



August 10, 2015

Ms. Donna Musa  
State of Washington, Dept. of Ecology  
3190 160<sup>th</sup> Ave SE  
Bellevue, WA 98008

Re: Site Hazard Assessment – West Valley Business Park  
18401-18652 72<sup>nd</sup> Avenue South  
Kent, Washington  
Ecology FS ID: 62654937 / CS ID: 1006

Dear Ms. Musa:

Prologis is in receipt of your letter dated April 7, 2015 requesting additional information concerning the West Valley Business Park (WVBP or subject "Property"). Per our recent discussion with Ms. Donna Musa with the Department of Ecology (Ecology), we understand that Ecology has completed their Site Hazard Assessment of the WVBP, but is willing to consider additional information before issuing a final ranking determination.. Prologis appreciates your time and we believe we have several documents that will assist you in removing the Property from Ecology's Confirmed and Suspected Contaminated Sites List (CSCSL) and to revise WVBP's site hazard assessment accordingly. We have enclosed the following documents for your review and consideration:

- Phase I Environmental Site Assessment, prepared by ATC Associates Inc., February 6, 2002.
- Groundwater Sampling Results, prepared by URS, July 18, 2002.
- Limited Groundwater Sampling Project, prepared by Environmental Management Services, LLC, October 1, 2003.
- Corrective Action Plan, Vinyl Chloride Remediation, prepared by Environmental Management Services, LLC, December 8, 2003.
- Subsurface Site Investigation, prepared by Environmental Management Services, LLC, February 15, 2008.
- Subsurface Investigation Soil and Groundwater Delineation, prepared by Environmental Management Services, LLC, May 5, 2008.

By way of background, the Property was acquired by AMB Property Corporation, Prologis' predecessor in 1998. During AMB's due diligence, two concerns were identified for the property: 1) staining near a former compressor bleed off valve; and 2) potential discharges from the adjacent CAM Metals Property located at 18250 68<sup>th</sup> Avenue South, the northerly-adjacent property of WVBP. Specifically, a drainage swale was identified that received discharge from a sump located on the CAM Property site. According to prior reports reviewed during due diligence, CAM Properties is listed on the Washington State Department of Ecology's Confirmed and Suspected Contaminated Sites List. In January 1991, soil excavation at CAM Properties revealed detectable levels of VOCs and petroleum hydrocarbons in the soil. In November 1996, ATC consultants had observed a concrete-lined sump on CAM Properties that discharged toward the Property through a 4-inch diameter plastic pipe, a 2-inch high pressure hose that protruded from a CAM Properties building to discharge toward the Property, and a poorly-maintained waste storage area within 20 feet of the subject Property line. To address these concerns, a soil and groundwater investigation was performed. The results identified two areas of petroleum impacted soil, one near the compressor discharge area and within the drainage swale. Groundwater samples also identified low levels of volatile organic compounds (VOCs) in groundwater, with the highest levels near the CAM Properties boundary. Subsequently, to address the petroleum impacted soil, approximately 120 cubic yards (161.39 tons) of petroleum-impacted soil was excavated during the remedial excavation work in October 1998. The soil was tested for the presence of volatile organic compounds (VOCs); none were detected with the exception of methylene chloride and acetone, which were both at concentrations well below cleanup levels. On August 30, 1999, Ecology issued the determination that no further remedial action is necessary for the soil portion of the Property under MTCA, chapter 70.105D RCW, however, they stated that further investigation, remedial action and/or monitoring may be required prior to issuance of a groundwater "no further action" determination.

ATC performed an additional subsurface Investigation at the Property and was performed in May and June of 2000 that indicated that groundwater flow direction is to the southwest (placing CAM Properties upgradient of WVBP). Vinyl

chloride was detected in the groundwater at concentration of 150 and 24 ug/L. Analytical data from soil analysis did not detect vinyl chloride in the soil on the Property, and there is no evidence that solvents have been used at the Property. Based on this information, ATC determined in their 2002 Phase I ESA that WVBP is not the source of the vinyl chloride in groundwater. ATC concluded that the vinyl chloride in the groundwater originates from the hydraulically upgradient CAM Properties.

Groundwater monitoring continued at the Property and the analytical results for VOCs in groundwater during the May 2002 sampling event were below the laboratory reporting limits, with the exception of trace levels of cis-1,2-dichloroethene, and trichloroethene in MW-2. These levels are below drinking water standard established by the Washington Department of Ecology. This data was presented by URS and confirmed the continued decrease of VOCs in groundwater beneath the Property, and concluded that no continued monitoring is warranted.

A Limited Groundwater Sampling Project Report, and a Corrective Action Plan Report were prepared by Environmental Management Services (EMS) in October and December 2003 for CAM Properties. The laboratory analytical results from the ground water samples found concentrations of vinyl chloride exceeding the MTCA Method A cleanup level along the southern property line of CAM Properties. EMS concluded that the contaminants are extending onto WVBP from the south, and it does not appear that the contaminants vinyl chloride and 1,2 dichloroethane extend more than approximately 60 feet onto the southern portion of the subject property.

In January 2004, a letter written by Brian Sato, from the Washington State Department of Ecology, requested and required additional sampling in the vicinity of a chlorinated solvent plume located on CAM Properties. Further, their requirement included the full delineation of the plume to include off site locations (WVBP, the Property). A proposal for a Sub-Surface Investigation on behalf of CAM Properties was prepared by EMS at the end of 2006. Prologis obtained a letter from CAM Properties representative, Spencer Law Firm to Prologis's representative in May 2007 that reads " Per Department of Ecology requirements, our client is in the process of conducting an environmental investigation and remediation of their property ... the Department of Ecology letter dated January 13, 2004, requiring that our client conduct a characterization of the ground water vinyl chloride plume. According to Ecology records and our consultant, this contamination plume likely extends onto the property owned by your client." The Sub-Surface Investigation was completed by EMS in 2008.

Prologis, formerly known as AMB Property Corporation, entered an agreement services contract with GeoEngineers in 2008 to conduct further investigation in regards to gathering groundwater data from EMS who is the consultant for CAM Properties. During GeoEngineers investigation and in review of EMS's Subsurface Site Investigation, dated February 15, 2008, five soil borings were advanced on the Property. The soil and groundwater samples were analyzed for halogenated volatile organic compounds (cVOCs) and the results for the samples collected on the Site were reported well below laboratory practical quantitative limits. Also enclosed in this packet is a Subsurface Investigation Soil and Groundwater Delineation Report, prepared by EMS, dated May 5, 2008, which further delineates the lateral extent of the VOC plume known to exist beneath CAM Properties and extends on to the Property. Analytical results from the report were collected and submitted for cVOCs. Borings 1 -5 which are located on the Property were non-detect for the constituents of concern (COCs). Please refer to Figure 3 of this report for boring locations.

Based on the results from EMS's February and May 2008 exploration and sampling, it is our opinion, as well as GeoEngineers (Prologis' consultant), that no further exploration and sampling on the Property is warranted. After review of several environmental reports that Prologis has accumulated, it has been determined that the source of the VOCs in groundwater historically detected on the Property (West Valley Business Park) originated from the adjacent hydraulically up gradient property (CAM Properties/ Coatings Unlimited). Prologis has enclosed documentation that proves CAM Properties is responsible for the vinyl chloride plume that extended on to the subject property and has been fully delineated as of May 5, 2008. Prologis respectfully requests the Site be removed from the CSCSL and to request that this case be reviewed and granted regulatory closure.

If you have any questions regarding the enclosed information or closure request, please feel free to contact me at (415) 733-9451.

Kind Regards,

Suzanne McCormick  
Environmental and Engineering Analyst, Prologis

cc: Janet Frentzel, VP Environmental & Engineering Division, Prologis

Enclosures

## Musa, Donna K. (ECY)

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**From:** McCormick, Suzanne [smccormick2@prologis.com]  
**Sent:** Monday, August 10, 2015 11:13 AM  
**To:** Musa, Donna K. (ECY)  
**Subject:** West Valley Business Park, Kent, Washington  
**Attachments:** Prologis Letter to DOE.docx; Phase I ESA WVBP ATC 2002.pdf

Hi Donna,

Per our conversation on Friday, please see attached documents for West Valley Business Park. I will be sending the other documents shortly.

Feel free to call me with any questions.

Kind regards,  
Suzanne

**Suzanne McCormick - Environmental & Engineering Analyst**

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## Musa, Donna K. (ECY)

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**From:** McCormick, Suzanne [smccormick2@prologis.com]  
**Sent:** Monday, August 10, 2015 11:16 AM  
**To:** Musa, Donna K. (ECY)  
**Subject:** WVBP Attachments  
**Attachments:** GW Sampling Results URS 2002.pdf; Limited GW Sampling Project EMS 2003.pdf; CAP EMS 2003.pdf

### Suzanne McCormick - Environmental & Engineering Analyst

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## Musa, Donna K. (ECY)

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**From:** McCormick, Suzanne [smccormick2@prologis.com]  
**Sent:** Monday, August 10, 2015 11:17 AM  
**To:** Musa, Donna K. (ECY)  
**Subject:** WVBP- Last Attachment  
**Attachments:** Subsurface Investigation Soil&GW Delineation Report EMS May 2008.pdf; Subsurface Site Investigation EMS Feb 2008.pdf

### Suzanne McCormick - Environmental & Engineering Analyst

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