containers, including three one-gallon antifreeze cans, a five-gallon pail full of unknown liquid with a solvent odor (Figure 4-6, Item No. UC-9), and a five-gallon pail of epoxy, half full. The structure and containers mentioned above were not observed at this location during the 2000 Phase I ESA Update. No surficial staining or other evidence of a release from these containers was observed. No further information was obtained during the course of the December 2005 Phase I ESA and no staining, stressed vegetation or other evidence of a potential release associated with these containers was observed. Based on site observations and available information, these containers no longer represent a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, one 55-gallon sealed drum containing unknown materials was observed near the northwest comer of the leased area (Figure 4-6, Item No. UC-10). This container was not observed during the 2000 Phase I ESA Update. No further information was obtained during the course of the December 2005 Phase I ESA and no staining, stressed vegetation or other evidence of a potential release associated with these containers was observed. Based on site observations and available information, these containers no longer represent a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, three full 55-gallon drums with unidentified contents were noted near the south end of the leased area, east of Building 45 (Figure 4-5, Item No. UC-11). These containers were not observed during the 2000 Phase I ESA Update site visit. No further information was obtained during the course of the December 2005 Phase I ESA and no staining, stressed vegetation or other evidence of a potential release associated with these containers was observed. Based on site observations and available information, these containers no longer

Location Of Finding	Topic	Finding Summary
		represent a REC with respect to the site. • *Previous Finding:* During the 2000 Phase I ESA Update, three unlabeled containers were observed on the lease area immediately south of two storage trailers (Buildings 43 and 44). These containers consisted of two 55-gallon drums, one full and one half full, and one polyethylene container approximately 85-gallons in capacity, which was three-quarters full (Figure 4-6, Item No. UC-12). The contents of these containers were not known and no staining or other evidence of a release from these containers was observed. These drums were reportedly removed and disposed of by Emerald Services in 2001. At the time of the Phase I ESA, these drums were no longer present onsite and no staining was observed in the vicinity of these former containers. Based on this information, these drums no longer represent a REC with respect to the site. • *Previous Finding:* During the 2000 Phase I ESA Update, one unlabeled 55-gallon drum was observed on a concrete pad adjacent to the southeastern corner of the Electrical Shop (Building 33) in the leased area (Figure 4-6, Item No. UC-13). This container was full of an unknown liquid. No staining or other evidence of a release from these containers was observed. This drum was reportedly removed and disposed of by Emerald Services in 2001. At the time of the Phase I ESA, this drum was no longer present onsite. Based on this information, the former presence of this drum no longer represents a REC with respect to the site. • *Previous Finding:* Numerous containers ranging in volume from one- to 55-gallons were observed in the lean-to structure (Building 42) in the lease area. Of these containers, one 2.5-gallon, two five-gallon and approximately 15 55-gallon containers were not labeled (Figure 4-6, Item No. UC-15). These containers had varying amounts of unidentified liquids and some surficial petroleum staining on asphalt was observed around the containers. These containers were reportedly removed and disposed of by Emerald Services in 2001. At the time of the Phase I ESA, these containers were no longer present onsite and little to no staining was observed in the vicinity of the lean-to building. Based on this information, these containers no longer represent a REC with respect to the site.
Various Location Figures 4-3 and 4-4, Item Nos. WW-2 and WW-5 through WW-7	Hazardous Substances In Connection With Identified Uses - Liquid Waste Storage and Disposal	During the 1998 Phase I ESA, the discharge location for a number of liquid waste streams appeared to be directly to the ground, surface waters, and/or earthen ditches that did not flow to the CSO/POTW. Observations made during the 2000 Phase I ESA Update and December 2005 Phase I ESA were generally consistent with those of the previous assessment. • *Previous Finding:* During the 1998 Phase I ESA, drainage from the large dredge spoils area (in the southern portion of the property) discharged through a three-foot diameter culvert to the Snohomish River (Figure 4-6, Item No. WW-2). According to KCWW personnel, there were previously two discharge points into the river from the dredge spoils area (Item Nos. WW-2A and WW-2B). The pipes for these discharge points were recently removed and were observed on the ground surface in the southern portion of the property. No new information was obtained during the December 2005 Phase I ESA and since these features have been removed, they no longer represent a REC to the site. • *Previous Finding:* During the 1998 Phase I ESA, two storm water catch basin/pump systems were operated by KCWW's tenant in the east-central portion of the site. These systems appeared to collect runoff from process and material/waste storage areas related to the boat/metal fabrication operation. For one system, storm water was pumped directly to a pipe discharging to the Snohomish River. Storm waters associated with the second system were pumped to an area east of the operation and near the river. Waters pumped to this area discharged to the ground surface and infiltrated into the sandy soil (Figure 4-6, Item Nos. WW-5 and WW-6). According to KCWW personnel during the 2000 Phase I ESA Update, the discharge points for both of these features were removed and were no longer used. Item No. WW-5, located at the northwestern corner of the Fabrication Shop (Building 37), was inspected and was dry with no staining or other evidence of a potential release to this feature. Item No. WW-6 could not be inspected during the 2000 Phase I ESA Update due to the presence of surface metal debris covering the area. No new information pertaining to these features was obtained during the course of the December 2005 Phase I ESA and since these features have been removed, they no longer represent a REC to the site. • *Previous Finding:* During the 1998 Phase I ESA, an outdoor sink was observed near the Fabrication Pavilion in the east-central portion of the site. The sink discharged directly to the adjacent Snohomish River. According to KCWW's tenant, the sink has only been used for employee hand washing (Figure 4-5, Item No. WW-7). At the time of the 2000 Phase I ESA Update, this feature was no longer present. The feature was not observed during the December 2005 Phase I ESA and no further information was obtained. Based on available information, this feature is no longer considered to represent a REC with respect to the site.

Location Of Finding	Topic	Finding Summary
E-1 through E-7	Indications of PCBs	Evidence of weeps/leaks from a number of transformers was noted on-site during the 1998 Phase I ESA. These areas were revisited during the Phase I ESA Update as well as the December 2005 Phase I ESA to review previous observations. Pertinent observations are described below. • *Previous Finding:* Stains were evident on the housing of a pole-mounted transformer located near the northeast corner of the Riverside Mill Office, Building 3 (Figure 4-5, Item No. E-3); however, there was no evidence of staining on the soils beneath the unit. According to KCWW personnel, this transformer had replaced prior to the 2000 Phase I ESA Update by the local utility company (PUD). The new unit was labeled as non-PCB containing and no staining or other evidence of a potential release from the previous unit was observed. No new information was obtained during the course of the December 2005 Phase I ESA and, as such, this feature is no longer considered to represent a REC to the site. • *Previous Finding:* A transformer was identified in a debris pile northwest of the Electric Shop, Building 33 (Figure 4-6, Item No. E-4). The transformer was an inactive unit that appeared to have been fractured into two pieces. The oil reservoir was observed in an upright position with apparent dielectric fluids present. There was no staining noted below either portion of the transformer or on soils/debris below this unit. No documentation was available regarding the concentration of PCBs within dielectric fluids associated with this transformer. This transformer was not observed during the 2000 Phase I ESA Update site visit and the exact fate of this unit was not known; however, no staining was observed in the vicinity of this former transformer. No new information was obtained during the course of the December 2005 Phase I ESA. Based on available information and fact that no staining was observed, this feature no longer represents an REC with respect to the site. • *Previous Finding:* A two square feet stain was noted on the concrete floor below an inactive transformer located inside the Chip mill (Building 4) first floor MCC room (Figure 4-5, Item No. E-5). No documentation was available regarding the concentration of PCBs within dielectric fluids associated with this transformer. At the time of the 2000 Phase I ESA Update, this transformer was no longer present and no staining was observed. No additional information was obtained during the December 2005 Phase I ESA and the chip mill had been demolished. Based on available information, minor amount of reported staining and fact that the staining was contained within the building, this former transformer no longer represents a REC to the site *Previous Finding:* A potential weep was noted on the housing of a pole-mounted transformer (No. 50) located near south entrance road to the facility (Figure 4-6, Item No. E-7). No staining or other evidence of a potential weep associated with this transformer was noted during the 2000 Phase I ESA Update or the December 2005 Phase I ESA. Based on these observations, this is no longer considered to represent a REC to the site.
East-Central Portion of the Site Figure 4-6, Item No. OSD-3		*Previous Finding:* At the time of the 1998 Phase I ESA, KCWW was accumulating demolition debris (from the KCWW Everett pulp and paper mill) for later use as on-site fill. The debris piles included approximately 5,000 cubic yards of principally red brick, fire brick and concrete block and was located north of the area leased to the boat/metal fabricating company (Figure 4-6, Item No. OSD-3). As further described below, masonry panels, potentially containing asbestos, were also noted within the stockpiled debris. At the time of the 2000 Phase I ESA Update, this material was no longer present on the property. According to KCWW personnel, this material was used as fill along the southeastern portion of the property. No new information was obtained during the course of the December 2005 Phase I ESA; however, based on the nature of the fill material, this
Various Locations Figures 4-3 and 4-4, Item Nos. OSD-9 through OSD-14	On-Site Disposal	During the 1998 Phase I ESA, evidence of solid waste disposal was noted at several locations within the leased area operated by the boat/metal fabricating company. At the time of the 2000 Phase I ESA Update, solid waste was still present in the leased area. At the time of the December Phase I ESA, the vast majority of these materials were removed from the site. According to individuals interviewed, the solid waste materials and former containers, drums, ASTs and other materials in this area were removed in 2001. These disposal areas are described below. • *Previous Finding:* During the 1998 Phase I ESA, nine 55-gallon drums of bilge scrapings/used shot blast media and one 55-gallon sealed drum were observed near the northwest corner of Building 34 in the east-central portion of the site. Approximately 3,000 square feet of soil appeared to be affected by shot blast media in the immediate vicinity of these containers. An additional 500 square feet of ground west of the containers also appeared to have been affected by used shot blast media. KCWW's tenant indicated that these bilge scrapings/used shot blast media were staged for off-site disposal due to the presumed presence of heavy metals, related to paints and residuals removed from a vessel previously repaired by the company (Figure 4-6, Item No. OSD-9). At the time of the 2000 Phase I ESA Update, the nine drums were no longer present; however, the ground surface in this area appeared to be affected by shot blast media. Observations related to the shot blast media in this area were consistent with the observations made during the previous assessment. At the time of the December 2005 Phase I ESA, this area had been cleaned up and little to no evidence of any shot blast media was observed. Based on the reported cleanup activities and onsite observations, this no longer represents a REC

TABLE 5-2
HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS

Location Of Finding	Topic	Finding Summary
		with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, approximately 50 cubic yards of used shot blast media were noted beneath and near the lean-to building (Building 42) in the east-central portion of the site. Test results provided by KCWW's tenant indicated that total metal concentrations within this media were below levels that would trigger disposal as a hazardous waste (Figure 4-6, Item No. OSD-10). At the time of the 2000 Phase I ESA Update, approximately 20 cubic yards of used shot blast media was observed in the vicinity of the lean-to Pavilion (Building 42). No additional information pertaining to the chemical composition of the shot blast media were obtained. At the time of the December 2005 Phase I ESA, this area had been cleaned up and little to no evidence of any shot blast media was observed. Based on the reported cleanup activities, previously obtained analytical results for the shot blast media and onsite observations, this no longer represents a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, approximately 600 square feet of soil appeared to have been affected by used shot blast media south of the former Electric Shop (Figure 4-6, Item No. OSD-11). This material was not observed during the 2000 Phase I ESA Update. The exact fate of this material was unknown. At the time of the December 2005 Phase I ESA, this area had been cleaned up and little to no evidence of any shot blast media was observed. Based on the reported cleanup activities, previously obtained analytical results for the shot blast media and onsite observations, this no longer represents a REC with respect to the site. • *Previous Finding:* During the 1998 Phase I ESA, grinding waste (approximately one-half cubic foot) was observed on the ground near the north exterior wall of the Fabrication Shop (Figure 4-5, Item No. OSD-12). Observations made during the 2000 Phase I ESA Update were consistent with the observations made during the previous assessment. At the time of the December 2005 Phase I ESA, this area had been cleaned up and little to no evidence of any grinding waste was observed. Based on the reported cleanup activities and onsite observations, this no longer represents a REC with respect to the site. • *Previous Finding:* During the 2000 Phase I ESA Update, approximately 30 to 40 cubic yards of scrap metal, piping from ship dismantling, scrap pallets, scrap wood and other miscellaneous debris was observed along the eastern side of the secondary containment structure (Building 34) in the east-central portion of the site (Figure 4-6, Item No. OSD-13). This material was piled along the riverbank and was pushed into the containment structure. At the time of the December 2005 Phase I ESA, this area had been cleaned up and little to no evidence of any remaining scrap metal, piping or other materials was observed. Based on the reported cleanup activities and onsite observations, this no longer represents a REC with respect to the site. • *Previous Finding:* During the 2000 Phase I ESA Update, miscellaneous surficial debris was observed in the northern portion of the subject property. This material consisted of approximately 20 to 30 cubic yards of piping, scrap metal, pieces of equipment and an empty polyethylene AST labeled sodium hypochlorite (Figure 4-3, Item No. OSD-14). According to KCWW personnel, these materials were from the KCWW Everett Mill property and were being stored on the subject site. No staining or other evidence of a release associated with these materials was observed. At the time of the December 2005 Phase I ESA, the majority of these materials had been removed. Based on available information and site observations, the former presence of these materials no longer represents a REC to the site. • *Previous Finding:* During the 2003 Phase I ESA Update, five to six piles of material ranging in size from ten to 30 cubic yards were noted on the eastern and northeastern portions of the Site (Figure 4-6, Item No. OSD-17). The material generally consisted of sand and gravel with creosote treated wood grindings. According to KCWW personnel, railroad tie processing (i.e., grinding) formerly occurred in this portion of the Site. When the processing area moved to the northern end of the Site, the ground surface in this area was scraped using heavy equipment (i.e., front-end loader) to clean up any creosote treated wood grindings resulting in these debris piles. KCWW personnel further indicated that there is too much sand and gravel in these piles such that this material cannot be used for hog fuel; therefore, the material has remained onsite until a disposal option is selected. With the exception of some plastic and a rubber tire/tire fragments in one of the piles in the northeastern corner of the Site, no other debris was observed in the piles. At the time of the December 2005 Phase I ESA, all of the previously identified piles had reportedly been screened and used as hog fuel. Miscellaneous piles of scrap wood were observed in this area along with some scrap metal that had been segregated from the piles of wood. Based on available information and site observations, these piles of material no longer represent a REC with respect to the site.

TABLE 5-2
HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS

Location Of Finding	Topic	Finding Summary
		• *Previous Finding:* At the time of the 2003 Phase I ESA Update, sludge from the primary and secondary treatment areas of the KCWW Everett Mill was reportedly staged temporarily in the on the northwestern corner of the site (Figure 4-6, Item No. OSD-18). According to individuals interviewed, an approximately 20-foot diameter by ten-foot high pile of sludge was placed at this location in May 2001 and was transported back to the Mill in May 2002 and burned in the wood waste boiler. Consequently, this material was not observed on the Site during the 2003 Phase I ESA Update. The sludge from the KCC Everett Mill Waste Water Treatment Plant (WWTP) is considered a "wood waste" under the Washington Department of Ecology (WDOE) solid waste rules (WAC 173-350) and is not considered a hazardous waste. This material consists of primarily wood fragments and particulates along with bacteria bodies and moisture. Based on available analytical reports, this material typically contains certain constituents of concern (i.e., metals and other inorganics) creating the possibility that these substances may have leached to the ground surface while the material was staged on the Site. No new information pertaining to this finding was obtained during the December 2005 Phase I ESA. Based on available information and site observations the deposition of this material onsite for a relatively short duration is no longer considered a REC with respect to the site.

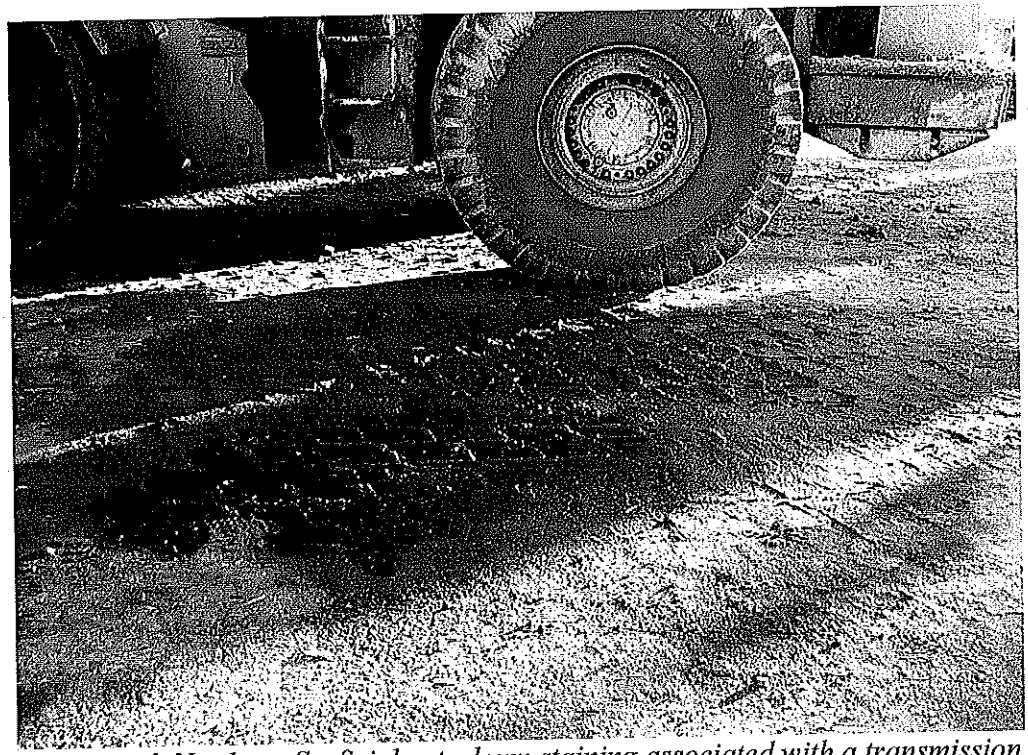
TABLE 5-3
BUSINESS ENVIRONMENTAL RISKS

Location Of Finding	Topic	Finding Summary
ACM-1 through ACM-7	Other Conditions or Concerns - Asbestos	With the exception of the recent demolition of the chip mill, KCTWW had not conducted a formal survey for the presence of asbestos containing material (ACM) at the Riverside Woodyard. Based on the reported construction dates of many of the site structures, building materials (insulation, wallboard, etc.) may contain ACM. According to the previous Phase I ESA Reports, potential ACM was observed on-site as described below. These materials were not observed during the course of the December 2005 Phase I ESA and the exact fate of these materials was not known. • *Previous Finding:* Approximately 15 cubic yards of masonry panels were stockpiled within demolition debris north of the leased area during the 1998 Phase I ESA (Figure 4-6, Item No. ACM-1). These panels were not observed during the 2000 Phase I ESA Update or the December 2005 Phase I ESA. The exact fate of these materials was not known. • *Previous Finding:* Insulation was observed on a pipe (approximately 40 linear feet) stored in a yard northeast of the KCWW Riverside Mill Office during the 1998 Phase I ESA and subsequent 2000 Phase I ESA Update (Figure 4-5, Item No. ACM-2). This material was not observed during the December 2005 Phase I ESA. The exact fate of this pipe insulation was not known. • *Previous Finding:* Approximately 400 square feet of floor tiles were observed within a scrap trailer located in a debris pile along the western perimeter of the leased area (Figure 4-6, Item No. ACM-3). The scrap trailer and floor tiles were not observed during the 2000 Phase I ESA Update or the December 2005 Phase I ESA. The exact fate of these materials was not known. • *Previous Finding:* Insulation on a 500-gallon AST was observed at southern end of the leased area (Figure 4-6, Item No. ACM-4). The 500-gallon AST and associated insulation was not observed during the 2000 Phase I ESA Update. According to the KCWW Riverside personnel, the occupant of the leased area reportedly removed the AST; however, the exact fate of the tank was not known. This tank was not observed during the December 2005 Phase I ESA. • *Previous Finding:* Waste brake lining material (approximately two cubic feet) was observed southeast of the Electric Shop (Figure 4-5, Item No. ACM-5). This waste material was not observed during the 2000 Phase I ESA Update and was likely disposed of with other solid waste materials in this area. The exact fate of these materials was not known. This material was not observed during the December 2005 Phase I ESA. • *Previous Finding:* KCWW personnel indicated that ACM was buried below the timber deck near the south end of the former Sawmill, Building 46 (Figure 4-6, Item No. ACM-6). This material, which included approximately two cubic yards of ACM, was deposited on-site following the removal of the former sawmill boilers. Information obtained during the 2000 Phase I ESA Update was consistent with the information obtained during the previous assessment. No further information was obtained during the December 2005 Phase I ESA. • *Previous Finding:* During the 2000 Phase I ESA Update site visit, one area of potential ACM was observed. This ACM consisted of approximately 100 linear feet of outer sheathing on metal piping (Figure 4-6, Item No. ACM-7). This sheathing encased the styrofoam insulation around the piping. This material was in good condition and did not appear friable. This material was not observed during the December 2005 Phase I ESA.
WET-1	Other Conditions or Concerns - Ecological	A review of the National Wetland Inventory map for the subject property indicated that there were no mapped Federal wetlands located on the subject property. With the exception of the storm water drainage swales and along the Snohomish River, no characteristic wetland features (i.e., vegetation, etc.) were observed at the subject property at the time of the Phase I ESA; however, note that a comprehensive wetland survey by a qualified wetland biologist was not conducted within the scope of this Phase I ESA. While there are no regulatory agency mapped wetlands on the site, approximately three acres of potential wetlands (characteristic vegetation, potentially hydric soils and standing water) were identified in the previous Phase I ESA report (Figure 4-6, Item WET-1). At the time of this December 2005 Phase I ESA however, the majority of this area had been filled with sand and gravel, construction/demolition debris and wood fiber waste such that little to no evidence of potential wetlands remained on-site.
	Other Conditions or Concerns - Ecological	According to an Army Corps of Engineers floodplain map as well as other documentation, approximately 20 percent of the site was within the 100-year floodplain. These areas were generally located along the riverbank in the eastern and northeast portion of the site and in a low area near the southern property boundary. Previous site maps indicate that a significantly greater portion of the property could have been within designated floodplain areas

Location Of Finding	Topic	Finding Summary
		prior to on-site filling (described in Section 4.5). Future property development could be affected by this flood zone designation, representing an important condition but not an ASTM defined REC.

5.2 *RELEVANT PHOTOGRAPHS*

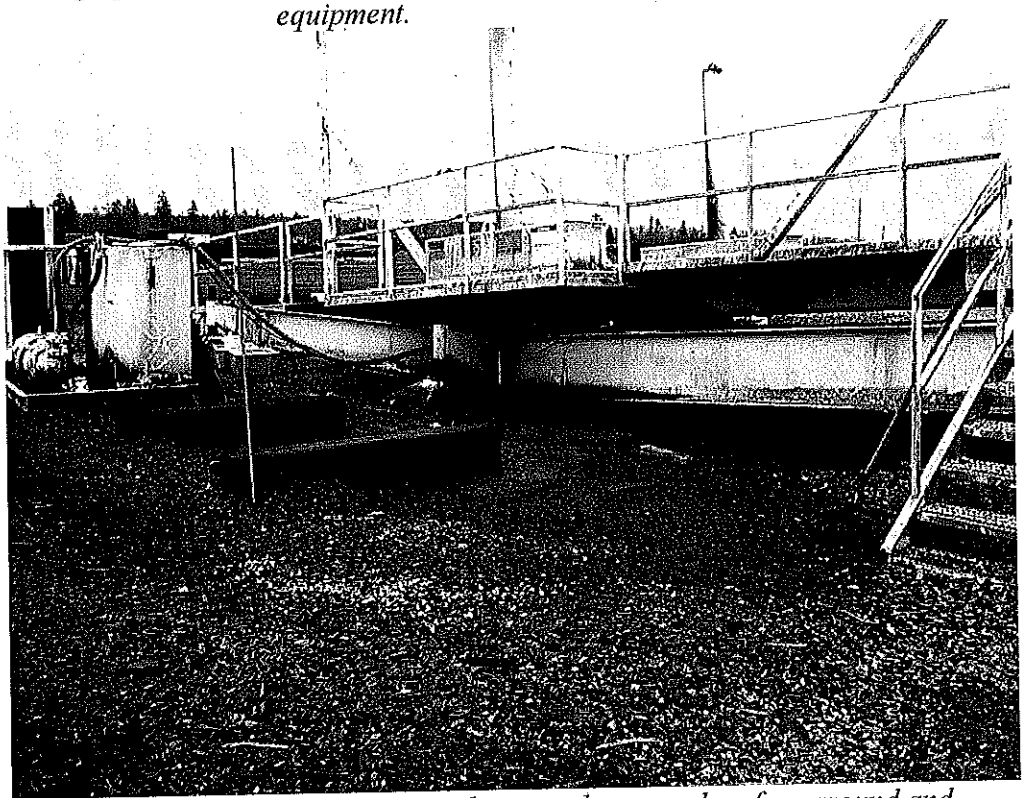
Photograph No. 1	*Surficial petroleum staining associated with a transmission fluid leak from one of the KCWW loaders near the southeastern corner of the Mill Office.*
Photograph No. 2	*Surficial petroleum staining on concrete and the ground on the northeastern corner of the diesel fuel AST containment structure.*
Photograph No. 3	*Surficial staining on the ground surface under heavy equipment.*
Photograph No. 4	*Surficial petroleum on the ground surface around and beneath the truck lift.*
Photograph No. 5	*Surficial staining from the secondary wastewater treatment plant sludge staged on the southeastern portion of the site.*
Photograph No. 6	*View of the truck washing area with wash water discharged to the ground surface in area leased by Washington Trucking.*
Photograph No. 7	*Oil/water separator location on the southern side of a storage building (Building 16) in the northwestern portion of the site.*
Photograph No. 8	*Solid waste debris illegally dumped onsite in the central portion of the site.*



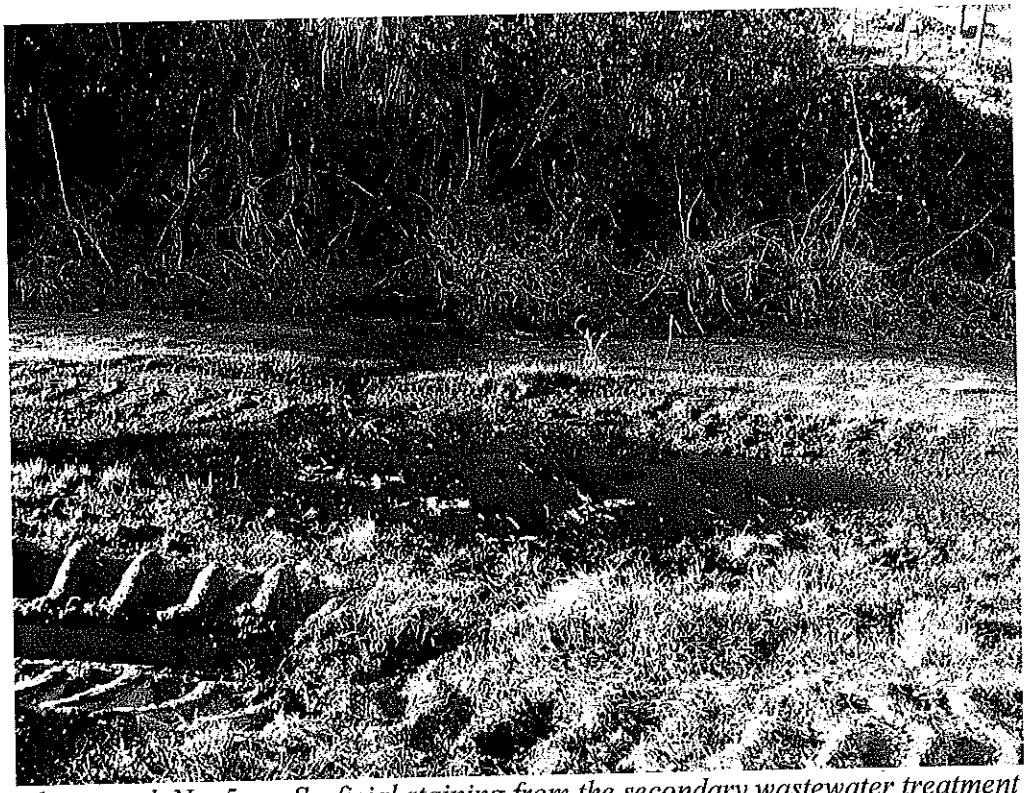
Photograph No. 1 *Surficial petroleum staining associated with a transmission fluid leak from one of the KCWW loaders near the southeastern corner of the Mill Office.*

Photograph No. 2 *Surficial petroleum staining on concrete and the ground on the northeastern corner of the diesel fuel AST containment structure.*

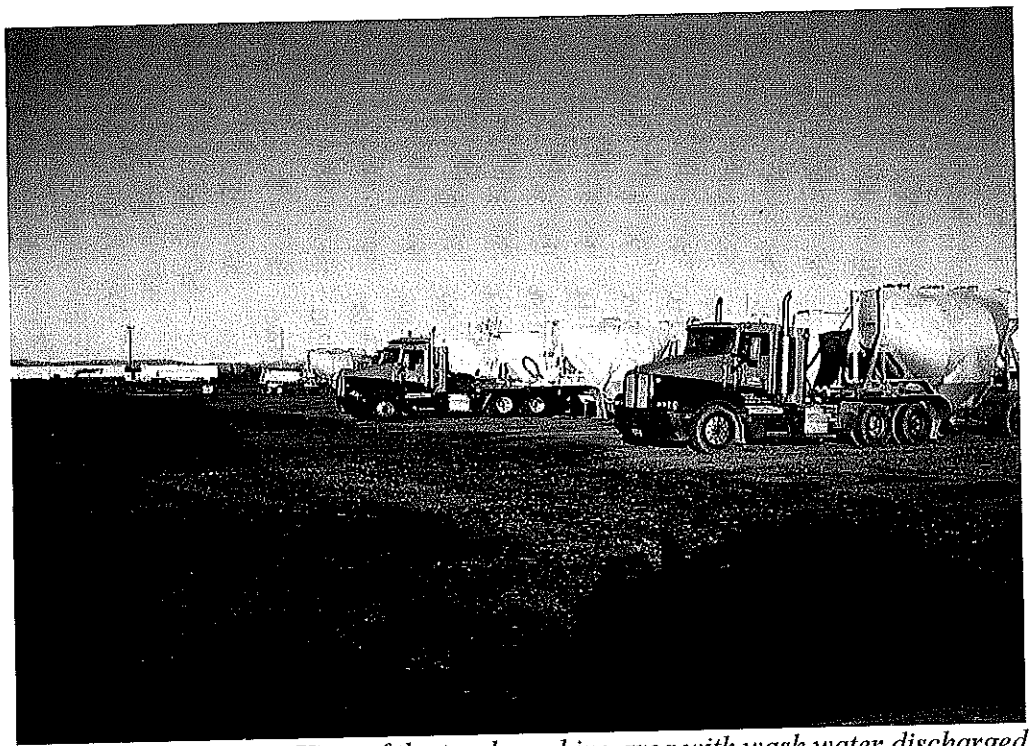
Photograph No. 3 *Surficial staining on the ground surface under heavy equipment.*



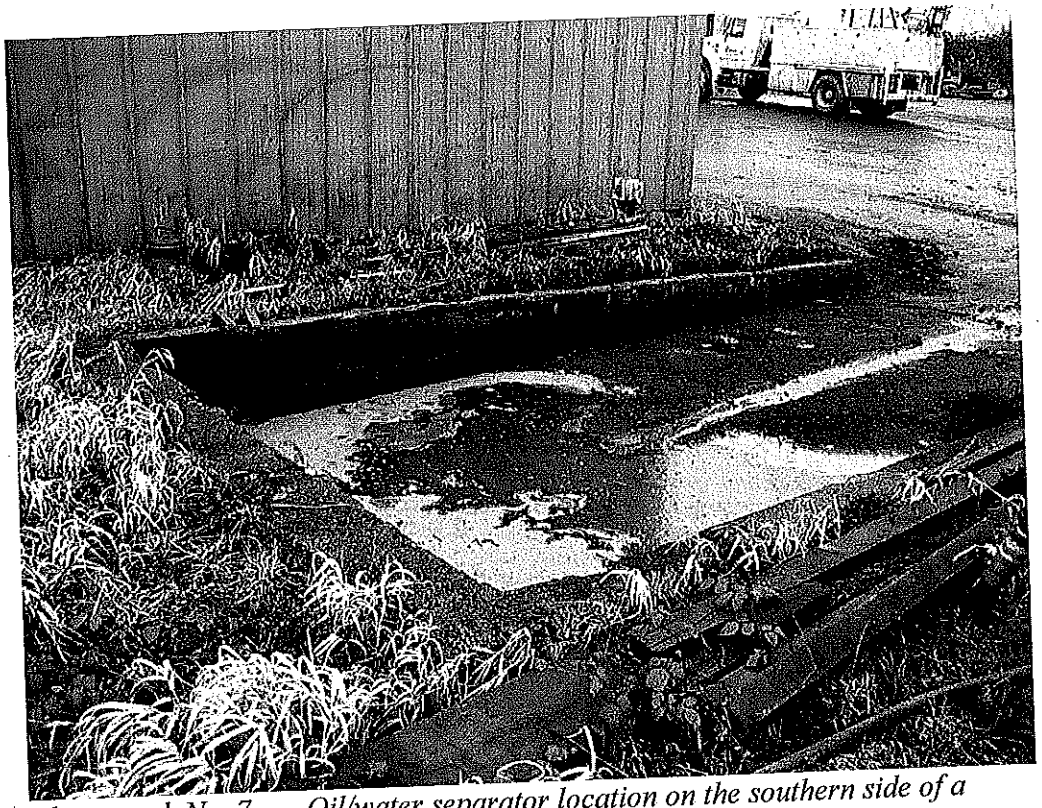
Photograph No. 4 *Surficial petroleum on the ground surface around and beneath the truck lift.*



Photograph No. 5 *Surficial staining from the secondary wastewater treatment plant sludge staged on the southeastern portion of the site.*



Photograph No. 6 *View of the truck washing area with wash water discharged to the ground surface in area leased by Washington Trucking.*



Photograph No. 7 *Oil/water separator location on the southern side of a storage building (Building 16) in the northwestern portion of the site.*

Photograph No. 8 *Solid waste debris illegally dumped onsite in the central portion of the site.*

6.0 QUALIFICATIONS AND SIGNATURES OF ENVIRONMENTAL PROFESSIONALS PARTICIPATING IN THE ASSESSMENT

6.1 PROFESSIONAL QUALIFICATIONS

In accordance with the requirements of the ASTM Standard E 1527-05 the professional qualifications of the project team are presented as follows:

- *Matthew D. Bell, P. G.*

Mr. Bell has more than 18 years of diversified experience in environmental consulting. His experience is wide ranging and includes planning, implementation, and management of due diligence assessments.

Mr. Bell has performed environmental liability and property transfer audits for over 100 sites, including wireless communication tower sites, pulp and paper mills and retail/commercial properties. Mr. Bell holds a Bachelors of Arts Degree in Geology from the University of Colorado at Boulder. Mr. Bell is a Registered Professional Geologist in the State of Pennsylvania.

- *Scott Bryant, P.G.*

Mr. Bryant has more than 18 years of diversified experience in environmental consulting. His experience is wide ranging and includes planning, implementation, and management of due diligence assessments.

Mr. Bryant has performed environmental liability and property transfer audits and acquisition/divestiture assessments for over 1000 sites. Properties audited include automotive dealerships and service stations, pulp and papermaking, timberland operations, pharmaceutical manufacturing, assembly, metal fabrication, manufacturing, chemical distribution, golf courses, radio/telecommunications sites, retail/commercial and undeveloped properties.

Mr. Bryant holds Bachelor of Arts Degrees in Geology and Computer Information Services from the State University College at Potsdam, New York and a Masters of Science in Geology from Rensselaer Polytechnic Institute. Mr. Bryant is a registered Professional Geologist in Pennsylvania.

6.2 *SIGNATORY SECTION*

Delta has undertaken a Phase I ESA of the KCWW Riverside Woodyard at 3700 Railway Avenue, Everett, Washington in conformance with the scope and limitations of ASTM Practice E 1527-05, *Standard Practice for Environmental Site Assessments*. Any exception or deletions from this practice are described in Section 1.2 and 1.3 of this report and Delta's Proposal No. 0510545Rev dated 13 December 2005.

This Phase I ESA was performed by Mr. Scott K. Bryant and reviewed by Mr. Matthew D. Bell. 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 the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. Information presented in this report is true and accurate to the best of the assessor's knowledge.

Matthew D. Bell

Matthew D. Bell, P. G.

Scott K. Bryant

Scott K. Bryant, P. G.

7.0 PRIMARY REFERENCES

Adirondack Environmental Services, Inc., Phase I Environmental Site Assessment, February 1998

EDR Database Search Report, Inquiry Number 1577418.2s, 16 December 2005

GeoEngineers, Inc., Report, Geotechnical and Hydrogeological Services, Proposed Riverside Operations Improvements, July 1, 1994;

InteGreyted Consultants, LLC, Phase I Environmental Site Assessment, December 2000

National Wetland Inventory Map, Everett, Washington Quadrangle, 1987;

US Army Corps of Engineers, Floodplain Map, District File No. E-2-6-487, 1973;

USDA Soil Survey of Snohomish County, Washington, July 1983;

USGS Everett, Washington Quadrangle, 7.5' Minute Series (Topographic), 1956 Photorevised 1968 and 1973

USGS Marysville, Washington Quadrangle, 7.5' Minute Series (Topographic), 1953 Photorevised 1968 and 1973

APPENDIX A

ASTM STANDARD E 1527-05 STANDARD PRACTICE FOR ENVIRONMENTAL SITE ASSESSMENTS

APPENDIX B

GEOENGINEERS REPORT - GEOTECHNICAL AND HYDROGEOLOGICAL SERVICES

APPENDIX C

ENVIRONMENTAL RECORD SEARCH
DATABASE REPORT

6.0 QUALIFICATIONS AND SIGNATURES OF ENVIRONMENTAL PROFESSIONALS PARTICIPATING IN THE ASSESSMENT

6.1 PROFESSIONAL QUALIFICATIONS

In accordance with the requirements of the ASTM Standard E 1527-05 the professional qualifications of the project team are presented as follows:

- *Matthew D. Bell, P. G.*

Mr. Bell has more than 18 years of diversified experience in environmental consulting. His experience is wide ranging and includes planning, implementation, and management of due diligence assessments.

Mr. Bell has performed environmental liability and property transfer audits for over 100 sites, including wireless communication tower sites, pulp and paper mills and retail/commercial properties. Mr. Bell holds a Bachelors of Arts Degree in Geology from the University of Colorado at Boulder. Mr. Bell is a Registered Professional Geologist in the State of Pennsylvania.

- *Scott Bryant, P.G.*

Mr. Bryant has more than 18 years of diversified experience in environmental consulting. His experience is wide ranging and includes planning, implementation, and management of due diligence assessments.

Mr. Bryant has performed environmental liability and property transfer audits and acquisition/divestiture assessments for over 1000 sites. Properties audited include automotive dealerships and service stations, pulp and papermaking, timberland operations, pharmaceutical manufacturing, assembly, metal fabrication, manufacturing, chemical distribution, golf courses, radio/telecommunications sites, retail/commercial and undeveloped properties.