Adapt Engineering, Inc.
615 – 8th Avenue South
Seattle, Washington 98104

Tel (206) 654-7045
Fax (206) 654-7048

ERTS 561330

March 19, 2007
Adapt Project No. No. WA07-14518-PH1/2

4233 Meridian Avenue North
Seattle, WA 98103

Attention: Mr. Robert Boggess

Subject: Summary Letter - Phase I/Limited Phase II Environmental Site Assessment
Automall Property
1401 Sprague Avenue South
Seattle, Washington

Dear Mr. Boggess:

The following is Adapt Engineering, Inc.'s (Adapt's) Summary Letter of preliminary results of our Phase I/Limited Phase II Environmental Site Assessment of the above-referenced site. Our preliminary findings are as follows:

- The subject site was originally developed with the Pierce County Transit vehicle maintenance and fueling facility, that included 10 petroleum underground storage tanks (USTs), two oil/water separators, six service pits, hydraulic hoists, and chemical storage areas.

- Pierce Transit operations on the property ceased in 1987. Applied Geotechnology, Inc. (AGI) completed subsurface remediation associated with a waste oil line leak and other contaminant source areas at the facility. According to AGI's report, an estimated 3,700 cubic yards of petroleum contaminated soil were excavated and disposed of off-site. Also, the report indicated that 45,000 gallons of oily water was pumped from the site excavations and disposed of off-site. However, the original building walls and foundations remained in the place, and petroleum hydrocarbon contaminated soils reportedly remain adjacent to some of the building footings.

- The building was redeveloped into the current self-storage facility in 1995. At that time, excavation for the sign on the northwest corner of the property encountered petroleum impacted soil and groundwater, in the approximate location of one of the pre-1995 Pierce Transit oil/water separators. According to the report, soils tested from the excavation exhibited a diesel range total petroleum hydrocarbon (TPH) concentration of 160 parts per million (ppm), which was below the Washington Department of Ecology (Ecology) Model Toxics Control Act (MTCA) Method A cleanup level. However, a groundwater sample collected from the open excavation exhibited a TPH concentration of 1.2 ppm, which was in excess of MTCA Method A cleanup level. The excavation was subsequently pumped, and a second groundwater sample collected from the open excavation did not exhibit a detectable concentration of TPH.

- The southwest portion of the site was developed in 1995 with a Shell mini-service and convenience store with two fueling islands and three gasoline USTs.

- The site was subsequently submitted to Ecology for review under its Voluntary Cleanup Plan in 2002 by Saltbush Environmental. Based upon its review, Ecology subsequently granted the site "No Further Action" (NFA) status, with a restrictive covenant for the residual contaminated soils that remain in place at the site.

- Adapt's current limited subsurface environmental assessment included advancing six (6) geoprobe borings to depths of up to 12 feet below ground surface (bgs), and analytical testing of recovered soil and groundwater sample. Boring locations are depicted on the attached Site and Vicinity Plan, Figure 3. Selected soil samples screened from borings did not exhibit detectable concentrations of gasoline through motor oil-range TPH. However, a soil sample collected from boring GP-4 (GP-4/9-10), drilled adjacent to the Shell station pump islands, exhibited a benzene concentration of 0.42 parts per million (ppm), which is in excess of the MTCA Method A cleanup level of 0.03 ppm (See Table 1 below).

Table 1 : Summary of Analytical Results: Soil

Sample ID	Sample Depth (ft)	TPH-G (ppb)	TPH-D (ppb)	TPH-HO (ppb)	TPH-MO (ppb)	B (ppb)	T (ppb)	E (ppb)	X (ppb)
GP-1/11-12	11 to 12	<20	<50	<100	<100	NT	NT	NT	NT
GP-2/9-10	9 to 10	<20	<50	<100	<100	NT	NT	NT	NT
GP-3/9-10	9 to 10	<20	<50	<100	<100	NT	NT	NT	NT
GP-4/9-10	9 to 10	<10	NT	NT	NT	**0.42**	<0.05	<0.05	<0.05
GP-5/11-12	11 to 12	<10	NT	NT	NT	<0.02	<0.05	<0.05	<0.05
GP-6/6-7	6 to 7	<20	<50	<100	<100	NT	NT	NT	NT
MTCA		30/100	2,000	2,000	4,000	0.03	7	6	9

ppm = All concentrations reported in parts per million (ppm)
TPH = Total Petroleum Hydrocarbons – gasoline, diesel and heavy oil and Mineral oil-range TPH by Ecology Methods NWTPH-G and NWTPH-Dx
BTEX = Benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8020
MTCA = Model Toxics Control Act (Method A Cleanup levels shown)

- Shallow groundwater was encountered in all of the borings at depths ranging from approximately 3½ to 7 feet bgs. The groundwater sample collected from boring GP-1, located near the sign on the northwest portion of the site and former Pierce Transit oil/water separator, exhibited elevated concentrations of gasoline, diesel, and motor oil-range TPH that were in excess of the respective MTCA Method A cleanup levels. Groundwater samples collected from Borings GP-4 and GP-5, drilled adjacent to the service islands and petroleum USTs associated with the onsite Shell station, exhibited elevated concentrations of benzene that were in excess of the MTCA cleanup level. Also, sample GP-5/W-1 exhibited an elevated concentration of gasoline-range TPH that is in excess of the MTCA Method A cleanup level for groundwater with detectable benzene. Groundwater samples collected from other on-site borings, drilled to the west

of the Automall building (GP-2 and GP-3), and the former Pierce Transit fueling facility located near the northeast corner of the site (GP-6), did not exhibit detectable concentrations of gasoline through mineral oil-range TPH, and non-detectable to low level concentrations of volatile organic compounds (VOCs) that are below MTCA cleanup levels. Groundwater analytical test results are summarized below:

Table 2 : Summary of Analytical Results: Groundwater

Sample ID	TPH-G (ppb)	TPH-D (ppb)	TPH-O (ppb)	B (ppb)	T (ppb)	E (ppb)	X (ppb)	Other VOCs (ppb)
GP-1/W-1	**3,100**	**29,000**	**63,000**	1.1	5.6	1.1	4.4	* See below
GP-2/W-1	<250	<400	<400	<1.0	<1.0	<1.0	<1.0	ND
GP-3/W-1	<250	<400	<400	<1.0	<1.0	<1.0	<1.0	ND
GP-4/W-1	670	NT	NT	**330**	16	24	82	NT
GP-5/W-1	**890**	NT	NT	**530**	50	<1.0	22	NT
GP-6/W-1	<100	<200	<400	<1.0	1.1	<1.0	2.6	ND
MTCA	800/1,000	500	500	5	1,000	700	1,000	varies

ppm = All concentrations reported in parts per billion (ppb)

TPH = Total Petroleum Hydrocarbons – gasoline, diesel and oil- range by Ecology Methods NWTPH-G and NWTPH-Dx

BTEX = Benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8020

MTCA = Model Toxics Control Act (Method A Cleanup levels shown)

* = sample also exhibited detectable concentrations of chlorobenzene (9.2 ppb), n-Propylbenzene (1.1 ppb), 1,2,4 Trimethylbenzene (6.1 ppb), and sec-Butylbenzene (1.9 ppb).

Conclusions and Recommendations

The results of Adapt's current assessment revealed the presence of petroleum hydrocarbon-impacted groundwater in the area of the former Pierce Transit oil/water separator, and benzene impacted groundwater adjacent to the UST and service islands associated with the on-site Shell station. These conditions represent a potential "Recognized Environmental Condition" associated with the property. Further subsurface sampling and analytical testing work would be required to assess the extent of the groundwater contamination plume and the potential monetary liability associated with the release.

The results of our assessment revealed the presence of soils exhibiting TPH concentrations in excess of MTCA Method A cleanup levels. According to WAC 173-340-300, "any owner or operator who has information that a hazardous substance has been released to the environment at the owner or operator's facility and may be a threat to human health and the environment shall report such information to the department (of Ecology) within 90 days of discovery. Releases from underground storage tanks shall be reported by the owner or operator of the underground storage tank within 24 hours of release confirmation, in accordance with WAC 173-340-450." We recommend contacting an environmental attorney regarding this issue.

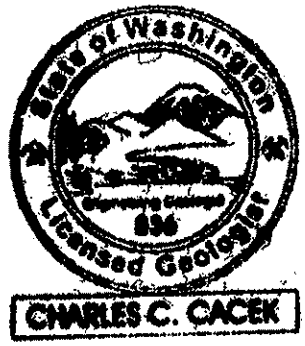
Limitations

Information contained in this report is based upon site characterization, field observations, and the laboratory analyses completed for this study. Conclusions presented are professional opinions based upon our interpretation of the analytical laboratory test results, as well as our experience and observations during the field activities. The location and depth of the exploration, as well as the analytical scope were completed within the site and proposal constraints. Adapt's observations and the analytical data are limited to the vicinity of each test boring and do not necessarily reflect conditions across the site. No other warranty, express or implied is made. In the event that additional information regarding either the site or surrounding properties becomes known, or changes to existing conditions occurs, the conclusions in this report should be reviewed, and if necessary, revised to reflect the updated information. Project specific limitations are presented in the appropriate sections of this report.

We appreciate the opportunity to be of service to you. If you have any questions or need additional information, please call us at your convenience.

Respectfully submitted,

Adapt Engineering, Inc.



Charles C. Cacek, L.E.G.
Senior Project Manager

Daryl S. Petrarca, L.H.G.
Principal

Attachments:

Figure 1 – Topographic/Location Map
Figure 2 – Parcel Map
Figure 3 – Site and Vicinity Plan

Analytical Test Certificates

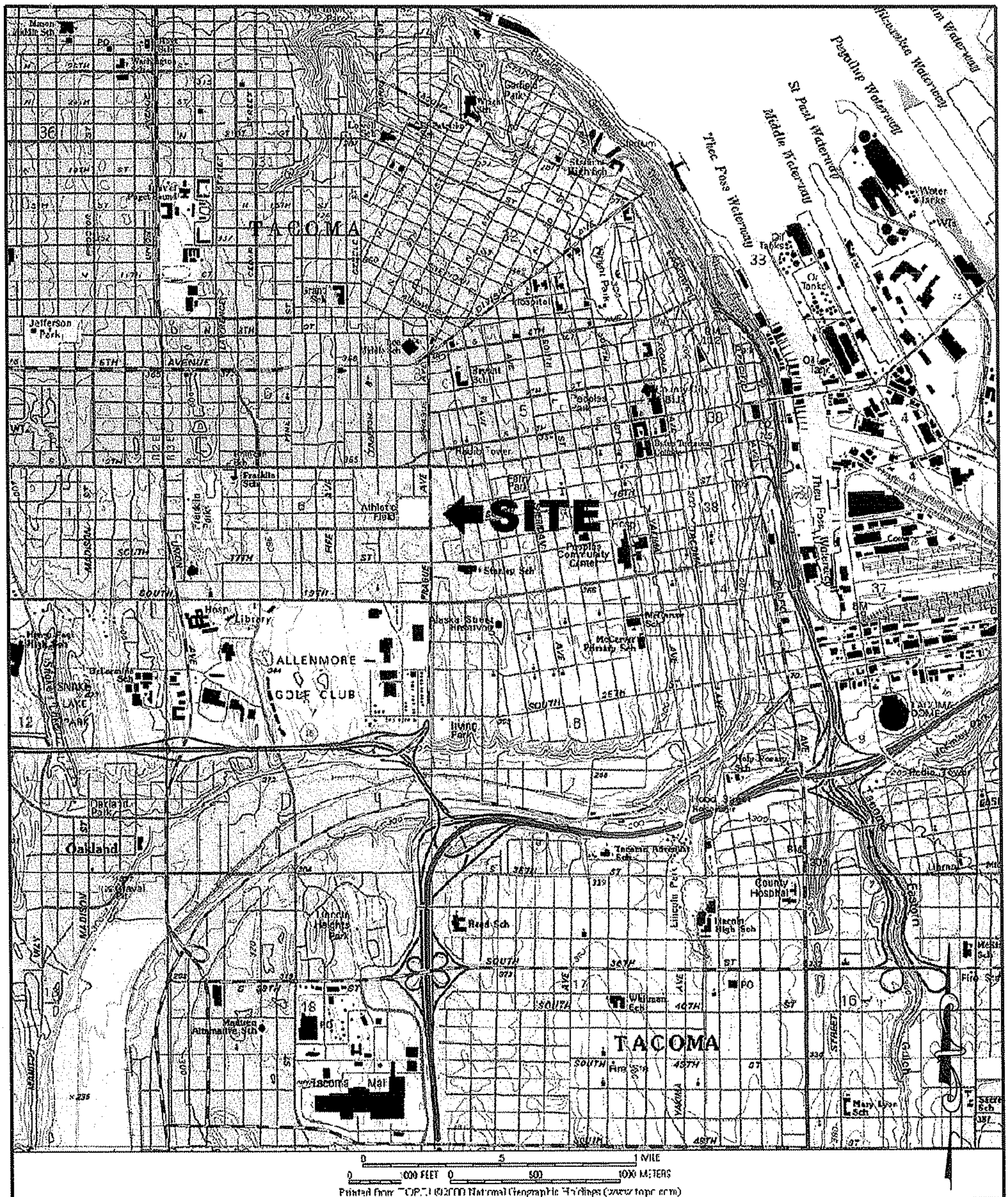


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FIGURE 1 - Location/Topographic Map

Project : Automall Property
Location : 1401 Sprague Avenue South
Tacoma, WA 98405
Client : Bob Boggess
Project No : WA07-14518-PH1 **Date** : 03/13/07

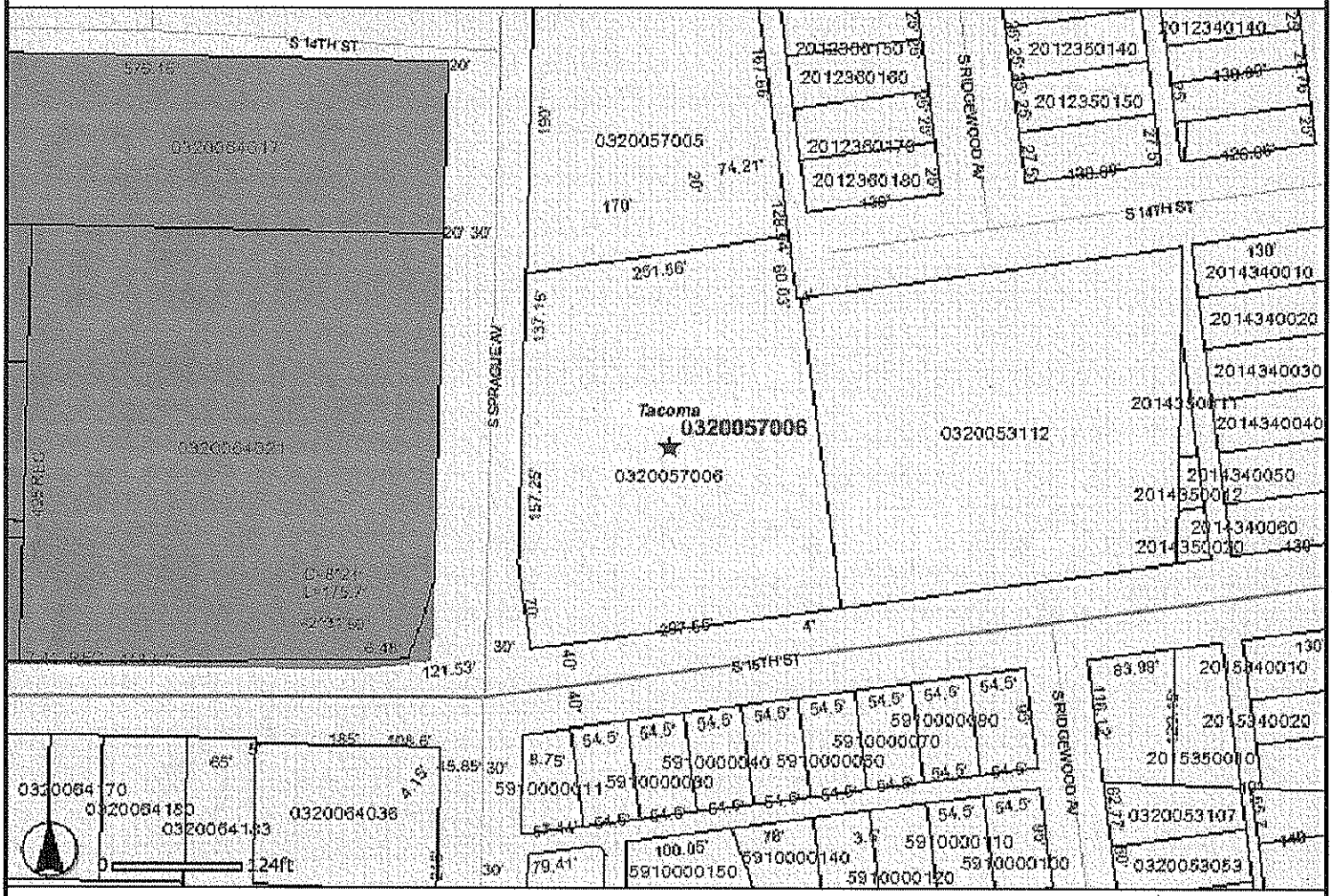

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FIGURE 2 - Parcel Map

Project : Automall Property
Location : 1401 Spraque Avenue South
Tacoma, WA 98405
Client : Bob Boggess
Project No : WA07-14518-PH1 **Date** : 03/13/07

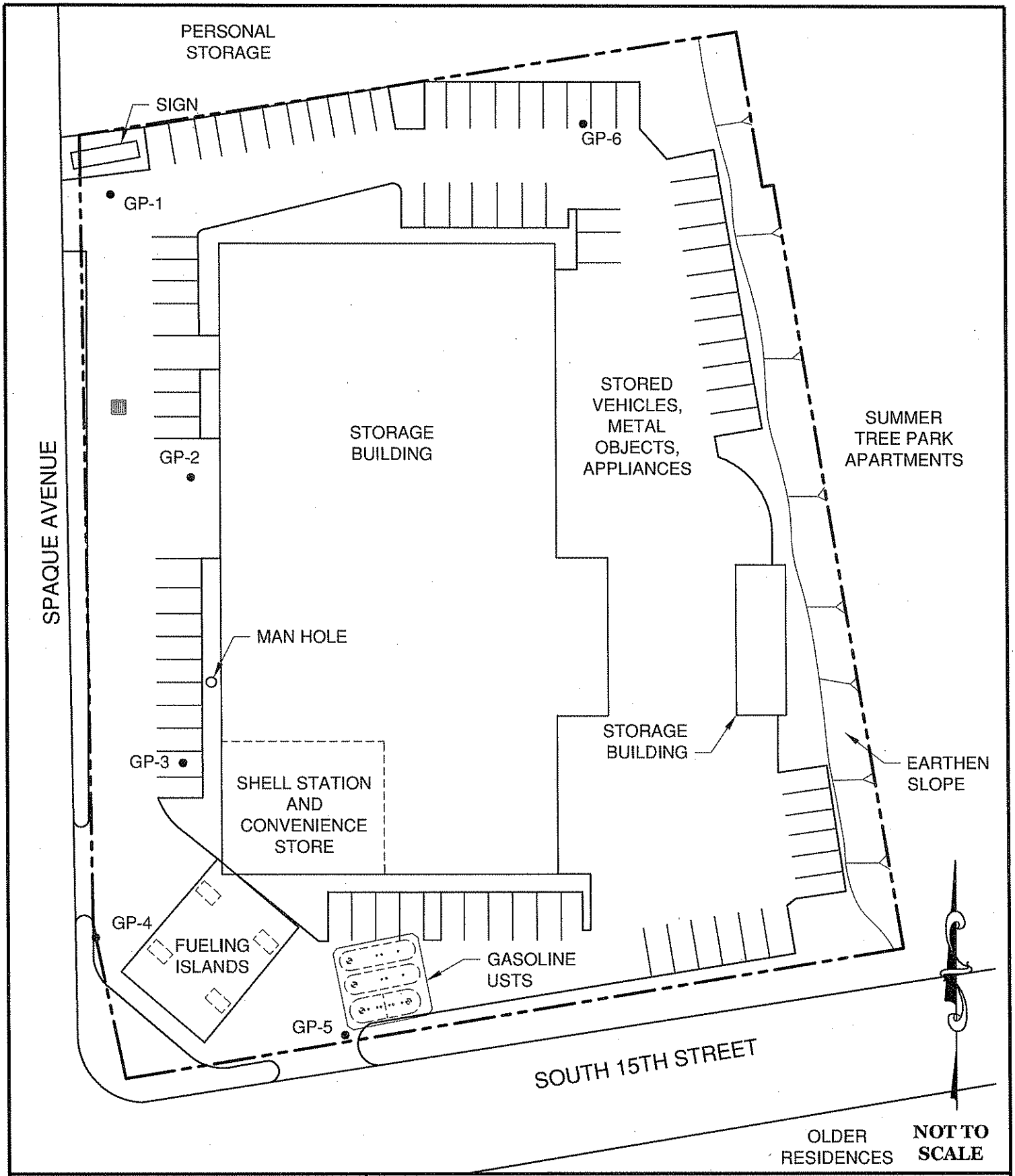

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FIGURE 3 - Site and Vicinity Plan

Project : Automall Property
Location : 1401 Spraque Avenue South
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Client : Bob Boggess
Project No : WA07-14518-PH1 **Date** : 03/13/07

ESN NORTHWEST CHEMISTRY LABORATORY

AUTOMALL PROJECT
Tacoma, Washington
Adapt Engineering Inc.
Client Project #W407-14518-PH2

ESN Northwest
1210 Eastside Street SE Suite 200
Olympia, WA 98501
(360) 459-4670 (360) 459-3432 Fax
lab@esnnw.com

Hydrocarbon Identification by NWTPH-HCID for Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Gasoline (mg/kg)	Diesel (mg/kg)	Heavy Oil (mg/kg)	Mineral Oil (mg/kg)
Method Blank	3/5/2007	101	nd	nd	nd	nd
GP-1/11-12	3/5/2007	104	nd	nd	nd	nd
GP-2/9-10	3/5/2007	104	nd	nd	nd	nd
GP-3/9-10	3/5/2007	96	nd	nd	nd	nd
GP-6/6-7	3/5/2007	103	nd	nd	nd	nd
GP-6/6-7 Dup.	3/5/2007	91	nd	nd	nd	nd
Method Detection Limits			20	50	100	100

"nd" Indicates not detected at listed detection limits.
"D" Indicates detected above the listed detection limit.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: M.Olson & S.Loague

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To Chuck	From Julie
Co./Dept. ADAPT	Co. ESN
Phone #	Phone #
Fax #	Fax #

ESN NORTHWEST CHEMISTRY LABORATORY

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Client Project #W407-14518-PH2

ESN Northwest
1210 Eastside Street SE Suite 200
Olympia, WA 98501
(360) 459-4670 (360) 459-3432 Fax
lab@esnnw.com

Hydrocarbon Identification by NWTPH-HCID for Waters

Sample Number	Date Analyzed	Surrogate Recovery (%)	Gasoline (ug/l)	Diesel (ug/l)	Heavy Oil (ug/l)	Mineral Oil (ug/l)
Method Blank	3/5/2007	99	nd	nd	nd	nd
GP-1/W-1	3/5/2007	int.	D	D	D	nd
GP-2/W-1	3/5/2007	99	nd	nd	nd	nd
GP-3/W-1	3/5/2007	100	nd	nd	nd	nd
GP-6/W-1	3/5/2007	125	nd	nd	nd	nd
Method Detection Limits			250	400	400	400

"nd" Indicates not detected at listed detection limits.
"D" Indicates detected above the listed detection limit.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

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Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8021B) in Soil

Sample Number	Date Analyzed	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Gasoline (mg/kg)	Surrogate Recovery (%)
Method Blank	3/5/2007	nd	nd	nd	nd	nd	105
LCS	3/5/2007	109%	73%	100%	98%	---	126
GP-4/9-10	3/5/2007	0.42	nd	nd	nd	nd	94
GP-5/11-12	3/5/2007	nd	nd	nd	nd	nd	89
Method Detection Limits		0.02	0.05	0.05	0.05	10	

"---" Indicates not tested for component.
"nd" Indicates not detected at the listed detection limits.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Chlorobenzene) & LCS : 65% TO 135%

ANALYSES PERFORMED BY: M.Olson & S.Loague

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Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8021B) in Water

Sample Number	Date Analyzed	Benzene (ug/l)	Toluene (ug/l)	Ethylbenzene (ug/l)	Xylenes (ug/l)	Gasoline (ug/l)	Surrogate Recovery (%)
Method Blank	3/5/2007	nd	nd	nd	nd	nd	105
LCS	3/5/2007	109%	73%	100%	98%	---	126
GP-1/W-1	3/5/2007	nd	nd	nd	nd	*3100	int.
GP-4/W-1	3/5/2007	330	16	24	82	670	117
GP-5/W-1	3/5/2007	530	50	nd	22	890	108
Method Detection Limits		1	1	1	1	100	

" * " Indicates gas range hydrocarbon possible kerosene.
"nd" Indicates not detected at the listed detection limits.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Chlorobenzene) & LCS: 65% TO 135%

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Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Water

Sample Number	Date Analyzed	Surrogate Recovery (%)	Diesel (ug/l.)	Oil (ug/l.)	Mineral Oil (ug/l.)
Method Blank	3/5/2007	95	nd	nd	nd
GP-1/W-1	3/5/2007	Int.	**29,000**	**63,000**	nd
Method Detection Limits			200	400	400

"nd" Indicates not detected at the listed detection limits.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: M.Olson & S.Loague