ASSOCIATED
ENVIRONMENTAL
GROUP, LLC

Phase I Environmental Site Assessment

Conducted on:
West View Mart
971 Ault Field Road
Oak Harbor, Washington

Prepared for:
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1 EXECUTIVE SUMMARY

A Phase I Environmental Site Assessment (ESA) is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser liability limitation under the *Comprehensive Environmental Response, Compensation and Liability Act* (CERCLA) 42 USC. §9601. CERCLA, otherwise known as "*landowner liability protection*", is the practice that constitutes "*all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice*" as defined in 42 USC §9601(35)(B). The purpose of this report is to identify, to whatever extent feasible, recognized environmental conditions in connection with the property.

Associated Environmental Group, LLC (AEG) has performed this ESA in conformance with the scope and limitations of ASTM practice E1527-05 that has been updated to meet the federally-mandated Environmental Protection Agency (EPA) "*all appropriate inquiry*" (AAI) standards (§312.10 of 40 CFR Part 312). Any exceptions to, or deletions from this practice are described in Section 9.0 of the report.

An abbreviated summary of findings is provided below. However, this report must be read in its entirety for comprehensive understanding of the site conditions.

AEG has preformed a Phase I Environmental Site Assessment, in accordance with the scope and limitations of the ASTM E1527-05, for the West View Mart/Texaco gas station, located at 971 Ault Field Road in Oak Harbor, Island County, Washington, the subject site.

Based on the scope of work and findings of the ESA, AEG identified the following recognized environmental conditions (RECs), as defined by ASTM, in connection with the subject site based on historical and current practices at the subject site.

Historical RECs Onsite

The subject site has operated as gas station and/or automotive repair facility since 1950 to the present time. In 1991, Edge Analytical (Edge) conducted a site assessment at the subject site. There were six underground storage tanks (USTs) onsite, split between two basins, one on the west side of the convenience mart and the others on the east side. Edge determined that gasoline range hydrocarbon soil contamination was present in both UST basins and surrounding the pump island. (Edge, 1995) Due to the location of the contamination – in close proximity with the convenience store and a building to the west – a soil vapor extraction system (VES) was installed. The system consists of nine extraction wells and began operation in 1992.

A status report issued by Edge in 1995 outlined the results of testing completed in 1992, 1994, and 1995. During that period, the petroleum hydrocarbons vapor concentration declined from

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2000 parts per million (ppm) to 25 ppm. (Note: There are no details provided in the Edge report as to which wells were tested.)

In 2004, SD&C tested the VES in order to "*evaluate the current discharge of petroleum hydrocarbon concentrations from the VES and the vapor wells, and the possibility of decommissioning the system*." Four vapor samples were collected from the VES system. According to the SD&C report, the sampling results "*indicated that there is a residual volume of petroleum hydrocarbon impacted soil in all of the vapor extraction well locations … The concentrations of the petroleum hydrocarbons in the soil are currently unknown, but it is likely that there is soil underlying the site that exceeds MTCA Method A cleanup levels*" (SD&C, 2004).

Current RECs Onsite

In 2007, AEG sampled the VES to "*determine the current state of the petroleum hydrocarbon contamination as the result of historical underground storage tanks (USTs).*" AEG extracted vapor samples from extractions wells (EW) EW-1 through EW-7. AEG instructed Libby Analytical to cease analysis at the first indication of petroleum hydrocarbons in any sample. The vapor sample from EW-7 contained concentrations of gasoline and gasoline constituents including benzene, toluene, ethylbenzene, and total xylenes (BTEX) which indicated that the site is still impacted by petroleum hydrocarbons. Additionally, AEG noted that the VES is in need of repair "*so that the system can be directed to the most affected areas of the site*" (AEG, 2007).

Geologic Hazards

Known active faults traverse Whidbey Island. Several strike –slip, reverse, and thrust displacement faults have been mapped in the northern area of Whidbey Island. Seismic reflection profiles, outcrops, boreholes, and potential field surveys have provided evidence of Quaternary movements on these faults (Johnson, S.Y., Potter, C.J., et. al., 1996). The presence of active faults on Whidbey Island poses geological hazards to the subject site and vicinity area.

Recommendations:

AEG recommends the following: 1) repair the vapor extraction system; 2) monitor the extraction wells; 3) submit vapor samples from the wells for analysis of petroleum hydrocarbons; 4) if analytical results of vapor samples indicate no detectable concentrations of constituents of concern then conduct subsurface investigation via a GeoProbe or other drilling methodology at specific areas at the subject site to confirm that petroleum hydrocarbons is no longer impacting the subsurface at the subject site; 5) enroll the subject site in Ecology's Voluntary Cleanup Program with the goal of obtaining a no further action status determination for the subject site.

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2 INTRODUCTION

Associated Environmental Group, LLC (AEG) conducted appropriate inquiries into the previous ownership and uses of the subject property consistent with good commercial or customary practices as defined in CERCLA 42 USC Section 9601 (35)(B). Appropriate inquiry includes the investigation of the subject property for recognized environmental conditions in terms of hazardous waste or petroleum products existing within the study area, and the determination of the potential sources for, and likelihood of, hazardous materials migrating onto the subject property from adjoining properties.

For the purposes of this study, the term "*recognized environmental conditions*" is defined as the presence, or likely presence of, any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws.

Put simply, a hazardous substance refers to a wide variety of biological chemical or radioactive substances which pose health and safety risks to humans, the environment, vegetation or wildlife; the release of which through spills, incineration, etc. would result in contamination.

The term is not intended to include de minimis conditions that generally do not present a material risk of harm to human health or the environment and that would generally not be the subject of enforcement action if brought to the attention of appropriate government agencies.

Ms. Linda Whitt, Registered Site Assessor, performed the visual, physical and photographic field inspection, data collection, and report review. Site photographs are presented in Appendix A, *Site Photographs*, while supporting documentation such as historical archives records, historical site plans, and Title Guarantee documents are presented in Appendix B, *Supporting Documents*. Appendix C, *Environmental Database Report*, consists of an environmental database search report prepared by Environmental Data Resources, Inc. The radial maps in the report provide a description of the general topography and currently available environmental data concerning the subject property and properties within a one-mile radius.

2.1 Scope of Work

The purpose of this report is to provide the Client with an assessment concerning environmental conditions (limited to those issues identified in the report) as they existed at the subject site. The assessment was conducted utilizing the requirements of the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05. AEG reviewed available federal, state, and local records in an effort to identify sites of known or suspected hazardous waste activity located

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at or near the subject site which could have an adverse impact on the subject site which could have an adverse impact on the subject site. In an attempt to determine whether historical uses of the subject property and surrounding area have had an environmental impact on the site, AEG interviewed individuals knowledgeable about the area, and property in particular, and reviewed available pertinent records and documents. This assessment is based on the evaluation of the information gathered, laboratory analysis of samples collected (when required), and accessibility at the time of the assessment.

The scope of work included an evaluation of:

- The history of the subject property in an attempt to identify and possible ownership(s) and/or uses that would suggest an impact to the environmental integrity of the site as identified through review of reasonably ascertainable standard historical sources;
- Physical characteristics of the subject site as identified through review of reasonably ascertainable topographic, wetlands, flood plain, soils, geology, and groundwater data;
- Available aerial photographs;
- Interview with knowledgeable site contacts;
- Past inspections or reports relating to hazardous materials spills, storage, usage, and transport;
- Information contained in federal and state regulatory programs such as the NPL, CERCLIS, SHWS, RCRIS, SWF, LUST, CSCSL, HSL, VCP, and other governmental information systems within specific search distances of the subject site. This evaluation was performed to identify and sites that would have the potential to impact the environmental integrity of the subject property. The regulatory agency report provided is based on an evaluation of the data collected and compiled by a contracted data researched company. The report is based on a radius search which focuses on both the site and neighboring sites that may impact it. Neighboring sites listed in governmental environmental records are identified within a specific search distance. The search distance varies depending upon the particular government record being checked;
- Underground storage tank and landfill databases;
- Visual observation of the adjacent properties to identify high-risk neighbors and the potential for known or suspected contamination to migrate onto the subject site;
- Facility storage tanks, drums, containers (above or below ground), etc.;
- Transformers and other electrical equipment which utilize fluid which may potentially contain PCBs; and
- The use of hazardous materials/chemicals and petroleum products, and/or the generation treatment, storage, or disposal of hazardous, regulated, or medical wastes.

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In accordance with the AAI and the ASTM E1527-05 standards, this ESA did not evaluate, among other things, liabilities associated with the presence of asbestos, lead-based paint and/or radon, or mold. Additionally, no subsurface investigations of the property were undertaken as part of this assignment.

2.2 Data Gaps

The ASTM E1527-05 indicates that the ESA report must identify and comment on significant data gaps that affect the ability of the environmental professional to identify recognized environmental conditions and identify the source of information that were consulted to address the data gaps. The environmental professional must provide and opinion whether those data gaps affect the ability to identify conditions indicative of release or potential release on the property.

A review of historical sources on the subject site including the Polk City Directories, historical aerial photographs, Washington State archive records, Sanborn Maps yielded minimal information regarding the historic development and usage of adjoining properties. However, AEG was able to interview two previous owners of the subject site and reviewed history title documents of the subject site. Based on these tasks, the lack of historical information on adjoining properties is not a significant data gap.

2.3 Specialized Knowledge or Experience

The AAI and ASTM E1527-05 require documentation of specialized knowledge of the purchaser (user) of the property and to "consider" the relationship between the purchase price and the value of the property. However, such acknowledgement of specialized knowledge and/or release of specific information of business transaction strategy which may impact current or future negotiations are at the discretion of the purchaser. The purchaser is not require to share these addition inquires with the EP.

The client or client's representative has no specialized information about the subject site.

2.4 Relationship of the Purchase Price to the Value of the Site

The client or client's representative was not aware of any knowledge that would result in a significantly lower purchase price of the subject site.

2.5 User Reliance

The information and opinions rendered in this report are exclusively for use and reliance by Mr. Bill Massey and his representative, Mr. Bailey Choi at Fortune Bank. AEG will not distribute or publish this report without written consent of Mr. Massey, except as required by law or court order. The information and opinions expressed in this report are given in response to a limited

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assignment by Mr. Massey and should be considered and implemented only in light of that assignment. The services provided by AEG in completing this subject site have been provided in a manner consistent with normal standards of the profession, no other warranty is made, expressed or implied.

This report is not for the use or benefit of, nor may it be relied upon by, any other person or entity for any purpose without the advance written consent of AEG. In expressing the opinions stated in this report, AEG has exercised the degree of skill and care ordinarily exercised by a reasonable prudent environmental professional in the same community and in the same time frame given the same or similar facts and circumstances. Documentation and data provided by the Client, designated representatives of the Client or other interested third parties, or from the public domain, and referred to in preparation of this assessment, have been used and referenced with the understanding that AEG assumes no responsibility or liability for their accuracy.

The independent conclusions represent our professional judgment based on information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the client or their representative had been assumed to be correct and complete. The conclusions presented are based on data provided, observations, and conditions that existed on the date of the site reconnaissance.

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3 SITE DESCRIPTION

The site descriptions that follow are a result of the site reconnaissance which consist of photographic documentation as well as visual and physical surveys. In addition, reviews of reasonably ascertainable records from publicly available standard environmental and historical sources were conducted as prescribed in ASTM E1527-05. These reviews aid in determining recognized environmental conditions in connection with the past and present uses of the subject property. For purpose of this report, an approximate search distance of one radial mile has been used in order to help assess the likelihood of potential environmental problems migrating onto the site from surrounding properties.

3.1 Site Location and Legal Description

The subject site, West View Mart/Texaco gas station, is located at 971 Ault Field Road in Oak Harbor, Island County, Washington. Its corresponding parcel number is Island County Parcel No. 13327-502-2990 which is situated in Section 27, Township 33N, and Range 1E. The geographic coordinates of the subject site are: 48°19'33.1" N, 122°39'53.0" W. Island County Parcel R 13327-502-2990 has two physical addresses: 971 and 973 Ault Field Road. The scope of this Phase I ESA is limited only to the West View Mart/Texaco gas station, the subject site. The adjoining structure, located at 973 Ault Field Road, is occupied by a warehouse. The West View Mart/Texaco gas station is located approximately 400 feet east of the intersection of Ault Field Road and North Langley Boulevard and is approximately 0.83 acre in size.

The subject site's current owner is Ault Field Investments, Inc. The legal description of the property is as follows:

The east 100 feet of the following described tract: The portion of the northwest quarter of the northeast quarter of section 27, Township 33 north, range 1 E.W.M., described as follows:

Commencing at the northwest corner of said northwest quarter of the northeast quarter; thence east along the north line of said subdivision a distance of 220 feet to the true point of beginning; thence continue east along said another line 196 feet, more or less, to the west line of the plat of pine terrace, as per plat recorded in volume 4 of plats, page 55, records of island county, Washington; thence south 208 feet, more or less, to the northwest corner of tract 39 of said plat: thence north 89°01'23" west 196 feet; thence north to the true point of beginning.

Except that portion thereof lying westerly of the following described line: commencing at the northwest corner of said northwest quarter of the northeast quarter; thence south 89°01" 12" east 316.76 feet along the north line of said subdivision to the true point of beginning of said line; thence south 1°14' 05" east 519.34 feet to a point on the north line of lot 36, plat of pine

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terrace, according to plat thereof recorded in volume 4 of plats, page 55, records of island county, Washington, said point being the terminus of said line.

Also except county road known as Clover Valley Road,

Together with an easement for ingress and egress as described in instrument recorded April 26, 1988 under Auditors file no. 88004657.

3.2 Site and Vicinity General Setting

The subject site, the West View Mart/Texaco gas station, is improved with a gas station and convenience store (with a separate attached addition on the south side of the building), two pump islands, four underground storage tanks (USTs), associated parking, and an over-head canopy. The convenience store is located in a one-story wood-framed building that underwent major renovations in 1988. The convenience store is approximately 1,800 square feet, while the attached addition is 1,350 square feet. The historical heating source for this building was an oil heat until approximately 1968 when it was converted to electric heat. From the 1980s to the present, the store has been heated by propane.

The gas station and convenience store occupy only the northern portion of the parcel (which is the subject site). The gas station includes two pump islands under one canopy, four single-walled steel lined underground storage tanks (USTs) covered by a concrete pad, located north of the canopy, and associated asphalt-paved parking area. The convenience store occupies an area south of the gas station. Surficially, the property slopes downward to the north. Appendix A, *Site Photographs*, presents documentation of these areas.

The area is dominated by commercial and retail businesses. The site is located above Clover Valley on the north end of Whidbey Island. Topographically, the site lies on nearly level ground although the general vicinity slopes to the north, towards the valley. Figure 1, *Site & Vicinity Aerial Photo*, presents the location of the subject site and adjoining properties.

3.3 Soil Characteristics

The following soil description is an excerpt from the US Department of Agriculture (USDA), Soil Conservation Service publication "*Soil Survey of Island County, Washington*."

There are two types of soil mapped on the subject site – Hoypus gravelly loamy sand, 5 to 15 percent slopes, and Whidbey gravelly sandy loam, 5 to 15 percent slopes. The Whidbey gravelly sandy loam, which covers the north end of the subject site, is the most common soil found in Island County, accounting for 32% of the area. "*The cemented gravelly till from which this soil*

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has developed is somewhat similar to that from which Alderwood soils originated. It was derived largely from granite, quartzite, schist, basalt, slate, and sandstone….. Natural drainage is good in this soil. Surface runoff is slow, however, because the surface layer and subsoil absorb the water readily" (USDA, 1992).

Hoypus gravelly loamy sand covers the south end of the subject site. "*This is one of the most extensive soils on Whidbey Island, but it is too droughty to be much use for agriculture. It occupies moraines and outwash plains. It is associated with the other Hoypus soils and with the Whidbey and Keystone soils on Whidbey Island…..The parent materials of this soil are comprised of a number of different kinds of rock. Rocks of acid igneous and metamorphic origin predominate, but some basic rocks are included. Natural drainage is somewhat excessive. Internal drainage is very rapid, and the water-holding capacity is low*" (USDA, 1992).

3.4 Geology/Hydrogeology

The subject site is located on Whidbey Island within Island County which lies within the Puget Sound lowland in western Washington. The Puget Sound is a north-south trending trough between the Olympic Mountains to the west and the Cascade Mountains to the east. The topography is dominated by north-south trending valleys and low, nearly flat-topped highlands cut by streams. The topographic surface of Island County is largely the result of erosion and deposition during three glaciations and three interglaciations (Easterbrook, D. J., 1968).

According to the *Geologic Map of Washington, Northwest Quadrant*, the subject site and vicinity area is underlain by Quaternary age glacial till deposits (Dragovich;, J.D., Logan, R.L., et al, 2002). The till deposits typically consist of "*unsorted unstratified, highly compacted mixture of clay, silt, sand, gravel, and boulders deposited by glacial ice; may contain interbedded stratified sand, silt, and gravel. Includes part of Vashon Drift undivided" (Dragovich;, J.D., Logan, R.L., et al, 2002).* Geologic cross sections of this area of Island County indicated that glacial till is underlain by Esperance Sand and the Whidbey Formation. The Whidbey Formation consists of "*sand, silt, and clay interbedded with peat and lenses of gravel. Crossbedding is common in the sand. … An unconformity is almost always present at the top of the Whidbey Formation. … Where the Esperance Sand Member lies directly on the Whidbey Formation, it is sometimes difficult to distinguish them. … The Esperance is usually somewhat coarser than the typical Whidbey, consisting mostly of pebbly crossbedded sand with scattered lenses of gravel"* (Easterbrook, D. J., 1968).

In addition, according to the Washington Department of Natural Resources (DNR), known active faults traverse Whidbey Island. DNR is currently performing geologic mapping in the Oak Harbor and Coupeville areas. Several strike –slip, reverse, and thrust displacement faults have been mapped in the northern area of Whidbey Island. Seismic reflection profiles, outcrops,

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boreholes, and potential field surveys have provided evidence of Quaternary movements on these faults (Johnson, S.Y., Potter, C.J., et. al., 1996). Devils Mountain fault is one of the active faults mapped to the north of the subject site (within the northern section of Whidbey Island). The presence of active faults on Whidbey Island poses geological hazards to the subject site and vicinity area.

Although extractions wells were installed at the subject site in the early 1990s, AEG was unable to locate well logs for these wells on the Washington State Department of Ecology (Ecology) Well Logs Image System website. In addition, the direction of shallow groundwater flow was not provided in environmental reports completed for the subject site. AEG reviewed well logs of properties located within approximately within one mile of the subject site. The well logs indicated that glacial till deposits consisting of sandy clay, silty sand, and sand and gravel deposits are logged for this area to depths of approximately 280 feet below ground surface (bgs). The depth to groundwater in the vicinity area is ranges from 70 feet below ground surface (bgs) to 160 feet bgs.

The direction of shallow groundwater flow is difficult to ascertain without the presence monitoring wells (which are monitored for depth-to-water information) and can be highly variable due to the presence of variable depth to perched groundwater at the subject site and vicinity area. However based on surface topography, the direction of regional groundwater flow at the subject site and vicinity area appears to be the west towards the Strait Juan de Fuca (approximately 1 1/2 miles west of the subject site).

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4 SITE HISTORY

The history of land use for the subject site, adjacent and surrounding properties was evaluated to identify past uses that might have had adverse effects on the environmental conditions of the subject property. The historical information was obtained by reviewing readily available information from public agencies, historians and/or library resources. Historical information was also obtained from the current property owners, tenants, and from other persons familiar with the property.

No aerial photographs, Polk City Directories, or Washington State Puget Sound Regional Archives records were available. Other pictorial sources may have included USGS topographic maps, flood plain maps, and wetland inventory maps.

4.1 Development History and Land Use

AEG reviewed historical information included in documents provided by Land Title Company of Island County. The historical information obtained from these documents was limited. AEG was able to locate the two previous owners of the subject site. Nonetheless, our understanding of the development and historical usage of adjoining properties is incomplete based on the above stated historical sources.

The following is a time line of the subject site development and usage:

1955 – Shell Oil leased the subject site and constructed a service station onsite. Mr. Arthur Brown took over management of the service station in approximately 1951. Mr. Lee Hayes worked for Mr. Brown from approximately 1951 until 1978 (when he purchased the property on contract). According to Mr. Hayes, the subject site operated as a Shell gas station and automotive repair shop until approximately 1988, when the automotive repair shop was converted to a convenience mart. Originally, there were three USTs, covered by a cement slab, on the west side of the repair shop. A fourth tank (unleaded) was added in the late 1970s on the east side of the building. There were two in-ground hoists and a sump in the repair shop. The sump was vacuumed out every six weeks, as per Mr. Hayes. The USTs were inventoried daily by placing a stick into the tank to determine the fuel levels and whether there was water present in the tank. According to Mr. Hayes, there were no indications of UST leakage during the time he worked at the station.

1978 - Mr. Hayes purchased the subject site on contract and continued to operate the service station until approximately 1983, even though the subject site has been sold to Mr. Mike Hahn in 1979. In 1982, Mr. Hahn assumed management of the service station, and added tire sales to the services provided. That same year, Mr. Hahn constructed the building to the south of the service station in which he stored tires.

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1988 – Mr. Hahn sold the subject site to Mr. Bill Massey. At that point, Mr. Massey converted the repair shop and office into a convenience store, and then sold the convenience store and gas station to Mr. Dave Kleffler, who has operated the business to this date.

1991 – 1992: In response to Ecology's new UST regulations, Mr. Massey ordered the replacement of the USTs onsite. Materials Testing & Consulting (MTC) decommissioned six USTs – two 1,000 gallon diesel oil tanks, two 2,000 gallon gasoline tanks, one 8,000 gasoline tank, and one 500 gallon stove oil or waste oil tank. During that process, MTC determined that gasoline range hydrocarbon soil contamination was present in both UST basins and the proposed new UST basin just north of the pump island.

Five of the USTs – two 1,000 gallon diesel oil tanks, two 2,000 gallon gasoline tanks and one 500 gallon stove oil or waste oil tank.– were removed from the UST basin on the west side of the building. The soils were observed to be heavily contaminated with gasoline and stove or waste oil. The contaminated soils were excavated (to an unknown depth) from this area and stockpiled on-site for remediation by aeration. No groundwater was observed in the basin. Analytical results of confirmation soil samples collected from the north and south wall at about 5 bgs indicated detections of petroleum hydrocarbons at concentrations above MTCA soil cleanup levels. No soil samples were collected from the floor of the basin. However, due to the location of the contamination – in close proximity with the convenience store and a building to the west, no further excavation or samples were collected (MTC, 1992).

One 8,000 gallon gasoline UST was removed from an area on the east side of the building. The most obviously petroleum-impacted soil was removed and clearance samples were collected from an unknown depth on the north and south walls. No soil samples were collected from the floor of the basin. No groundwater was observed in the basin. Laboratory results indicated the detections were below the cleanup levels for both TPHs and BTEX. Due to the location of the contamination – in close proximity with the convenience store, no further excavation or samples were collected (MTC, 1992).

The current UST basin was excavated (to an unknown depth) in an area north of the pump islands. Petroleum contaminants were detected in the north and east walls at 5 bgs. Petroleum fumes were detected along the west wall of the pit. The southwestern portion of the pit, toward the dispensing island, was heavily contaminated. No further excavation was done because of the basin's location (MTC, 1992).

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Because of the location of the contamination – very close to the east and west side of the building - a soil vapor extraction system (VES) was installed. The system consisted of nine extraction wells that could be isolated by ball valves near the ring compressor.

1995 - A status report issued by Edge Analytical (Edge) in 1995 outlined the results of VES testing completed in 1992, 1994, and 1995. During that period, the vapor concentration declined from 2000 parts per million (ppm) to 25 ppm. (Note: There are no details provided in the Edge report as to which wells were tested.)

2004 - SD&C tested the VES in order to "evaluate the current discharge of petroleum hydrocarbon concentrations from the VES and the vapor wells, and the possibility of decommissioning the system." According to the SD&C report, the sampling results "*indicated that there is a residual volume of petroleum hydrocarbon impacted soil in all of the vapor extraction well locations..... The concentrations of the petroleum hydrocarbons in the soil are currently unknown, but it is likely that there is soil underlying the site that exceeds MTCA Method A cleanup levels*" (SD&C, 2004).

2006 – The station changed from Shell Oil to Texaco.

August 2007 - AEG sampled the VES to "*determine the current state of the petroleum hydrocarbon contamination as the result of historical underground storage tanks (USTs)*". The vapor sample from EW-7 contained concentrations of gasoline and BTEX, which indicated that the site is still impacted by petroleum hydrocarbons. Additionally, AEG noted that the VES is in need of repair "so that the system can be directed to the most affected areas of the site." (AEG, 2007)

In December, 2007 the Autostik ATG system recorded tank failures on underground storage tanks one (1), two (2), and three (3). On the date of AEG's site reconnaissance, December 10th, 2007, AEG observed the Sleiter Company replace the extractor gaskets on the three (3) effected tanks. On December 19, 2007, Mr. Kleffle advised AEG that the ATG system continued to indicate tank failure in tanks one (1), two (2), and three (3). However, on December 27, 2007 Northwest Pump and Equipment conducted a tank tightness test to determine if any of the USTs were leaking. Information faxed to AEG immediately following the test indicated that all tanks were tight, and there was no leak detected.

The historical practices at the subject site pose RECs, as defined by ASTM, in connection with the subject site. Current residual petroleum impacted soil at the subject site and presence of the VES also pose RECs in connection with the subject site.

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5 SITE RECONNAISSANCE

AEG conducted site reconnaissance of the subject site and adjacent properties on December 10, 2007. Figure 1, *Site & Vicinity Aerial Photo*, presents an overview of the subject site and adjoining properties. Appendix A, *Site Photographs*, provides photo documentation of the subject site.

5.1 Subject Site Reconnaissance

Site Summary	
Address:	West View Mart/Texaco gas station – 971 Ault Field Road, Oak Harbor, WA.
On site Point of Contact (POC)	Mr. Dave Kleffle, owner/operator of the West View Mart and Texaco gas station.
Areas accessed:	Included all exterior and interior areas, except the addition attached to the south side of the convenience mart, which is leased to another individual who uses the space to store cars parts for an auto restoration business.
Inaccessible areas:	The addition attached to the south side of the convenience mart, which is leased to another individual as a storage area.
Weather conditions:	Clear and cold.
Current Subject site use:	The subject site is currently occupied by a gas station and convenience store and office. There is a 1350 square foot separate attached storage space in the rear that is leased to Mr. Jim Casper, who uses the space to store car parts for his auto restoration business.
Land area:	Approximately 0.83 acre
Construction/renovation date(s):	According to a prior owner/manager, the subject site was originally a Shell service station from 1955 until 1988, when it was converted from a service station to a convenience store with a gas station.
Heating Source(s):	According to a long-time employee and former owner of the subject site, the service station was originally heated by heating oil. In 1968, the heating source was converted to electricity. At some point, propane replaced the electrical heat. That continues to be the primary heating source.
Improvements:	Subject site improvements included a canopy, two pump islands, four USTs, a convenience store, a separate attached storage area, and paved parking/drive areas.
Water/sewer service:	The subject site is serviced by public well water and a septic system.
Mechanical/HVAC systems:	Currently, the subject site has an HVAC system. The subject site is heated by propane.

Assessment components	Result
Operational Activities/Noteworthy Tenants	The subject site is currently occupied by a Texaco gas station and a convenience store (known as Westview Mart). In 2006, the gas station was changed from Shell to Texaco branded gas.

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Assessment components	Result
Underground Storage Tanks (USTs)/Aboveground Storage Tanks (ASTs)	Based on interviews with two former owners, there were a total of four USTs present at the subject site from 1955 to 1991, when the four older tanks were decommissioned. However, MTCs report indicates that it decommissioned six USTs – two 1,000 gallon diesel oil tanks, two 2,000 gallon gasoline tanks, one 8,000 gasoline tank, and one 500 gallon stove oil or waste oil tank. The former USTs were replaced with four single-walled USTs. Per Mr. Dave Kleffle, current owner of the gas station and convenience store, two tanks - an 8,000 gallon and a 6,000 gallon - are joined by a manifold mechanism. There is also a 6,000 gallon and a 2,000 gallon UST onsite. Mr. Kleffle provided AEG with January 2006 Tank Cathodic Protection test, which indicated that the system had passed. He also provided an August 2002 UST Tightness test, which indicated that the UST system had passed. During AEG's site reconnaissance, the AutoStik 950 Series automatic tank gauging system indicated, while in "leak detection mode," that tanks one, two, and three had failed. Per Mr. Kleffle, the system had been registering tank failures in the same three tanks since early December. Mr. Kleffle had the extraction gaskets replaced on the three failing tanks, but the ATG continued to indicate leak detection failures on the three effected tanks. On December 27, 2007, Northwest Pump and Equipment conducted a tank tightness test to determine if any of the USTs were leaking. Information faxed to AEG immediately following the test indicated that all tanks were tight and there was no leak detected. There is also a 150 gallon propane AST located on the south side of the convenience store. Propane is the primary heating source of the store.
Monitoring Wells/Wells	There is currently nine extraction wells onsite, as part of the vapor extraction system.
Hazardous Materials and Petroleum Products Storage/Handling	North Whidbey Fire & Rescue, a volunteer department, has not yet provided AEG with information to provide Island County Fire Marshall's office indicate that there have been no violation notices issued for violation of hazardous materials codes regarding the generation or storage and handling of those materials. Neither has the fire department responded to any hazardous nor petroleum spills.
Waste Generation, Treatment, Storage, and Disposal	No hazardous waste is generated onsite.
Polychlorinated Biphenyls (PCBs)	Potential sources of PCBs including a pad-mounted transformer or pole-mounted transformer were not observed onsite.
Asbestos-Containing Materials (ACM)	A survey for potential ACMs was not included as part of this Phase I ESA.

Based on the site reconnaissance, the UST system is functioning normally and passed a tank tightness test on December 27, 2007. However, recent sampling of the VES indicate that the site continues to be impacted by petroleum hydrocarbons and as such, pose RECs, as defined by ASTM, in connection with the subject site.

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5.2 Adjacent properties Reconnaissance

The following properties were observed:

Direction	Use(s)
North	North of the subject site is Ault Field Road. Beyond the roadway is undeveloped forest land.
East	Directly east of the site is a small office that rents out motorcycles and motor scooters, which do not appear to be stored onsite. Slightly south and east of the office is an auto detailing shop that also rents out U-Haul trucks.
South	The subject site is border on the south by a 1900 square foot warehouse, constructed in 1982 by then-owner Mike Hahn, to store tires. Currently, the building is leased to a business by Ault Property Management. As per Sherry Ryan of Ault Property Management, the building is leased to an individual who, as a hobby, does custom auto body repair. There is no engine work done on the premises. AEG observed a fenced-in area behind (south) the warehouse that contained a car and auto parts. On the north side of the warehouse, AEG observed car parts stacked against the wall. The ground under the parts was relatively clean, with little or no evidence of leaking oil or other substances. (Note: AEG was unable to access this building.)
West	The subject site is bordered to the west by a tattoo business. To the south of that building is a barber shop.

Based on the site reconnaissance of adjacent properties, it appears that adjacent properties do not pose environmental concerns in connection with the subject site.

5.3 Historical Uses of the Adjacent and Surrounding Properties

Archives documents and aerial photographs indicated the following:

Direction	Use(s)
North	Adjacent to the north of the subject site is Ault Field Road and beyond is undeveloped forest land.
East	No archive or historical aerial photographs are available.
South	No archive or historical aerial photographs are available.
West	No archive or historical aerial photographs are available.

AEG encountered significant data gaps regarding the historical development and usage of the adjoining properties during the completion of this site assessment. This lack of information regarding the historical usage of the adjacent properties, in particular at properties adjacent and potentially upgradient to the east, may pose potential environmental concerns in connection with the subject site.

5.4 Prior Reports Reviewed

Mr. Massey, current subject site owner, provided the following reports for AEG to review. Please refer to section 5.1 for a summary of the reports.

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- Materials Testing & Consulting, Inc., 1992. *Results of the UST Assessment - West View Mart, 971 Ault Field Road, Oak Harbor, WA*; and

- Edge Analytical, 1995. *Status Report of Petroleum Cleanup - West View Mart, 971 Ault Field Road, Oak Harbor, WA.*

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6 RECORDS REVIEW

6.1 Regulatory Database Review

As per ASTM E1527-05, Section 8.1.1, "the purpose of a records review is to obtain and review records that will help identify recognized environmental conditions in connection with the properties." Records were obtained using Environmental Data Resources, Inc. (EDR) commercial database search which searches U.S. Environmental Protection Agency (EPA), Washington State Department of Ecology (Ecology) databases, local, and tribal agencies. The search radii EDR utilizes for its standard Phase I Environmental Site Assessment database searches meet or exceed those specified in ASTM Standard E: 1527-05. The commercial database search report was reviewed for accuracy of site locations and was modified as necessary.

AEG also reviewed the unmappable sites in the database report, cross-referencing addresses and site names. Unmappable sites are environmental risk sites that cannot be plotted with confidence, but can be located by zip code or city name. In general, a site cannot be geocoded because of inaccurate of missing location information in the record provided by the agency. Any identified unmappable site within the specified search radii is included below. A review of regulatory agency records was conducted for the subject site and nearby properties to identify known or suspected sources of contamination that could adversely impact the subject site. The following table provides a summary of the lists reviewed and the corresponding acronyms. The complete commercial database search report is including in Appendix C, *Environmental Database Search Report (EDR)*, and contains figures identifying the locations of the reportable sites within the search radius noted in the following table.

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REGULATORY DATABASES

Database	Search Radius
FEDERAL ASTM STANDARD	
National Priorities List (NPL)	1.0 mile
Delisted NPL	1.0 mile
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)	0.5 mile
CERCLIS No Further Remedial Action Planned (NFRAP)	0.25 mile
Resource Conservation and Recovery Information System (RCRIS) Small Quantity Generator (SQG)	0.25 mile
RCRIS Large Quantity Generator (LQG)	0.25 mile
RCRIS Treatment, Storage, and Disposal Facility (TSDF)	0.5 mile
RCRIS-Corrective Action Report (CORRACTS)	1.0 mile
Emergency Response Notification System (ERNS)	Subject Site
FEDERAL ASTM SUPPLEMENTAL	
CERCLA Consent Decrees (CONSENT)	1.0 mile
NPL Records of Decision (ROD)	1.0 mile
Facility Index System (FINDS)	Subject Site
Hazardous Materials Information Reporting System (HMIRS)	Subject Site
Material License Tracking System (MLTS)	Subject Site
Mines Master Index File (MINES)	0.25 mile
NPL Liens (NPL LIENS)	Subject Site
PCB Activity Database System (PADS)	Subject Site
RCRA Administrative Action Tracking System (RAATS)	Subject Site
Toxic Chemical Release Inventory System (TRIS)	Subject Site
Toxics Substances Control Act (TSCA)	Subject Site
STATE OF WASHINGTON ASTM STANDARD	
State Hazardous Sites List (HSL)	1.0 mile
Confirmed & Suspected Contaminated Sites List (CSCSL)	1.0 mile
Underground Storage Tank Database (UST)	0.25 mile
Leaking Underground Storage Tank Site List (LUST)	0.5 mile
Independent Cleanup Reports (WA ICR)	0.5 mile
Voluntary Cleanup Program Sites (WA VCP)	0.5 mile
Solid Waste Facilities/Landfill Sites (SWF/LF)	0.5 mile
STATE OR LOCAL ASTM SUPPLEMENTAL	
Confirmed Release List and Inventory (CRL)	1.0 mile
Hazmat/Incidents	Subject Site

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The following selected facilities, located within a one-quarter mile of the subject site, were listed by EDR. A brief summary of these facilities is presented below.

Naval Air Station
Whidbey Island, WA.
Databases: NPL, ENG CONTROLS, INST CONTROLS, RODS

The Naval Air Station (NAS) at Whidbey Island, Ault Field is a Department of the Navy 8,000-acre facility and consists of Ault Field and the Seaplane Base. It is located approximately 500 feet north of the subject site. The Seaplane Base is also on the National Priorities List (NPL) and is being addressed in conjunction with Ault Field. The station was commissioned in 1942, and the air station's current mission is to maintain and operate Navy aircraft and aviation facilities and to provide associated support activities. Since the 1940s, operations at the air station have generated a variety of hazardous wastes. Site investigation studies have confirmed contamination of soil, sediments, and groundwater throughout the installation. Contaminants include polychlorinated biphenyls (PCBs), heavy metals, chlorinated solvents, polyaromatic hydrocarbons (PAHs), and pesticides.

Groundwater at this facility is contaminated with volatile organic compounds (VOCs) including trichloroethylene (TCE) and trichloroethane (TCA). Ingestion of or direct contact with the contaminated groundwater could be a health hazard. As a result, the Navy has provided free connections to city water for residents whose drinking water wells could be impacted by the plume of contaminated groundwater. Soils and sediments contaminated with PCBs, heavy metals, pesticides, PAHs, and dioxin have been found at various locations throughout the site. While there is no immediate threat to human health, there are future human health, as well as ecological risks, in these areas (EPA, Region 10, ID # WA5170090059)

NAS Whidbey Island, Ault Field has been designated as "construction complete," which signifies that all cleanup remedies required for the site have been implemented. A five-year review was completed in September 1998. The second Five Year Review was completed in March, 2004. In conjunction with this review, groundwater at the Area 6 landfill was tested for 1,4 dioxane, a stabilizer associated with chlorinated solvents. This previously undetected chemical compound was found in the groundwater at Area 6. To determine if this contaminant had spread off-site, the Navy sampled private wells adjacent to the landfill. The Navy sampled private wells in May and August of 2005. The chemical was detected in very low concentrations in several private wells. ATSDR has provided a health consultation and concluded that adverse health effects are not expected to occur in adults or children at the concentrations detected in the private wells. Private well owners have been notified and It is too early to determine if additional remedial work is necessary to address 1,4, dioxane which cannot be removed by airstripping at the existing pump and treat system, so the Navy is planning on doing additional

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sampling. Several rounds of sampling have been completed (11/05, 4/06, 5/06, 8/06) and results indicate that almost all the private wells are below the state cleanup level or are non-detect (EPA, Region 10, ID # WA5170090059) The Navy is working closely with EPA and the local Restoration Advisory Board.

Based on its crossgradient locale and remedial activities completed at this facility, this facility does not appear to pose RECs, as defined by ASTM, in connection to the subject site.

Based on a review of the EDR database report and site reconnaissance, it appears that the remaining facilities, located within a one-quarter mile of the subject site, do not pose potential environmental concerns in connection with the subject site.

6.2 Environmental Liens or Activities and Use Limitations

A review of public documents and regulating agency records shows no evidence of any environmental liens on the subject style.

6.3 Title Search Documentation

Title search documents for the subject site were obtained from Land Title Company. The information provided in these documents appears to be in agreement with the historical findings documented by AEG, as presented in this report.

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7 INTERVIEWS

7.1 Site Reconnaissance and Historical Interviews

Interviews were conducted with the following site owner, site representatives, local agencies and environmental contractors pertaining to historical and current external conditions of the subject property, history of the land use of the subject site or surrounding area, the existence of any information pertaining to the historical or current environmental conditions on the property or surrounding area, and the development plans for the subject site or surrounding area.

1. Mr. Dave Kleffle, current operator of the subject site, was interviewed by AEG on December 10, 2007 during the site reconnaissance. The West Valley Mart/Texaco gas station were originally constructed as a service station in 1951 by Shell Oil. Mr. Kleffle stated that he purchased West View Mart in 1988, just after the property owner, Mr. Bill Massey, had converted the service station into a gas station and convenience mart. Mr. Kleffle stated that in 1991, when the new Ecology regulations came into effect, Mr. Massey decided to decommission the former USTs and install new tanks. However, when the decommissioning was begun, petroleum contaminated soil was found at both UST basins and in the area of the proposed USTs nest just north of the pump islands. He stated that because the majority of the contamination was so close to the east and west walls of the convenience store, a Soil Vapor Extraction System (VES) was installed. He stated that the decommissioned USTs were replaced with four new single-walled steel tanks. He stated that in 2006, the gas station was converted from Shell Oil to Texaco products.

   During the site reconnaissance, AEG noted that the Sleiter Company was replacing gaskets on three out of four tank extractors. Mr. Kleffle indicated the automatic tank gauging (ATG) system had, since early December 2007, indicated that these same three tanks had failed leak detection tests. He stated that he believed that the failures were not due to a leak, but rather, a mechanical problem and so he was having the gaskets replaced. In a subsequent telephone interview, Mr. Kleffle stated that even after the repairs, the ATG was still indicating a leak in the same three tanks. He indicated that Northwest Pump has inspected the UST and ATG systems and had concluded that the problem was most likely mechanical. He explained that two tanks had been "manifolded together" and that it was creating problems for the ATG system. Nonetheless, Mr. Kleffle scheduled a tank tightness test for December 27, 2007. As per Mr. Sam Ross of Northwest Pump and Equipment, all the tanks were tight and no leak was detected.

2. Mr. Mike Hahn, prior owner/operator of the subject site, was interviewed by telephone on December 19, 2007. He stated that he purchased the subject site in the late 1970s and

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sold it to Mr. Bill Massey in 1988. When he purchased the site, it was a service station with two in-ground hoists. He expanded the services offered onsite to include tire sales. In order to do so, he constructed a warehouse directly behind (south) of the service station. Mr. Hahn stated that there were six USTs onsite when he sold the property.

3. Mr. Lee Hayes, former owner/operator of the subject site, was interviewed by telephone on December 19, 2007. He stated that he was employed at the service station from 1952 until 1978, when he purchased the site on a real estate contract. He stated that the service station had two repair bays with in-ground hoists and a sump, which was vacuumed out approximately every six weeks. The three original USTs were located on the west side of the service station. A fourth tank was added in the 1970s on the east side of the building. He stated that the USTs were stick-checked daily and no leaks were ever detected. Mr. Hayes stated that the service station was initially heated by heating oil and then converted to electricity in 1968. He was unsure whether the heating oil had been stored in an AST or UST.

4. Per Mr. Sam Ross of Northwest Pump and Equipment, who performed the tank tightness testing on the USTs at the subject site on December 27, 2007, was interviewed by telephone on December 27, 2007. He stated that all four of the USTs had been tested and passed.

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8 FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

In the professional opinion of AEG, an appropriate level of inquiry has been made into the current and previous ownership and use of the subject site consistent with good commercial and customary practice in an effort to minimize liability.

We have performed a Phase I Environmental Site Assessment, in accordance with the scope and limitations of the ASTM E1527-05, for the subject site, West View Mart and Texaco gas station located at 970 Ault Field Road in Oak Harbor, Island County, Washington. Any exceptions to, or deletions from, this practice are described in section 9.0 of this report

8.1 Findings and Conclusions

AEG has preformed a Phase I Environmental Site Assessment, in accordance with the scope and limitations of the ASTM E1527-05, for the West View Mart/Texaco gas station, located at 971 Ault Field Road in Oak Harbor, Island County, Washington, the subject site.

Based on the scope of work and findings of the ESA, AEG identified the following RECs, as defined by ASTM, in connection with the subject site based on historical and current practices at the subject site.

Historical RECs Onsite

The subject site has operated as gas station and/or automotive repair facility since 1950 to the present time. In 1991, Edge Analytical (Edge) conducted a site assessment at the subject site. There were six USTs onsite, split between two basins, one on the west side of the convenience mart and the others on the east side. Edge determined that gasoline range hydrocarbon soil contamination was present in both UST basins and surrounding the pump island. (Edge, 1995) Due to the location of the contamination – in close proximity with the convenience store and a building to the west – a VES was installed. The system consists of nine extraction wells and began operation in 1992.

A status report issued by Edge in 1995 outlined the results of testing completed in 1992, 1994, and 1995. During that period, the petroleum hydrocarbons vapor concentration declined from 2000 ppm to 25 ppm. (Note: There are no details provided in the Edge report as to which wells were tested.)

In 2004, SD&C tested the VES in order to "*evaluate the current discharge of petroleum hydrocarbon concentrations from the VES and the vapor wells, and the possibility of decommissioning the system*." Four vapor samples were collected from the VES system.

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According to the SD&C report, the sampling results "*indicated that there is a residual volume of petroleum hydrocarbon impacted soil in all of the vapor extraction well locations … The concentrations of the petroleum hydrocarbons in the soil are currently unknown, but it is likely that there is soil underlying the site that exceeds MTCA Method A cleanup levels*" (SD&C, 2004).

Current RECs Onsite

In 2007, AEG sampled the VES to "*determine the current state of the petroleum hydrocarbon contamination as the result of historical underground storage tanks (USTs).*" AEG extracted vapor samples from extractions wells (EW) EW-1 through EW-7. AEG instructed Libby Analytical to cease analysis at the first indication of petroleum hydrocarbons in any sample. The vapor sample from EW-7 contained concentrations of gasoline and gasoline constituents including BTEX which indicated that the site is still impacted by petroleum hydrocarbons. Additionally, AEG noted that the VES is in need of repair "*so that the system can be directed to the most affected areas of the site*" (AEG, 2007).

Geologic Hazards

Known active faults traverse Whidbey Island. Several strike –slip, reverse, and thrust displacement faults have been mapped in the northern area of Whidbey Island. Seismic reflection profiles, outcrops, boreholes, and potential field surveys have provided evidence of Quaternary movements on these faults (Johnson, S.Y., Potter, C.J., et. al., 1996). The presence of active faults on Whidbey Island poses geological hazards to the subject site and vicinity area.

Recommendations:

AEG recommends the following: 1) repair the vapor extraction system; 2) monitor the extraction wells; 3) submit vapor samples from the wells for analysis of petroleum hydrocarbons; 4) if analytical results of vapor samples indicate no detectable concentrations of constituents of concern then conduct subsurface investigation via a GeoProbe or other drilling methodology at specific areas at the subject site to confirm that petroleum hydrocarbons is no longer impacting the subsurface at the subject site; 5) enroll the subject site in Ecology's Voluntary Cleanup Program with the goal of obtaining a no further action status determination for the subject site.

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9 LIMITATIONS AND EXCEPTIONS

Appropriate inquiry was conducted and practically obtainable documentation was researched. AEG shall not be help responsible for conditions arising from concealed or incorrect information. AEG is not responsible for the independent conclusions, opinions, or recommendations made by others based on the field exploration and analysis presented in this report.

AEG's services were limited to the Scope of Work; no testing for specific gases,, polychlorinated biphenyls (PCBs), lead, asbestos-containing, materials, air monitoring, radon sampling, or magnetic survey were conducted as part of this ESA. No soils or water testing was included in this phase I environmental Site Assessment. Areas hidden from view or beneath the ground surface were not assessed. Areas not asses included but were not limited to: beneath vehicles, beneath concrete and asphalt. NO inspection was made under floors, above ceilings, or behind walls.

This report describes the result of AEG's investigation to identify the potential presence of hazardous conditions affecting the subject property. The facts and conclusions are subject to change over time and must be viewed within the context of the assessment. Section 4.6 of ASTM Practice E1527-05 states that "*an environmental site assessment meeting or exceeding this practice and completed less than 180 days prior to the date of acquisition or the date of intended transaction is presumed to be valid*." Certain information in the ESA that is more than 180 days old must be updated (i.e. regulatory records review, site visit, interviews, specialized knowledge and environmental liens). ISA reports older than one calendar year is NOT valid and will not meet AAI or ASTM E1527-05 standards.

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10 CERTIFICATION

The undersigned has performed its services and prepared this report in accordance with generally accepted environmental engineering consulting standards. The undersigned makes no warranties, either expressed or implied, as to the character and nature of such service and product.

Researched/Prepared by:	Linda J. Whitt, Registered Site Assessor
Reviewed by:	Yen-Vy Van, P.G., P.H.G. Senior Hydrogeologist
Declaration:	I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject site. I have developed and performed the all appropriate inquiries in conformance with the standard and practices set forth in 40 CFR Part 312.

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11 REFERENCES

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Interview: Mr. Dave Kleffle, current owner/operator of the West View Mart and Texaco gas station.

Interview: Mr. Mike Hahn, former owner/operator of the subject site.

Interview: Mr. Lee Hayes, former owner/operator of the subject site.

Interview: Mr. Sam Ross of Northwest Pump and Equipment.

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Source: Google Map, 2007

ASSOCIATED ENVIRONMENTAL GROUP, LLC

FIGURE 1 – SITE & VICINITY AERIAL PHOTO

West View Mart/Texaco gas station
971 Ault Field Road
Oak Harbor, WA 98277

Project No.: 07-282