

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

1700 Airport Way South, Seattle, WA

Prepared for: Evergreen Treatment Services

Project No. AS180043 • November 25, 2024 FINAL



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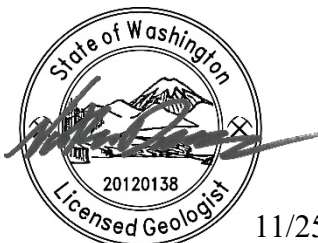
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Aspect Consulting, a Geosyntec Company



11/25/2024

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Contents

Executive Summary	1
1 Introduction	1
1.1 Purpose	1
1.2 Scope of Work	2
1.3 Significant Assumptions	4
1.4 Deviations	4
2 User-Provided Information and Interviews	5
2.1 User Questionnaire and Interview	5
2.1.1 Information Regarding Environmental Liens	5
2.2 Property Representative Interview	5
3 Subject Property Reconnaissance	6
3.1 Subject Property Observations	6
3.2 Adjoining Property Use Observations	8
4 Records Review	9
4.1 Physical Setting	9
4.2 Historical Use Information	9
4.2.1 Subject Property	10
4.2.2 Adjoining and Surrounding Properties	11
4.3 Previous Environmental Reports	11
4.3.1 Environmental Studies in 1995 and 1996	12
4.3.2 Environmental Studies in 2019, 2020, and 2024	13
4.4 Regulatory Environmental Records Review	15
4.4.1 Area-wide Contamination	19
5 Evaluation	20
5.1 ASTM Significant Data Gaps	20
5.2 Findings and Conclusions	20
5.3 Recommendation	22
6 References	23
7 Declaration of Environmental Professional	25
7.1 Qualifications of Environmental Professional	25

8 Limitations and Exceptions26

List of Tables

1 Subject Property Observations6

2 Regulatory Agency and Database Review17

List of Figures

1 Subject Property Location Map

2 Subject Property Plan

List of Appendices

A Site Reconnaissance Photographs

B User-Provided Information and Previous Environmental Reports

C Select Historical Records

D Database Definitions and Regulatory Database Search

E Report Limitations and Guidelines for Use

Executive Summary

Aspect Consulting, a Geosyntec Company (Aspect), prepared this Phase I Environmental Site Assessment (ESA) report on behalf of Evergreen Treatment Services (ETS) for the property located at 1700 Airport Way South in Seattle, Washington (tax parcel no. 766620-2855), referred to herein as the Subject Property. ETS currently owns the Subject Property, so the purpose of this Phase I ESA is to satisfy lender, grant, and permitting purposes prior to redevelopment. The Subject Property is currently developed with one building with two wings connected via an open breezeway. The southern wing includes a former warehouse that has been converted into office space and treatment rooms used by ETS until a water line break in early 2024 rendered the building largely unusable. The northern wing is a predominantly unoccupied warehouse partially used for temporary storage of support materials for ETS' operations. The building was constructed in 1914–1915 as a factory for the Western Blower Company, manufacturer of industrial blowers for sawmills and furnaces. The Subject Property is shown relative to surrounding physical features on Figures 1 and 2, Subject Property Location Map and Subject Property Plan, respectively.

Aspect completed a Phase I ESA in 2019, when ETS was first considering purchase of the Subject Property, and a Phase I ESA update in 2021, prior to ETS' purchase of the property that year. The property use prior to ETS' purchase spanned two time periods, each representing recognized environmental conditions (RECs): industrial fan/blower manufacturing and large engine repair by Western Blower from 1915 to the 1960s and then oil recycling support facilities by NW EnviroService (NWES, later Emerald Services) from 1987 to 2021. The property was generally unoccupied from the late 1960s to late 1980s. Concerns related to these historical activities included the potential release of hazardous chemicals (primarily petroleum hydrocarbons, metals, and solvents) into drains and sump at the Subject Property. Other RECs included the potential for impacted fill soil imported from an unknown source (common contaminants of concern in fill soil is petroleum hydrocarbons, metals, and polycyclic aromatic hydrocarbons [PAHs]), and the possibility for a heating oil underground storage tank on the property near the building's boiler room.

Of key importance to the NWES period is that they completed an environmental investigation across the main NWES oil-recycling facility that was located on a property north of the Subject Property and on the Subject Property where NWES handled and stored materials in the north warehouse portion of the Subject Property. There has been no evidence of processing or recycling of oil on the Subject Property because those more industrial activities occurred on the property to the north. As a result of soil and groundwater testing in the 1990s across this site, and for Washington State Department of Ecology (Ecology) to offer a No Further Action (NFA) determination for the Subject Property, Ecology requested that a restrictive covenant be recorded for the property. The covenant requires the ETS building and pavement be maintained as a protective cover over subsurface contamination, including arsenic, lead, benzo(a)pyrene (BaP; a PAH compound), and oil-related total petroleum hydrocarbons (TPH). Notification to Ecology

is required for redevelopment or other disturbance to the cover. The restrictive covenant also includes a prohibition of groundwater use due to elevated concentrations of manganese in groundwater at well MW-1.

Because of these RECs a Phase II ESA was completed to evaluate soil, groundwater, and soil gas at the Subject Property. In addition, an interim action that included clean out and follow-up assessment of the drains and sump was completed. These actions were summarized in the 2021 Phase I ESA and are included and amended here.

Aspect completed a Phase II ESA (Aspect, 2019b) consisting of soil, groundwater, and soil gas sampling and testing to evaluate the RECs identified in the 2019 and 2021 ESAs. The investigation included installation of four groundwater monitoring wells on the Subject Property and off the property, and sampling and testing of six representative soil samples and four groundwater samples from the monitoring wells. In addition, soil gas was sampled for the first time at four locations beneath the building. In soil and groundwater, the results of the Phase II ESA investigation indicated that contaminants of concern (volatile organic compounds [VOCs]; gasoline-, diesel-, and oil-range TPH; carcinogenic PAHs [cPAHs]; and metals) either were not detected or were detected at concentrations less than Model Toxics Control Act (MTCA) Method A or B cleanup levels, except for one soil sample from AMW-1 and the groundwater samples from AMW-1 and AMW-3, both of which are located off the property in the right of way. The contaminants detected were arsenic and lead in the soil sample, and vinyl chloride and arsenic in groundwater. Because these contaminants were not detected in soil or groundwater on the property, a direct relationship to a source could not be drawn by the study. However, if those contaminants are present in fill beneath the Subject Property, it would be covered by the Restrictive Covenant that already exists.

The more significant issue resulting from the Phase II ESA was the presence of chlorinated solvents (trichloroethene [TCE] and vinyl chloride) that were detected in soil gas at concentrations higher than the MTCA Method B screening levels; that, when modeled, had the potential to intrude into the north warehouse. Aspect recommended cleaning the storm drains at the Subject Property and sump in the north warehouse (the unoccupied portion of the project), which occurred in 2020. After this action, follow-up soil gas samples were again obtained and TCE and vinyl chloride in soil gas were found to continue to pose a vapor intrusion risk for the unoccupied north warehouse area. ETS elected not to occupy the north warehouse portion of the building until redevelopment occurred. Additional soil and groundwater sampling is occurring within the north warehouse in preparation for redevelopment.

Based on these actions and investigations, the previously identified RECs have been variously addressed and revised in accordance with the following summary table:

Previously identified REC (Aspect, 2019a)	Addressed by 2019-2021 actions or Existing Covenant	REC Status
Historical manufacturing on property by Western Blower; large engine maintenance/cleaning (north warehouse).	Yes, now considered a controlled recognized environmental condition (CREC).	The impacts from historical manufacturing have been evaluated via the Phase II ESA and is mitigated through the restrictive covenant and sump and drain cleaning. This is no longer considered a REC to the Subject Property and is considered a CREC.
Spills and releases to drains and sump from former property use by NWES/Emerald.	Partially addressed, further investigation in progress at sump area.	The former activities by NWES/Emerald Recycling have been evaluated via the Phase II ESA and risk reduced through sump and drain cleaning, though not fully remedied at the sump area. Release around the sump is being evaluated through ongoing subsurface investigation.
Fill soil	Yes, now considered a CREC	Fill soil evaluation has been supplemented by the Phase II ESA and soil is covered under the restrictive covenant. This is now considered a CREC to the Subject Property.
Potential heating oil underground storage tank	Yes	The potential heating oil UST was not identified, and no evidence of impacts were observed in the vicinity of the boiler room. This is no longer considered a REC to the Subject Property.

Additional investigation of environmental conditions is in progress in accordance with a Subsurface Investigation Work Plan prepared by Aspect on September 27, 2024. Once these data are obtained, an Environmental Construction Management Plan (ECMP) will be prepared to guide cleanup of contaminated soil and/or groundwater that may become available during redevelopment, after the north building demolition occurs. At that time, an evaluation regarding a chemical vapor barrier and/or vapor intrusion mitigation measures for the new building will be considered (if needed). Aspect understands ETS is seeking funding assistance from the United States Department of Housing and Urban Development; based on the findings of this study, further investigation and corrective actions needed to ensure the property meets the requirements of 24 CFR 58.5(i)(2)(i) or 24 CFR 50.3(i)(1) are currently underway.

This Executive Summary should only be used in the context of the full report.

1 Introduction

Aspect Consulting, a Geosyntec Company (Aspect), has prepared this Phase I Environmental Site Assessment (ESA) report on behalf of Evergreen Treatment Services (ETS) for the property, referred to herein as the Subject Property. The Subject Property is shown relative to surrounding physical features on Figures 1 and 2, Subject Property Location Map and Subject Property Plan, respectively.

The Subject Property is located at 1700 Airport Way South in Township 24 North, Range 4 East, and Section 8 in Seattle, King County, Washington (Figure 1). It comprises tax parcel no. 766620-2855, totaling approximately 0.75 acres, as indicated in tax assessor records. The Subject Property is currently developed with one building. The south wing includes a former warehouse that has been converted into office space and treatment rooms used by ETS. The north wing is a warehouse most recently used by Emerald Recycling, a subsidiary of Clean Harbors,¹ as part of their used-oil recycling facility. The building was constructed in 1914–1915 as a factory for the Western Blower Company, a manufacturer of industrial blowers for sawmills and furnaces. The north warehouse is currently vacant.

At the time of this study, the Subject Property was owned and occupied by ETS. The Subject Property is zoned MML U/85, “Marine, Manufacturing and Logistics,” which is an area with a concentration of core and legacy industrial and maritime uses, including manufacturing, warehousing, shipping, and logistics activities well served with vehicle and freight transportation infrastructure.

Aspect understands ETS is seeking funding assistance from the United States Department of Housing and Urban Development (HUD). HUD policy, defined in Title 28 of the Code of Federal Regulations (28 CFR), requires the Subject Property demonstrate compliance with 24 CFR 58.5(i)(2)(i) or 24 CFR 50.3(i)(1).

1.1 Purpose

The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs) associated with the Subject Property, to the extent practicable using standard methods, and to document compliance with 24 CFR 50.3(i) or 24 CFR 58.5(i)(2).

As defined by Section 1.1.1 of ASTM International (ASTM) E1527-21, the term REC means the presence or likely presence of hazardous substances or petroleum products in, on, or at the Subject Property under conditions that indicate a release, or that pose a material threat of a future release to the environment, including into structures on the properties or into the ground, groundwater, or surface water of the properties. RECs can be further evaluated and categorized as:

¹ Emerald Recycling (an oil recycling facility—aka Emerald Services and previously Northwest EnviroService) was sold to Clean Harbors in 2016.

- Controlled RECs (CRECs), defined as “a recognized environmental condition affecting the Subject Property that has been addressed to the satisfaction of the applicable regulatory authority, or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations, or other property use limitations).”

CRECs are considered a REC; however, the risk to the property can be low if the engineering controls and subsurface conditions remain unchanged.

- Historical RECs (HRECs), defined as “a previous release of hazardous substances or petroleum products affecting the Subject Property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the Subject Property to any controls (for example, activity and use limitations or other property use limitations).”

HRECs are not considered RECs because the represented conditions have been previously addressed to the satisfaction of the applicable regulatory authority with no use restrictions, and do not pose a threat of environmental impact to the property.

A summary of the RECs, CRECs, and HRECs to the Subject Property, if identified, is presented in Section 5.2 of this report. The Phase I ESA was performed in general accordance with the ASTM E1527-21 guidelines and the U.S. Environmental Protection Agency’s (EPA) Title 40 Code of Federal Regulation (40 CFR) Part 312 *Standards and Practices for All Appropriate Inquiries (AAI)*. Deviations from these guidelines are described in Section 1.3 of this report.

1.2 Scope of Work

The scope of services for this ESA consisted of the following tasks:

Site Reconnaissance

1. Conduct a visual inspection of the Subject Property and surrounding properties to identify potential sources of contamination and to document the status of the Subject Property at the time of this assessment. Photographs obtained during the site reconnaissance are included in Appendix A.

Interviews

2. Interview the ESA User, the Key Site Manager (as defined by ASTM) with knowledge of the current and historical uses of the Subject Property, current occupants (as applicable), and a representative of the state and/or local agencies, such as the local fire department, health department, and/or state environmental or human health regulatory agencies as necessary. The User Questionnaire is included in Appendix B.

Records Acquisition and Review

3. Review all previous environmental reports for the Subject Property located by the study and evaluate the environmental risk associated with report findings. Pertinent sections of previous environmental reports are included in Appendix B.
4. Review historical records and physical setting information to identify past land-use activities and hydrogeologic conditions at the Subject Property (to the first developed use,² or 1940, whichever is earlier) and surrounding properties, and evaluate the environmental risk associated with the identified activities. Historical records obtained are included in Appendix C.
5. Contact potential sources of environmental records, including federal, state, and tribal regulatory databases, and review records provided to identify facilities with past or current regulatory enforcement activities of environmental concern. The search includes facilities on, or formerly on, the Subject Property, adjoining properties, and surrounding area, at distances designated in ASTM E1527-21. The regulatory database search report is included in Appendix D.

Evaluation and Report

6. Preparation of this Phase I ESA report to document the findings, significant data gaps, and conclusions of the assessment, and to present recommendations for further investigation, if needed. A “significant data gap” is defined as a lack of or inability to obtain information required by this practice despite *good faith* efforts to gather information that affects the ability of the environmental professional to identify a REC. Declaration of the environmental professional who completed this assessment is included in Section 7.

The scope of services did not include an environmental compliance audit or a hazardous building material (HBM; e.g., asbestos, lead-based paint, radon, lead in drinking water, toxic mold, urea-formaldehyde insulation, and other materials) survey of onsite structures or debris as part of this Phase I ESA. If existing HBM reports were provided for Aspect review, they are summarized in Section 4.3.

The scope of services does not specifically include evaluation of business environmental risks (BERs), defined as “a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of commercial real estate, and is not necessarily an issue required to be investigated in this practice.” However, if evidence of BERs was revealed during the scoped Phase I ESA research, they are summarized in Section 5.

The scope of services did not include soil, groundwater, soil gas, indoor or outdoor air, or surface water sampling. If existing environmental reports describing sampling activities were provided for Aspect review, they are summarized in Section 4.3.

² The term “developed use” as defined in ASTM E1527-21 “includes agricultural uses and placement of fill dirt, and other uses that may not involve structures.”

1.3 Significant Assumptions

The conclusions of this Phase I ESA are based on research of readily available and reasonably ascertainable³ current and historical information sources, interviews, and a site reconnaissance visit as described in Section 1.1. When possible, Aspect researched multiple sources to corroborate information. Aspect has assumed that the information sources reviewed are correct unless another source indicated otherwise.

1.4 Deviations

Aspect did not enter and observe all office and clinical spaces within the existing Subject Property building during our site reconnaissance, because the spaces were either closed or in active use; however, representative spaces were observed to gather knowledge on typical use of all spaces. The unobserved spaces are unlikely to contain more than de minimis quantities of hazardous materials and this deviation is unlikely to alter the findings of this study and is not considered a significant data gap.

³ The term “reasonably ascertainable” is defined in ASTM E1527-21 as “information that is (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints, and (3) practically reviewable.”

2 User-Provided Information and Interviews

This section presents a summary of the information provided to Aspect by the User, the Subject Property representative identified as the Key Site Manager for this study, and information available in Aspect's files for the neighborhood.

2.1 User Questionnaire and Interview

Aspect provided a copy of the User Questionnaire included in Appendix B. The User provided information regarding the current, past, and future planned use(s) of the Subject Property, incorporated by reference throughout this report.

2.1.1 Information Regarding Environmental Liens

An environmental restrictive covenant for the Subject Property parcel was recorded with King County in 2018. This activity and use limitation (AUL) and supporting environmental data are discussed in Section 4.3. Environmental liens pertaining to the Subject Property were not identified by the User or over the course of the research for this study.

2.2 Property Representative Interview

Nathan Dickey from Aspect interviewed Mr. John Chandler, Real Estate Manager at ETS and the Key Site Manager identified for this study. Information provided by interview included information on property uses prior to redevelopment, details on the redevelopment construction and concurrent cleanup action, and information on the current uses of the building. Mr. Chandler is unaware of any releases, spills, or other conditions of potential environmental concern other than those discussed in the prior environmental reports (see Section 4.4). Information provided by the Key Site Manager is incorporated by reference throughout this report.

3 Subject Property Reconnaissance

This section presents the site reconnaissance activities, observations, and findings pertaining to the Subject Property and adjoining properties. Approximate locations of the features described below are shown on Figure 2, Site Plan. Photographs are provided in Appendix A.

3.1 Subject Property Observations

The site reconnaissance was performed on September 4, 2024, by Nathan Dickey from Aspect to document the current features, activities, uses, and conditions of the Subject Property. The site reconnaissance focused on areas or uses with potential environmental implications (if present), including potential chemical storage, chemical usage, and waste disposal practices, and signs of activities other than those documented in the historical records. Aspect was accompanied by John Chandler, Real Estate Manager with ETS. The Subject Property was accessed via Airport Way South. Aspect did not enter and observe all office spaces or treatment rooms within the existing Subject Property building during our site reconnaissance; however representative spaces were observed. Because the unobserved spaces are unlikely to contain more than de minimis quantities of hazardous materials, this deviation is unlikely to alter the findings of this study and is not considered a significant data gap. A summary of our observations is provided in Table 1, below.

Table 1. Subject Property Observations

Feature	Observed?		Comments	Finding
	Yes	No		
Evidence of underground storage tanks (USTs)		X	Not Observed.	None
Aboveground storage tanks (ASTs)		X	Not Observed.	None
Chemical, hazardous substances, and petroleum products use or storage		X	Not Observed.	None
Hydraulic hoists		X	Not Observed.	None
Drums or other containers		X	Not Observed.	None
Evidence of leaks and spills of hazardous materials or corrosion		X	Not Observed.	None
Evidence of past uses of the Subject Property	X		The north portion of the building was historically used as a used-oil recycling facility, and is a historical warehouse building.	None
Hazardous waste		X	Not Observed.	None
Solid waste	X		Refuse dumpsters are located in the parking area on the east side of the property, and additional dumpsters are located inside the garage of the north portion of the building.	None
Universal Waste		X	Not Observed.	None

Feature	Observed?		Comments	Finding
	Yes	No		
Potable water supply	X		Municipal System.	None
Sewage disposal system (including septic systems and drainfields)	X		Municipal System.	None
Heating/Cooling System	X		A natural gas heater was observed in the basement of the southern portion of the building. The northern heating unit was not observed.	None
Electrical transformers or other polychlorinated biphenyl-containing (PCB) equipment		X	Not Observed.	None
Interior floor drains, sumps, or dry wells	X		Floor drains observed in the floor of the north portion of the building. Sump located at the southeast corner of the north warehouse. The sump was empty, had been recently cleaned, and is no longer in use. The sump formerly pumped to the exterior AST removed in 2021.	None
Stormwater drainage	X		Four catch basins observed along the paved parking area on the east side of the building. A review of the City of Seattle side sewer card indicted catch basins discharge to city combined main sewer in Airport Way South, near the driveway at the center of the property.	None
Oil/water separators		X	Not Observed.	None
Standing water or pools of liquid (e.g., pits, ponds, lagoons, etc.)		X	Not Observed.	None
Wells (including dry wells, irrigation wells, injection wells, abandoned wells, water supply, monitoring wells, or other wells)	X		Monitoring wells installed during previous investigations (see Section 4.3) were observed in the locations shown on Figure 2.	None
Discolored or stressed vegetation		X	Not Observed.	None
Discolored or stained pavement		X	Not Observed.	None
Unusual odors		X	Not Observed.	None
Other Environmental Condition(s) of Concern		X	Not Observed.	None

3.2 Adjoining Property Use Observations

Adjoining properties were observed from adjacent rights-of-way on September 4, 2024. Adjoining properties or buildings were not entered. A description of the conditions observed on the adjoining properties during the site reconnaissance is presented below.

North – The north-adjacent property is occupied by Emerald Recycling/Clean Harbors as a used-oil recycling facility. Site use and environmental investigations related to this facility are discussed in more detail in Section 6.2.2.

East – Interstate 5 is located east of the Subject Property.

South – The south-adjacent property is a multitenant light industrial property. Tenants include a clothing print shop, cabinet maker, recording studio, window tinting service, product design studio, and martial arts school.

West – The property to the west across Airport Way South includes Holgate Center office building and CenturyLink garage and storage facility. Tenants of the Holgate Center include Department of Social and Health Services and Quest Diagnostics.

Adjoining-property uses and locations relative to the Subject Property are shown on Figure 2, Site Plan. Adjoining property uses do not represent RECs to the Subject Property.

4 Records Review

This section summarizes the records review findings for the Subject Property and for adjoining and surrounding properties, including current use and development, physical setting, historical uses, and regulatory agency and database records.

4.1 Physical Setting

According to the Geologic Map of Seattle, produced by the U.S. Geological Survey (USGS) and the Pacific Northwest Center for Geological Mapping Studies, the Subject Property and properties westward are underlain by tide flat deposits. The steep hillslope to the immediate east is underlain mainly by Quaternary continental glacial drift deposits from the Pleistocene, including pre-Fraser-age glaciation, about 70,000 to 20,000 years ago (Troost et al., 2005). Historical Sanborn maps for the predevelopment Subject Property vicinity indicate that the Elliott Bay tide flats were located at the Subject Property, and Airport Way South was a plank road. The tide flats were filled in the early 1900s. Today, the immediate Subject Property vicinity is generally flat and situated at approximate elevation 25 feet above mean sea level (msl), as shown on the current USGS 7.5-minute topographic map for Seattle South, Washington, included in Appendix D.

Based on our review of boring logs from adjacent properties, properties in the vicinity are often underlain by approximately 10 feet of imported fill containing wood, brick, slag, concrete, and metal debris. Previous explorations on the north-adjacent property encountered alternating strata of clay, silt, and silty sand beneath imported fill soil. Subsurface investigations completed to the north identified two water-bearing zones separated by a clay unit. The shallower aquifer is at 10 to 15 feet below ground surface (bgs) and the lower aquifer below 20 feet bgs. Monitoring wells completed in the shallow aquifer indicate groundwater flow is to the west.

No surface water was noted on the Subject Property during the site reconnaissance visit and the nearest surface water body is the Duwamish Waterway, approximately 1 mile west of the Subject Property.

4.2 Historical Use Information

- The history of the Subject Property and adjoining properties was compiled through review of historical sources and reasonably ascertainable information pertaining to the Subject Property. Historical sources reviewed by Aspect included:
- Aerial photographs obtained from Environmental Data Resources, Inc. (EDR) and King County dated 1936, 1943, 1953, 1956, 1965, 1969, 1977, 1980, 1985, 1990, 2006, 2011, 2015, and 2019.
- Sanborn® Fire Insurance maps obtained from EDR dated 1893, 1904, 1916, 1950, and 1969.
- Topographic maps obtained from EDR for the years 1894, 1895, 1897, 1908, 1909, 1968, 1973, 1983, 2014, 2017, and 2020.

- Excerpts from historical city directories obtained from EDR for approximate 5-year intervals from 1920 to 2020. Note that Airport Way South address numbering changed such that the Subject Property was listed at 1800 Airport Way South prior to 1980.
- Current and historical tax assessor documents provided by King County and Puget Sound Archives.
- Historical site plans that ETS acquired from Seattle Department of Construction and Inspection (SDCI).
- Pertinent information provided during interviews with the User, Key Site Manager for the Subject Property, and others.

The historical resources acquired during this study are in general accordance with the requirements of ASTM 1527-21. Copies of the historical records obtained from the sources above are provided in Appendix C. The following subsections provide the findings of the historical review.

4.2.1 Subject Property

The earliest identified development of the Subject Property is recorded in the 1893 Sanborn Map, which shows the lot as residential properties possibly built on wharf-like structures at the eastern edge of the Elliott Bay tide flats. At that time, present-day Airport Way South was a wood plank road.

Tax assessor records indicate the Subject Property was developed in 1914 by Western Blower Company. The 1916 Sanborn map only illustrates the south warehouse suggesting the factory was built incrementally. A 1937 historical tax assessor record indicates a 350-gallon fuel tank was on the property and the building was heated with an oil burner and depicts the boiler room in the central portion of the building. SDCI's historical building plans from 1942 indicate the basement of the north wing included a paint spray booth and shop and plating areas. City directory listings indicate Western Blower occupied the property until the 1960s, and the Subject Property is listed as vacant in the 1970s.

NWES started operating a tank cleaning service north of the Subject Property in the late 1970s. As detailed in Section 4.3, NWES expanded operations to the Subject Property in 1987. NWES operated a commercial hazardous waste management facility, providing storage and treatment to businesses that generate hazardous waste up until 1995. NWES moved out of the south wing of the Subject Property building in 1995 and vacated the north wing of the Subject Property building in 2020.

Tax assessor records indicate the southern Subject Property building was renovated in 1997 for use by ETS. ETS acquired the Subject Property from NWES in 2021.

SUMMARY – The historical use of the Subject Property for manufacturing and oil-related warehousing of materials and use of heating oil may have resulted in releases of petroleum, solvents, and/or metals to subsurface soil and/or groundwater, which is a REC to the Subject Property. Based on the previous investigations conducted at the Subject Property (as detailed in Section 4.3), evidence of impacts of solvents and metals in soil and groundwater above MTCA Method A cleanup levels (CULs) have been identified,

and contamination in soil gas has been detected at concentrations exceeding MTCA Method B screening levels protective of indoor air quality.

4.2.2 Adjoining and Surrounding Properties

Adjoining and surrounding properties have been generally developed since as early as the 1890s with residential developments north, south, and east of the Subject Property. The Elliott Bay tide flats bordered the Subject Property to the west, which by the mid-1910s were mostly filled. Subsequent uses are as follows:

North – A service station operated on the property north of the Subject Property from the 1920s into the 1950s, after which the property is listed vacant in city directories. A battery supply store operated on the property in the 1960s and 1970s. In the 1980 aerial photo, the north-adjacent property is vacant and used for parking. Tax assessor records indicate the large tanks currently present on the property were installed in the early 1980s by NWES, for its oil recycling business which remains on the property today.

West – Properties on the west side of Airport Way South were undeveloped until the early 1950s. The present-day office building west of the south Subject Property building was built in 1951. Tenants have included Western Electric Company, Eddie Bauer mail order offices, Quest Diagnostics, and Washington State Department of Social and Health Services.

South – The south-adjacent property was developed with a flour mill in the early 1900s. The property was redeveloped with a radiator manufacturing facility by 1916; however, the building is no longer present in the 1936 aerial photo. From the 1940s through the 1970s, the property was occupied by Bay Construction, excavation contractors. During this period, the area immediately south was used as a storage yard, and a building was located at the northeast corner of South Holgate Street and Airport Way South. As discussed in Section 4.4, the property to the south underwent a cleanup during redevelopment.

East – Railroad tracks were located on the east side of the property from the early 1900s until they were removed in the 1980s. A steep hillslope is located east of the Subject Property. It has been mostly undeveloped with some residences in the early 1900s to 1940s. Interstate 5 is shown under construction in the 1965 aerial photo and completed by 1969.

Historical uses of adjoining and surrounding properties do not represent environmental concerns to the Subject Property, except for those discussed in Section 4.4.

4.3 Previous Environmental Reports

A total of five previous environmental reports were identified for the Subject Property:

- 1) “Northwest EnviroService Inc. Interim Status Closure Plan, Western Blower Property” (Closure Plan; NWES, 1995)
- 2) “Northwest EnviroService Inc, Western Blower Property RCRA Closure Sampling Results” (Results Report; NWES, 1996)
- 3) “Phase I Environmental Site Assessment” (2019 Phase I; Aspect, 2019a)

- 4) “Phase II Environmental Site Assessment” (Phase II; Aspect 2019b)
- 5) “Sump Cleanout and Soil Gas Sampling Memorandum” (Sump and Soil Gas Memo; Aspect, 2020).
- 6) “Phase I Environmental Site Assessment” (2021 Phase I; Aspect, 2021A)
- 7) “Preconstruction Environmental Actions and Next Steps” (Preconstruction Memo; Aspect, 2024a)
- 8) “Subsurface Investigation Work Plan” (Aspect, 2024b)

Copies of these reports are provided in Appendix B.

4.3.1 Environmental Studies in 1995 and 1996

From 1987 to 1995, NWES operated a hazardous waste treatment and storage facility that occupied 1.3 acres between Airport Way South and Interstate 5, spanning from South Atlantic Street to the north and South Holgate Street to the south. The main treatment part of this facility occupied the property immediately north of the Subject Property, but it also extended onto, and included the Subject Property. Site operations were regulated by the Washington State Department of Ecology (Ecology) under the Resource Conservation and Recovery Act (RCRA).

In 1995, NWES discontinued its hazardous-waste operations and started RCRA closure of the hazardous-waste handling aspect of the facility. Since their use of the Western Blower Property (Subject Property) was limited, closure of this portion of the property was conducted separately from the remainder of the property to the north where more hazardous-waste handling (aka oil recycling) activities were focused. The following provides a summary of NWES’s use of the Subject Property, as provided in the 1995 and 1996 NWES reports, and closure activities completed in 1995. The Closure Plan includes the shed-like structure just north of the Subject Property; however, our summary focuses on the Subject Property.

Little information is available in the 1995 and 1996 NWES reports providing specifics on site use, or chemical handling or storage. NWES states in the reports that Subject Property use included “administrative and warehouse activities,” and “Sealed and containerized wastes were unloaded from trucks at the load/unload dock and transported to the north-adjacent NWES property for processing.” The loading dock near the center of the Subject Property building was used for loading and unloading hazardous waste. Containerized waste was then transferred to the north-adjacent parcel, also owned by NWES, for processing. NWES used the Subject Property warehouse space to store pumps, hoses, and other equipment. The north warehouse included an area for repairing pumps and a parts washer.

A figure in the report refers to the north warehouse as the “Stores Building.” King County tax assessor records indicate that the southern portion of the south wing included laboratory space for organic and inorganic sample preparation, most likely for waste disposal characterization.

The 1995 Closure Plan stated the following activities were to be completed for site closure:

- Remove waste inventory
- Decontamination of site concrete, sumps, tanks, and equipment
- Disposal of contaminated materials
- Collection of samples to certify completion of closure

The language in the 1995 report does not provide details about specific storage tanks or sumps to be decontaminated on the Subject Property. The 1996 report provides results from the post-closure sample collection that included three concrete samples, two shallow soil samples, and two groundwater samples from wells MW-1 and MW-2. Sample locations are depicted on Figure 2. Samples were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCS), pesticides, polychlorinated biphenyls (PCBs), sulfide, total petroleum hydrocarbons (TPH), dioxins, metals, and cyanide.

Concrete samples had elevated metals concentrations with cadmium at 200 milligrams/kilogram (mg/kg), exceeding the Washington State Model Toxics Control Act (MTCA) cleanup level for cadmium for unrestricted land use. Arsenic, TPH, and benzo(a)pyrene (BaP) were detected in soil samples with only BaP exceeding the MTCA Method A CUL at that time of 0.1 mg/kg (the current MTCA Method A CUL for BaP is 0.19 mg/kg). Manganese was detected in groundwater at a concentration of 3,400 micrograms/liter (µg/L), which has a drinking water standard of 2,200 µg/L.

In 1997, Ecology provided an opinion that No Further Action (NFA) or investigation would be required for site closure (at the Subject Property; Ecology, 2017); however, a restrictive covenant would need to be placed on the property. The restrictive covenant has the following stipulations:

- The property shall be used in compliance with General Industrial 2 zoning classification per City of Seattle ordinances.
- Property groundwater shall not be used for domestic, agricultural, industrial, or any other use.
- Existing structures cannot be altered or modified in any manner that may result in the release or exposure to the environment of contaminated soils or concrete, without prior Ecology approval.
- Existing paved surface must be maintained to prevent the release or exposure to the environment of contaminated soils or concrete. Any activity that would pierce or damage the surface is prohibited, without prior Ecology approval.

These environmental (aka restrictive) covenant requirements will need to be upheld and honored during redevelopment of the Subject Property.

4.3.2 Environmental Studies in 2019, 2020, and 2024

The RECs identified in Aspect's Phase I ESA (Aspect, 2019a) include historical manufacturing operations by Western Blower Company and hazardous and nonhazardous

waste handling by NWES, as well as former used-oil waste handling in the northern warehouse of the Subject Property. These property-use activities indicated a potential for petroleum, solvents, and metals contamination to soil and/or groundwater at the Subject Property from on-property potential sources, and a risk for vapor encroachment or intrusion to the Subject Property structures.

Based on the RECs identified in the Phase I ESA, Aspect completed a Phase II ESA (Aspect, 2019b) consisting of soil, groundwater, and soil gas sampling and testing to:

- Evaluate the presence and nature of volatile contaminants of potential concern (COPCs) in soil gas beneath the Subject Property.
- Evaluate the potential presence of soil contamination associated with current or past sources of contamination on the Subject Property or nearby adjacent properties.
- Evaluate the potential presence of groundwater contamination associated with current or past sources of contamination on the Subject Property or nearby upgradient properties.

The Phase II ESA included installation of four permanent groundwater monitoring wells (AMW-1 through AMW-4; Figure 2) on and off the Subject Property and completion of four temporary soil gas sampling points. Soil, groundwater, and soil gas samples were collected and submitted for laboratory analysis. Soil observed in the borings included fill material up to a depth of 15 to 19 feet bgs. Fill soils were underlain by a clay to sandy clay unit, representative of historical tideflat deposits. Groundwater was encountered in all four monitoring wells at a depth of 4.5 to 5.7 feet bgs, with a westerly flow direction (Figure 5).

Six soil samples were submitted for analysis based on field observations and relative to identified RECs, including gasoline-, diesel-, and oil-range TPH (using methods NWTPH-Gx, and NWTPH-Dx), and metals (arsenic, cadmium, chromium, copper, lead, manganese, mercury, nickel, and zinc) using EPA Method 6020B. In addition, two samples were submitted for analysis of VOCs using EPA Method 8260D and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) using EPA Method 8270D/SIM. Contaminants of concern either were not detected or were detected at concentrations less than cleanup levels in soil and/or groundwater, except for the following:

- Two analytes were detected in one soil sample above the MTCA Method A cleanup levels. These exceedances were at 12.5 feet bgs at location AMW-1 at concentrations of 27.8 and 4,720 mg/kg for arsenic and lead, respectively. The arsenic value slightly exceeds the CUL of 20 mg/kg, while lead was greater than the CUL of 250 mg/kg (Figure 3).
- Vinyl chloride was detected in groundwater at a concentration of 2.9 µg/L in off-property well AMW-1, exceeding the MTCA Method A CUL. Dissolved arsenic concentrations above the MTCA Method A CUL (5 µg/L) were detected in off-property wells AMW-1 and AMW-3 at concentrations ranging between 11 and 20.3 µg/L, respectively (Figure 4).

Four temporary subslab soil gas samples (SV-1 through SV-4; Figure 6) were collected and submitted for analysis of VOCs. Based on the chemical analytical soil gas results, and vapor intrusion modeling using the Johnson-Ettinger Model for vapor intrusion (JEM), vinyl chloride was predicated to possibly exceed the MTCA Method B CUL in indoor air of the north warehouse. Draft Ecology guidance related to trichloroethene (TCE) vapor intrusion screening⁴ was also referenced in the Phase II ESA report (Aspect, 2019b), and TCE was also considered a potential chemical that could intrude into the north warehouse building at levels exceeding screening levels. The model did not predict exceedances of contaminants in the south warehouse. Aspect recommended that the sump in the north warehouse (the suspected source of solvents) be cleaned, following which soil gas be resampled in the north wing of the building. The Phase II ESA recommendations also indicated that if “concentrations remain elevated in soil gas, mitigation measures may be necessary (such as active and/or passive venting systems) for that portion of the building to be occupied.”

In 2020, the basement sump in the north warehouse, and on-site stormwater system (five catch basins around the Subject Property), were cleaned (Aspect, 2021). After the sump and stormwater systems were cleaned, two subslab soil gas samples were collected and analyzed for VOCs and air-phase petroleum hydrocarbons. Based on the chemical analytical soil gas results, the following contaminants were detected at concentrations greater than the MTCA Method B screening levels (adjusted to commercial exposure): benzene, TPH, TCE, and vinyl chloride.

In 2024, ETS began the process of designing and planning for building demolition and then a multiphased redevelopment. The initial phase of redevelopment will include construction of a Dispensary building on the north portion of the Subject Property followed by future support structures to facilitate ETS’ mission. In the Preconstruction memo (Aspect, 2024a), Aspect provided a summary of the environmental conditions of the Subject Property and next steps including development of a Subsurface Investigation Work Plan (Aspect, 2024b). The Subsurface Investigation was implemented in October 2024 and is ongoing as of November 25, 2024.

Locations of samples collected during historical and recent environmental investigations are included on Figure 2.

4.4 Regulatory Environmental Records Review

This section presents information from regulatory agency records and database listings. A summary of the requested records, and including response status of the agencies contacted, is presented below and review findings are presented in Table 2.

Regulatory Environmental Database Search – Aspect contracted EDR to conduct a regulatory agency databases search for listings pertaining to the Subject Property and surrounding properties within the ASTM approximate minimum search distances. The database search was completed on August 16, 2024. For the remaining database search results, Aspect used the following screening criteria to focus the review based on the high

⁴ Now incorporated into updated guidance regarding vapor intrusion assessment (Ecology, 2022)

density of listed sites in the area and our understanding of the hydrogeologic conditions in the vicinity:

- Aspect reviewed all database listings information for the Subject Property and adjacent properties.
- Nonadjacent sites considered low risk for contaminant migration to the Subject Property were not reviewed. For this study, low-risk criteria are:
 - Sites listed only on databases that are not indicative of a past release were considered low risk and were not reviewed.
 - Sites located greater than 0.5 miles in any direction from the Subject Property.
 - Sites located downgradient and greater than 0.25 miles from the Subject Property.

The results of the database search by EDR are included in Appendix D.

Washington Pollution Liability Insurance Agency (PLIA)—Aspect requested a file review for the Subject Property, adjoining properties that were identified in the regulatory databases, and for nearby listed sites that were identified as listed sites of concern during Aspect’s review of the database listings. PLIA replied with no responsive records for the Subject Property.

Washington State Department of Ecology—Aspect requested a file review for the Subject Property, adjoining properties that were identified in the regulatory databases, and for nearby listed sites that were identified as listed sites of concern during Aspect’s review of the database listings. Aspect received a response to our request identifying multiple files for review for the north-adjacent property, Northwest EnviroServices. Details are discussed below.

King County Public Records Program—Aspect submitted a public records request to King County on September 10, 2024, for any Subject Property records maintained by King County’s health and environmental departments. King County replied with no responsive records for the Subject Property.

Seattle Fire Department—Aspect contacted the Seattle Fire Marshal’s Office on September 10, 2024, to request any records pertaining to hazardous materials storage or incidents at the Subject Property. Aspect received a response to our request identifying multiple files for the Subject Property and north adjacent properties, which indicated required maintenance of sprinkler systems which were in violation of fire code. Aspect also reviewed Seattle Fire Department records for permitted residential UST decommissioning, which has been required since 1996, and is published online. No records were found for the Subject Property.

The following table presents a summary of the pertinent information from the regulatory database listings and regulatory agency records review for the Subject Property and adjacent or surrounding properties.

Table 2. Regulatory Agency and Database Review

Listed Site	Regulatory Databases	Finding
Subject Property		
Northwest EnviroServ 1700 Airport Way S	FINDS, FTTS, HIST FTTS, EDR HIST AUTO	REC
<p>The Subject Property was identified by EDR on the following regulatory databases: FINDS, FTTS, HIST FTTS, and EDR Hist Auto. These listings are related to waste reporting issues by NWES from the early 1990s when they occupied the Subject Property. NWES failed to report storage of polychlorinated biphenyl (PCB) waste on the property, but subsequent soil and groundwater sampling did not detect PCBs at concentrations exceeding applicable cleanup levels (NWES, 1996). NWES's historical use of the Subject Property and contamination identified in subsequent investigation associated with NWES' historical use (discussed in Section 4.3.1) constitutes a REC.</p>		
Adjacent Properties		
Northwest EnviroServ 1500 to 1700 Airport Way S North adjacent Crossgradient	SEMS-ARCHIVE, CORRACTS, RCRA-TSDF, RCRA-LQG, WA CSCSL, WA UST, WA ALLSITES, 2020 COR ACTION, RAATS, PADS, WA MANIFEST	NOT A REC

ASPECT CONSULTING

Listed Site	Regulatory Databases	Finding
<p>NWES operated a commercial hazardous waste management facility from 1979 through 1995, providing storage and treatment to businesses that generate hazardous waste. NWES received and treated various waste streams, including wastewater, used oil, metals, solvents, paint, and corrosive materials. Since 1995, Emerald Recycling has been recycling nonhazardous waste and used oil, and treating industrial wastewater at the NWES Facility. As a hazardous waste management facility, NWES was identified by EDR on multiple regulatory databases including the Federal Superfund Enterprise Management System Archive (SEMS-ARCHIVE), Resource Conservation and Recovery Act (RCRA) Corrective Action (CORRACTS), RCRA Treatment Storage and Disposal list (TSDF), RCRA Large Quantity Generator (LQG), RCRA Administrative Action Tracking System (RAATS), and PCB Activity Database System (PADS) lists; and Ecology's Confirmed and Suspected Contaminated Sites List (CSCSL), SPILLS, and Underground Storage Tank (UST) lists.</p> <p>Aspect reviewed Ecology files for the NWES facility. In 2002, NWES completed a RCRA Facility Investigation, which included soil sampling and groundwater monitoring (NWES, 2004). Soil and groundwater were contaminated from releases related to NWES's site use. The more heavily impacted area was approximately 400 feet north of the Subject Property. Groundwater flow, thus contaminant transport, is to the west towards Airport Way South.</p> <p>The nearest groundwater monitoring well to the Subject Property on this property, MW-7, is located approximately 125 feet north of the northwest Subject Property corner. Benzene and vinyl chloride, which pose a potential risk for vapor intrusion impacting indoor air, were detected in groundwater at 7 µg/L and 1 µg/L, respectively. These values exceed MTCA Method B screening levels for assessing potential impacts to indoor air, which are 2.4 µg/L and 0.3 µg/L, respectively for benzene and vinyl chloride.</p> <p>File records also include data related to a 100–200-gallon diesel release that occurred in May 2012 at the south end of the NWES property, west of the south tank farm (CH2MHill, 2012). Approximately 22 cubic yards of soil were removed from the sidewalk area between the NWES property and Airport Way South. Further excavation was reportedly not feasible due to the presence of major subsurface utilities. The contaminated area is crossgradient of the Subject Property; therefore, not considered a REC.</p>		
US WEST SERVICES 1709 AIRPORT WAY S West adjacent Downgradient	CSCSL, LUST, UST and VCP	NOT A REC
<p>According to the database listings and Ecology's website, benzene, diesel, gasoline, and unspecified petroleum were confirmed in soil and groundwater above applicable cleanup levels at this site. The Site is listed as "cleanup started." The Site is located downgradient of the Subject Property; therefore, it is not considered a REC.</p>		
VECA ELECTRIC 1762 AIRPORT WAY S South adjacent Crossgradient	CSCSL, LUST, and UST	NOT A REC

Listed Site	Regulatory Databases	Finding
<p>The Veca Electric Site was operated as a general contractor storage and repair garage from the 1940s to 1970s. During the redevelopment of the site in 2009, cleanup activities occurred at the site, to address releases from former leaking USTs located on the site. According to the Ecology's website, documents, the LUST was reported in 1992, and benzene, diesel, and gasoline were confirmed in soil above the applicable cleanup levels, and the initial investigation occurred in 2011. Based on Ecology's files, a 2013 status update letter indicated that an area of contamination exists at this property, in the proximity of the former underground storage tanks. The Site status is listed as "cleanup started."</p> <p>The former UST area is likely located slightly greater than 200 feet from the Subject Property (the exact location is unknown and not shown on Figure 2), and is cross-gradient of the Subject Property; therefore, it is not considered a REC.</p>		
Surrounding Properties		
<p>ATLANTIC OPERATING BASE 1555 AIRPORT WAY S 250 feet northwest Downgradient</p>	<p>CSCSL, LUST, UST, ALLSITES, CSCSL NFA, MANIFEST</p>	<p>NOT A REC</p>
<p>According to the database listing and Ecology records, a site assessment conducted at this property in 1991 revealed concentrations of diesel-range TPH exceeding the applicable MTCA Method A cleanup level in soil near the "Fuel/Wash" building featuring 13 USTs for various petroleum products. Subsequent investigation revealed TPH-related VOCs including benzene at concentrations exceeding applicable MTCA Method A cleanup levels in groundwater. Following a UST replacement program involving the replacement of 18 USTs across the property, groundwater investigation found no detectable concentrations of TPH or related VOCs in groundwater on the property.</p> <p>Ecology issued an NFA determination on January 16, 2001. Based on the lack of detected contamination following the UST replacement program, NFA determination, and downgradient location of this property, it is not considered a REC.</p>		

4.4.1 Area-wide Contamination

Aspect also conducted a search of state and federal websites for readily available information that may concern area-wide soil and groundwater contamination in the Subject Property vicinity.

Asarco Smelter Plume – According to Ecology's website, widespread lead and arsenic contamination in near-surface soil has been identified throughout a large zone in the south Puget Sound region that originated from an Asarco copper smelter that historically operated in Tacoma, Washington for over 100 years (Ecology, 2021). The Subject Property is located inside the zone, in the area of least impact with typical range of arsenic detections between nondetect and 20 parts per million (ppm; the MTCA cleanup level for arsenic). Based on our experience in the neighborhood, there is low likelihood of significant impact to the Subject Property from the Asarco smelter, and it is not considered a REC.

Radon Zones – According to EPA's Map of Radon Zones (EPA, 2021), the Subject Property vicinity and King County are mapped within Radon Zone 3, defined as areas with low potential for radon gas and a predicted average indoor screening levels of less than 2.0 picoCuries per liter (pCi/L). This is well below the EPA recommended Action Level for radon of 4.0 pCi/L; therefore, radon is not considered a REC.

5 Evaluation

5.1 ASTM Significant Data Gaps

No significant data gaps were identified during this assessment.

5.2 Findings and Conclusions

Aspect has performed a Phase I ESA in conformance with the scope and limitations of ASTM E1527-21 for the Subject Property located at 1700 Airport Way South in Seattle, Washington. Any exceptions to, or deletions from, this practice are described in Section 1.3 of this report. This Phase I ESA is an update to two prior Phase I ESAs completed for this property.

Aspect completed a Phase I ESA in 2019, when ETS was first considering purchase of the Subject Property, and a Phase I ESA update in 2021, prior to ETS' purchase of the property that year. The property use prior to ETS' purchase spanned two time periods each representing RECs: industrial fan/blower manufacturing and large engine repair by Western Blower from 1915 to the 1960s, and then oil recycling support facilities by NW EnviroService (NWES, later Emerald Services) from 1987 to 2021. Concerns related to these historical activities included the potential release of hazardous chemicals (primarily petroleum hydrocarbons, metals, and solvents) into drains and sump at the Subject Property. Other RECs included the potential for impacted fill soil imported from an unknown source (common contaminants of concern in fill soil is petroleum hydrocarbons, metals, and PAHs) and the possibility for a heating oil underground storage tank on the property near the building's boiler room.

Based on this 2024 Phase I ESA, the RECs are managed and/or are being mitigated as follows:

Restrictive Covenant for Fill Soil Capping and Prohibition on Use of Groundwater.

As a result of soil and groundwater testing in the 1990s across the subject property (and NWES facility to the north), and for Ecology to offer an NFA determination for the Subject Property, Ecology requested that a restrictive covenant be recorded for the property. The covenant requires the ETS building, and pavement be maintained as a protective cover over subsurface contamination, including arsenic, lead, BaP, and oil-related TPH. Notification to Ecology is required for redevelopment or other disturbance to the cover. The restrictive covenant also includes a prohibition of groundwater use due to elevated concentrations of manganese in groundwater at well MW-1.

Phase II ESA, Interim Action, and Planned Redevelopment. Aspect completed a Phase II ESA (Aspect, 2019b) consisting of soil, groundwater, and soil gas sampling and testing to evaluate the RECs identified in the 2019 and 2021 ESAs. The investigation included installation of four groundwater monitoring wells on the Subject Property and off-property and sampling and testing of six representative soil samples and four groundwater samples from the monitoring wells. In addition, soil gas was sampled for the first time at four locations beneath the building. In soil and groundwater, the results of the Phase II ESA investigation indicated that contaminants of concern (VOCs; gasoline-, diesel-, and oil-range TPH; cPAHs; and metals) either were not detected or were detected

at concentrations less than MTCA Method A or B CULs, except for one soil sample from AMW-1 and the groundwater samples from AMW-1 and AMW-3, both of which are located off the property in the right of way. The contaminants detected were arsenic and lead in the soil sample, and vinyl chloride and arsenic in groundwater. Because these contaminants were not detected in soil or groundwater on the property, a direct relationship to a source could not be drawn by the study. However, if those contaminants are present in fill beneath the subject property, it would be covered by the Restrictive Covenant that already exists.

The more significant issue resulting from the Phase II ESA was the presence of chlorinated solvents (TCE and vinyl chloride) that were detected in soil gas at concentrations higher than the MTCA Method B screening levels; that, when modeled, had the potential to intrude into the north warehouse. Aspect recommended cleaning the storm drains at the Subject Property and sump in the north warehouse (the unoccupied portion of the project), which occurred in 2020. After this action, follow-up soil gas samples were again obtained and TCE and vinyl chloride in soil gas were found to continue to pose a vapor intrusion risk for the unoccupied north warehouse area. ETS elected not to occupy the north warehouse portion of the building until redevelopment occurred.

Based on these actions and investigations, the previously identified RECs have been variously addressed and revised in accordance with the following summary table:

Previously identified REC (Aspect, 2019a)		Addressed by 2019-2021 actions or Existing Covenant	REC Status
	Historical manufacturing on property by Western Blower; large engine maintenance/cleaning (north warehouse).	Yes, now considered a controlled recognized environmental condition (CREC).	The impacts from historical manufacturing have been evaluated via the Phase II ESA and is mitigated through the restrictive covenant and sump and drain cleaning. This is no longer considered a REC to the Subject Property and is considered a CREC.
	Spills and releases to drains and sump from former property use by NWES/Emerald.	Partially addressed, further investigation in progress.	The former activities by NWES/Emerald Recycling have been evaluated via the Phase II ESA and risk reduced through sump and drain cleaning, though not fully remedied at the sump area. Release around the sump is being evaluated through ongoing subsurface investigation.
	Fill soil	Yes, considered a CREC	Fill soil evaluation has been supplemented by the Phase II ESA and soil is covered under the restrictive covenant. This is now considered a CREC to the Subject Property.
	Potential heating oil underground storage tank	Yes	The potential heating oil UST was not identified, and no evidence of impacts were observed in the vicinity

Previously identified REC (Aspect, 2019a)		Addressed by 2019-2021 actions or Existing Covenant	REC Status
			of the boiler room. This is no longer considered a REC to the Subject Property.

In 2024, ETS began the process of designing and planning for building demolition and then a multiphased redevelopment. The initial phase of redevelopment will include construction of a Dispensary building on the north portion of the Subject Property followed by future support structures to facilitate ETS’ mission. In the Preconstruction memo (Aspect, 2024a), Aspect provided a summary of the environmental conditions of the Subject Property and next steps including development of a Subsurface Investigation Work Plan (Aspect, 2024b). The Subsurface Investigation was implemented in October 2024 and is ongoing as of November 25, 2024.

5.3 Recommendation

Based on the results of this Phase I ESA and ongoing environmental investigation work in October/November 2024, completion of ongoing investigation work and corrective actions are necessary to meet the requirements of 24 CFR 58.5(i)(2)(i) or 24 CFR 50.3(i)(1) for proposed HUD-assisted use. A cleanup action, including excavation of contaminated soil and treatment of contaminated groundwater, should be considered as part of redevelopment plans. At that time, an evaluation regarding a chemical vapor barrier and/or vapor intrusion mitigation measures for the new building will be considered (if needed).

Prior to redevelopment activities, Aspect recommends development of an Environmental Construction Management Plan (ECMP for contractors use during demolition and construction. The ECMP would outline management of soil and groundwater and plan for unanticipated conditions. In addition, Aspect recommends enrolling the Expedited Voluntary Cleanup Program in pursuit of a timely NFA determination and/or revision of the environmental covenant limiting use of the Subject Property following any cleanup action undertaken during redevelopment. An NFA determination from Ecology and/or revision of the environmental covenant is assumed to fulfill the requirements of 24 CFR 58.5(i)(2)(i) or 24 CFR 50.3(i)(1).

6 References

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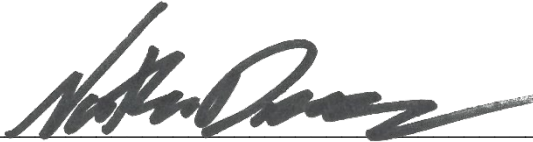
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<https://fortress.wa.gov/ecy/smeltersearch/>

Washington State Department of Ecology (Ecology), 2017, Environmental Restrictive Covenant, Western Blower Associates, LLC (grantor), Ecology (grantee), recorded on December 27, 2017.

7 Declaration of Environmental Professional

“I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Sec. 312.10 of 40 CFR Part 312.

“I have the specific qualifications based on education, training, and experience to assess a property to the nature, history, and setting of the Subject Property. I have developed and performed AAI in conformance with the standards and practices set forth in 40 CFR Part 312.”

A handwritten signature in black ink, appearing to read 'Nathan Dickey', is written over a horizontal line.

Nathan Dickey, LG
Geologist

7.1 Qualifications of Environmental Professional

Nathan Dickey is a registered licensed geologist (LG) in Washington State (#20120138) with at least 7 years of full-time experience completing Phase I ESAs and meets the definition of an Environmental Professional per 40 CFR Part 312.

8 Limitations and Exceptions

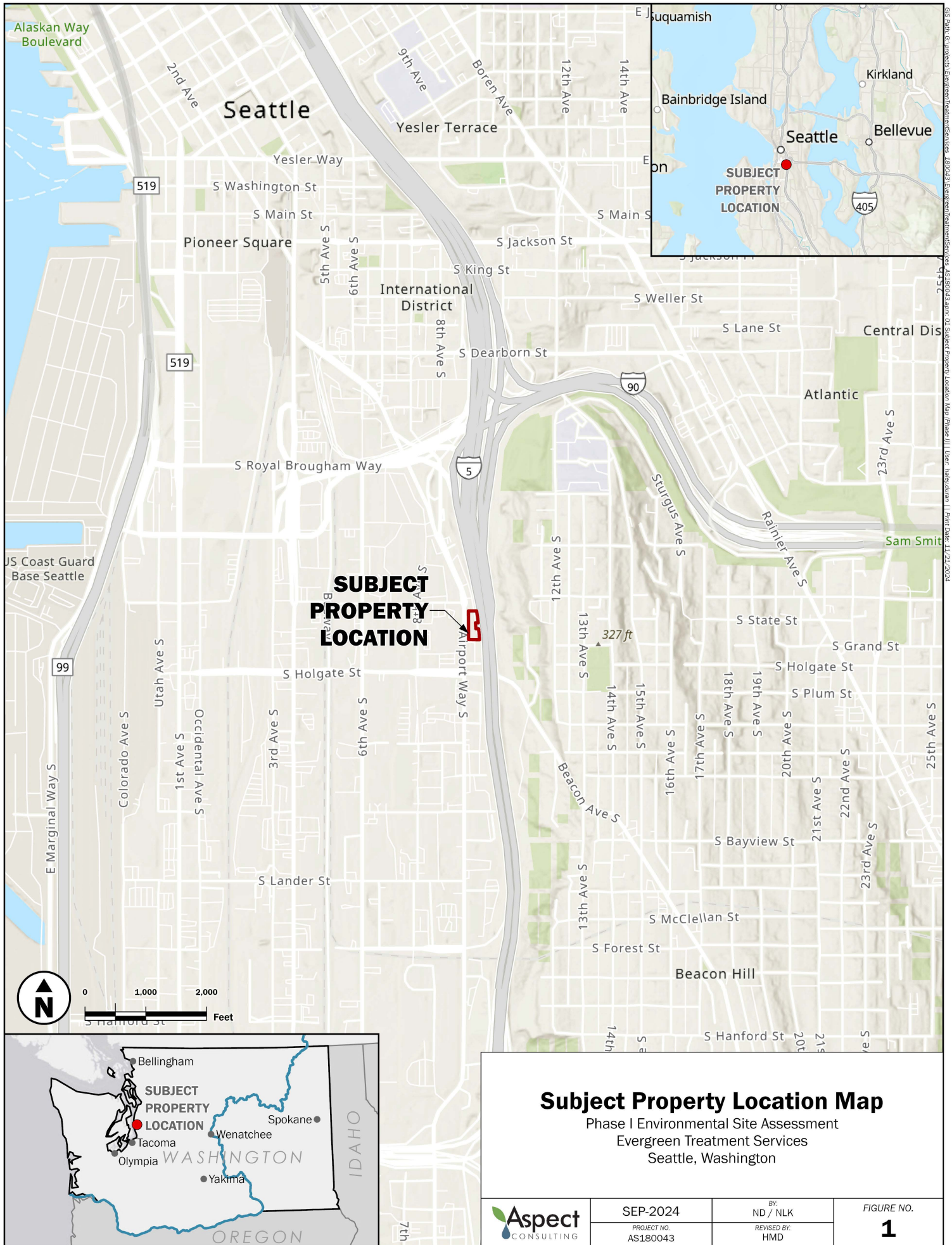
This Phase I Environmental Site Assessment was prepared for use by Evergreen Treatment Services (Client) and may not be relied upon by any other person or entity without the express written consent of Aspect Consulting (Aspect). The Phase I Site Assessment was prepared in accordance with the agreement between Aspect and Client, dated August 13, 2024 (Agreement), as well as ASTM E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* and 40 CFR Part 312, EPA's *Innocent Landowners, Standards for Conducting all Appropriate Inquiries*.

This report was prepared in accordance with recognized standards of professionals in the same locality and involving similar conditions. No other warranty, express or implied, is made by Aspect.


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Please refer to Appendix E titled "Report Limitations and Guidelines for Use" for additional information governing the use of this report.


FIGURES









Soil Gas Sample Location
(Aspect, 2018-2020)




Concrete Sample Location
(NWES, 1995)




Shallow Soil Sample Location
(NWES, 1995)




Groundwater Monitoring Well Location
(Aspect, 2018)




Boring
(Aspect, 2024)




Decommissioned Well




Sump



Subject Property



King County Tax Parcel



0 25 50
Feet

Subject Property Plan

Phase I Environmental Site Assessment
Evergreen Treatment Services
Seattle, Washington



NOV-2024	BY: ND / HMD	FIGURE NO. 2
PROJECT NO. AS180043	REVISED BY: --- / ---	

APPENDIX A

Site Reconnaissance Photographs



Photograph 1. Exterior of Subject Property, facing southeast



Photograph 2. Basement of north warehouse, facing north-northeast



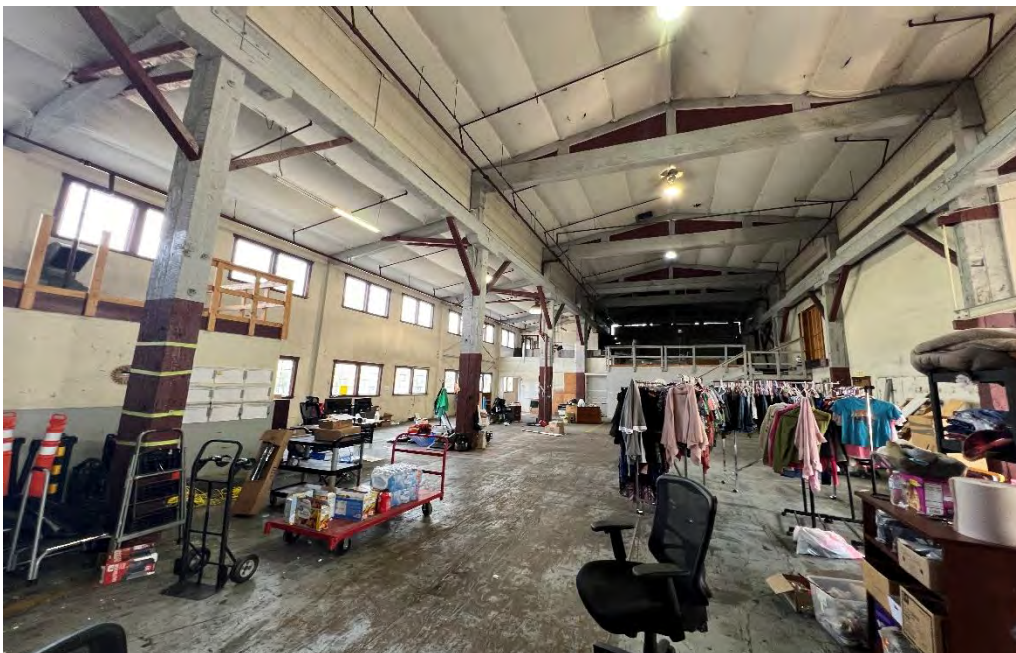
Photograph 2b. Sump in north warehouse basement



Photograph 3. Floor drain in north warehouse



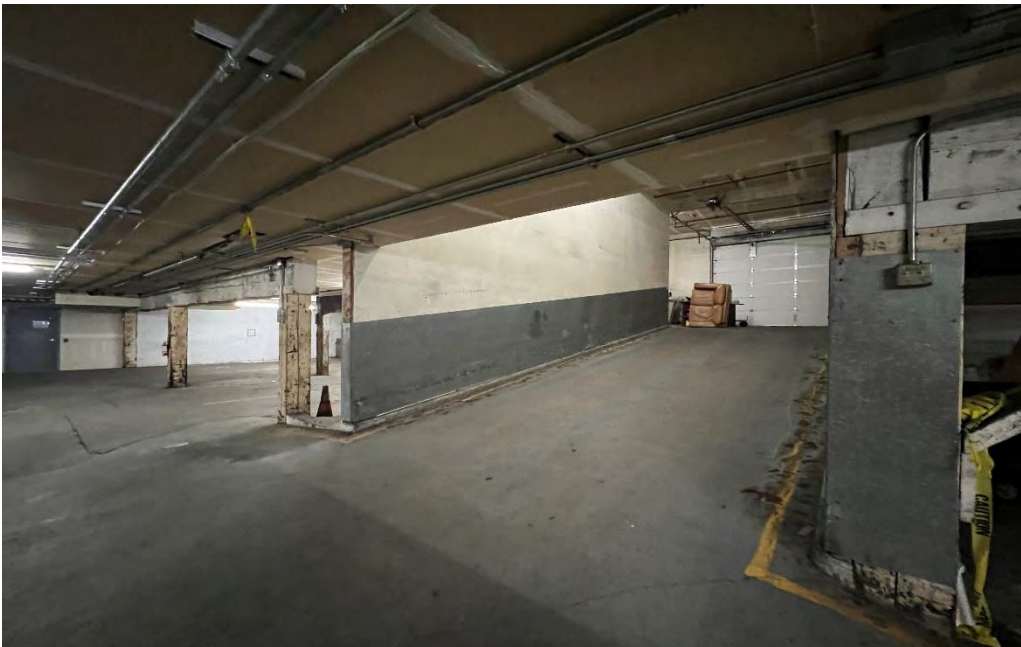
Photograph 3b. Room in basement of north warehouse, facing northeast



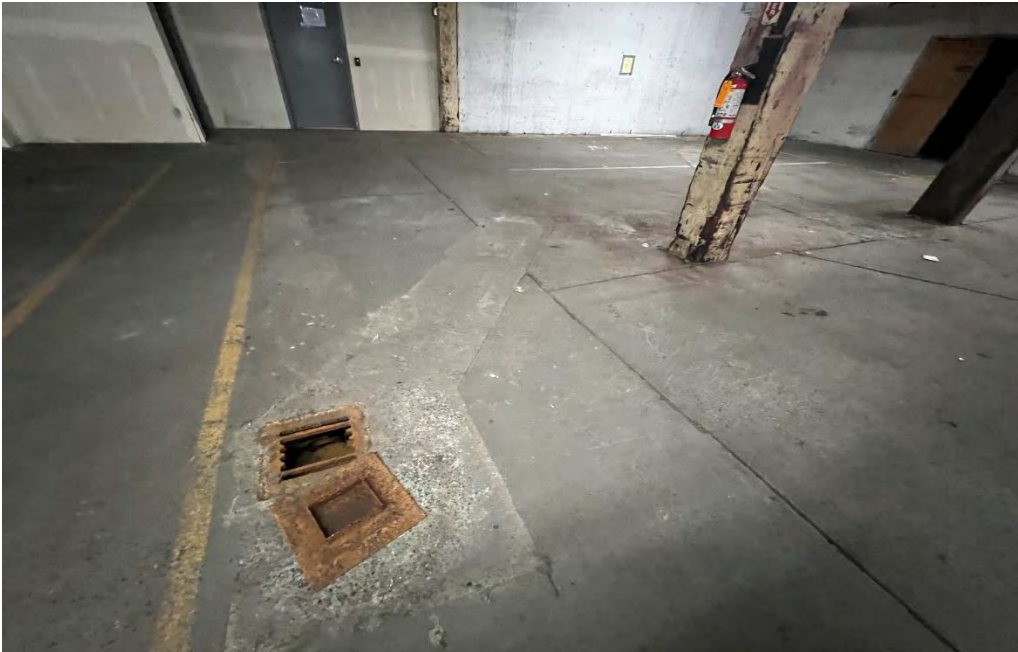
Photograph 4. Main floor of north warehouse, facing north



Photograph 5. Interior of south wing and elevator



Photograph 6. Basement parking ramp under south wing



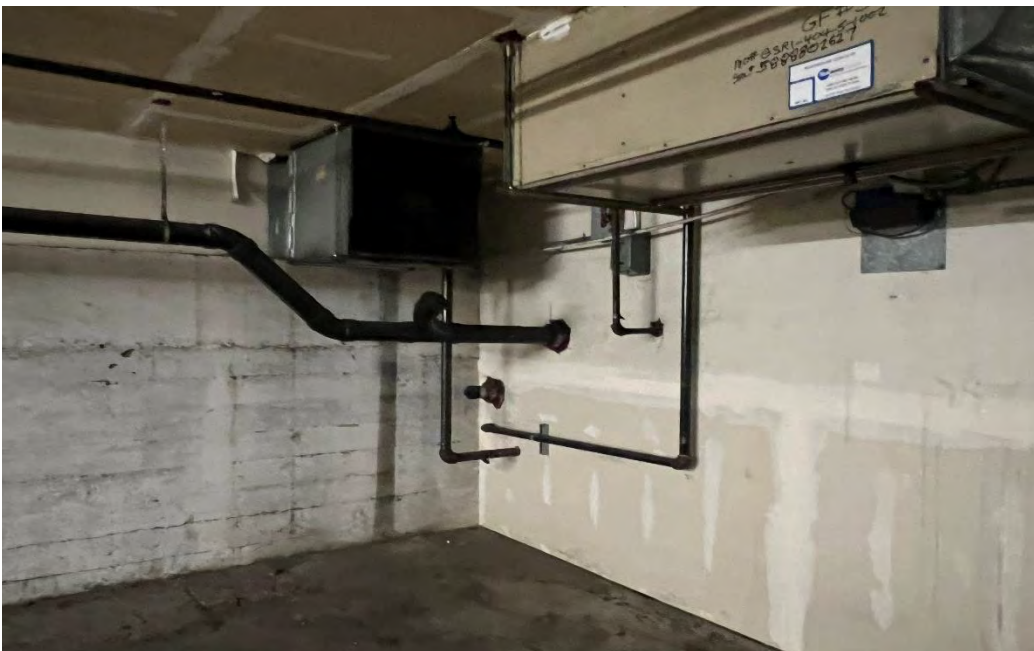
Photograph 7. Blocked floor drain in basement of south wing



Photograph 8. Common maintenance materials stored in basement of south wing



Photograph 9. Storage room in basement of south wing



Photograph 10. Gas-fueled heaters in basement of south wing



Photograph 11. Typical interior of south wing



Photograph 12. Portable offices in parking area east of south wing



Photograph 13. Typical stormwater catch basin in parking area on Subject Property



Photograph 14. Breezeway between north warehouse and south wing



Photograph 15. Monitoring well on Subject Property



Photograph 16. Decommissioned monitoring well (MW-2) on Subject Property



Photograph 17. Monitoring well in sidewalk west of north warehouse



Photograph 18. North-adjointing property, Emerald Recycling



Photograph 19. West-adjointing property across Airport Way South, CenturyLink service vehicle parking



Photograph 20. West-adjointing property, Holgate Center



Photograph 21. South-adjoining property