INTERIM ENVIRONMENTAL CLEANUP STATUS REPORT

SKOTDAL PROPERTY

WDOE LUST NOTIFICATION #608812

Prepared for
ART SKOTDAL
2707 Colby Avenue, Suite 1200
Everett, Washington, 98206

Prepared by
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December 2008

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1.0 *INTRODUCTION*

Galloway Environmental, Inc. (GEI) has prepared this Interim Environmental Cleanup Status Report (IECR) on behalf of Skotdal Real Estate. This report documents the current status of environmental cleanup activities completed at the subject property by GEI.

Previous environmental studies identified petroleum impacts to soil at the subject property *(See Section 1.0.4 Previous Environmental Investigations).* Based on the results of these previous studies, Art Skotdal (current owner of the property) decided to remove the impacted soils so he would be able to arrange financing for future development of the site.

An empty underground storage tank (UST) was discovered during the impacted soil removals. Based on the presence of this tank and petroleum impacts, GEI notified the Washington Department of Ecology (Ecology) of the petroleum release at the site *(Release Notification #608 812 - Telephone communication between Gary Galloway and Tammy Fawyaman (Ecology Release Notification Manager), October 8, 2008).* The tank was discovered and removed on the date of discovery. John Bails (Ecology Project Supervisor) visited the site on October 13, 2008 to inspect the progress of the cleanup. GEI completed a separate letter report to document the UST decommissioning and site assessment *(See UST Decommissioning Report, by GEI, dated November 2008).*

1.0.1 *Special Terms and Conditions*

This report is based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based upon the facts currently available within the limits of the existing data, scope of work, budget and schedule and may undergo revision as additional data are obtained. To the extent that more definitive conclusions are desired by the client than are warranted by the currently available facts, it is specifically GEI's intent that the conclusions and recommendations stated in our report is intended as guidance and not necessarily a firm course of action except where explicitly stated as such. WE MAKE NO WARRANTIES, EXPRESS OR IMPLIED INCLUDING WITHOUT LIMITATION, WARRANTIES AS TO MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

GEI makes no claims or guarantees with regard to this report.

1.0.2 *Involved Parties*

Current Facility Operator and addresses

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Ecology Project Manager

Not yet assigned (Voluntary Cleanup Program Site Manager)

1.0.3 *Regulatory Framework*

Remediation of petroleum-impacted soil in Washington State is regulated by the Model Toxics Control Act *(MTCA, WAC 173-340, February 2001)*. Generally, remediation of such sites is performed following the voluntary independent provisions of MTCA.

GEI's approach to these site cleanup services has followed all appropriate Washington State, local and federal guidance documents, including the following Washington Department of Ecology (WDOE) and US Environmental Protection Agency (EPA) guidance documents. This work complies with current safety, health and other relevant regulations, including:

- OSHA CFR 1910.120, Hazardous Waste Operations and Emergency Responses
- WAC 296-24, General Safety & Health Standards
- WAC 296-62, WAC Occupational Health Standards
- WAC 296-800/OSHA 29 CFR 1910, WAC Core Safety & Health Standards
- WAC 296-155/OSHA 29 CFR 1926, Construction Industry Standards
- WAC 173-340, Model Toxics Control Act Cleanup Regulation
- WAC 173-303, Dangerous Waste Regulations
- WDOE's Guidance on Preparing Independent Remedial Action Reports under the Model Toxics Control Act (Chapter 70.105D RCW, DRAFT dated March 1, 1994, Pub. 94-18)
- EPA CFR 40, Protection of Environment
- US EPA SW-846 (sampling and laboratory analysis)

1.0.4 *Previous Environmental Investigations*

Three environmental site investigations (ESAs) were performed at the site prior to startup of this remediation project. These reports are summarized as follows *(See Appendix A – Previous Environmental Reports)*.

Phase I ESA Report – Former Greyhound Depot, 1503 Pacific Avenue, Everett WA, by GeoEngineers, November 21 2002

Skotdal Real Estate engaged GeoEngineers to perform a Phase I ESA at the subject property in 2002. The ESA consisted of research and review of generally available historical and environmental information to identify potential environmental liabilities at the Site.

GeoEngineers' review of adjacent properties and properties in vicinity of the subject property did not identify any potential off-site sources of contamination, which may have impacted the subject Site. However, their review of regulatory listings did identify the Southland Corporation property (aka. 7-11 Store), located approximately one block east of the subject property, as having a history of USTs being removed and a final cleanup report received by Ecology on August 6, 1993. GeoEngineers concluded that due to: 1) the distance from the Southland property to the subject site (approximately 200 feet), 20) the relatively impermeable nature of the soils in vicinity of the site, and 3) reported indication that a remedial action was completed at the Southland site, that the Southland site did not represent an Recognized Environmental Condition (REC) at the subject property and no additional regulatory file reviews were necessary.

GeoEngineers' historical review of the Site indicated that the Site was not developed until 1914. GeoEngineers' review of the 1914-1957 Sanborn Maps indicated that Puget Sound Traction, Light & Power Company (PSTLP) occupied a portion of the property. The existing Greyhound station building is reported to be observed in historic aerial photos from 1965 to 1991. Reportedly, the structure was completed in 1957 and the remainder of the subject property was covered with asphalt at that time.

Walter V. Shannon (retired PSTLP employee) reported the following historical information to GeoEngineers during an interview conducted on November 6, 2002.

> *"The freight depot, which occupied a portion of the Greyhound site, existed between 1934 and 1947. The freight depot, waiting room and office was (sic) heated by a steam system. He has no knowledge of boiler or heating plant on the site. He indicated that a fueling island with USTs was located in the northwest corner of the plat, operated by Pacific Northwest Traction (PNWT) for bus fueling. He has no knowledge of tank removal activities. The PNWT freight depot was razed between 1947 and 1955 to construct the Greyhound Depot."*

GeoEngineers concluded that based on: 1) the reported presence of the fuel island and USTs, and 2) potential equipment maintenance and hazardous substance spills associated with the former freight depot, potential petroleum-related impacts may be present at the Site. GeoEngineers stated that further evaluation of the potential for subsurface contamination by hazardous substances beneath the Site would require soil and/or groundwater sampling and chemical analysis.

Limited Phase II ESA – Proposed Trinity Lutheran College Campus, Hoyt Avenue and Pacific Avenue, Everett Washington

Associated Earth Sciences, Inc. (AESI) completed a Limited Phase II ESA on the northern portion of the subject property in 2008. According to the report, AESI had completed a Phase I ESA previously at the Site, which did not disclose any RECs other than a heating oil UST and 40 tons of heating oil impacted soil that had been removed from on an adjoining parcel northeast of the Skotdal property. AESI concluded the following *"Our research also identified other areas in the site vicinity that have reported releases of contaminants, but our Phase I concluded that those sites did not appear to pose a risk to the subject site."*

In February 2007, AESI completed a subsurface exploration program for the purpose of gathering data for geotechnical engineering analysis. However, AESI identified petroleum impacts to the Site's soil in a boring situated on the northern portion of the Skotdal property. Based on the presence of petroleum impacts to the soil, AESI completed four additional soil borings in vicinity of the boring (with the observed impacts) to further delineate the impacts to the soil – three of the four additional soil borings confirmed gasoline-range petroleum impacts and benzene to the soil at depths ranging up to 21 feet below ground. AESI concluded the following - *"The site has been confirmed to contain soils that exceed applicable cleanup levels for gasoline and benzene in soils."* NOTE: AESI's single soil sample with detectable benzene (0.15 mg/kg) using EPA Method 8021B was re-analyzed using EPA Method 8260B, which did not detect benzene at the method detection level of 0.03 mg/kg.

AESI reportedly observed groundwater in one soil boring situated in the northwestern portion of the Skotdal property. AESI tested the water for diesel-range hydrocarbons, which was not detected in the sample (no other tests were performed on the water sample).

Limited Site Investigation by ERM-West, Inc., March 2008

ERM completed three soil borings located approximately 30 feet south of the AESI borings (with petroleum impacts) to test for the presence of petroleum impacts to the soil. ERM did not issue a final report for the study, but did provide a figure showing the locations of the borings, boring logs and a table summarizing the data from the sample analysis.

GEI's review of the data and boring logs indicate the following.

1) Gasoline-range impacts were present from approximately one foot below the ground surface (bgs) to the bottom of two of the borings (14.5 feet bgs)
2) Benzene was not detected in the samples
3) MTBE was detected in one soil sample

2.0 SITE DESCRIPTION

2.0.1 Location and Legal Description

The Skotdal Site is located at 1503 Pacific Avenue in Everett, Snohomish County, Washington. The property is situated in the NE ¼ of the NE ¼ of Section 30, Township 29 North, Range 5 East. The Greyhound structure is currently being re-developed as a multi-tenant professional office building.

The Site is situated in Everett's Central Business District. The property is situated approximately one mile west of the Snohomish River and 1¼ -mile southeast of Possession Sound *(see Figure 2-1 - Site Location Map).*

Snohomish County Assessor records indicate that the subject property consists of two tax parcels of land, which are separated by a public alley property. The acreages encompassed by the parcels are summarized as follows.

Parcel #00645171801200 – 0.36 acres, Greyhound Building - currently used for "Retail Trade", 6,531 square foot (sf)
Parcel #00645171801000 – 0.14 acres, no structures – asphalt covered parking lot

2.0.2 Background and General Facility Information

GeoEngineers' historical review of the Site indicated that the Site was not developed until 1914. GeoEngineers' review of the 1914-1957 Sanborn Maps indicated that Puget Sound Traction, Light & Power Company (PSTLP) occupied a portion of the property *(See Section 1.0.4 - Previous Environmental Investigations).* Assessor records indicate that the existing Greyhound station building was built in 1957.

As previously stated, Walter V. Shannon (retired PSTLP employee) reported the following historical information to GeoEngineers during an interview conducted on November 6, 2002.

"The freight depot, which occupied a portion of the Greyhound site, existed between 1934 and 1947. The freight depot, waiting room and office was (sic) heated by a steam system. He has no knowledge of boiler or heating plant on the site. He indicated that a fueling island with USTs was located in the northwest corner of the plat, operated by Pacific Northwest Traction (PNWT) for bus fueling. He has no knowledge of tank removal activities. The PNWT freight depot was razed between 1947 and 1955 to construct the Greyhound Depot."

2.0.3 Site Improvements

The subject property is currently developed with a 6,531 sf structure, which was built in 1957. Skotdal recently completed remodeling of the structure.

2.0.4 Current Uses of Adjoining Properties

Pacific Avenue borders the Site to the south, Hoyt Avenue borders the Site to the to the west, asphalt-covered parking lots border the Site to the north, and a three-story professional office building borders the Site to the east.

2.0.5 Proposed Land Use

Current plans for the subject property include leasing the Greyhound structure to tenants for professional office space and to continue providing parking stalls for public use. Long-range plans include re-developing the site with a multi-story apartment building with two levels of underground parking.

3.0 ENVIRONMENTAL SETTING

3.0.1 Regional Physiographic Conditions

The subject property is approximately 130 feet above mean sea level and is situated near the top of a northerly-trending ridgeline, which separates the Snohomish River from Puget Sound (Possession Sound). Topography in vicinity of the site slopes slightly to the west *(see Figure 2-1 - Site Location Map)*.

3.0.2 Soil/Geologic Conditions

The present day landscape and underlying hydro-stratigraphy of Seattle are the result of repeated advances and retreats of Pleistocene continental glaciers, which inundated the Puget Lowland during recent geologic time. Over the past 300,000 years, at least six glacial and intervening interglacial episodes have affected the region. During this time, a large volume of glacial and interglacial material was deposited over the basin, resulting in complex accumulation of unconsolidated sediments, which is up to 3,000 feet thick in some places.

The US Department of Agriculture Soil Conservation Survey maps two soils series in the vicinity of the property - the Alderwood and Norma series of soils. The Alderwood soil series consists of moderately well drained soil with a perched water table developing for short periods during the winter and spring rainy seasons. Surface runoff is very slow to slow and erosion hazard is slight. The soil has the natural ability to support large loads.

AESI describes the shallow subsurface soils as *"discontinuous stringers or lenses of sand with trace silt at various depths" (See Appendix A - Previous Environmental Reports).*

Subsurface soils observed by GEI during this project included discontinuous silt and sand lenses ranging from silt to course-grained sands. The soils were generally damp to moist and ranged from dense to very dense.

3.0.3 Hydrogeologic Conditions

The subject property is supplied water from a local municipal source. On site drainage is handled through on site ground retention and storm drains. Surface drainage appears to be adequate over the majority of the Site, however, storm drains along the western portion of the property appear to be clogged.

AESI reported the presence of groundwater in one of their borings (EB-7 at 12' bgs) on the western side of the property - no water was present in any of AESI's other borings. Groundwater was not encountered by GEI during this project, however water was observed by GEI to be seeping out of the remedial excavation along the western sidewall at approximately eight feet belowground. Since this seepage was observed in vicinity of the plugged storm drain catch basins and no water was observed elsewhere in the excavation, GEI considers this water to be related to storm drain leakage.

Groundwater gradient and flow direction is inferred to follow the surface topography - westerly toward Puget Sound.

4.0 *SITE REMEDIAL INVESTIGATION*

As described above, environmental consultants had previously confirmed the presence of gasoline-range petroleum impacts at the Site with concentrations above the currently allowable MTCA cleanup levels (CULs) in soil *(See Section 1.0.4 - Previous Environmental Investigations).*

At the client's request, GEI's the primary objective of the environmental cleanup of the property was to remove petroleum-affected soil (and water, if applicable) with concentrations above the MTCA Method A (WAC-173-340) cleanup levels and document the work in a remediation report. To accomplish this objective, GEI was contracted to oversee the owner's contractor (Affordable Abatement) during the removals of the impacted soil (identified in earlier studies) and inspect the property for additional impacted soil. Also, as per Washington Dept. of Labor & Industries requirements, GEI prepared a Site-specific Health & Safety Plan and provided health & safety support for the project.

GEI documented the removals of previously identified impacted soils and soils confirmed by GEI to be impacted above MTCA-acceptable levels and verified the adequacy of the removals by collecting "clearance" soil samples at the limits of the excavation. However, since the volume of the impacted soil anticipated by the owner was much larger than originally expected, GEI also submitted "confirmation" samples to analytical laboratories during the removals of the impacted soil to confirm that GEI's field screening had properly identified the impacted soils with concentrations above the MTCA CULs for removal. Also, since the source(s) of the impacts to the soil had not been positively identified, GEI collected additional soil samples for forensic testing to (potentially) identify the age(s) of the release(s). GEI also observed impacted soils that had not been previously identified, which appeared to be related to fill materials adjacent to and directly beneath railroad ties that were installed during the electric trolley use at the site.

Specifically, GEI collected the following samples at the site for laboratory analysis.

1) Clearance soil samples collected at the limits of the excavation
2) Confirmation soil samples collected from the impacted soils
3) Forensic soils samples collected from the impacted soils
4) Characterization soil samples from the soils in vicinity of the railroad ties.

4.0.1 *Clearance Soil Samples*

GEI collected 45 soil samples at the limits of the excavation to document the residual petroleum concentrations remaining in the soil *(See Table 4-1 – Clearance Soil Samples).* These data confirm that MTCA CULs (Method A ULU) have been met in all areas, with the exception of the southern sidewall and soils in the eastern sidewall near the power pole situated along the city alley *(See Figure 4-1 – Clearance Soil Sample Locations).*

4.0.2 *Confirmation Soil Samples*

GEI collected ten soil samples during the impacted soil removals to verify field-screening results of the soil. These soil sample locations are shown in Figure 4-2

— Forensic and Railroad Tie Soil Sample Locations and the data is summarized in Table 4-2 — Confirmation Soil Sample Results.

4.0.3 *Forensic Testing of Soil Samples*

GEI submitted six additional soil samples to Friedman & Bruya, Inc. (FBI) for forensic testing to attempt identify the age(s) of the release(s).

The following is excerpted from FBI's summary of their conclusions of their analysis *(See Appendix C — Laboratory Data Sheets).*

> *"The GC trace using the flame ionization detector (FID) showed the presence of low to medium boiling compounds. The patterns displayed by these peaks are indicative of a low to medium boiling material such as gasoline, and possibly a middle distillate such as kerosene or similar materials.*
>
> *The low boiling compounds appear as an irregular pattern of peaks on top of a small hump or unresolved complex mixture (UCM). This material elutes from n-C_7 to n-C_{16} showing a maximum near n-C_{11}. This correlates with a temperature range of approximately 100° C to 290° C with a maximum near 200° C. Within this range, the GC/FID trace showed a low level or absence of peaks, which are indicative of toluene, ethylbenzene, and the xylenes. The low level or absence of these constituents indicates that any gasoline present has undergone extensive degradation. It should also be noted that peaks characteristic of the normal alkanes may be present in this sample."*

4.0.4 *Impacted Soil Adjacent to Railroad Ties*

GEI observed fill soil materials beneath the asphalt in the area of buried railroad ties that were dissimilar to all other soil encountered at the site. The fill was used as a base material to set the railroad ties for use with Puget Sound Traction, Light & Power electric trolleys. The ties appeared to be left in place following the removals of the rails *(See Figure 4-2 — Forensic and Railroad Tie Soil Sample Locations).*

Since these materials were considerably different than other soils encountered at the site, GEI segregated these soils and collected soil samples for laboratory analysis to properly characterize the soils for disposal and/or reuse at the site.

GEI submitted five discrete soil samples from the stockpile — these data confirm that the soils were impacted with lube oil, cPAHs and lead with concentrations above the CULs and could be disposed of at a Subtitle D landfill (TCLP lead < Washington Dangerous Waste levels).

4.0.5 *Groundwater Investigation*

Groundwater was not encountered or investigated during this project.

5.0 *SUMMARY OF SITE CONDITIONS AND REMEDIAL ACTION*

The following observations were made by GEI during the course of this remedial action.

1) Gasoline-range petroleum impacts to the Site's soil were confirmed in soil ranging from directly beneath the asphalt to depths up to 23 feet below the ground surface (bgs) with the highest concentrations centered near the former UST location. Gasoline-range impacted soils were observed over approximately 40 feet (east-west) by 20 feet (north-south) directly beneath the asphalt and appear to have resulted from surface spills.

2) Field screening of soil samples collected from the vicinity of the UST (during decommissioning of the tank) did not indicate that the tank was the source of the release based on: A) the tank was in good condition (minor corrosion, not pitted, etc), B) the sides and ends of the tank were not stained indicating spills or leaks from the tank, C) the soil directly beneath the tank was not stained indicating that product had impacted the soils, and D) gasoline-impacted soil was observed above the top of the tank *(See UST Decommissioning Report, by GEI, dated November 2008).*

3) Petroleum compounds appear to have migrated slowly downward until they encountered more permeable, thinly bedded sand lenses and then traveled laterally within the sandy lenses. Clean (non-impacted) soils were excavated and temporarily stockpiled (for reuse as backfill) from above the impacted soils where the contaminants had migrated laterally into the sand lenses. Very dense, silty, glacial tills exposed at the bottom of the excavation appear to have prohibited the contaminants from migrating below the bottom of the excavation.

The volumes and disposal locations of the excavated soils are summarized as follows.

- Approximately 6,829.28 tons of petroleum-impacted soil was delivered to the CEMEX thermal desorption facility in Everett for processing and recycling.
- 128.43 tons of soil impacted by heavy oil, cPAHs and lead were disposed of at Waste Management's Columbia Ridge facility (CEMEX was not permitted to accept these lead-contaminated soils).
- Approximately 5,000 cubic yards of clean (non-impacted) soils were excavated and temporarily stockpiled at a nearby site until they could be used as backfill at the site. The excavation has been backfilled and will be blacktopped as soon as weather allows.

The Model Toxics Control Act (MTCA) cleanup regulations require that a cleanup action must comply with cleanup levels for selected hazardous

substances, points of compliance, and applicable or relevant and appropriate state and federal laws (ARARs) [WAC 173-340-710]. The final indicator hazardous substances identified for the site, the associated cleanup levels, and ARARs are briefly summarized in the following sections.

5.0.1 *Nature and Extent*

The results of the soil sampling at the limits of the removal activities indicate that residual gasoline-range petroleum compounds are present in soil at depths ranging from directly beneath the asphalt to approximately 23 feet bgs along the southern sidewall of the excavation and from approximately six feet to 23 bgs near the power pole in the northeastern portion of the property *(See Figure 4-1 — Clearance Soil Sample Locations).* The extent of the contamination has not been delineated south of the excavation due to the presence of an existing structure. The owner intends to complete the removals of the impacted soil from these areas prior to (or during) the re-development of the site.

5.0.2 *Exposure Pathways*

The following pathways were evaluated at the site for this ECR.

- Product to groundwater and surface water
- Soil to groundwater
- Soil particulate to air
- Soil direct contact
- Terrestrial ecological evaluation

5.0.2.1 *Soil to Groundwater Pathway*

Groundwater studies were not performed during this project and a groundwater investigation is necessary to confirm that groundwater is not impacted beneath the site. However, potential groundwater impacts resulting from the migration of residual petroleum compounds in the soil to the groundwater is considered to be low, based on the following,

1) Shallow groundwater was not encountered within the limits of the excavation, and
2) The residual petroleum contamination in the soil is (or will be) covered by asphalt and/or the existing structure, which will prohibit water from percolating downward into the impacted strata.

5.0.2.2 *Soil Particulate to Air Pathway*

This pathway is not of concern for the site provided that the asphalt surface and existing structure covering the contaminants are not removed.

5.0.2.3 *Soil Direct Contact Pathway*

As stated above, the residual petroleum contamination in the soil is (or soon will be) covered by asphalt and/or the existing structure.

This pathway is not of concern for the site provided that the asphalt surface and structure covering the contaminants are not removed and are maintained.

5.0.2.4 *Terrestrial Ecological Evaluation*

The Terrestrial Ecological Evaluation is excluded because the existing structure and asphalt covers the residual contamination.

5.0.3 *Cleanup Levels and Points of Compliance*

Soil cleanup levels for the indicator hazardous substances were identified for the site using the criteria outlined in WAC 173-340-900 Table 740-1 Method A - Soil Cleanup Levels for Unrestricted Land Uses.

5.0.3.1 *Groundwater*

Groundwater cleanup levels have not been identified for this site.

5.0.3.2 *Soils*

Soil cleanup levels for the petroleum compounds were identified using the criteria outlined in WAC 173-340-900 Table 740-1 Method A - Soil Cleanup Levels for Unrestricted Land Uses.

- Gasoline-range petroleum hydrocarbons - CULs = 30 mg/kg
- Diesel-range petroleum hydrocarbons - CULs = 2,000 mg/kg
- Heavy oil -range petroleum hydrocarbons - CULs = 2,000 mg/kg
- Lead – CULs = 250 mg/kg
- cPAHs (TECs) CULs = 0.137 mg/kg
- Benzene = 0.03 mg/kg

5.1 *SUMMARY OF SELECTED CLEANUP ACTION*

Site-specific cleanup action alternatives were considered for the site to ensure the protection of human health and the environment. Specifically, the cleanup action for the site was based on a comparison of each potential cleanup action alternative with the following criteria (WAC 173-340-360(2) and (3)) and consideration of the MTCA remedy selection requirements:

- Overall Protection of Human Health and the Environment
- Compliance with Cleanup Standards
- Use of Permanent Solutions to the Maximum Extent Practicable
- Compliance with ARARs
- Provision of Compliance Monitoring
- Provision for Reasonable Restoration Time Frame

The initial screening and evaluation of supplemental data collected during the remedial investigation indicates that remedial actions completed at the site are sufficient to protect human health and the environment, provided that the asphalt covering the affected soil and the existing concrete floor in the structure are maintained. However, additional removals are necessary in areas where residual contaminant concentrations exceed CULs established for the site.

Institutional Controls (Deed Restrictions) may be necessary to ensure adequate protection from exposure of the residual petroleum compounds remaining below the asphalt and structure. These controls are measures undertaken to

limit or prohibit activities that may interfere with the integrity of the cleanup action or result in exposure to hazardous substances at the site. Such measures may be required to assure continued protection of human health and the environment when a cleanup action results in residual concentrations of hazardous substances that exceed MTCA CULS established for the site.

5.1.1 *Justification for the Selected Remedial Action*

Available records indicate that the Puget Sound Traction, Light & Power Company (PSTLP) owned and operated at the site from circa 1914 to 1957. The records indicate that PSTLP's development and site use are likely sources of the gasoline-range petroleum impacts *(See Section 1.0.2 - Background and General Facility Information).*

The existing structure (with a concrete slab-on-grade foundation) and asphalt covering the affected soil is considered to be sufficient to mitigate environmental concerns at the site provided that the institutional controls proposed in this IECR are followed until the remaining impacted soils can be remediated.

6.0 *LIMITATIONS*

This report was prepared for the use of the Skotdal Real Estate Company ("Client") and the findings presented in this Interim Cleanup Report are based upon the agreed scope of work outlined in the report and the Contract for Professional Services between Client and Galloway Environmental, Inc. ("Consultant"). Use or misuse of this report, or the reliance upon the findings hereof by any parties other than the Client, is at their own risk. Neither Client nor Consultant make any representations or warranty to such other parties as to the accuracy or completeness of this report or to the suitability of its use by such other parties for any purpose whatever, known or unknown to Client or Consultant. Neither Client nor Consultant shall have any liability to, or indemnifies or holds harmless third parties for any losses incurred by the actual or purported use or misuse of this report.

GEI is not engaged in environmental auditing and reporting for the purpose of advertising, sales promotion, or endorsement of any client's interests, including raising investment capital or recommending investment decisions or other publicity purposes. The client acknowledges that any reports prepared by GEI are for the exclusive use of the client and agrees that GEI's reports or correspondences will not be used or reproduced in full or in part for such promotional purposes and may not be used or relied upon in any prospective or offering circular. The client also agrees that none of its advertising, sales promotion, or other publicity matter containing information obtained from this assessment will make reference to GEI's trade name.

FIGURES

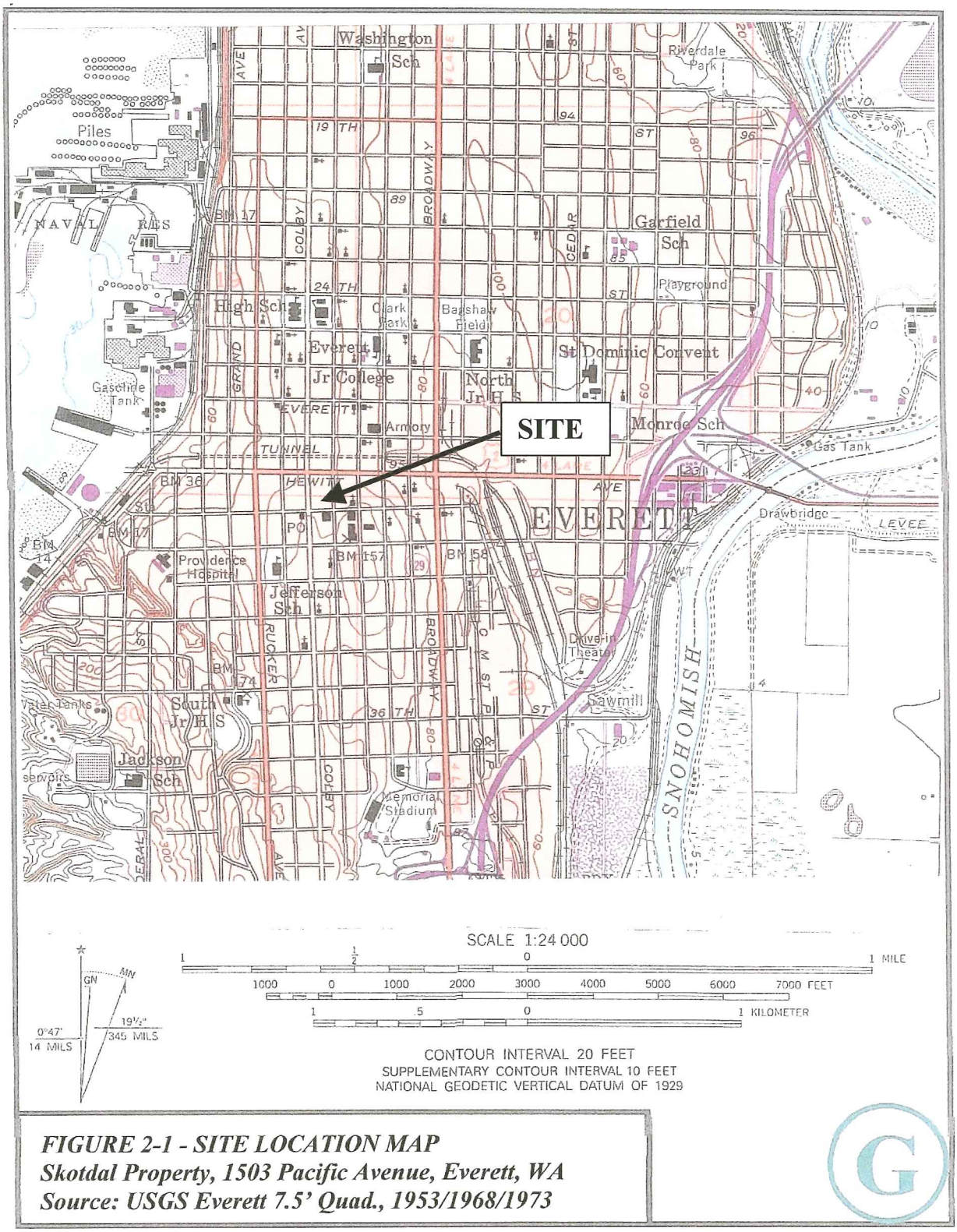


FIGURE 2-1 - SITE LOCATION MAP
Skotdal Property, 1503 Pacific Avenue, Everett, WA
Source: USGS Everett 7.5' Quad., 1953/1968/1973

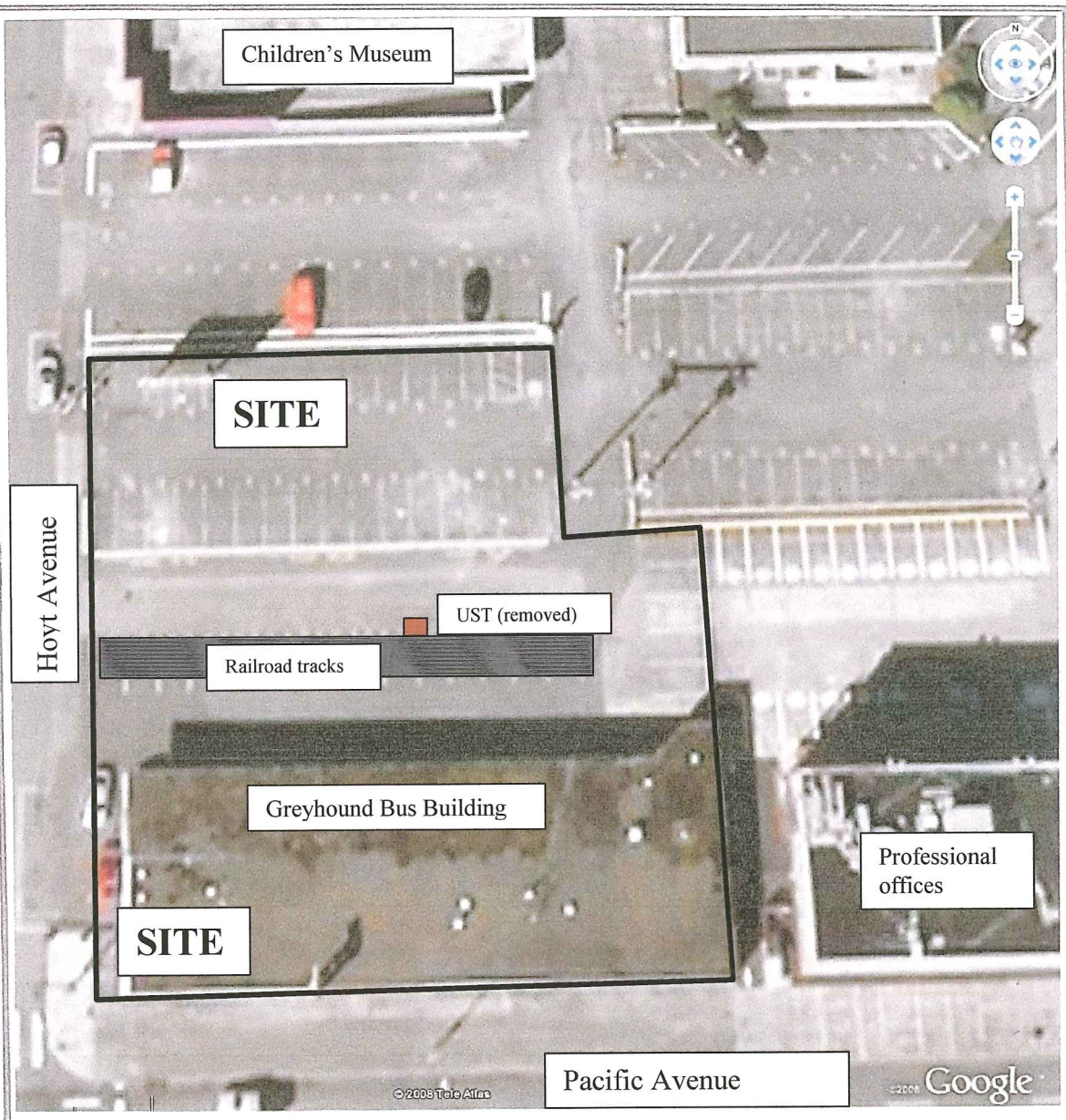


FIGURE 2-2 – SITE PLAN & VICINITY MAP
Skotdal Property, 1503 Pacific Ave., Everett, WA
Source: Modified after Google 2008

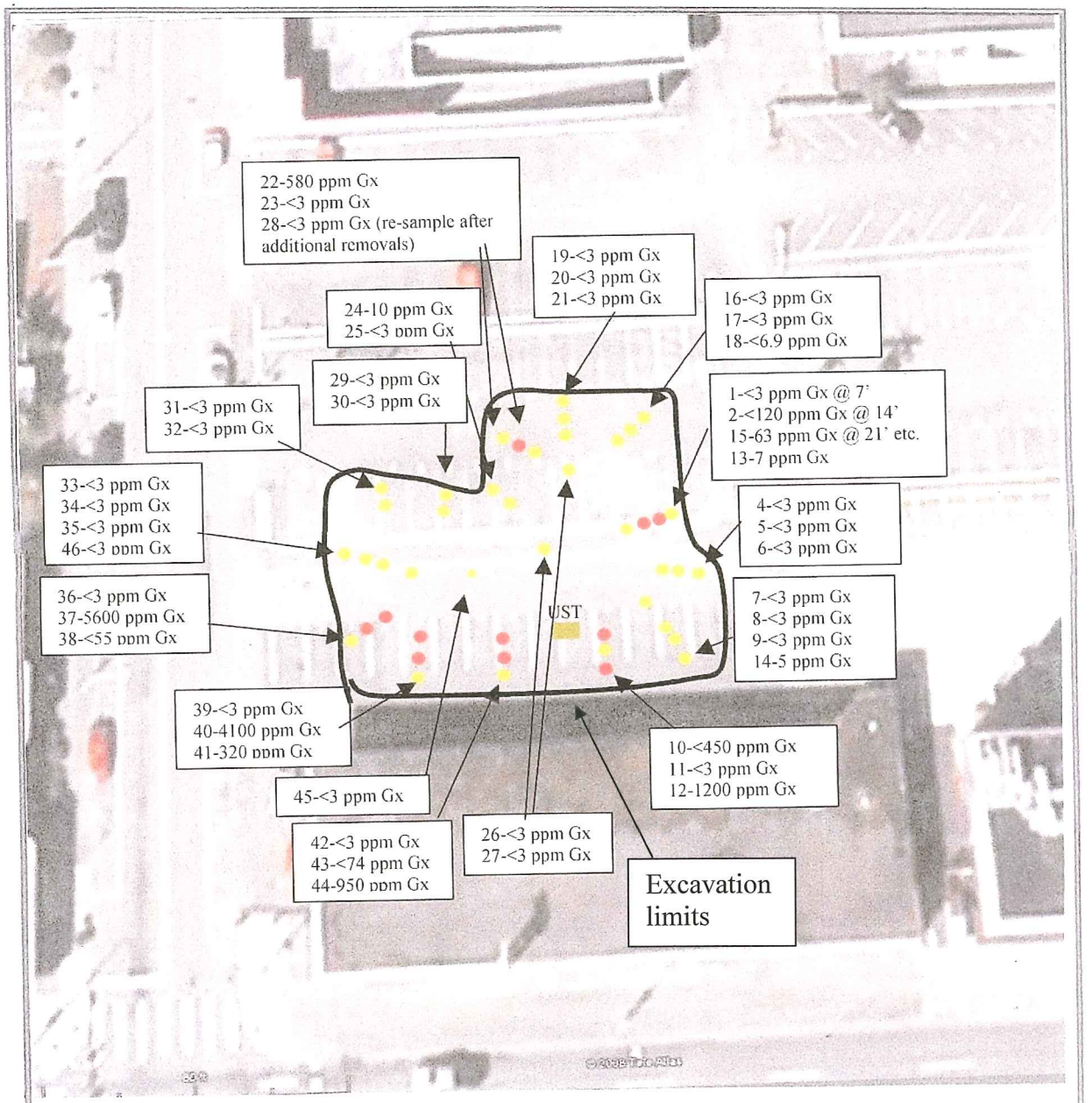


FIGURE 4-1 – CLEARANCE SOIL SAMPLE LOCATIONS
Skotdal Property, 1503 Pacific Ave., Everett, WA
Source: Modified after Google 2008

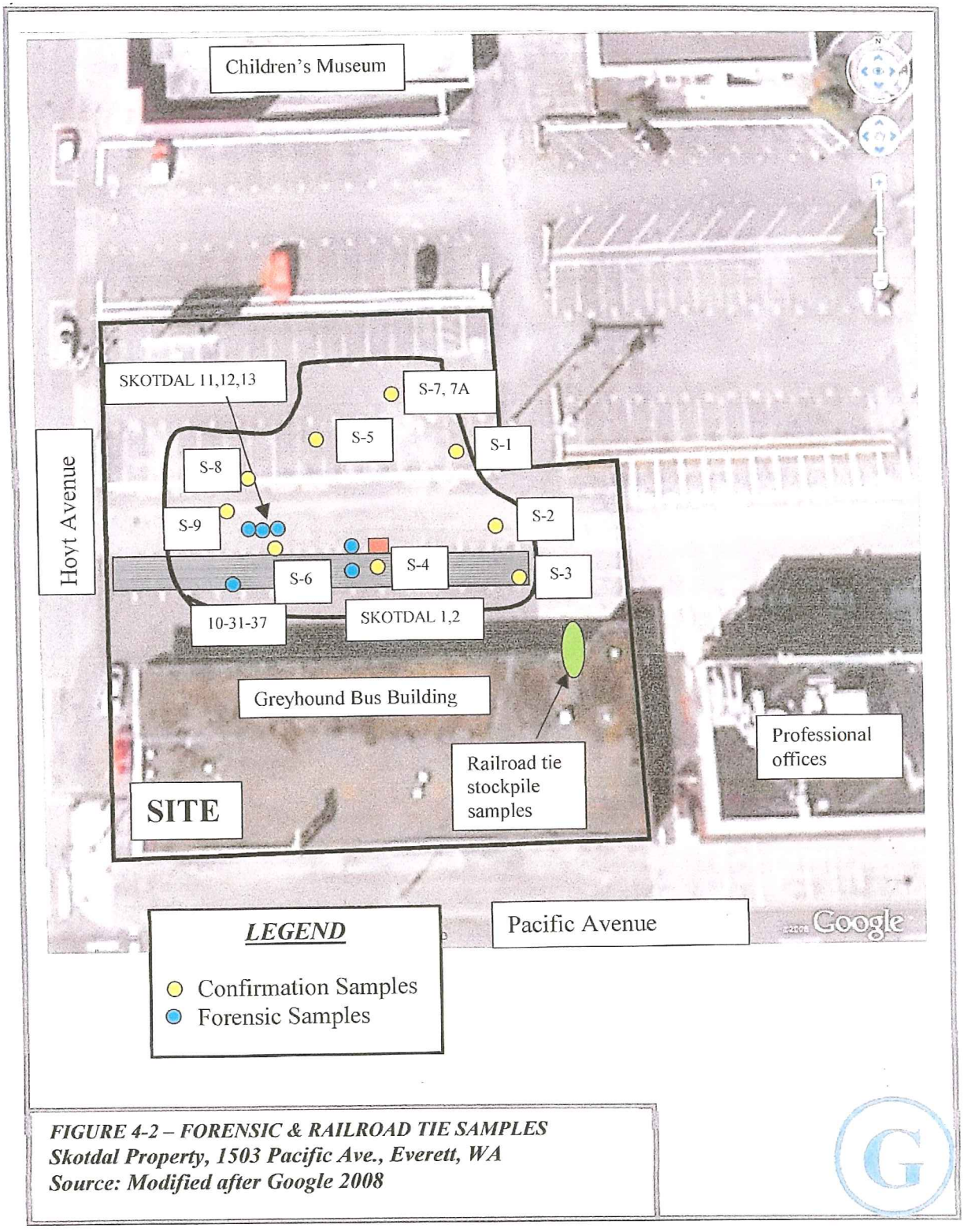


FIGURE 4-2 – FORENSIC & RAILROAD TIE SAMPLES
Skotdal Property, 1503 Pacific Ave., Everett, WA
Source: Modified after Google 2008

TABLES

TABLE 4-1 CLEARANCE SOIL SAMPLE RESULTS (mg/kg)

Sample No.	Depth (feet)	PID	TPH-Gx	MTBE	Benzene	Toluene	Ethylbenzene	Xylenes	Remarks
10-10-1	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-10-2	14	>50	**<120**	<0.1	<0.04	<0.06	0.4	0.4	
10-10-4	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-10-5	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-10-6	21	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-10-7	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-10-8	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-10-9	21	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-10-10	7	>50	**<450**	<1	<0.3	<0.5	4.2	5.1	Dx = 220 Lube oil = <50
10-10-11	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-10-12	21	>50	**1200**	<0.5	**0.3**	<0.3	4.8	5.4	
10-10-13	22	0.0	7	<0.1	<0.03	<0.05	<0.05	<0.2	
10- 10-14	22	0.0	5	<0.1	<0.03	<0.06	<0.06	<0.2	
10-16-15	21	0.0	**63**	<0.1	<0.03	<0.05	0.1	<0.2	
10-16-16	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-16-17	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-16-18	21	0.0	<6.9	<0.1	<0.03	<0.05	<0.05	<0.2	
10-16-19	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-16-20	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-16-21	21	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-20-22	14	>50	**580**	<0.1	<0.03	<0.05	0.9	1.9	
10-20-23	21	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-20-24	14	0.0	10	<0.1	<0.03	<0.05	<0.05	<0.2	
10-20-25	21	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-20-26	23	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-20-27	23	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-28	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	Re-sample No. 22, following additional removals
10-31-29	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-30	21	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-31	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-32	21	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-33	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-34	14	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
MTCA CULs			30	0.1	0.03	7	6	9	Method A ULU

TABLE 4-1 CLEARANCE SOIL SAMPLE RESULTS (mg/kg) - Continued									
Sample No.	Depth (feet)	PID	TPH-Gx	MTBE	Benzene	Toluene	Ethylbenzene	Xylenes	Remarks
10-31-35	21	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-36	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-37	14	>50	**5600**	<1.0	**5.1**	<0.05	**7.6**	8.6	
10-31-38	21	23.2	**<55**	<0.1	<0.03	<0.05	0.2	0.2	
10-31-39	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-40	14	>50	**4100**	<0.1	**2.5**	<1.0	**8.8**	10	
10-31-41	21	>50	**320**	<0.1	**0.2**	<0.05	1.1	1.9	
10-31-42	7	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-43	14	31.4	**<74**	<0.1	<0.03	<0.05	0.5	0.6	
10-31-44	21	>50	**950**	<0.1	**0.3**	1.2	3.8	5.4	
10-31-45	23	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
10-31-46	23	0.0	<3	<0.1	<0.03	<0.05	<0.05	<0.2	
MTCA CULs			30	0.1	0.03	7	6	9	Method A ULU

TABLE 4-2 CONFIRMATION SOIL SAMPLE RESULTS (mg/kg)

Sample No.	Depth (feet)	PID	TPH-Gx	MTBE	Benzene	Toluene	Ethylbenzene	Xylenes	Remarks
S-1	8	3.8	**32**	---	<0.03	<0.05	<0.05	<0.2	
S-2	12	31.2	**<67**	---	<0.03	<0.05	0.14	0.6	
S-3	12	>50	**750**	---	<0.06	<0.1	1.2	2.3	
S-4	10	>50	**250**	---	**0.06**	<0.05	0.4	0.8	
S-5	10	0.0	<3	---	<0.03	<0.05	<0.05	<0.2	
S-6	5	0.0	4.2	---	<0.03	<0.05	<0.05	<0.2	
S-7	17	1.6	<9.2	---	<0.03	<0.05	<0.07	<0.2	
S-7a	18	>50	**<150**	<0.1	<0.03	<0.05	<0.05	0.3	Dx = 130 Lube = <50
S-8	15	28.6	**<64**	<0.1	<0.03	<0.05	0.7	<0.2	
S-9	16	>50	**<120**	<0.1	<0.03	<0.5	1.9	1.8	See EPH/VPH
MTCA CULs			30	0.1	0.03	7	6	9	Method A ULU

TABLE 4-3 FORENSIC SOIL SAMPLE RESULTS (mg/kg)

Sample No.	Depth (feet)	TPH-Gx	Organic lead	Organic Manganese	Remarks
SKOTDAL - 2	5	**590**	<0.05	<0.05	
SKOTDAL - 11	15	**620**	---	---	
SKOTDAL - 12	20	**1700**	<0.05	<0.05	
SKOTDAL - 13	3	88	---	---	
ROCK	0.3	12	---	---	Asphalt
10-31-37	14	---	0.01	<0.01	
MTCA CULs		30	0.1	0.03	Method A ULU

TABLE 4-4 RAILROAD TIE - SOIL SAMPLE RESULTS (mg/kg)

Sample No.	TPH-Gx	TPH-Diesel	TPH-oil	Napth-alene	cPAHs TECs	As	Cd	Cr	Pb	Remarks
SBUS-1	<3	340	780	0.07	**0.2021**	9.4	<1.0	21	**490**	TCLP Pb = 0.07 mg/L
SBUS-2	<7	1700	**2900**	0.21	**0.2997**	<5.0	<1.0	20	190	
SBUS-3	<3	130	350	<0.02	0.1030	<5.0	<1.0	20	54	
SBUS-4	<3	64	180	<0.02	0.1141	<5.0	<1.0	24	66	
SBUS-5	<6	410	490	0.22	0.1325	<5.0	<1.0	21	120	
MTCA CULs	30	2000	2000	5	0.137	20	2	19/2000	250	Method A ULU

APPENDIX A

PREVIOUS ENVIRONMENTAL REPORTS
(Attached Separately)

Not included

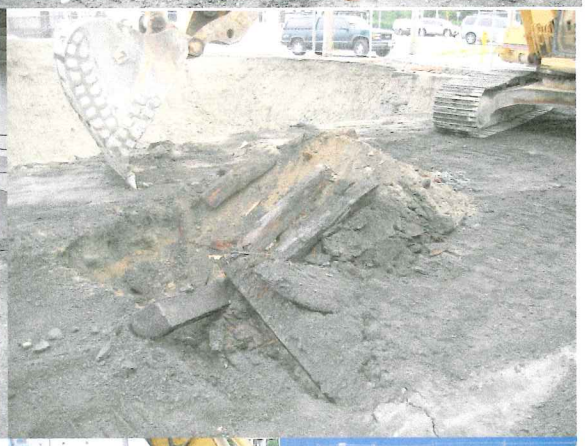
APPENDIX B

PHOTOS


09/15/2008


10/06/2008


10/06/2008

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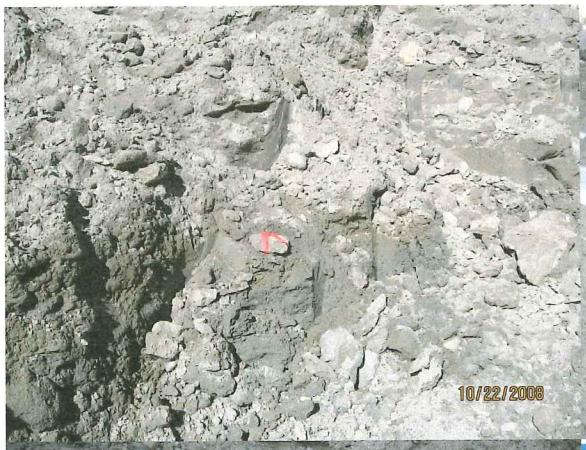
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APPENDIX C

LABORATORY DATA SHEETS

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