PERIODIC REVIEW

Bellefield Office Park
Buildings N and O

Facility Site ID#: 22751725

1800 and 1756 114th SE
Bellevue, Washington

Northwest Region Office

TOXICS CLEANUP PROGRAM

February 2015

1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to ensure that human health and the environment are being protected at the Bellefield Office Park Buildings N and O (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed under the Voluntary Cleanup Program. The cleanup actions resulted in concentrations of total petroleum hydrocarbons (TPH), polychlorinated biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHs), arsenic, lead, and zinc remaining at the Site which exceed MTCA cleanup levels. The MTCA cleanup levels for soil are established under WAC 173-340-740. The MTCA cleanup levels for groundwater are established under WAC 173-340-720. WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

(a) Whenever the department conducts a cleanup action
(b) Whenever the department approves a cleanup action under an order, agreed order or consent decree
(c) Or, as resources permit, whenever the department issues a no further action opinion;
(d) and one of the following conditions exists:
    1. Institutional controls or financial assurance are required as part of the cleanup
    2. Where the cleanup level is based on a practical quantitation limit
    3. Where, in the department's judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

(a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site;
(b) New scientific information for individual hazardous substances of mixtures present at the site;
(c) New applicable state and federal laws for hazardous substances present at the Site;
(d) Current and projected site use;
(e) Availability and practicability of higher preference technologies; and
(f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

The Department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site Description and History

Building N (Aspenwood Building) - Former Anderson Property, 1800 114th Ave. S.E., Bellevue, WA 98004
Building O (Magnolia Building) - Former Koll Center Bellefield, 1756 114th Ave. S.E., Bellevue, WA 98004

The subject properties are included within the Bellefield Office Park located west of Interstate 405, south of S.E. 8th Street and east of 112th Avenue S.E. in Bellevue, Washington. The site can be located on the United States Geologic Survey Bellevue South Quadrangle, 7.5 Minute Series Topographic Map within Section 5, Township 24 North, Range 5 East (or approximately 122° 11' 40" west longitude, 47° 35' 45" north latitude). Land surface elevations generally range between 14 and 18 feet. The Mercer Slough surrounds the site. The general area of the Bellefield Office Park, including the subject properties is situated along the western edge of a valley that drains from north to south into Lake Washington. Historically, this area was part of a much deeper valley created by glaciation. The valley, carved by glaciers, was then partially filled by alluvial (river) deposits consisting of silts, sands and gravels. The partially filled valley was inundated with water when downstream drainage was blocked. Lake deposits consisting of silt and peat subsequently filled the valley.

The properties are used for general office purposes. A two story office building, over covered parking with associated parking lots, roadways, and landscaped areas are present on each property.

Spieker Properties (Spieker) purchased the Bellefield Office Park in March 1995. The initial purchase did not include the Building N (Aspenwood) and O (Magnolia) properties. Dalton, Olmsted & Fuglevand, Inc. (DOF), on behalf of Spieker, submitted an Independent Remedial Action Report (IRAP) (DOF 1995) to the Washington State Department of Ecology (Ecology) in June 1995. Based on the IRAP, Spieker requested a 'No Further Action' (NFA) letter for the initially purchased property which did not include Buildings N and O. Ecology requested that additional ground-water sampling and analysis be completed after reviewing the IRAP. The results of the requested work are documented in a report prepared by DOF (1996). Based on the IRAP and the results of the additional Ecology requested work, and after a restrictive covenant was recorded, Ecology issued an NFA letter for the initially purchased property on November 1, 1996. This 1996 cleanup is subject to a separate Periodic Review.

The Building N and O sites are located immediately adjacent to the initially purchased portion of the Bellefield Office Park. Spieker purchased the Building N property in December 1996 and the Building O property in January 1998. As part of these purchases, DOF completed additional soil and ground-water sampling on each of the properties. The primary purpose of the work was to generally evaluate whether the environmental conditions on the subject properties are similar to those on the initially purchased Bellefield Office Park property and to assist with construction of

Building N. The results of these additional samplings are documented in reports prepared by DOF (1997a, b, c; 1998). In addition to the work completed by DOF, Clayton Environmental Consultants (Clayton) completed a Phase 1 environmental site assessment for the former Koll Center Bellefield property (Building O property). This work was completed for Transamerica Realty Services, Inc. (former owner). The properties are now owned by a Goldman Sachs Real Estate Fund, and has changed hands more than once since Spieker owned them.

Development of the adjacent Bellefield Office Park and subject properties occurred over a former peat bog. Building N was constructed by Spieker in 1997 while Building O was present when Spieker purchased the property. Prior to 1916, the area in the vicinity of the subject properties was under water and formed part of Lake Washington. Following construction of the Hiram Chittendon Locks, the lake level was lowered and the site emerged as a peat bog. Property development in the general area began in 1970 by importing and placing fill on top of peat; dredging existing and new channels to improve drainage; and constructing buildings, bridges and pavements. The imported fill was reportedly demolition wood debris from wood-frame residences that were demolished as a result of the construction of Interstate 405 located approximately one-quarter mile east of the Site and demolition of super-structures of buildings in Seattle including the site of the Seattle Federal Office Building (Earth Consultants, 1988). The geologic materials encountered beneath the Building N and O properties are similar to those encountered elsewhere in the Bellefield Office Park area. Buildings and bridges are supported on piles bearing below the peat while parking lots, roadways and landscaped areas were constructed over various thicknesses of fill consisting of sand, gravel, logs and demolition debris (wood, brick fragments etc.). Consolidation of the peat deposits caused by filling to develop the area has caused ground settlements.

2.2 Site Investigations and Sample Results

Geotechnical investigations began in the late 1960's to determine design parameters for development of the general area. A series of peat probes were completed in 1969 that defined the general subsurface conditions. These explorations were supplemented with borings completed on the subject properties in 1996 and 1997. Prior to development of the building N and O sites, approximately 25 to 45 feet of soft, brown peat was found to overlie a loose to dense sand and gravel. The subsurface conditions were modified during development by placement of fill. Geologic data from recently drilled borings and wells indicate that 15 to 30 feet of fill has been placed on the subject sites. This fill generally consists of a variable surficial layer of clean to silty sand w/ gravel, cobbles and brick fragments that overlie a layer consisting of wood fragments and logs/timbers with sand, brick and other fragments.

The low lying Mercer Slough receives precipitation runoff from paved areas (e.g. parking lots and roadways) located within and surrounding the slough, including runoff-from 1-405. The slough is dissected by several surface water channels, two of which surround the office park. The topographic relationships of the area also indicate that the slough likely receives ground-water recharge from surrounding higher areas. In the Puget Sound region, topographically higher areas are typically ground-water recharge areas, while lower elevation areas are ground-water discharge areas. The depth to water in well MW-Kl measured on December 19, 1997 was

approximately 1.5 feet below ground surface. Water levels have been periodically measured in monitor wells DW-l to DW-6 between March 1996 and April 1998. Depths to water below ground-surface measured in these wells ranged between approximately 0.2 feet to 3.7 feet. Surface water runoff at the site is handled by drains located on the adjacent streets, parking areas and sloughs. During periods of high precipitation, ground-water levels and water levels in the adjacent slough flood some parking lots in the office park below an elevation of approximately 16 feet.

The Building N property is approximately 4 acres in size. When Spieker purchased this property, it was undeveloped, except for fill that had been placed over the former peat bog. Spieker constructed the existing building and parking areas in 1997. As part of the assessments associated with purchasing and developing the property, DOF completed the following work:

- Two soil borings were drilled and soil samples were collected and analyzed for petroleum hydrocarbons and PCBs;
- One of the borings (BA-MW 1) was converted into a monitor well and a ground water sample was obtained and analyzed for petroleum hydrocarbons, PCBs and total metals (arsenic, lead and zinc);
- Near-surface soil samples well collected and analyzed for petroleum hydrocarbons.

Soil samples from borings BA-B 1 and BA-MW1 were collected in November 1996 from depths between approximately 2.5 feet and 22.5 feet. Samples were analyzed for petroleum hydrocarbons (WTPH-D, extended) and PCBs. Diesel range hydrocarbons ranged between less than 10 milligrams per kilogram (mg/kg) to 228 mg/kg, and heavy-oil range hydrocarbons ranged between approximately 52 mg/kg and 1,340 mg/kg. The highest petroleum hydrocarbon concentration (1,568 mg/kg) was found in a sample collected at a depth of 17.5 feet at BA-MW1. No PCBs were detected in any of the samples at a reporting limit of 0.05 mg/kg.

Near-surface soil samples were obtained during construction of Building N. The first sampling occurred in March 1997 (DOF 1997b) to assess the presence of petroleum hydrocarbons in soil piles created by footing excavations. Diesel range hydrocarbon concentrations ranged between less than 10 mg/kg to 134 mg/kg while heavy-oil range hydrocarbons ranged between 102 mg/kg and 1,180 mg/kg. The highest concentration detected was 1,314 mg/kg. A second round of near surface soil sampling occurred in May 1997 (DOF 1997c). The purpose of the testing was to provide data to assess the concentrations of petroleum hydrocarbons in soils excavated to install near-surface utilities. Diesel range hydrocarbon concentrations ranged between less than 10 mg/kg to approximately 69 mg/kg while heavy-oil range hydrocarbons ranged between less than 25 mg/kg and 1,200 mg/kg. The highest concentration detected was 1,341 mg/kg.

As part of construction of Building N, approximately 275 tons of soil were removed from the property and disposed in the Rabanco Regional Disposal Company's landfill located near Roosevelt, WA. The material consisted of soil from piles N-4, N-6 and N-7 and soil in the vicinity of location W-7.

A ground-water sample was obtained from well BA-MW1 on November 25, 1996. Low flow/low turbidity sampling procedures were used to collect the sample. The sample was analyzed by North Creek Analytical, Inc. for petroleum hydrocarbons, PCBs and total arsenic, lead and zinc. Petroleum hydrocarbons, PCBs, total arsenic and total zinc were not detected above laboratory reporting limits in the ground-water sample from BA-MW1. Total lead was detected at a concentration of 0.007 milligrams per liter (mg/l).

The Building O property is approximately 7 acres in size. When Spieker purchased this property, the existing building and facilities had been constructed. As part of the assessments associated with purchasing the property DOF completed the following work (DOF 1998):

- Two soil borings were drilled and soil samples were collected and analyzed for petroleum hydrocarbons, PCBs, and polycyclic aromatic hydrocarbons (PAHs);
- One of the borings (MW-K1) was converted into a monitor well and a ground water sample was obtained and analyzed for petroleum hydrocarbons, PCBs, PAHs and total metals (arsenic, lead and zinc).

In addition, Transamerica Realty Services, Inc. (previous owner) contracted Clayton Environmental Consultants (Clayton) to complete a Phase I Environmental Site Assessment. Clayton's Phase I assessment did not identify any specific soil or ground-water contamination on the Building O property; however, they noted that contamination had been detected on the adjacent Bellefield Office Park Site (covered by Ecology's November 1996 NFA letter) and considered "it likely that similar contamination exists at the Koll Center Bellefield property".

Soil samples from borings B-K1 and MW-Kl were collected from depths between approximately 3 feet and 20 feet in December 1997. Samples were analyzed for petroleum hydrocarbons (WTPH-D, extended), PCBs, and PAHs. Diesel range hydrocarbons ranged between 273 mg/kg and 394 mg/kg, and heavy-oil range hydrocarbons ranged between approximately 1,680 mg/kg and 2,890 mg/kg. The highest petroleum hydrocarbon concentration (3,284 mg/kg) was found in a sample collected at a depth of 3 to 4 feet at MW-K1. PCBs were detected in samples from each boring. Aroclors 1242, 1254, and 1260 were detected at a total PCB concentration ranging between 0.36 mg/kg to 1.5 mg/kg. PAHs were also detected in soil samples from both soil borings. Concentrations of individual PAHs ranged from less than 0.05 mg/kg to 5.9 mg/kg (fluoranthene). The sum of carcinogenic PAHs (CPAHs) ranged from 3 mg/kg to 11.9 mg/kg. The highest concentration was for a sample collected from a depth of 3 to 9.5 feet at B-K1.

A ground-water sample was obtained from well BA-MW1 on December 18, 1997. Low flow/low turbidity sampling procedures were used to collect the sample. The sample was analyzed by North Creek Analytical, Inc. for petroleum hydrocarbons, PCBs, PAHs and total arsenic, lead and zinc. Petroleum hydrocarbons, PCBs, total arsenic and total zinc were not detected above laboratory reporting limits in the ground-water sample from MW-K1. Acenaphthene (1.3 micrograms per liter [ug/1]), fluoranthene (0.28 ug/l), fluorene (1.5 ug/l), naphthalene (6.8 ug/l), phenanthene (1.5 ug/l), and total lead (8.9 ug/l) were detected in the ground-water sample

Groundwater was monitored for eight years, with the last required sampling completed in May 2004. Diesel range TPH slightly exceeded current standards in May 2000 but compare more favorably with the standards in effect when the cleanup began. CPAHs were not detected at levels of concern but it should be noted that detection limits were higher than desirable to properly calculate a CPAH summation using toxicity equivalency.

2.3 Cleanup Actions

No actual soil removal for cleanup occurred, but 275 tons of soil were removed during the construction of Building N for the foundation piles. Not all of that was contaminated. The application of non-residential and risk-based cleanup standards, recording of Restrictive Covenants, and groundwater monitoring showed the remedy to be protective of human health and the environment. In addition there is pavement over much of the area, but that was not considered a necessary part of the remedy. The surrounding surface waters and sediments were tested as part of the cleanup action three years earlier of the adjacent Bellefield Office Park, the owner being the same. The results were satisfactory, although sediments are affected by upstream runoff sources.

A 'No Further Action' letter was issued by Ecology May 21, 1999 after the recording of two restrictive covenants, one for each building.

2.4 Cleanup Levels

Total petroleum hydrocarbon (TPH) concentrations on the Building N and O sites ranged between not detected to 3,284 mg/kg. The majority (greater than approximately 85%) of petroleum hydrocarbons are heavy-oil hydrocarbons (C24-C40). The range of petroleum hydrocarbons detected on the Building N and O sites is consistent with TPH concentrations detected elsewhere in the Bellefield Office Park area. The results of soil analyses were compared to TPH cleanup levels derived using Ecology's interim Total Petroleum Hydrocarbon (TPH) cleanup guidance (Ecology 1997). Data is not available to rigorously apply this guidance; however, if it is assumed that all the hydrocarbons are aromatic, a residential land use cleanup level of 2,400 mg/kg and a commercial land use cleanup level of 9,600 mg/kg are derived using the pyrene surrogate (Clarc II - Ecology 1996). The concentrations in three of the thirty-eight samples analyzed were above the 2,400 mg/kg residential soil ingestion cleanup level. None of the samples exceeded the commercial land use cleanup level of 9,600 mg/kg.

Many of the detected concentrations of petroleum hydrocarbons are above the Model Toxics Control Act (MTCA) Method A cleanup level of 200 mg/kg, based on protection of groundwater quality. However, analysis of ground-water samples from wells BA-MW1 and MW-K1 using Washington State Method WTPH-DX with silica gel cleanup did not detect the presence of petroleum hydrocarbons. Petroleum hydrocarbons were not detected at reporting levels of 0.25 mg/l for diesel range hydrocarbons (C12 to C24) and 0.75 mg/l for heavy-oil range hydrocarbons (C24 to C40). This is consistent with the low-solubility of the predominant hydrocarbons detected in soil samples (i.e. heavy-oil hydrocarbons).

PCBs were not detected in soil samples on the Building N property. On the Building O property, PCBs were detected in three of the four soil samples analyzed. Total PCB concentrations ranged from less than 0.05 mg/kg to 1.5 mg/kg. The PCB concentration of 1.5 mg/kg (B-K1 - 3' to 8') slightly exceeds the MTCA residential Method A cleanup level of 1 mg/kg but is below the Method C cleanup level for commercial sites of 5.2 mg/kg (CLARC II - Ecology 1996). The PCB concentrations on the Building O property are similar to those detected in borings B-1 to B-3 located on the Bellefield Office Park Site, where concentrations measured in soil samples ranged from less than 0.05 mg/kg to0.75 mg/kg. PCBs were not detected in ground-water samples collected from monitor wells BA-MW1 and MW-Kl. The reporting limit was 0.1 ug/l.

PAHs were detected on the Building O property in the four soil samples. For discussion purposes, the PAHs are divided into non-carcinogenic PAHs (NPAHs) and carcinogenic PAHs (CPAHs). The lowest NPAR cleanup level (based on soil contact) is for pyrene and is 2,400 mg/kg. Concentrations of the NPAHs detected in soil are well below the pyrene cleanup level (Method A, WAC 173-340-745). CPAH concentrations in soil samples collected from boring B-K1 ranged between 7.5 mg/kg and 11.9 mg/kg while those in MW-K1 ranged between 3.0 mg/kg and 3.3 mg/kg. A comparison of the CPAH concentrations in soil with the possible cleanup levels indicates that the residential cleanup level is exceeded at both locations and that the commercial cleanup level is exceeded at B-K1. None of the samples exceeded the industrial cleanup level.

PAHs were not analyzed in soil elsewhere on the Bellefield Office Park site. However, the PAHs appear to be associated with petroleum hydrocarbons. Based on the similar concentrations of petroleum hydrocarbons detected in the Bellefield Office Park area, in the opinion of the environmental consultants, the PAH concentrations should be similar.

Several non-carcinogenic PAHs were detected in the groundwater sample from MW-Kl installed on the Building O property. The detected concentrations are below the MTCA cleanup levels.

Ground-water samples collected from monitor wells BA-MW1 and MW-K1 were analyzed for total arsenic, total lead, and total zinc. Arsenic and zinc were not detected at reporting limits of .001 mg/l and 0.02 mg/l, respectively. Total lead was measured at concentrations of 0.007 and 0.0089 mg/l which slightly exceeds the MTCA Method A cleanup level of 0.005 mg/l. The total lead concentration measured in the sample from wells BA-MW1 and MW-Kl are similar to the concentrations measured elsewhere on the Bellefield Office Park. Samples from wells DW-l to DW-6, ranged between less than 0.002 mg/l and 0.014 mg/l.

Residential soil cleanup standards were not met at a standard point of compliance. Non-residential levels for soil were allowed using MTCA Methods A, B, and C. Groundwater was deemed not to have been affected after eight years of groundwater monitoring.

2.5 Restrictive Covenant

Based on the property use and cleanup levels, it was determined that the Site was eligible for a 'No Further Action' determination if Restrictive Covenants were recorded for the properties.

Two Restrictive Covenants were recorded for the Site in 1999, one for each property, which imposed the following limitations:

1. Except as provided in Sections 2 and 3 below, any contaminated soils at the Property may remain in place until such time as Spieker, or its successors, grantees or assigns, redevelops or makes substantial new improvements to the Property which cause excavation of soils containing hazardous substances at concentrations above the then applicable State of Washington cleanup levels, at which time any such soils that have been excavated shall be remediated. For purposes of this Section, demolition of existing buildings, and demolition and/or resurfacing of paved areas of the Property will not be considered a substantial improvement that requires excavation and remediation of subsurface contaminated soils.
2. If any utility or other work is required to be performed at the Property (such as underground cable, wire, conduit, manholes, handholes, plate utility poles) by the City of Bellevue or other public entity or private utility company in areas that contain concentrations of hazardous substances above the then applicable State of Washington cleanup standards, Spieker, or its grantees, successors or assigns, shall remediate any contaminated soils at the Property that will be excavated by such work as necessary for the protection of the health or safety of the persons performing the work, or the protection of human health or the environment.
3. If at any time Spieker, or its grantees, successors or assigns, learns of contamination at the Property which presents an imminent risk to human health or the environment, Spieker, or its grantees, successors, or assigns, shall take immediate action to remediate such contamination.
4. Any activity on the Property that may interfere with the ongoing monitoring of groundwater wells is prohibited. In addition, no groundwater may be taken for potable water purposes at the Property.
5. Spieker, or its grantees, successors or assigns, must give written notice to the Department of Ecology, or to a successor agency, of such persons intent to convey any interest in the Property. No conveyance of title, easement, lease or other interest in the Property shall be consummated for a period of three years from the date of this document without adequate and complete provision for the continued operations, maintenance and monitoring of the groundwater wells.
6. Spieker, or its grantees, successors or assigns, must notify the Department of Ecology, or its successor agency, prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Public notice and comment may he sought by the Department of Ecology or its successor agency with regard to the proposed change.
7. Spieker, or its grantees, successors or assigns, shall allow authorized representative of the Department of Ecology or from a successor agency, the right to enter the Property at reasonable times for the purpose of evaluating compliance with the monitoring of groundwater wells, overseeing any remediation that is required pursuant to Sections 1, 2 and 3 above, to take samples and to inspect records.
8. Spieker, and its grantees, successors and assigns, reserve the right under WAC 173-340-440 (1997 ed.) to record an instrument which provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However,

such instrument may be recorded only with consent of the Department of Ecology or of a successor agency. Public notice and comment may be sought by the Department of Ecology or of a successor agency prior to the recording of such an instrument.

9. Any action required by this Restrictive Covenant to be performed by Spieker, or its grantees, successors or assigns, shall be the duty of the person who is the legal owner of the Property at the time the action is required, and a prior owner of the Property shall have no duty to perform such action.

The Restrictive Covenant is available as Appendix 6.4.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

Two Restrictive Covenants for the Site were recorded, one for each property, and are in place. The Restrictive Covenants prohibit activities that will result in the release of contaminants at the Site without Ecology's approval, and prohibits any use of the properties that is inconsistent with the Covenants. The Restrictive Covenants serve to ensure the long term integrity of the remedy.

Based upon the site visit conducted on February 3, 2015 the remedy at the Site continues to eliminate exposure to contaminated soils by ingestion and contact. The asphalt appears in average condition and no repair, maintenance, or contingency actions have been required, although normal maintenance is recommended. The Site is still operating as an office park. A photo log is available as Appendix 6.5.

Soils with TPH, PCBs, PAHs, arsenic, lead, and zinc concentrations higher than MTCA residential cleanup levels are still present at the Site. However, the remedy prevents human exposure to this contamination by ingestion and direct contact with soils. The Restrictive Covenant for the property will ensure that the contamination remaining is contained and controlled.

3.2 New scientific information for individual hazardous substances for mixtures present at the Site

There is no new scientific information for the contaminants related to the Site.

3.3 New applicable state and federal laws for hazardous substances present at the Site

The cleanup at the site was governed by [insert appropriate edition, like: Chapter 173-340 WAC (1996 ed.)]. WAC 173-340-702(12) (c) [2001 ed.] provides that,

"A release cleaned up under the cleanup levels determined in (a) or (b) of this subsection shall not be subject to further cleanup action due solely to subsequent amendments to the provision in this chapter on cleanup levels, unless the department determines, on a case-by-case basis, that the previous cleanup action is no longer sufficiently protective of human health and the environment."

Although cleanup levels changed for petroleum hydrocarbon compounds as a result of modifications to MTCA in 2001, contamination remains at the site above the new MTCA Method A and B cleanup levels. Even so, the cleanup action is still protective of human health and the environment. A table comparing MTCA cleanup levels from 1991 to 2001 is available below.

Analyte	1991 MTCA Method A Soil Cleanup Level (ppm)	2001 MTCA Method A Soil Cleanup Level (ppm)	1991 MTCA Method A Groundwater Cleanup level (ppb)	2001 MTCA Method A Groundwater Cleanup Level (ppb)
Cadmium	2	2	5	5
Lead	250	250	5	15
TPH	NL	NL	1000	NL
TPH-Gas	100	100/30	NL	1000/800
TPH-Diesel	200	2000	NL	500
TPH-Oil	200	2000	NL	500
NL = None listed				

3.4 Current and projected site use

The site is currently used for non-residential purposes. There have been no changes in current or projected future site or resource uses.

3.5 Availability and practicability of higher preference technologies

The remedy implemented included containment of hazardous substances, and it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

3.6 Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the remedial action were capable of detection below selected site cleanup levels, with the possible exception of CPAHs. The presence of improved analytical techniques would not affect decisions or recommendations made for the site.

4.0 CONCLUSIONS

The following conclusions have been made as a result of this periodic review:

- The cleanup actions completed at the Site appear to be protective of human health and the environment.

- Soils residential cleanup levels have not been met at the standard point of compliance for the Site; however, the cleanup action has been determined to comply with non-residential cleanup standards.

- Restrictive Covenants for the properties are in place and continue to be effective in protecting public health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this periodic review, the Department of Ecology has determined that the requirements of the Restrictive Covenants continue to be met. No additional cleanup actions are required by the property owner. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the remedy is maintained.

4.1 Next Review

The next review for the site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

Summary of Groundwater Sampling Events Through May 2004, by Dalton, Olmsted, & Fuglevand, Inc., dated July 31, 2004;

Summary of Groundwater Sampling Events Through January 2002, by Dalton, Olmsted, & Fuglevand, Inc., dated February 4, 2002;

Summary of 1999 Groundwater Sampling Event, by Dalton, Olmsted, & Fuglevand, Inc., dated February 23, 2000;

Independent Remedial Action Report, by Dalton, Olmsted, & Fuglevand, Inc., dated October, 1998;

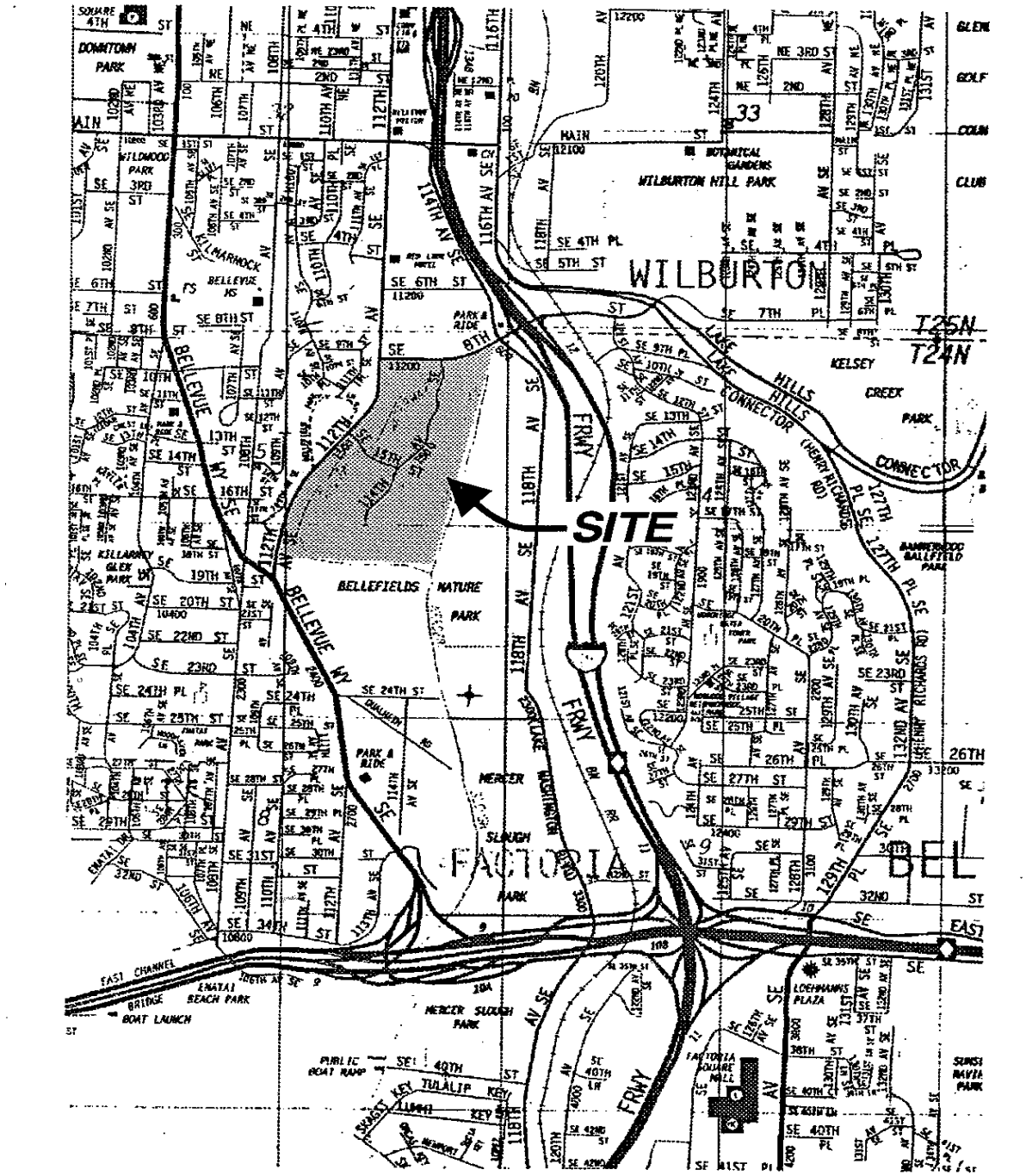
Ecology, 1999, Restrictive Covenant.

Ecology, 2009, Site Visit.

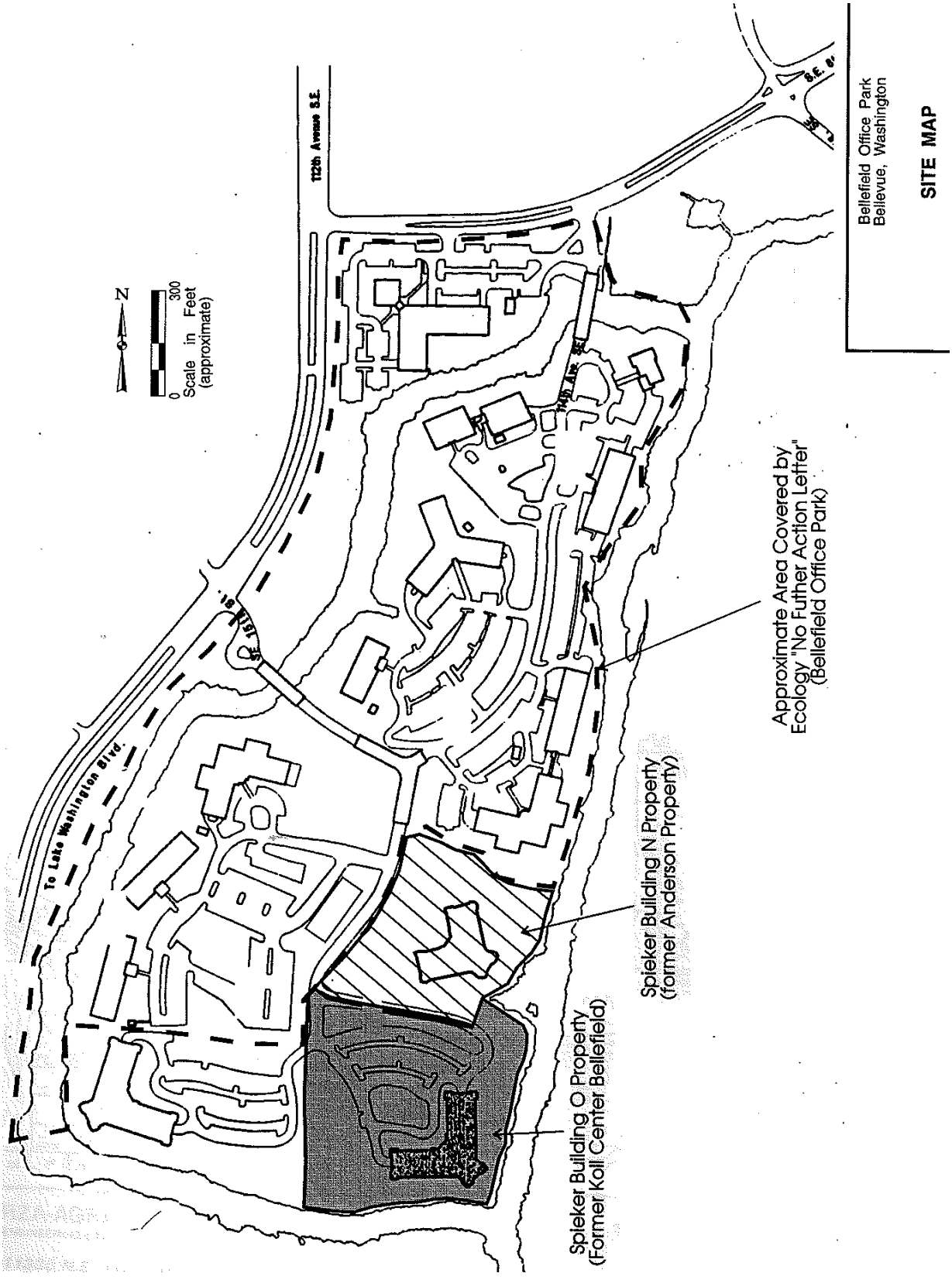
Ecology, 2015, Site Visit.

6.0 APPENDICES

6.1 Vicinity Map



6.2 Site Plan


SITE MAP
Bellefield Office Park
Bellevue, Washington
112th Avenue S.E.
N
Scale in Feet
(approximate)
0
300
To Lake Washington Blvd.
Approximate Area Covered by
Ecology "No Futher Action Letter"
(Bellefield Office Park)
Spieker Building N Property
(former Anderson Property)
Spieker Building O Property
(Former Koll Center Bellefield)

6.3 TPH-Dx Concentration Map

Not available

6.4 Environmental Covenant

Ralph H. Palumbo
Summit Law Group PLLC
1505 Westlake Avenue North, Suite 300
Seattle, WA 98109

Restrictive Covenant (for Aspenwood Building "N") CTIW9902687-CR

Recording No. of any assigned, released or referenced documents: None 4139

Grantors names: Spieker Properties, L.P.

Grantees names: None

Abbreviated legal description: Lot 6 of Bellefield Office Park (Exhibit A)

Assessor's tax parcel number: 066287-0060-02 (address: 1800 114th Avenue S.E., Bellevue, WA)

9904062100

RESTRICTIVE COVENANT

Spieker Properties, L.P., a California Limited Partnership ("Spieker") is the owner of the real property in the County of King, State of Washington (legal description attached hereto as Exhibit A), hereinafter referred to as the "Property". The Property contains petroleum hydrocarbons in subsurface soil locations BA-MW-1 and in other near surface soil locations sampled as part of installing building foundations and buried utilities. The concentrations of petroleum hydrocarbons at these locations exceed the Method A cleanup levels set forth in the Washington Model Toxics Control Act Cleanup Regulation. The concentrations are summarized in the Independent Remedial Action Report, dated October 1998 and prepared by Dalton, Olmsted & Fuglevand, as Table 1. A copy of the Table is attached as Exhibit B.

Declarations

Spieker hereby subjects the Property to the following terms, conditions and restrictions ("Restrictive Covenants"):

1. Except as provided in Sections 2 and 3 below, any contaminated soils at the Property may remain in place until such time as Spieker, or its successors, grantees or assigns, redevelops or makes substantial new improvements to the Property which cause excavation of soils containing hazardous substances at concentrations above the then applicable State of Washington cleanup levels, at which time any such soils that have been excavated shall be remediated. For purposes of this Section, demolition of existing buildings, and demolition and/or resurfacing of paved areas of the Property will not be considered a substantial improvement that requires excavation and remediation of subsurface contaminated soils.

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2. If any utility or other work is required to be performed at the Property (such as underground cable, wire, conduit, manholes, handholes, plate utility poles) by the City of Bellevue or other public entity or private utility company in areas that contain concentrations of hazardous substances above the then applicable State of Washington cleanup standards, Spieker, or its grantees, successors or assigns, shall remediate any contaminated soils at the Property that will be excavated by such work as necessary for the protection of the health or safety of the persons performing the work, or the protection of human health or the environment.

3. If at any time Spieker, or its grantees, successors or assigns, learns of contamination at the Property which presents an imminent risk to human health or the environment, Spieker, or its grantees, successors, or assigns, shall take immediate action to remediate such contamination.

4. Any activity on the Property that may interfere with the ongoing monitoring of groundwater wells is prohibited. In addition, no groundwater may be taken for potable water purposes at the Property.

5. Spieker, or its grantees, successors or assigns, must give written notice to the Department of Ecology, or to a successor agency, of such persons intent to convey any interest in the Property. No conveyance of title, easement, lease or other interest in the Property shall be

consummated for a period of three years from the date of this document without adequate and complete provision for the continued operations, maintenance and monitoring of the groundwater wells.

6. Spieker, or its grantees, successors or assigns, must notify the Department of Ecology, or its successor agency, prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Public notice and comment may be sought by the Department of Ecology or its successor agency with regard to the proposed change.

7. Spieker, or its grantees, successors or assigns, shall allow authorized representative of the Department of Ecology, or from a successor agency, the right to enter the Property at reasonable times for the purpose of evaluating compliance with the monitoring of groundwater wells, overseeing any remediation that is required pursuant to Sections 1, 2 and 3 above, to take samples and to inspect records.

8. Spieker, and its grantees, successors and assigns, reserve the right under WAC 173-340-440 (1997 ed.) to record an instrument which provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such instrument may be recorded only with consent of the Department of Ecology or of a successor agency. Public notice and comment may be sought by the Department of Ecology or of a successor agency prior to the recording of such an instrument.

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9. Any action required by this Restrictive Covenant **to be performed by Spieker**, or its grantees, successors and assigns, shall be the duty of person **who is the legal owner of the** Property at the time the action is required, and a prior owner of **the Property shall have no duty to** perform such action.

DATED this 24th day of ~~February~~ March, 1999.

SPIEKER PROPERTIES, L.P.
a California Limited Partnership

By: Spieker Properties, Inc., a Maryland Corporation
Its: General Partner

By: _____
Richard Leider
Vice President

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I certify that I know or have satisfactory evidence that **Donald S. Jefferson is the person** who appeared before me, and said person acknowledged that he **signed this instrument, on oath** stated that he was authorized to execute the instrument and acknowledged it as the Restrictive Covenant of Spieker Properties, L.P. to be the free and voluntary **act and deed of said** corporation, for the uses and purposes therein mentioned.

Given under my hand and official seal this 24th day of ~~February~~ March, 1999.

CATHY THOMPSON NOTARY PUBLIC STATE OF WASHINGTON COMMISSION EXPIRES MAY 9, 1999

(Notary signature)

(Print name of Notary)
NOTARY PUBLIC **in and for the State of** Washington, residing at Everett
My appointment expires 12/9/99

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LEGAL DESCRIPTION OF THE PROPERTY

(Aspenwood Building "N")

LOT 6 OF BELLEFIELD OFFICE PARK, AS PER PLAT RECORDED IN VOLUME 119 OF PLATS, PAGES 81 THROUGH 90, RECORDS OF KING COUNTY; TOGETHER WITH THOSE CERTAIN EASEMENTS FOR SEWER LINES, WATER LINES, LIGHT STANDARDS, TELEPHONE LINE AND TELEPHONE CONDUIT CONTAINED IN INSTRUMENTS RECORDED UNDER RECORDING NOS. 8208190269, 8208190270, 8211120393, 8211120394, 8211120395 AND 8310200183.

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EXHIBIT A

TABLE 1 - Summary of Soil Quality Data - Building N Site

Building N Site
Bellefield Office Park

Results of Soil Samples From Soil Borings (Nov. 1996)

Sample No.	Depth (feet)	Petroleum Hydrocarbons (mg/kg)		PCBs (mg/kg)	Material Description
		Diesel Range	Heavy-Oil Range		
BA-B1	2.5	<10	51.9	<0.05	Very silty Sand w/ gravel & brick
BA-B1	12.5	142	721	<0.05	Wood fragments w/ some silty sand and brick frags.
BA-B1	22.5	209	451	<0.05	Wood fragments w/ some silty sand and brick frags; sheen on wood
BA-MW1	7.5	19.4	115	<0.05	Moist Wood w/ silty sand and sandy silt
BA-MW1	17.5	226	1340	<0.05	Wood fragments in silty sand matrix

Results of Soil Stockpile Analyses From Footing Excavations (March 1997)

Sample No.	Depth (feet)	Petroleum Hydrocarbons (mg/kg)			Material Description
		Diesel Range	Heavy-Oil Range	Total	
N-1	stockpile	19.3	102	121	Silty Sand w/ gravel, wood debris, grass
N-2	stockpile	18.1	139	158	Silty Sand w/ gravel, cobbles, wood debris
N-3	stockpile	20.1	169	189	Silty Sand w/ gravel, wood and metal debris
N-4	stockpile	39.8	272	312	Silty Sand w/ gravel, wood debris, metal, brick frags.
N-5	stockpile	<10	31.1	41.1	Silty Sand w/ gravel, wood & metal debris, brick/concrete
N-6	stockpile	134	1180	1314	Similar to N5
N-7	stockpile	73.4	566	639	Silty Sand w/ gravel, wood & metal debris

Results of Soil Samples From Utility Trench Excavations (May 1997)

Sample No.	Depth (feet)	Petroleum Hydrocarbons (mg/kg)			Material Description
		Diesel Range	Heavy-Oil Range	Total	
S-1	0-3.5	<10	42.5	42.5	Gray-brown, silty, fine to coarse Sand w/ gravel
S-2	0-2.5	34.3	223	257.3	Gray-brown, silty, fine to coarse Sand w/ wood chips, bark, roots
S-3	0-2	28.7	203	229.7	Gray-brown, silty, fine to coarse Sand w/ wood chips, bark, roots
S-4	0-1.5	45.4	764	809.4	Brown, silty, gravelly fine to coarse Sand w/ wood debris
S-5	0-1.5	17.5	233	250.5	Dk. brown-orange, silty, fine to coarse Sand
S-6	0-2.5	56.3	617	673.3	Dk. brown-orange, silty, fine to coarse Sand w/ wood & gravel
W-1	0-3	57.8	334	391.8	Brown, silty, fine to coarse Sand w/cobbles, gravel, wood debris
W-2	0-4	16.6	131	147.6	Mixed silt, sand, gravel & cobbles w/ wood & brick debris
W-3	0-4.5	68.7	457	525.7	Mixed silt, sand, gravel & cobbles w/ wood & brick debris
W-4	0-4	16.9	144	160.9	Gray, silty, fine to coarse Sand w/ gravel & wood/brick debris
W-5	0-3	38.9	225	264.9	Dk. brown, wood debris w/ intermixed sand
W-6	0-3	23.8	155	178.8	Dk. brown, wood debris w/ intermixed sand
W-7	0-3	141	1200	1341	Wood debris w/ brick debris & sand
P-1	0-4	<10	74.9	74.9	Brown, silty, fine to coarse Sand w/ brick & wood debris
P-2	0-3	13.1	85.7	98.8	Gray/brown, silty, gravelly, fine to coarse Sand w/ wood debris
P-3	0-2	10.4	74.1	84.5	Gray/brown, silty, gravelly, fine to coarse Sand w/ wood debris
G-1	1-1.5	19	197	216	Brown, silty, fine to coarse Sand
G-2	0.5-1	12.1	77.3	89.4	Gray/brown, gravelly, fine to coarse Sand
G-3	0-0.5	<10	<25	<25	Gray/brown, silty, gravelly, fine to coarse Sand
G-4	0-0.5	29.5	176	205.5	Brown, silty, fine to coarse Sand w/ wood fragments
G-5	0-0.5	48.8	336	384.8	Brown, silty, fine to coarse Sand w/ wood fragments
G-6	0-0.5	34	176	210	Brown, silty, fine to coarse Sand w/ wood fragments

Notes: * Diesel-range hydrocarbons (C12-C24)
* Heavy-oil range hydrocarbons (C24-C40)
* Results in the diesel organics range are primarily due to overlap from a heavy oil range product

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Ralph H. Palumbo
Summit Law Group PLLC
1505 Westlake Avenue North, Suite 300
Seattle, WA 98109

Restrictive Covenant (for Magnolia Building "O")

Recording No. of any assigned, released or referenced documents: None

C I W990265794 $13.45

Grantors names: Spieker Properties, L.P.

Grantees names: None

Abbreviated legal description: Lot 7 and Tract A, Bellefield Office Park (Exhibit A)

Assessor's tax parcel number: 066287-0070-00 (1756 114th Avenue S.E., Bellevue, WA)

RESTRICTIVE COVENANT

Spieker Properties, L.P., a California Limited Partnership ("Spieker") is the owner of the real property in the County of King, State of Washington (legal description attached hereto as Exhibit A), hereinafter referred to as the "Property". The Property contains petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs) in subsurface soil locations B-K1 and MW-K1. The concentrations of petroleum hydrocarbons at these locations exceed the Method A cleanup levels set forth in the Washington Model Toxics Control Act Cleanup Regulation (MTCA). Concentrations of PAHs and PCBs are above the Method A cleanup levels for residential sites but are below the Method A cleanup levels for industrial sites as set forth in the MTCA. The soil concentrations are summarized in the Independent Remedial Action Report, dated October 1998 and prepared by Dalton, Olmsted & Fuglevand, as Table 3. A copy of the Table is attached as Exhibit B.

Declarations

Spieker hereby subjects the Property to the following terms, conditions and restrictions ("Restrictive Covenants"):

1. Except as provided in Sections 2 and 3 below, any contaminated soils at the Property may remain in place until such time as Spieker, or its successors, grantees or assigns, redevelops or makes substantial new improvements to the Property which cause excavation of soils containing hazardous substances at concentrations above the then applicable State of Washington cleanup levels, at which time any such soils that have been excavated shall be remediated. For purposes of this Section, demolition of existing buildings, and demolition and or resurfacing of paved areas of the Property will not be considered a substantial improvement that requires excavation and remediation of subsurface contaminated soils.

2. If any utility or other work is required to be performed at the Property (such as underground cable, wire, conduit, manholes, handholes, plate utility poles) by the City of Bellevue or other public entity or private utility company in areas that contain concentrations of hazardous substances above the then applicable State of Washington cleanup standards, Spieker, or its grantees, successors or assigns, shall remediate any contaminated soils at the Property that will be excavated by such work as necessary for the protection of the health or safety of the persons performing the work, or the protection of human health or the environment.

3. If at any time Spieker, or its grantees, successors or assigns, learns of contamination at the Property which presents an imminent risk to human health or the environment, Spieker, or its grantees, successors, or assigns, shall take immediate action to remediate such contamination.

4. Any activity on the Property that may interfere with the ongoing monitoring of groundwater wells is prohibited. In addition, no groundwater may be taken for potable water purposes at the Property.

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5. Spieker, or its grantees, successors or assigns, must give written notice to the Department of Ecology, or to a successor agency, of such persons intent to convey any interest in the Property. No conveyance of title, easement, lease or other interest in the Property shall be consummated for a period of three years from the date of this document without adequate and complete provision for the continued operations, maintenance and monitoring of the groundwater wells.

6. Spieker, or its grantees, successors or assigns, must notify the Department of Ecology, or its successor agency, prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Public notice and comment may be sought by the Department of Ecology or its successor agency with regard to the proposed change.

7. Spieker, or its grantees, successors or assigns, shall allow authorized representative of the Department of Ecology, or from a successor agency, the right to enter the Property at reasonable times for the purpose of evaluating compliance with the monitoring of groundwater wells, overseeing any remediation that is required pursuant to Sections 1, 2 and 3 above, to take samples and to inspect records.

8. Spieker, and its grantees, successors and assigns, reserve the right under WAC 173-340-440 (1997 ed.) to record an instrument which provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such instrument may be recorded only with consent of the Department of Ecology or of a successor agency. Public notice and comment may be sought by the Department of Ecology or of a successor agency prior to the recording of such an instrument.

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9. Any action required by this Restrictive Covenant to be performed by Spieker, or its grantees, successors and assigns, shall be the duty of person who is the legal owner of the Property at the time the action is required, and a prior owner of the Property shall have no duty to perform such action.

DATED this 31st day of ~~February~~ March, 1999.

SPIEKER PROPERTIES, L.P.
a California Limited Partnership

By: Spieker Properties, Inc., a Maryland Corporation
Its: General Partner

By: _____
Richard Leider
Vice President

STATE OF WASHINGTON)
) ss
COUNTY OF KING)

I certify that I know or have satisfactory evidence that Donald S. Jefferson is the person who appeared before me, and said person acknowledged that he signed this instrument, on oath stated that he was authorized to execute the instrument and acknowledged it as the Restrictive Covenant of Spieker Properties, L.P. to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned.

Given under my hand and official seal this 31st day of ~~February~~ March, 1999

CATHY THOMPSON
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES DECEMBER 9, 1999

Notary Signature

Cathy Thompson
(Print name of Notary)
NOTARY PUBLIC in and for the State of Washington, residing at Everett
My appointment expires: 12/9/99

LEGAL DESCRIPTION OF THE PROPERTY

(Magnolia Building "O")

LOT 7 AND TRACT A, BELLEFIELD OFFICE PARK, ACCORDING TO THE PLAT THEREOF, RECORDED IN VOLUME 119 OF PLATS, PAGES 81 THROUGH 90, INCLUSIVE, IN KING COUNTY, WASHINGTON, AND CORRECTED BY AFFIDAVIT RECORDED UNDER RECORDING NUMBER 8109230492.

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EXHIBIT A

Koll Bellefield
Bellevue, Washington

Table 3 - Summary of Soil Quality Data - Building O Site (Former Koll Center Bellefield)

Analyte	Boring No.	B-K1	B-K1	MW-K1	MW-K1	Concentration Range Reported Elsewhere In Bellefield Office Pk. (DOF 1996)
	Sample No.	3-6.5'	18'	3'	13'	
	Depth(ft)	3-6.5	18-18.5'	3-4.5'	13-14.5	
	Material	Wood	Wood	Sand	Wood	
Total Petroleum Hydrocarbons	Method					
TPH as Diesel (mg/kg)	WTPH-DX(1)	273(2)	288(2)	384(2)	314(2)	<10 - 1400
TPH as Oil (mg/kg)	WTPH-DX(1)	2,000	7,300	2,800	1,600	52 - 9900
PCBs (mg/kg)	EPA 8081					
Aroclor 1242	EPA 8081	0.73	0.51	<0.05	<0.05	—
Aroclor 1254	EPA 8081	0.81	<0.05	0.38	<0.05	—
Aroclor 1260	EPA 8081	<0.05	0.38	<0.05	<0.05	—
Sum of PCBs	EPA 8081	1.54	0.88	0.36	<0.05	<0.05 - 0.75
Polynuclear Aromatic Hydrocarbons (mg/kg)						
Acenaphthene	EPA 8270 mod	0.40	1.8	<0.05	0.33	—
Acenaphthylene	EPA 8270 mod	0.17	<0.02	0.082	<0.03	—
Anthracene	EPA 8270 mod	1.8	1.7	0.19	0.61	—
Benzo(a)anthracene*	EPA 8270 mod	2.0	1.6	0.45	0.97	—
Benzo(a)pyrene*	EPA 8270 mod	2.1	1.3	0.84	0.47	—
Benzo(b)fluoranthene*	EPA 8270 mod	2.7	1.5	0.90	0.87	—
Benzo(g,h,i)perylene	EPA 8270 mod	1.8	0.87	0.40	0.40	—
Benzo(k)fluoranthene*	EPA 8270 mod	0.77	0.34	0.16	0.38	—
Chrysene*	EPA 8270 mod	1.9	1.7	0.62	0.60	—
Dibenzo(a,h)anthracene*	EPA 8270 mod	0.42	0.17	0.13	0.038	—
Fluoranthene	EPA 8270 mod	6.9	4.5	1.1	2.2	—
Fluorene	EPA 8270 mod	0.83	1.4	0.092	0.39	—
Indeno(1,2,3-cd)pyrene*	EPA 8270 mod	2.1	0.90	0.44	0.088	—
Naphthalene	EPA 8270 mod	0.21	4.5	<0.05	0.27	—
Phenanthrene	EPA 8270 mod	3.8	7.6	1.8	2.0	—
Pyrene	EPA 8270 mod	4.6	4.4	1.8	2.3	—
Sum of carcinogenic PAHs	EPA 8270 mod	11.9	7.5	3.0	3.3	

< = Not detected at indicated reporting limit
(1) WTPH-DX with silica gel cleanup
(2) Results in the diesel organics range are primarily due to overlap from a heavy oil range product.
* = carcinogenic PAHs

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6.5 Photo log

Photo 1: Building O, aka Magnolia

Photo 2: Building N, aka Aspenwood

Photo 3: Map and listing of all addresses – Bldgs N and O in upper right of map

Photo 4: Close-up of addresses