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Washington State
Department of Ecology

PHASE-I ENVIRONMENTAL AUDIT

Former Washington Belt Company
672 East 11th Street
Tacoma, Washington

CHRIS & LINDA NELSON

PREVIOUS ENVIRONMENTAL WORK

Insignia Kidder Mathews provided EAI with copies of three (3) environmental reports, which document UST closures on the subject property. A brief summary of each report is presented below. Copies of these reports are also included in Appendix B.

August 2000 Underground Heating Oil Storage Tank Abandonment / Replacement Project,
Langseth Environmental Services, Inc.

This report documents the closure in-place of a 675 gallon heating oil UST, which was located in the northwest corner of the warehouse portion of the subject building below the concrete floor. The closure method consisted of initially pumping the UST of remaining product. The product was temporarily stored in drums so that it could be transferred to a replacement above ground tank. Once the tank was pumped, the top of the tank was exposed by excavation and cut open. The tank was then entered and cleaned of residual product and sludge. Langseth inspected the interior of the tank and reported "no visual indications of pinholes and/or steel/weld failures." Upon completion of the tank cleaning, a hole was drilled through the base of the tank to allow for the collection of a soil sample below the tank. The tank was then filled with concrete slurry.

The single soil sample was analyzed by a laboratory for diesel range petroleum (heating oil). The certificate of laboratory analysis indicates that diesel was not detected in the soil sample.

February 2001 Underground Heating Oil Storage Tank Abandonment, Langseth
Environmental Services, Inc.

This report documents the closure in-place of an older heating oil UST that was estimated to have been abandoned at least 20 years ago. This second UST was located below the floor in the southeast corner of the warehouse portion of the building. The tank had an approximate capacity of 1570 gallons. Approximately 500 gallons of residual heating oil / water was removed from the tank. The top of the tank was then exposed and entered for final cleaning. As before, Langseth then drilled a hole through the base of the UST with the intention of collecting a soil sample. However, Langseth's report indicates that groundwater began entering the UST preventing the collection of a soil sample. The tank was then filled with concrete slurry. Langseth attributed the presence of the groundwater to tidal fluctuations, noting that the work had been performed near high tide.

December 2002 Phase II Site Investigation / Soil Boring & Sampling Project, Langseth
Environmental Services, Inc.

This report documents the completion of a single soil boring in the vicinity of the UST abandoned in February 2001. The boring was placed off the south end of the UST (outside of the subject building). The boring was completed to a depth of approximately 8.5 feet, which according to Langseth corresponded to a depth of at least 1 foot below the base elevation of the adjacent UST. A single soil sample was then collected. The work was performed at low tide, and groundwater was

CONCLUSIONS/RECOMMENDATIONS

FORMER USE OF HEATING OIL

As discussed briefly in the executive summary/cover letter and at length elsewhere in this report, two (2) underground heating oil tanks were closed-in-place by others (Langseth) in 2000 and 2001 in areas beneath the floor of the existing building at approximately the locations depicted schematically in the Site Plan, Plate 2. A single soil sample was obtained from beneath (through the bottom of) the tank in the northwest quadrant of the building. Owing to reported difficulties associated with influx of groundwater (reported as tidal influenced), soil sampling beneath and through the bottom of the second tank situated in the southeast corner of the building was not possible so a boring was made in close proximity to the south end of that tank for the purpose of sampling and testing of soil quality. Langseth advised that no petroleum was detected in either of the soil samples, and opined that "no petroleum soil above MTCA Method-A cleanup levels is present in the UST pit area of the site".

As a technical footnote, in section 5.3 of their document entitled "Guidance for Site Checks and Site Assessments for Underground Storage Tanks", WDOE publication 90-52, WDOE provides five (5) criteria for certain conditions which (any of which) trigger the need for groundwater sampling and testing at UST sites. The first of these is when "the lowest point of the UST system is located in groundwater". As Langseth did not obtain groundwater samples even though groundwater was reportedly present during his efforts with the southeast tank, it would appear that this aspect of the WDOE-proscribed site assessment criteria may not have been fully satisfied, and that groundwater quality (tidal affected or otherwise) remains unassessed.

Langseth's apparent reluctance to directly obtain a sample of the water reportedly entering the southeast tank appears defensible from several technical perspectives. First, a sample obtained from such a flow entering the bottom of that tank may not have been representative of ambient groundwater conditions outside the tank. Second, interior tank conditions could conceivably have affected results of testing such a sample.

In summary, taken on balance, Langseth's report does not indicate that soils proximal to the closed USTs have been adversely impacted as a result of use of the two decommissioned UST's.

FORMER PETROLEUM COMPANY USE/EASTERN HALF OF PROPERTY

As discussed earlier in the report, the results of our research suggest that the eastern portion of the subject property may have been occupied by petroleum companies in the 1930's. Historical Polk City Directories identified the presence of a company known as "Tacoma Petroleum" on the site in 1932. The same directories identify "Buck and Powers Oil Company" on the property in 1934, with a move

to the east adjacent property in 1935 and continuing until the end of the 1930's. The records contain no information with respect to what extent (if any) these companies used or stored petroleum products on the subject property. This lack of data is not surprising given the age of the property and the non-uniformity in the maintenance of public records over the years in Washington.

Acknowledging the absence of definitive information regarding subsurface conditions beneath most of the subject property and past practices and conditions associated with the above-referenced petroleum/oil companies, the strongest statement we can make at this time is simply that we are not aware of any information which would suggest that the subject property has been adversely impacted by this past historical land usage.

If some degree of confidence beyond that afforded by the current limited level of knowledge is desired, the following actions could be implemented:

- (1) Acknowledging that petroleum product distributors often employed the use of underground storage tanks, a limited geophysical survey could be performed on the east subject parcel in an effort to identify any subsurface anomalies indicative of underground storage tanks. Such a survey would likely employ the use of both electromagnetic detectors (EM) and ground penetrating radar (GPR). If an anomaly were to be detected, a soil boring could then be completed in the vicinity of the anomaly to verify the environmental quality of soil and/or groundwater at that location.
- (2) Alternatively/or additionally several soil borings could be completed on the subject property at locations selected to provide broad representative coverage of the subject site. These borings would allow for visual observation of existing soil conditions and allow for the collection and laboratory analysis of soil and groundwater samples. Acknowledging that a gasoline station may have operated on the east adjacent property, at least one to two borings could be placed along the common property line between the two parcels.

Decision-making authority with regard to selection of the steps outlined above or other approaches clearly lie with the property owner and/or the lender, depending upon their individual risk tolerances.

A non-CERCLA condition of potential environmental significance identified in the course of this Phase I consisted of the presence of suspect asbestos containing building materials in the subject property building. Guidance with respect to this issue is provided in the following subsection.

ASBESTOS

Borrowing evaluation criteria adopted under the Asbestos Health Emergency Response Act (AHERA, 40 CFR Part 763), the observed suspect asbestos building materials were in "good" condition. In the current use and condition, these material poses no threat to public health or to the environment. No action would be required under current state or federal regulations.

Chris & Linda Nelson
December 24, 2002

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To reduce exposure to potential future liability, it may be prudent to consider implementation of a management policy whereby all maintenance, repair, or service personnel who may be engaged to work on the property are formally advised (i.e., signed acknowledgment) as to the "suspected" presence of asbestos-containing materials (ACM) prior to commencement of any work associated with the ACM.

Should the owner intend to renovate, demolish, remodel, or repair any or all portions of the structure containing asbestos, please note that applicable sections of WAC 296-65 require that all projects relating to construction, demolition, repair, or maintenance where release or likely release of asbestos fibers into the air could occur must be performed by "certified asbestos workers." Additional information may be obtained through the offices of Environmental Associates, Inc., or directly from the Washington State Department of Labor and Industries, P.O. Box 207, Olympia, Washington 98504. If future representative sampling and laboratory testing of these suspect materials were to confirm that they do not contain asbestos, these recommendations may logically be disregarded for those materials.

LIMITATIONS

This report has been prepared for the exclusive use of Chris & Linda Nelson, along with CNL Commercial Finance, and their several representatives for specific application to this site. Our work for this project was conducted in a manner consistent with that level of care and skill normally exercised by members of the environmental science profession currently practicing under similar conditions in the area, and in accordance with the terms and conditions set forth in our proposal dated December 4, 2002. The condition of subsurface soil and/or groundwater cannot typically be determined by visual examination of surficial conditions such as those afforded by a Phase-I audit such as performed here. Acknowledging that limitation, no warranty in that regard is made. No other warranty, expressed or implied, is made. If new information is developed in future site work that may include excavations, borings, studies, etc., Environmental Associates, Inc., must be retained to reevaluate the conclusions of this report and to provide amendments as required.

The level of effort regarding identification of potential ACM should be considered a reconnaissance, should not be confused with an asbestos survey, and should not be used as a sole informational resource for removal, construction, or abatement bidding purposes.

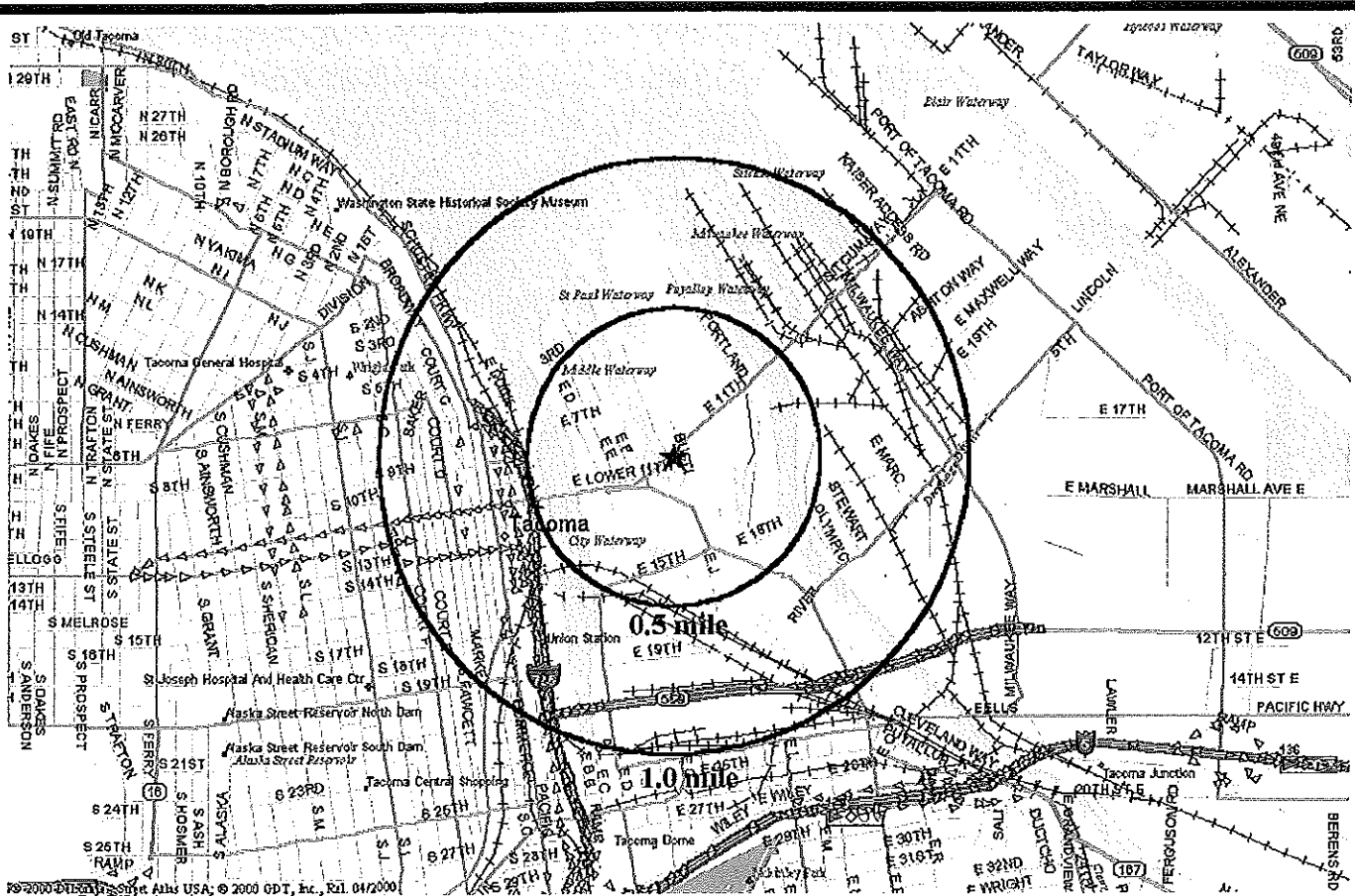
REFERENCES

GENERAL

Bonneville Power Administration (BPA), January 1993, Radon Monitoring Results from BPA's Residential Conservation Program, Report No. 15, (with April 1993 Map).

Brown and Caldwell, July 1985, Clover/Chambers Creek Geohydrologic Study for the Tacoma/Pierce County Health Department. 197 pps., 30 tables, 48 figures, appendices.

Environmental Protection Agency (EPA), September 1987, Radon Reference Manual EPA 520/1-87-20.



Approximate location of the subject property.



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Bellevue, Washington 98004

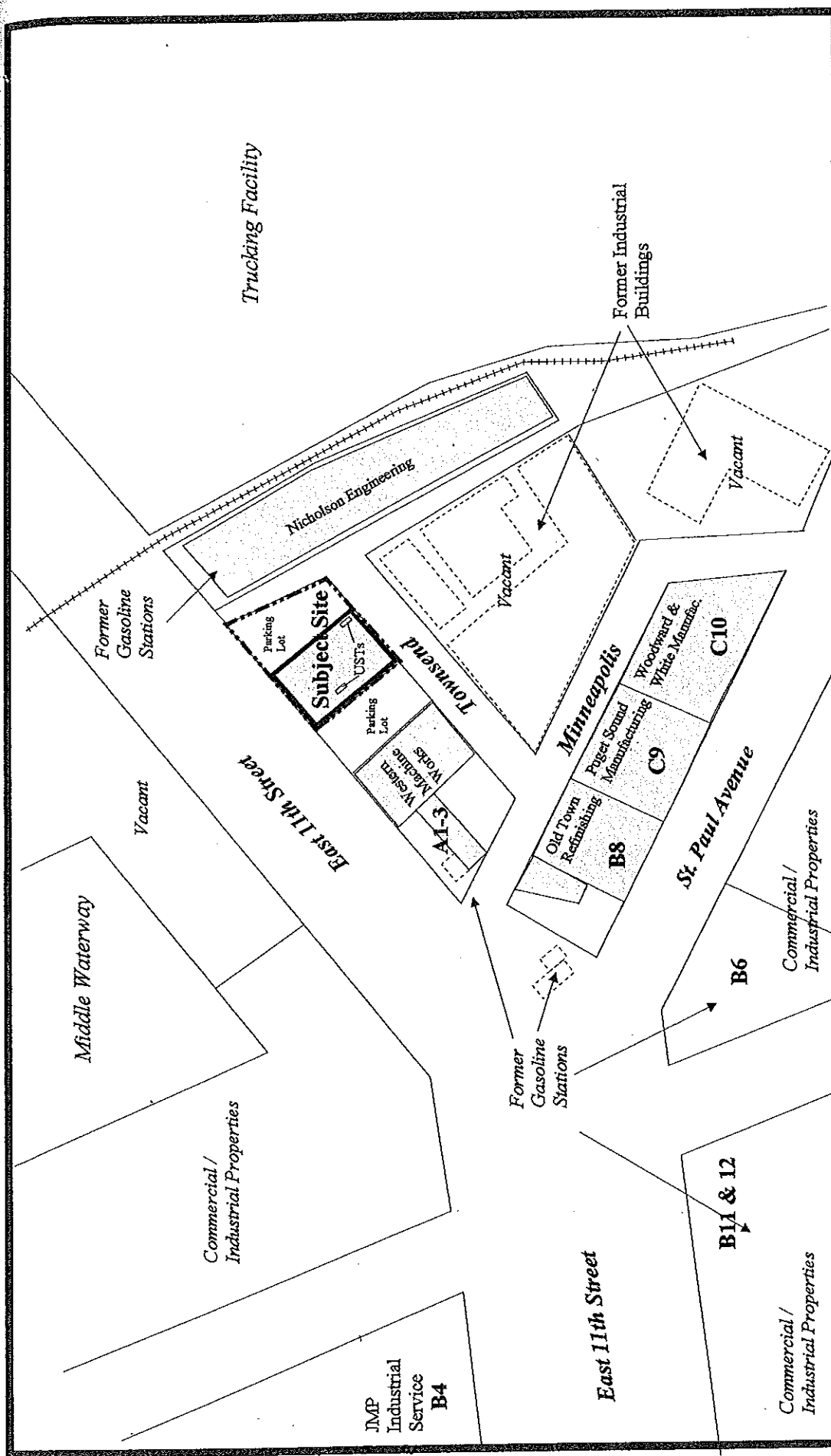
VICINITY MAP

Former Washington Belt Company
672 East 11th Street
Tacoma, Washington

Job Number:
JN 22417

Date:
December 2002

Plate:
1



SITE PLAN

Former Washington Belt Company
672 East 11th Street
Tacoma, Washington

Place:

2

Scale:

Date:

December 2002

Job Number:

JN-22417

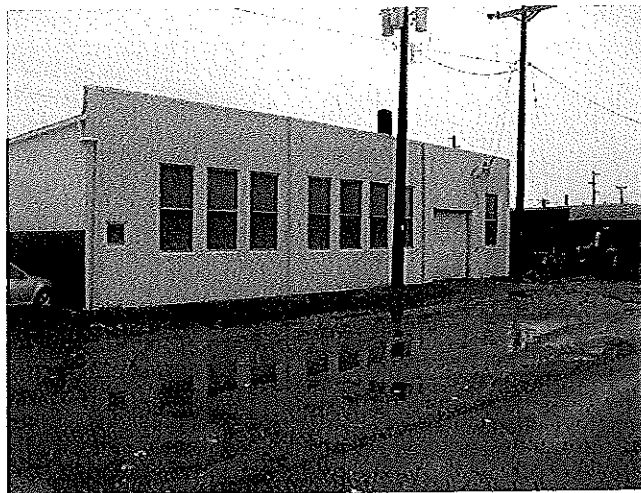
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Subject building as viewed from East 11th Street.



South side of subject building, looking northeast.



View of the Middle Waterway, which lies north of East 11th Street.



Vacant parcel south of the subject site, which was previously occupied by industrial buildings.



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SITE PHOTOGRAPHS

**Former Washington Belt Company
672 East 11th Street
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Job Number:
JN 22417

Date:
October 2002

Plate:
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