

Phase I Environmental Site Assessment

***Proposed Willamette Court Apartments
581 and 583 Eastmont Avenue
East Wenatchee, Washington***

Prepared For:

***Steel Lake Enterprises
Seattle, Washington***

March 5, 1997

Project No. 6E-9702003



GILES
ENGINEERING ASSOCIATES, INC.



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March 5, 1997

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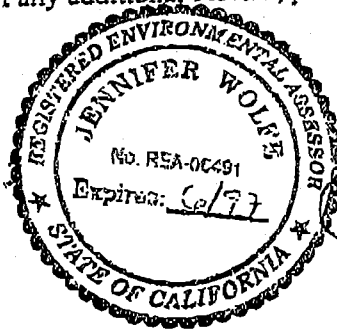
Attention: Mr. Paul Scott Price, Manager

Subject: Phase I Environmental Site Assessment
Proposed Willamette Court Apartments
581 and 583 Eastmont Avenue
East Wenatchee, Washington
Project No. 6E-9702003

Dear Mr. Price:

In accordance with your request and subsequent authorization, Giles Engineering Associates, Inc. (*Giles*) has completed a Phase I Environmental Site Assessment of the above-referenced property. We recommend that you read the report in its entirety.

Giles appreciates the opportunity to be of service on this project. The report was prepared with the assistance of Mr. Jeffrey P. Dobrzynski. If there are any questions regarding the information contained herein, or if *Giles* can be of any additional service, please contact the undersigned at your convenience.



Respectfully submitted,

GILES ENGINEERING ASSOCIATES, INC.

Jennifer Wolfe, R.E.A.
Project Environmental Assessor

John E. Zipper, P.E.
Regional Manager

Distribution: Steel Lake Enterprises
Attn Mr. Paul Scott Price (3)

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 EAST WENATCHEE, WASHINGTON
 PROJECT NO. 6E-9702003

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PHASE I ENVIRONMENTAL SITE ASSESSMENT

PROPOSED WILLAMETTE COURT APARTMENTS
581 AND 583 EASTMONT AVENUE
EAST WENATCHEE, WASHINGTON
PROJECT NO. 6E-97020031.0 SUMMARY

A summary of the findings and conclusions for this report are briefly outlined below. Detailed information is provided in the following report.

- The subject property is undeveloped, and consists of two parcels covering 0.26-acre situated in a residential neighborhood. Debris observed on the subject property included several five-gallon buckets of tools and wood stakes, cardboard boxes, wood debris, empty white fuel cans, and two discarded Christmas trees on the eastern-most portion of the subject property. At the time of the site reconnaissance, approximately 6 inches of snow covered the subject property, and therefore the condition of the soils could not be assessed; however, based on the nature of the area in which the subject property is located, the potential for the presence of hazardous materials due to current use of the subject property appears low.
- Historical research of the property indicates the subject property has not been developed for at least the past 45 years, although an orchard occupied the eastern half of the property during at least the 1960s. The former presence of an orchard at the subject property indicates the potential for the presence of lead and arsenic in the soils due to the use of pesticides. Soil samples were obtained from the subject property in January 1995 by Mr. Tom Linden, one of the owners of the property, and were analyzed for the presence of lead and arsenic. Based on review of the analytical results, the soils sampled revealed as high as 212 parts per million (ppm) arsenic, and as high as 655 ppm total lead. These concentrations exceed the state MTCA Method A clean-up levels of 20 ppm for arsenic and 250 ppm for lead. Based on the results of the soil sample analysis, it is recommended that future development of the subject property be conducted in accordance with recommended options by the Washington State Department of Ecology. *Giles* is available to assist with writing an IRAP in an effort to obtain NFA status, should you so desire.
- There is an above-ground heating oil tank associated with the adjacent house to the immediate west of the subject property. As this tank is apparently situated on the down-gradient side of the subject property, it is not considered likely to impact the subject property.
- Based on review of environmental agency database listings, there are two sites documented on the Leaking Underground Storage Tank (LUST) list within ½ mile of the subject property. Based on the locations of these sites, it is considered unlikely that either of these sites have impacted the subject property. No other sites were documented on the environmental database lists within the ASTM Standard radii relative to the subject property.

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Giles Engineering Associates, Inc. (*Giles*) has completed a *Phase I Environmental Site Assessment (Phase I)* in general accordance with the scope and limitations of ASTM E1527-94 for the property located along the east side of Eastmont Avenue, approximately 100 feet to the north of Rolf's Court in East Wenatchee, Washington (subject property). Any exceptions to, or deletions from, this practice are described in Section 3.0 of this report. The assessment has not revealed evidence of recognized environmental conditions in connection with the subject property except for elevated levels of lead and arsenic in soils due to past pesticide usage. Washington Department of Ecology recommended options for encapsulation of these soils appear feasible to mitigate this condition.

2.0 INTRODUCTION

Giles has completed a Phase I Environmental Site Assessment of the Proposed Willamette Court Apartments located along the east side of Eastmont Avenue, approximately 100 feet to the north of Rolf's Court in East Wenatchee, Washington. This assessment was performed at the request of Mr. Paul Scott Price of Steel Lake Enterprises in accordance with *Giles*' proposal (6EP-970204), dated February 5, 1997. The subject property was evaluated by *Giles* for indications of environmental mismanagement activities, and the possible presence of hazardous substances that may have been manufactured, stored, used, or disposed of on and/or near the subject property and which can potentially exist in the soil and/or groundwater of the subject property. The subject property visit was conducted by Ms. Jennifer Wolfe on February 21, 1997.

3.0 SCOPE OF SERVICES AND LIMITATIONS

The scope of services performed by *Giles* for this assessment included:

- 1) A visual reconnaissance of the subject property for indications of the presence of possible hazardous substances and/or environmental mismanagement activities;
- 2) A cursory overview of the properties in the vicinity of the subject property;
- 3) A review of federal, state, and local regulatory agency records and documents for the subject property and general vicinity;
- 4) Personal and/or telephone interviews with staff members of state, county, and local units and agencies of government, as well as private citizens;
- 5) A review and evaluation of available aerial photography, select city directories, available Sanborn Fire Insurance Maps, the United States Department of Agriculture Soil Conservation Service Soil Survey of Douglas County Area, Washington (1981), and the United States Geological Survey (USGS) 7.5 Wenatchee, Washington (1966, photorevised 1987) quadrangle map;
- 6) A review of analytical certificates for soil samples obtained from the subject property in January 1995;

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- 7) A review of the *Site Assessment Report* prepared by VISTA Information Solutions, Inc. (VISTA) which lists state and federal sites of potential environmental concern within the vicinity of the subject property; and
- 8) An evaluation of the collected information and the preparation of this report, including the resulting conclusions and recommendations.

Wetland, archeological, asbestos, lead-based paint, and radon studies were not included in the scope of services for this project.

4.0 DESCRIPTION OF SUBJECT PROPERTY

4.1 Setting and Location

The subject property is located along the east side of Eastmont Avenue, approximately 100 feet to the north of Rolf's Court in East Wenatchee, Washington (Township 22 North, Range 20 East, Section 1). The subject property is situated at approximately 47.414016 degrees North Latitude, 120.280242 degrees East Longitude. The enclosed *Subject Property Location Map*, Figure 1, on the following page shows the general location of the subject property.

4.2 Current Property Use and Activity

The subject property consists of two undeveloped, adjacent parcels, which total approximately 0.26 acres in a residential neighborhood. At the time of the site reconnaissance, the subject property was covered with approximately 6 inches of snow, and therefore, the condition of the soils could not be assessed. Several five-gallon buckets of tools and wood stakes, cardboard boxes, wood debris, empty white fuel cans, and two discarded Christmas trees were observed on the eastern-most portion of the subject property. A 75-KVA pad-mounted electrical transformer is located in the northeast corner of the subject property. There is a road, which accesses the subject property from Eastmont Avenue toward the east. The road is mostly un-paved; however, the eastern-most portion of the road is paved with asphalt adjacent to a newly constructed apartment building. The subject property and surrounding area slope down from east to west.

For information regarding the subject property, Mr. David Quick, one of the owners of the property, was interviewed. According to Mr. Quick, the subject property has never been developed. There are reportedly no underground storage tanks, septic tanks, water wells, oil/water separators, or sumps on the subject property. According to Mr. Quick, the subject property was occupied by an orchard in the past, and soil samples were obtained in January 1995 to assess the potential for the presence of lead and arsenic on the subject property. Additional information regarding the soil sampling and analysis can be found in section 6.11.

4.3 Surrounding Area

The subject property is located in a residential neighborhood in East Wenatchee, Douglas County, Washington. The subject property is bound by a newly constructed apartment building to the immediate

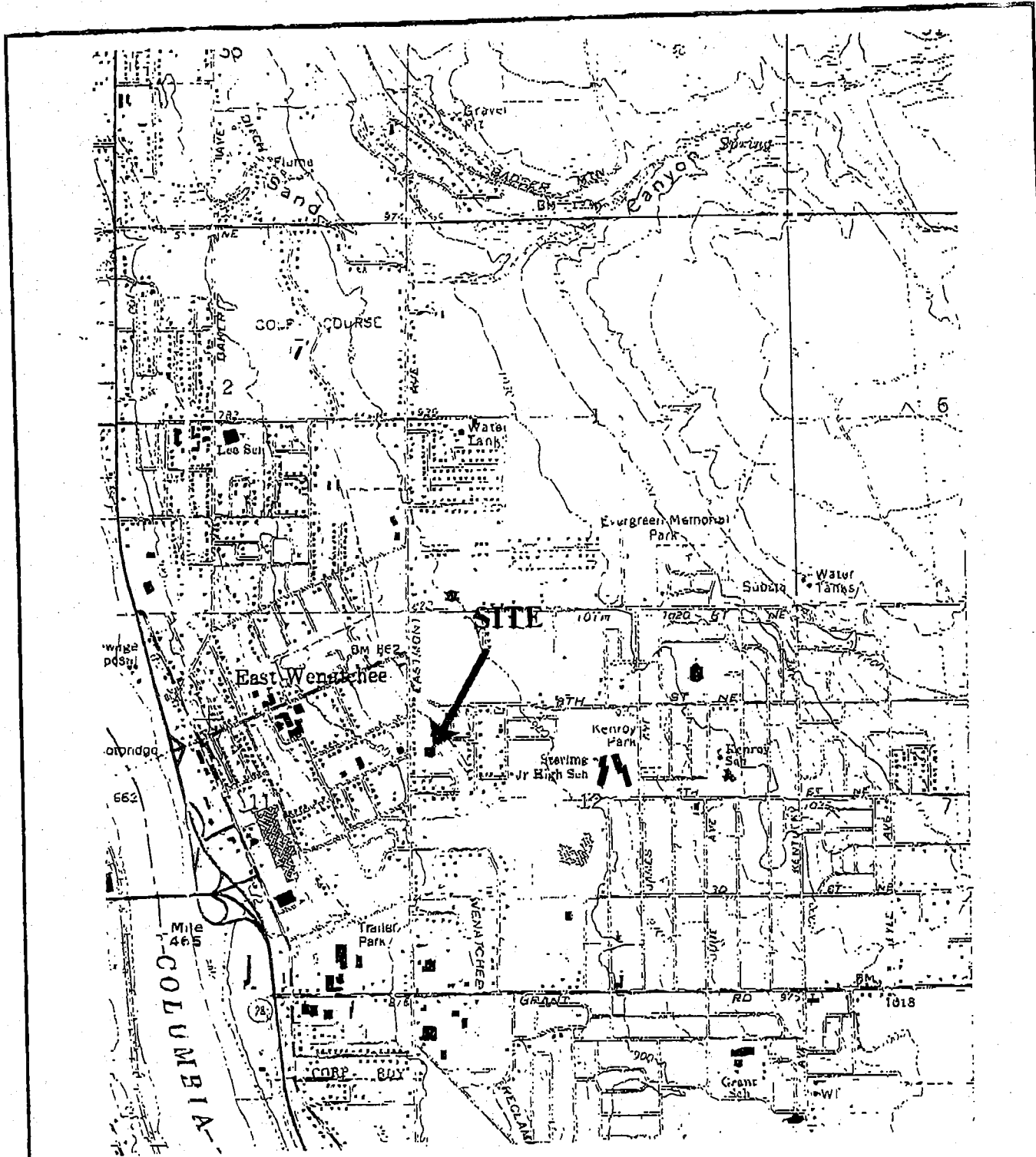
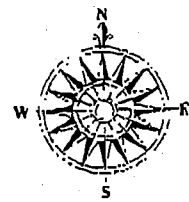


Figure 1 - Location Map

Project Name	Proposed Willamette Court Apartments
Project Location	East Wenatchee, WA
Project Number	6E-9702003
Map Reference	USGS Wenatchee, WA
Scale	1:24,000
Date	Mar. 5, 1997



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east, a partially un-paved/partially asphalt-paved access drive, which separates the subject property from houses and a newly constructed apartment building to the north, and residential houses to the south and west. Most of the development in the area is residential in nature. The closest commercial development is a school district maintenance yard situated nearly ½ mile to the northwest of the subject property. During the site reconnaissance, an above-ground heating oil tank associated with the house to the immediate west of the subject property was observed adjacent to the subject property's western boundary line. Visual observations of the tank did not reveal indications of leaks or spills, although the ground around the tank was covered with snow. The house and associated heating oil tank to the west of the subject property appear to be down-gradient of the subject property. It is possible that there may be other heating oil tanks associated with houses in the area, although no other heating oil above-ground storage tanks (ASTs) were observed during the vicinity reconnaissance.

No visible indications of hazardous conditions were observed at the time of the surrounding area reconnaissance. The subject property and surrounding area are illustrated on the *Surrounding Property Usage* plan, Figure 2, on the following page. Photographs of the subject property and vicinity, dated February 21, 1997 are enclosed in Appendix A.

4.4 Geologic Conditions

4.4.1 Soil Type and Permeability

Based on review of the United States Department of Agriculture - Soil Conservation Service *Soil Survey of Douglas County, Washington*, the subject property is underlain by Cashmere fine sandy loam, 3-8% slopes. These soils are described in the Soil Survey as very deep, well drained soil on terraces. It formed in alluvium mixed with loess, and is typically described as a surface layer of brown fine sandy loam, about 11 inches thick. The underlying material is pale brown sandy loam, about 73 inches thick. Some areas have pebbles, gravel, or boulders. Permeability of the Cashmere soil is moderately rapid.

4.4.2 Regional Geology

Soils in the Douglas County area are formed in material weathered from glacial till and outwash, which were deposited during the late Pleistocene Epoch. At that time, the Wisconsin Glacier entered Douglas County from the north, depositing glacial till as it migrated south. As the ice from the glacier melted, streams and rivers flowed and deposited thick beds of glacial outwash.

The Columbia River, which borders Douglas County along the west, has cut a deep gorge along the northern and western boundaries of the county. In most of the areas along the river, there are a series of nearly level to gently sloping terraces. Long steep side slopes lead from these terraces to a broad upland plateau. This plateau, underlain by basalt, occupies most of the county. The topography consists of undulating and rolling hills, and is interspersed by intermittent drainages.

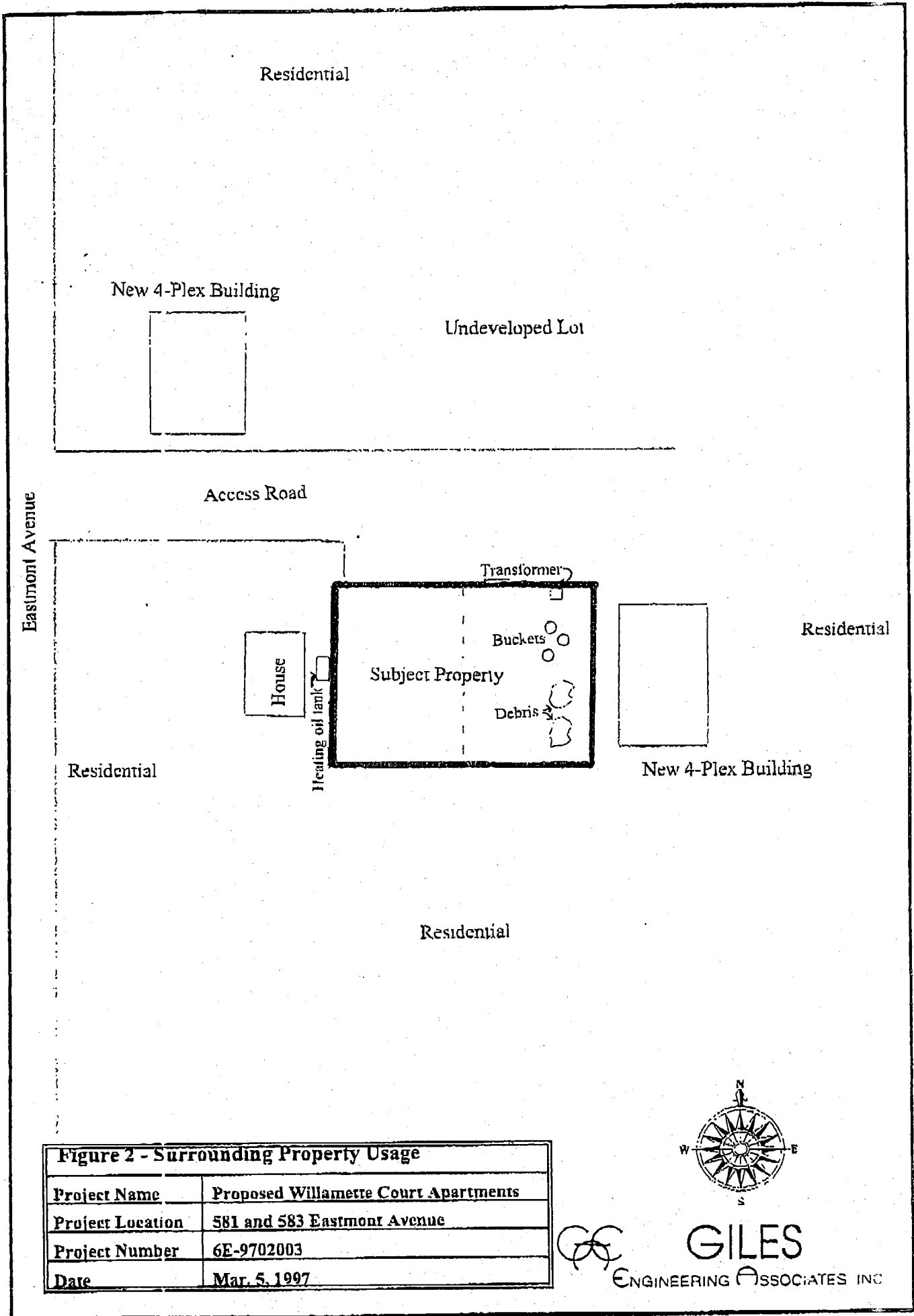
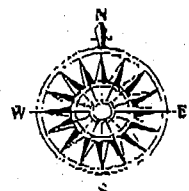


Figure 2 - Surrounding Property Usage

Project Name	Proposed Willamette Court Apartments
Project Location	581 and 583 Eastmont Avenue
Project Number	6E-9702003
Date	Mar. 5, 1997




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4 th Street NE Residential	4 th Street NE Residential	4 th Street NE Residential	4 th Street NE Residential	4 th Street NE Residential	4 th Street NE Residential
5 th Street NE Residential	5 th Street NE Residential	5 th Street NE Residential	5 th Street NE Bankers Life & Casualty	5 th Street NE Residential	5 th Street NE Residential
Rolf's Place Residential	Rolf's Place Residential	Rolf's Place Residential	Rolf's Place Residential	Rolf's Place Residential	Rolf's Place Residential
Rolf's Court Residential	Rolf's Court Residential	Rolf's Court Residential	Rolf's Court Residential	Rolf's Court Residential	Rolf's Court Residential
6 th Street NE Residential	6 th Street NE Residential	6 th Street NE Residential	6 th Street NE Residential	6 th Street NE Residential	6 th Street NE Residential
7 th Street NE Residential	7 th Street NE Residential	7 th Street NE Residential	7 th Street NE Residential	7 th Street NE Residential	7 th Street NE Residential

Rolf's Court (from west to east - 400 block to the 600 block. Subject property is near the 500 block)

1965 No listings	1971 Residential	1978 Residential	1984 Residential	1991 Residential	1995 Residential
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6th Street NE (from north to south - 300 block to the 700 block. Subject property is near the 500 block)

1965 Residential	1971 Frans Ceramics	1978 Appliance Service	1984 Residential	1991 Residential	1995 Residential
Residential	Residential	School District	Residential	Residential	Residential
Residential	Residential	Progressive Learning	Residential	Residential	Residential
N Eastmont Ave	N Eastmont Ave	N Eastmont Ave	N Eastmont Ave	N Eastmont Ave	N Eastmont Ave
N. Lyle Ave.	N. Lyle Ave.	N. Lyle Ave.	N. Lyle Ave.	N. Lyle Ave.	N. Lyle Ave.
Residential	Residential	Residential	Residential	Residential	Residential

5.4 Aerial Photographs

Three aerial photographs of the subject property and surrounding properties, dated 1965, 1983, and 1992 were reviewed at the office of the United States Department of Agriculture Soil Conservation Service in Waterville, Washington. The scale of the photos reviewed varied from 1 inch = 600 feet to 1 inch = 1,500 feet. Therefore, a clear view of specific property characteristics was not always feasible during the review of the aerial photographs. However, general developmental trends in the area were observed, as well as the absence and presence of structures in the area. The following is a summary of *Giles'* interpretation of the aerial photograph review:

1965

The eastern portion of the subject property and adjacent areas appeared to be utilized as orchard land in this photo. The western portion of the subject property was undeveloped. Single family houses could be seen to the immediate west and south of the subject property, as well as along Eastmont Avenue to the northwest and southwest.

1983 and 1992

The subject property appeared undeveloped in these photos. Single-family houses could be seen to the immediate west and south of the subject property. Orchard land was observed approximately 0.25 mile to the south. No other significant changes were observed between these photos and the 1965 print.

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5.5 USGS Quadrangle Map

The USGS Wenatchee, Washington quadrangle map, (dated 1966, photorevised 1987) 7.5 minute series quadrangle map was reviewed. The map shows the subject property as an undeveloped parcel. A few residential structures were observed to the west, southwest, and within approximately 0.25 mile to the northeast of the subject property. Based on a review of the quadrangle map, the subject property is located at an elevation of approximately 840 feet above sea level.

6.0 SUBJECT PROPERTY OBSERVATIONS

6.1 Hazardous Substances

There were no potentially hazardous substances observed on the subject property during the site reconnaissance.

6.2 Observations that may pose potential environmental concerns

- Staining and Corrosion None observed
- Drains and Sumps None observed
- Stained Soil and/or Pavement None observed
- Stressed Vegetation None observed
- Drums/Other Containers Empty white gas containers and buckets
- Pits, Ponds, and Lagoons None observed
- Odors None observed
- Wetlands None observed

Several empty white gasoline containers were observed on the subject property, and a few 5-gallon buckets filled with tools and wood stakes had been set on the ground at the time of the site reconnaissance. There were no indications of spilled or dumped materials, although the surface of the soil could not be assessed due to snow cover.

6.3 PCB sources that may pose potential environmental concerns

- Transformers One pad-mounted transformer
- Capacitors None observed
- Compressors None observed
- Hydraulic Lifts None observed

Mr. Kris (last name not given) with the Douglas County Public Utilities Department (PUD) was interviewed for information regarding the potential presence of PCBs in the transformer on the subject property. The PUD representative stated that the transformer was installed in 1995, and based on the age of the transformer was not tested. The transformer is assumed to be PCB-free based on the age.

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6.4 Solid waste production and storage

- Hazardous None observed
- Non-hazardous None observed

6.5 Spills

- Petroleum None observed
- Other None observed

6.6 Storage Tanks

- Aboveground Storage Tanks (ASTs) None observed
- Underground Storage Tanks (USTs) None observed

While there were no storage tanks observed on the subject property, an above-ground heating oil tank was noted on the property to the immediate west of the subject property. There were no indications of leaks or spills from the AST at the time of the site reconnaissance.

6.7 Wastewater Discharges

- Sanitary None observed
- Industrial None observed
- Septic Systems None observed

6.8 Water Supplies

Public water supplies are provided for the area by the East Wenatchee Water District. According to Ms. Sue (last name not given) with the East Wenatchee Water District, East Wenatchee receives its drinking water from wells, each of which are situated well over a mile from the subject property. The water wells are reportedly 50-65 feet in depth, and there are currently no known problems with water quality in the area

6.9 Monitoring Wells

No monitoring wells were observed on the subject property.

6.10 Interviews

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The following people/agencies were interviewed for this assessment:

- Mr. David Quick - One of the owners of the subject property
- Chief Kombs - Fire Chief for East Wenatchee
- Ms. Sue (last name not given) - East Wenatchee Water District
- Ms. Kris (last name not given) - Douglas County Public Utilities Department
- Mr. Tony Grover - Washington State Department of Ecology (Central Office)

Information obtained from those interviews can be found in relevant sections of this report.

6.11 Previous Site Sampling and Analysis

Due to the former presence of an orchard on the subject property, soil samples were obtained from the subject property in January 1995 by Mr. Tom Linden, one of the property owners. Three composite soil samples were obtained from the subject property. The soil samples were submitted to Cascade Analytical Laboratory in Wenatchee, Washington, and were analyzed for the presence of lead and arsenic. Based on review of the analytical certificates, the soil sample results were as follows:

Analytical Results

Sample Number	Results of Lead Analysis	Results of Arsenic Analysis
1	636 ppm	197 ppm
2	313 ppm	135 ppm
3	655 ppm	212 ppm
State Clean-up Level	250 ppm	20 ppm

Washington State Method A clean-up levels for lead and arsenic are documented in Model Toxics Control Act (MTCA) as 20 ppm for arsenic and 250 ppm for lead in soil. Therefore, the concentrations of lead and arsenic in each of the samples exceed the state clean-up levels. Copies of the analytical certificates are attached in Appendix B.

Based on an interview with Mr. Tony Grover with Ecology, it is understood that there are several options for development of the property given the presence of lead and arsenic in the soils at concentrations exceeding MTCA Method A cleanup levels. The main concern with the presence of arsenic and lead in soil is the potential for human contact, either by playing with and/or eating the soil (as children often do) or gardening activities. According to Mr. Grover, remedial actions may be curtailed if institutional controls are followed and accepted by Ecology. One option for development of the property, therefore, is to place the surficial layer (approximately 8 inches was suggested by Mr. Grover; the actual depth should be confirmed by sampling/testing during construction) of soil beneath the footprint of the building and beneath the paved driveway areas prior to construction. Another option is to construct the building, and then cover the non-paved/non-developed portions of the property with approximately 18 inches of clean fill material.

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While both of these options are viable, in order to obtain a "No Further Action" status rating for the subject property from Ecology, an Independent Remedial Action Plan is required. This option involves writing a plan (such as one of the two scenarios described above) and submitting the plan to Ecology along with a \$1,000.00 application fee. Ecology will then review the plan and meet with the owner/developer/consultant to discuss the plan. Once the building is constructed, with monitoring of soil stockpiling including documentation with analytical tests sufficient for Ecology IRAP criteria, Ecology will write a letter, providing the property with a NFA designation.

7.0 REGULATORY AGENCY RECORD REVIEWS AND INTERVIEWS

7.1 City of East Wenatchee

Chief Kombs at the East Wenatchee Fire Department was interviewed for information regarding underground storage tanks (USTs) at the subject property and surrounding area. According to Chief Kombs, the area is residential, and there are no known USTs, although there may be some heating oil tanks in the area. Chief Kombs stated there have been no problems with USTs in the vicinity of the subject property.

7.2 Douglas County

A representative of the Chelan-Douglas County Department of Environmental Health was contacted for information regarding potential environmental problems associated with the subject property or immediate vicinity. There are reportedly no known environmental problems in the area. Records of residences in the area indicates that some of the houses utilize septic systems; however, there have been no recorded problems with the septic tanks or hazardous materials incidents in the area at the Department of Health. Copies of site maps showing the area were provided by the Department of Environmental Health, and have been attached in Appendix C.

7.3 State of Washington

A compilation of State of Washington publications of sites with known environmental concerns was provided by VISTA Information Solutions (VISTA) at the request of Giles. A copy of the VISTA report is provided in Appendix D. The information presented below is a summary of the information provided by VISTA. There were six un-mapped sites included in the VISTA report; however, during the site reconnaissance, Giles confirmed that none of these sites are located within the ASTM standard radius distances relative to the subject property.

7.3.1 The Washington State Department of Ecology (Ecology) - Solid Waste Services Program publications entitled *Municipal Solid Waste Facilities* dated December, 1995, and *Municipal Sludge Waste Facilities*, dated November, 1993 were reviewed. The subject property was not included on these publications. In addition, no sites located within 0.5 mile of the subject property are included on these publications.

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7.3.2 Ecology's Toxics Cleanup Program listing of *Confirmed and Suspected Contaminated Subject property*, dated July, 1996 was reviewed. This list includes sites that are known or suspected to have contaminated soils or groundwater. The subject property was not included on this list. Furthermore, there were no sites within 1.0 mile of the subject property included on this list.

7.3.3 The *Toxic Cleanup Program Site Register*, dated October 1996, was reviewed for sites within at least 0.5 mile of the subject property. This list includes sites which are part of the Toxics Clean-up Program. The subject property is not included on this list. In addition, no sites located within 0.5 mile of the subject property are documented on this list.

7.3.4 The Ecology's Central Regional Office listing of *Leaking UST Sites* dated July 1995 and Ecology's Toxic Cleanup Program listing of *Leaking UST Sites* dated July 1995, was reviewed. The subject property was not included on these lists. However, there are two sites included on the LUST list within 0.5 mile of the subject property. The City of Wenatchee site located at 271 9th Street Northeast and the County Shop located at 110 3rd Street Northeast are listed as located 0.36 mile to the west and 0.45 mile to the southwest of the subject property, respectively. Both of these sites are situated in apparent down-gradient locations relative to the subject property.

7.3.5 Ecology's Solid Hazardous Waste program listing of *Underground Storage Tanks* (USTs), dated November, 1996, was reviewed. The subject property was not included on the UST report; however, there is one site within 0.25 mile of the subject property listed in VISTA's report. However, ASTM Standards require a review of UST sites adjacent to the subject property, and the site included on VISTA's list is over 0.125 mile from the subject property. Therefore, the UST site has not been included in this report.

7.4 Federal Government

A compilation of federal listings of subject property with known environmental concerns was provided by VISTA at the request of *Giles*. A copy of the VISTA report is provided in Appendix D. The information presented below is a summary of the information provided by VISTA. There was one unmapped site listed on VISTA's report; however, during the site reconnaissance, *Giles* verified that this site is outside the ASTM standard radius relative to the subject property.

7.4.1 The United States Environmental Protection Agency (USEPA) *National Priorities List* (NPL), dated June, 1996, was reviewed. The subject property was not included on the NPL. In addition, no sites included on the NPL are located within 1.0 mile of the subject property.

7.4.2 The USEPA *Comprehensive Environmental Response, Compensation, and Liability Information Source* (CERCLIS) list, dated March, 1996, and the *CERCLIS - No Further Remedial Action Planned* (NFRAP) list, dated March, 1996, were reviewed. The subject property was not included on the CERCLIS and CERCLIS-NFRAP lists. Furthermore, no sites were included on the CERCLIS or CERCLIS-NFRAP lists located within 0.5 mile of the subject property.

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7.4.3 The *Resource Conservation and Recovery Act* (RCRA), dated August, 1996, which lists all hazardous substance generators, transporters, and treatment, storage and disposal (TSD) facilities, was reviewed. The subject property was not included on the RCRA list; nor were there any sites documented on the RCRA list within 0.125 mile of the subject property. Furthermore, there were no RCRA TSD sites within a mile of the subject property.

7.4.4 The USEPA *Emergency Response Notification System* (ERNS), dated March, 1996, was reviewed. The subject property was not included on the ERNS list. Furthermore, there are no sites included on the ERNS list located within 0.125 mile of the subject property.

8.0 FINDINGS AND CONCLUSIONS

- 1) The subject property is undeveloped, and consists of two parcels covering 0.26-acre situated in a residential neighborhood. Debris observed on the subject property included several five-gallon buckets of tools and wood stakes, cardboard boxes, wood debris, empty white fuel cans, and two discarded Christmas trees on the eastern-most portion of the subject property. At the time of the site reconnaissance, approximately 6 inches of snow covered the subject property, and therefore the condition of the soils could not be assessed; however, based on the nature of the area in which the subject property is located, the potential for the presence of hazardous materials due to the current use of the subject property appears low.
- 2) Historical research indicates the subject property has not been developed for at least the past 45 years, although an orchard occupied the eastern half of the property during at least the 1960s. The former presence of an orchard at the subject property indicates the potential for the presence of lead and arsenic in the soils due to the use of pesticides. Soil samples were obtained from the subject property in January 1995 by Mr. Tom Linden, one of the owners of the property. The soil samples were analyzed for the presence of lead and arsenic. Based on review of the analytical results, the soils sampled revealed as high as 212 ppm arsenic, and as high as 655 ppm total lead. These concentrations exceed the Washington State MICA Method A clean-up levels of 20 ppm for arsenic and 250 ppm for lead. Due to the elevated concentrations of lead and arsenic, remedial actions may be warranted at the subject property. Based on an interview with Mr. Tony Grover with Ecology, it is understood that there are several options for development of the property given the presence of lead and arsenic in the soils. The main concern with the presence of arsenic and lead in soil is the potential for human contact, either by playing with and/or eating the soil (as children often do) or gardening activities. According to Mr. Grover, remedial actions may be curtailed if institutional controls are followed and accepted by Ecology. One option for development of the property, therefore, is to place the surficial layer (approximately 8 inches was suggested by Mr. Grover; the actual depth should be confirmed by sampling/testing during construction) of soil beneath the footprint of the building and beneath the paved driveway areas prior to construction. Another option is to construct the building, and then cover the non-paved/non-developed portions of the property with approximately 18 inches of clean fill material. While both of these options are viable, in order to obtain a "No Further Action" status rating for the subject property from Ecology, an Independent Remedial Action Plan (IRAP) is required. This option involves writing a

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plan (such as one of the two scenarios described above) and submitting the plan to Ecology along with a \$1,000.00 application fee. Ecology will then review the plan and meet with the owner/developer/consultant to discuss the plan. Once the building is constructed, with monitoring of soil stockpiling including documentation with analytical tests sufficient for Ecology IRAP criteria, Ecology will write a letter, providing the property with a NFA designation. Based on the results of the soil sample analysis, it is recommended that future development of the subject property be conducted in accordance with one of these recommended options. Should you opt for applying for NFA status with Ecology, *Giles* is available to assist with writing an IRAP in an effort to obtain NFA status.

- 3) There is an above-ground heating oil tank associated with the adjacent house to the immediate west of the subject property. A visual evaluation of the subject property did not reveal indications of leaks or spills from the tank, although the ground around the tank was covered with snow at the time of the assessment. As this tank is apparently situated on the down-gradient side of the subject property, it is not considered likely to impact the subject property.
- 4) Based on review of environmental agency database listings, there are two sites documented on the Leaking Underground Storage Tank (LUST) list within ½ mile of the subject property. The sites are situated nearly ½ mile to the west and southwest, both in apparent down-gradient locations relative to the subject property. Based on the locations of these sites, it is considered unlikely that either of these sites have impacted the subject property. No other sites were documented on the environmental database lists within the ASTM Standard radii relative to the subject property.

9.0 GENERAL COMMENTS

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Hazardous substances include any substance that the USEPA has designated for special considerations under the Toxic Substances Control Act, Clean Air Act, or Clean Water Act, as defined under Section 101 (14) of CERCLA, as well as any hazardous waste under RCRA, and constituents of petroleum products.

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This report has been prepared in order to aid in the evaluation of the subject property located at 581 and 583 Eastmont in East Wenatchee, Washington, with regard to the potential for hazardous substance presence at the time of this study. The conclusions presented in this report were based on available information pertaining to various points in time and were presented by others for use by *Giles* or were based on informal discussions with various agency personnel. *Giles* does not warrant the accuracy of information supplied by others.

The conclusions in this report may rely on others credibility and, therefore, an alteration in documentation or verbal information obtained may result in the redirection of the conclusions presented in this report. The conclusions are also based on visual field observations performed within the property boundaries at this specific point in time and, therefore, do not include the potential for hazardous substance present within undocumented fills placed on the subject property or adjacent properties. Opinions presented herein may be based on analysis performed by others and, therefore, *Giles* is not responsible for variations in analytical results or inaccuracies resulting from laboratory analysis opinions are based in part on interpretation of data from discreet sampling locations that may not present actual conditions at non-sampled locations.