STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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September 6, 2017

Ms. Janet Frentzel
Pier One, Bay One
San Francisco, California 94111

RE: Further Action at the following Site:

- **Site Name:** Qualex Photo Finishing Facility
- **Site Address:** 21249 72nd Avenue South, Kent, 98032
- **Facility/Site No.:** 598108
- **Cleanup Site ID No.:** 332
- **VCP Project No.:** NW3088

Dear Ms. Frentzel:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Qualex Photo Finishing facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

YES. Ecology has determined that further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Total Petroleum Hydrocarbons-Diesel Range (TPH-Dx), Total Petroleum Hydrocarbons Heavy Oil-Range (TPH-HO) into both Soil & Groundwater.
- Selenium, Arsenic, Iron, & Manganese into Groundwater.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. Geologica, Inc. (Geologica), October 2, 2003: *Phase II Subsurface Environmental Investigation, Former Qualex Photofinishing Facility*, San Francisco, CA
2. Geologica, February 19, 2004a: *Supplemental Phase II Site Investigation, Former Qualex Photofinishing Facility*, San Francisco, CA
3. Geologica, July 1, 2004b: *March 2004 Quarterly Groundwater Sampling Results, Former Qualex Photofinishing Facility*, San Francisco, CA
4. Geologica, October 29, 2004c: *June 2004 Quarterly Groundwater Sampling Results, Former Qualex Photofinishing Facility*, San Francisco, CA
5. Geologica, January 5, 2005: *2004 Annual Summary Quarterly Groundwater Sampling, Former Qualex Photofinishing Facility*, San Francisco, CA
6. Geologica, April 4, 2006a: *Trap Tank Sump Closure, Former Qualex Photofinishing Facility*, San Francisco, CA
7. Geologica, August 3, 2006b: *2006 Groundwater Sampling Results, Former Qualex Photofinishing Facility*, San Francisco, CA
8. Geologica, March 12, 2007: *Supplemental Groundwater Quality Assessment, Former Qualex Photofinishing Facility*, San Francisco, CA
9. Geologica, May 22, 2008: *March 2008 Groundwater Quality Assessment, Former Qualex Photofinishing Facility*, San Francisco, CA
10. Geologica, April 2, 2010: *March 2009 Groundwater Quality Monitoring Results, Former Qualex Photofinishing Facility*, San Francisco, CA
11. Geologica, March 25, 2011: *January 2011 Groundwater Quality Monitoring Results, Former Qualex Photofinishing Facility*, San Francisco, CA

12. Farallon Consulting (Farallon), July 26, 2016: *Groundwater Monitoring Results, Former Qualex Photofinishing Facility*, Proj. No. 1071-013-001, Sacramento, CA
13. Farallon, August 29, 2016: *VCP Application and Request for No Further Action Determination*. Proj. No. 1071-013-001, Sacramento, CA

These documents are kept in the Central Files of the Headquarters Office of Ecology for review by appointment only. You can make an appointment by calling 360-407-7224.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in detail in Enclosure A.

In 2003, Geologica conducted a Phase One Environmental Site Assessment (PHI), identifying several recognized environmental conditions (RECs) per ASTM 1527E (Geologica, October 2003). The RECs identified warranted further subsurface investigation.

The following characterization activities have commenced on the Site to date, (conducted by Geologica). A detailed description of the below-listed characterization activities is included in Enclosure A.

Characterization Activities:

- March 2003, Geologica advanced a total of nine soil borings (S-1 to -9) throughout the interior and exterior of the facility.
- From July to December 2003, Geologica advanced five monitoring wells (MWs). Four MWs (MW-2 to -5) were advanced throughout the facility exterior, and one (MW-1) was advanced in the facility interior. Geolgica determined the groundwater was impacted with arsenic, selenium, iron, manganese, and TPH-HO above their respective MTCA Method A or B Cleanup Levels (CULs). TPH-Dx was detected in groundwater above the laboratory method detection limits (MDLs), but below the respective MTCA Method A CUL.

- Geologica subsequently conducted quarterly groundwater sampling from July 2003 to March 2005.
- In February 2006, Geologica removed a subsurface trap tank and associated ancillary equipment. Geologica determined the trap tank as the source of soil and groundwater contamination. Geologica removed a total of nine-tons of impacted soil in the vicinity of the trap tank. Soils were impacted with priority pollutant metals, TPH-Dx & -HO. Groundwater was also sampled from the existing five MWs.
- In December 2006, Geologica advanced an additional three soil borings (GP-1 to -3), and collected reconnaissance groundwater samples from the soil borings as well as the five on-Site MWs.
- Between March 2008 and January 2011, Geologica conducted three additional groundwater monitoring events.
- Farallon completed the most recent groundwater monitoring event in January 2016. A total of twelve groundwater monitoring events have transpired on the Site to date.

In summary, Geologica and Farallon have determined that arsenic, iron, & manganese are consistently present in all MWs at levels above the respective MTCA Method A or B CULs throughout the monitoring period.

Geologica detected selenium at levels above the respective MTCA Method B CUL at MW-1 in February 2006 and March 2008.

Throughout the monitoring period, Geologica did not detect TPH-Dx above the respective MTCA Method A CUL.

In March 2004, Geologica detected TPH-HO above the respective MTCA Method A CUL at a concentration of 530 micrograms per liter (µg/L). All additional sampling events exhibited TPH-HO concentrations below the respective MTCA Method A CUL.

Exposure Pathways:

Soil-Direct Contact:
This pathway is *incomplete*. Geologica removed all residual priority pollutant metals- and petroleum-contaminated soil (PCS) during tank trap excavation and removal activities in 2006.

Soil-Leaching:
This pathway remains *potentially complete*. Arsenic, iron, & manganese are likely leaching out of the soil due to the on-Site natural reducing conditions (Enclosure A), (Farallon, July 2016), & (Geologica March 2011).

Soil-Vapor:
This pathway is *incomplete*. No volatile constituents detected in soil or groundwater at the Site.

Groundwater:
This pathway is currently *complete*. As indicated above and in detail in Enclosure A, arsenic, iron, & manganese are present in groundwater at concentrations above their respective MTCA Method A or B CULs. Historical arsenic detections have ranged between 1.18 to 60.0 µg/L.

Surface Water:
This pathway is *incomplete*. No surface water features are located within the immediate vicinity of the Site.

Ecological:
This pathway is *incomplete*. Farallon completed a terrestrial ecological evaluation. The Site qualifies for an exclusion (Farallon August 2016).

Based on a review of the above-listed reports and investigations, Ecology has the following comments:

1. Please collect additional groundwater samples from the five on-Site MWs to determine if residual groundwater impacts are present. Analyze and sample for TPH-HO, TPH-Dx, arsenic, selenium, iron, manganese, & total organic content[1]. In addition, measure standard groundwater parameters (dissolved oxygen, oxidation-reduction potential [ORP], pH, etc.), and collect depth to water measurements to assess groundwater flow direction and gradient.

   In reference to Ecology Implementation Memorandum #4[2], please determine the nature of the release by either performing a NWTPH-HCID (hydrocarbon identification) analysis, analyze chromatograms, or assure the laboratory MDLs are less-than 250 µg/L. As such, the TPH-Dx & -HO MDLs can be combined, which would achieve the respective CUL of 500 µg/L.

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[1] USGS OFR 02-89*: Organic Matter in Ground Water*, March 21, 2016.
http://water.usgs.gov/ogw/pubs/ofr0289/ga_organic.htm
[2] https://fortress.wa.gov/ecy/publications/SummaryPages/0409086.html

2. Please conduct a beneficial well use survey to assure that no extraction wells are in the vicinity of the Site (within ¼-mile). Include this information in the conceptual Site model as supporting evidence to determine the completeness of the groundwater pathway.

3. In the event the groundwater pathway cannot be closed, (i.e. TPH-Dx/HO, dissolved arsenic, iron, & manganese concentrations remain above the MTCA Method A or B CULs), an environmental covenant (EC) with institutional controls (ICs) may be necessary to close the pathway.

4. After Item no.1 is completed above, please incorporate the data to further demonstrate that arsenic, selenium, iron, & manganese is naturally mobilized under subsurface reducing conditions. Include all previously-iterated lines of evidence supporting this presumption.

5. Prior to issuance of a No Further Action (NFA) determination, please decommission all on-Site MWs, as MWs serve a potential conduit to the subsurface, posing a potential risk to human health and the environment.

6. In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840 (Data Submittal Requirements), data generated for Independent Remedial Actions shall be submitted simultaneously in both a written and electronic format. For additional information regarding electronic format requirements, see the website http://www.ecy.wa.gov/eim. Be advised that according to the policy, any reports containing sampling data that are submitted for Ecology review are considered incomplete until the electronic data has been entered. Please ensure that data generated during on-site activities is submitted pursuant to this policy. Data must be submitted to Ecology in this format for Ecology to issue a No Further Action determination. Please be sure to submit all soil and groundwater data collected to date, as well as any future data, in this format. Data collected prior to August 2005 (effective date of this policy) is not required to be submitted; however, you are encouraged to do so if it is available. Be advised that Ecology requires up to two weeks to process the data once it is received.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance (POCs) you established for the Site meet the substantive requirements of MTCA.

In 2006, Geologica removed the presumed source of dissolved priority pollutant metals, TPH-Dx & -HO impacts to soil and groundwater (Enclosure A).

The Groundwater MTCA Method A CULs are:

TPH-Dx	500 µg/L
TPH-HO	500 µg/L
Arsenic	5 µg/L

The Groundwater MTCA Method B CULs are:

Iron	11,200 µg/L
Manganese	2,240 µg/L
Selenium	80 µg/L

Ecology determined the following POCs apply to the Site:

Soil - Leaching: For sites where soil cleanup levels are based on the protection of groundwater: "*...the point of compliance is throughout the Site.*"

Groundwater: For groundwater, the standard point of compliance as established under WAC 173-340-720(8) is: "*...throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site.*"

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site does not meet the substantive requirements of MTCA because the Site needs additional cleanup action(s) to meet the requirements in WAC 173-340-360(2). *Please see comments 1 to 6 above.*

The trap tank and associated piping have been removed. Soil impacted with TPH-Dx, -HO, and primary pollutant metals have been excavated and disposed of off-Site, and therefore no longer pose a threat to human health and the environment (Enclosure A).

In May 2005, Ecology issued an *Independent Remedial Action Request for Review* letter (May 10, 2005) for then VCP Site no. NW 1202. The letter indicated the dissolved arsenic concentrations were a result of the TPH release, due to the consequent increase in organic carbon in groundwater, resulting in a reducing environment, thereby enabling metals to dissolve and mobilize in groundwater.

Since the issuance of the aforementioned letter, groundwater has been periodically sampled at the Site to evaluate if the dissolved metals (i.e. arsenic) concentrations have decreased (Enclosure A).

Recent and historical groundwater data indicate no discernable trend or decrease in dissolved metals concentrations. TPH-Dx & -HO concentrations have been below their respective laboratory MDLs.

4. **Cleanup.**

Ecology has determined the cleanup actions do not meet cleanup standards at this time. *Please see comments 1 to 6 above.*

Geologica determined the source of soil and groundwater contamination was the interior trap tank. The trap tank acted as a sump to collect sediment and other solids (i.e. metals) from wastewater, prior to discharge to the sanitary sewer. Geologica determined the connecting lines to the trap tank were compromised, resulting in subsurface spillage, impacting surrounding soils with TPH-Dx, -HO and priority pollutant metals. A total of 9-tons of impacted soil were excavated, removed and disposed of off-Site (Geolgica, March 2006).

To date, on-Site cleanup actions have included the following:

- Removal of the trap tank and associated ancillary equipment.
- Excavation and disposal of approximately 9-tons of impacted soil in the trap tank vicinity.
- Installation of five permanent groundwater MWs.
- Collection and laboratory analysis of both soil and groundwater samples, including a total of 12 groundwater monitoring events since July 2003.

Limitations of the Opinion

1. **Opinion does not settle liability with the state.**

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. **Opinion does not constitute a determination of substantial equivalence.**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. **State is immune from liability.**

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at 360.407.6834 or e-mail at Jason.cook@ecy.wa.gov.

Sincerely,

J.G. Cook, LG
Headquarters - Toxics Cleanup Program

Enclosures (1): A – Description and Diagrams of the Site

cc: Scott Allin
Matt Alexander, Ecology
Sandra Caldwell, Ecology

Enclosure A

Description and Diagrams of the Site

Site Description

Site:
The Site consists of King County parcel no. 122204-9013, totaling 16.87 acres, and is improved with a 59,884 square-foot warehouse structure, as part of the O'Donnell Business Park in Kent, Washington (Enclosure B).

The Site, identified as the former Qualex Photo Finishing Facility, is located at the southwest corner of the intersection of 212th Street SE & 72nd Avenue South, at 21249 72nd Avenue South in Kent, Washington.

Property Historical and Current Use:
The Site is currently utilized as a commercial-office facility. The Site was initially improved in the mid- to late-1980s with the existing warehouse structure. Prior to the mid- to late-1980s, the Site was undeveloped and unimproved. The Site was initially occupied by Flow Industries (manufacturer of water jet cutting & drilling tools), until 1990, when the Site was occupied by a variety of photo processing and finishing businesses such as Kodak, Samilian Foto, & Qualex, until the early- to mid-2000s (Geologica 2003 & 2011). Since the mid-2000s, the Site has been occupied by a variety of administrative/office-related commercial businesses.

Qualex operated at the Site as a routine overnight photo-processing lab. Chemicals used in the process were Eastman-Kodak proprietary chemicals. Chemicals handling and conveyance reportedly took place aboveground. Chemicals were mixed in a designated chemicals-mixing area and conveyed to the various operations via overhead or above-ground piping. Chemicals were stored in aboveground storage tanks. Floor sumps collecting waste water were set in concrete vaults and double lined with polyethylene plastic. Process waste water collected in the sumps was conveyed in the above-referenced aboveground pipes. After metals removal and settlement, waste water was discharged directly into the sanitary sewer. Silver-bearing waste water was conveyed in aboveground pipes to a silver recovery area, processed, and then discharged to the sewer passing through a below-ground trap tank. (Geologica 2003).

Surface/Storm Water System:
No surface water features are located on or within the vicinity of the Site.

It is assumed stormwater is conveyed to the municipal separate storm sewer system operated and maintained under the NPDES Phase One Municipal Stormwater Permit.

Soils and Geology:
The Site is located in the Green River Valley at an approximate elevation of 185-feet above mean sea level (Geologica, 2003). Shallow Holocene sediments at the Site are of fluvial origin and are comprised of silts, sands, & gravels that are over 250-feet thick.

Soils encountered at the Site generally consist of silt, silty-sand, & sand from the base of the building foundation down to the maximum depth explored at 16.5 feet below ground surface

(bgs).

Observed subsurface conditions underlying the Site are primarily comprised of sand and gravelly-fill material to approximately four feet bgs. Underlying the sand and gravelly-fill material are coarse gravels in a silty to clayey matrix to a depth of approximately 13- to 14-feet bgs. A fine to medium-grained sand underlies the aforementioned coarse gravels. Depth to water ranges from 5 to 10-feet bgs (Geologica, March 2006).

Groundwater:

Groundwater at the Site is encountered between approximately 5- to 10-feet bgs (Geologica, 2004a). The groundwater gradient from the most recent sampling event (Farallon, 2016) show a relatively flat gradient to the east-northeast. Historically, the gradient has been to the south in the early 2000s. However, by 2011 the gradient had turned to the northeast to east (Geologica, 2011).

Source of Contamination & Contamination Extent:

Geologica performed a PHI in 2003 (Geologica, Feb. 2004). Geologica identified several RECs as part of the PHI per ASTM 1527E Standards, including general Site operations as a photographic processing facility, chemical storage areas, effluent lines, and subsurface sumps, and a trap/settlement tank.

Between March and July 2003, Geologica conducted two subsurface investigations and sampling events.

In March 2003, Geologica advanced of five shallow exterior and four interior soil borings in aforementioned areas of concern identified in the PHI (Geolgica, October 2003 & Feb. 2004). Geologica et. al. submitted a total of ten soil samples and one groundwater sample for analysis of volatile organic compounds (VOCs), TPH-Gx, -Dx, -HO, nitrate, sulfate, total cyanide, and 17 priority metals. The soil sampling revealed elevated concentrations of silver (up to 27 mg/kg), nitrate (up to 160 mg/kg), and sulfate (up to 670 mg/kg) in the vicinity of the former trap tank (Geologica, 2003).

From July to December 2003, Geologica advanced a total of five MWs, four established at exterior locations and one MW (MW-1), was advanced in the interior of the facility. Geologica subsequently collected groundwater samples, exhibiting detections of TPH-Dx & -HO, as well as elevated concentrations of arsenic and selenium from well MW-1 (Geologica 2003). Subsequent groundwater sampling at MW-1 to -5 confirmed the presence of TPH-Dx, -HO, arsenic, and selenium above their respective MTCA Method A or B CULs (Geologica, 2011). The groundwater is also characterized by elevated concentrations of dissolved iron and manganese, also above their respective MTCA Method B CULs.

A total of 12 groundwater monitoring events have been conducted since 2003, exhibiting consistent elevated concentrations of dissolved iron, manganese, and arsenic in groundwater. Arsenic concentrations exceeded the MTCA Method A CUL in all MWs. Selenium exceeded the

MTCA Method B CUL in well MW-1 only in February 2006 & March 2008. TPH-Dx exceeded the Method A CUL in MW-1 at one sampling event between 2003 and 2016 (March 2004), suggesting effective biodegradation of TPH underlying the Site (Geologica, March 2009).

In May 2005, Ecology issued a*Independent Remedial Action Request for Review* letter, requesting additional groundwater monitoring, to observe if the dissolved arsenic concentrations decrease over time. It was postulated that due to the TPH release from the trap tank further enabled the mobilization of arsenic, iron, & manganese in groundwater.

On February 7, 2006, Geologica et. al. excavated, demolished, and transported the remnants of the aforementioned trap tank off-Site for disposal. The trap tank was located in the former maintenance interior room at a depth of approximately 4-feet bgs. The trap tank collected process waste water effluent and eventually discharged to the sanitary sewer after preliminary treatment and settling of suspended solids (Geologica, March 2006).

During trap tank decommissioning, a one-inch layer of sediment containing petroleum hydrocarbons and slightly-elevated concentrations of chromium, silver, and lead were detected (Geologica, March 2006). A total of nine-tons of impacted soil was removed during decommissioning activities. Confirmation soil sampling performed in excavation walls and bottom revealed TPH-Dx, -HO, and priority pollutant metal concentrations below applicable MTCA Method A or B CULs. Arsenic soil concentrations collected from the trap tank excavation ranged between 1.55 to 8.64 milligrams per kilogram (mg/Kg), selenium was not detected above the laboratory MDLs. The excavation was backfilled with inert material and the surface restored to its original condition.

In December 2006, Geologica advanced an additional three soil borings (GP-1 to -3), and collected groundwater reconnaissance samples from GP-1 to -3 and MW-1 to -5. Arsenic was detected in all groundwater samples, ranging in concentration from 1.18 to 14.2 µg/L. Selenium, TPH-Dx, & -HO were not detected above laboratory MDLs.

From March 2008 to January 2011, Geologica et.al. conducted three additional groundwater monitoring events at MW-1 to -5 (Farallon, July 2016). Dissolved arsenic was detected at concentrations ranging between 3.82 to 58.0 µg/L. TPH-Dx, -HO, & selenium were not detected above laboratory MDLs or their respective MTCA CULs.

In January 2016, Farallon conducted the most recent groundwater monitoring event. MW-1 was reportedly not-accessible due to the presence of flooring over the MW monument (Farallon, July 2016). Groundwater flow direction was estimated to be towards the northeast, at a gradient of 0.003 ft/Ft. TPH-Dx, -HO, & dissolved selenium were not detected above the laboratory MDLs. Farallon et.al. detected dissolved arsenic at concentrations ranging between 3.9 to 27.0 µg/L, above the respective MTCA Method A CUL of 5.0 µg/L.

Historically, Arsenic has been detected in groundwater at concentrations ranging between 1.18 to 60.0 µg/L (Farallon, July 2016).

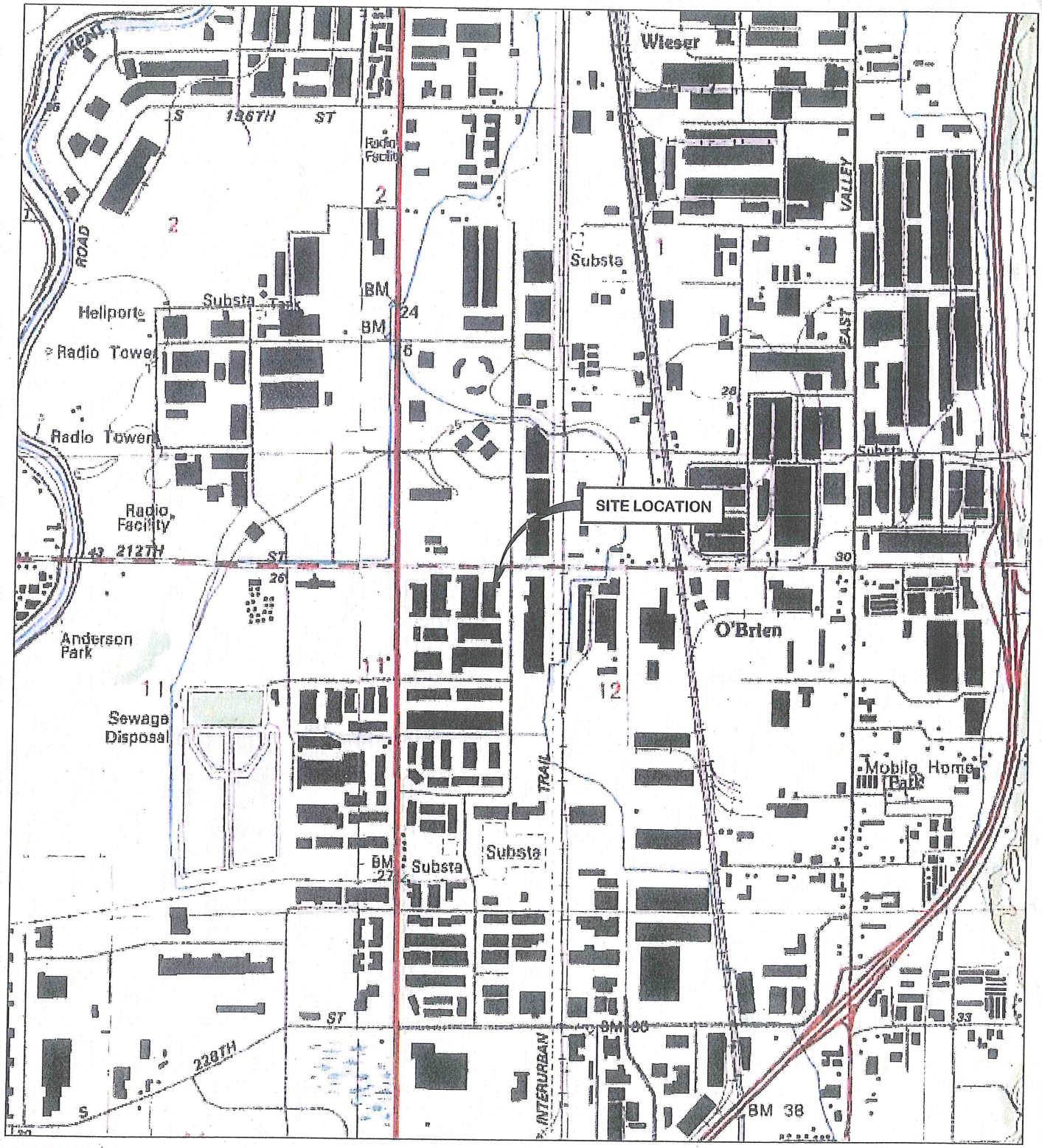
Site Geochemical Conditions:

As referenced above, arsenic was not detected above the MTCA Method A CUL in soil samples collected from the Site (Geologica, January 2011). In addition, arsenic was not used in the photo-developing process nor is a constituent in photo-chemicals.

Arsenic in soil is insoluble under oxygen-enriched subsurface environments, typically adhering to soil colloids. Arsenic becomes soluble under anoxic or reduced conditions, when it is reduced from a +5 to a +3 valence state, (arsenate to arsenite). Low dissolved oxygen (DO), low pH, high oxidation-reduction potential (ORP), increased organic matter (natural decaying vegetation), are all typically inclusive of reducing conditions. In addition, the presence of anomalous concentrations of dissolved iron & manganese are also indicative of natural reducing conditions.

The native Kent Valley (prior to development) contained numerous natural anoxic environments, such as peat bogs and wetlands (Geologica, January 2011). As such, the natural subsurface geochemical environment is deemed the most likely cause of arsenic and metals mobility on a regional scale, including the Site.

Site Diagrams



REFERENCE: 7.5 MINUTE USGS QUADRANGLE RENTON, WASHINGTON. DATED 1994

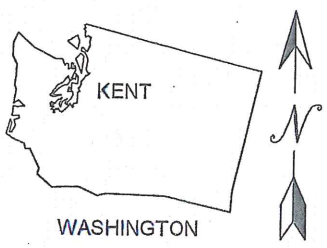


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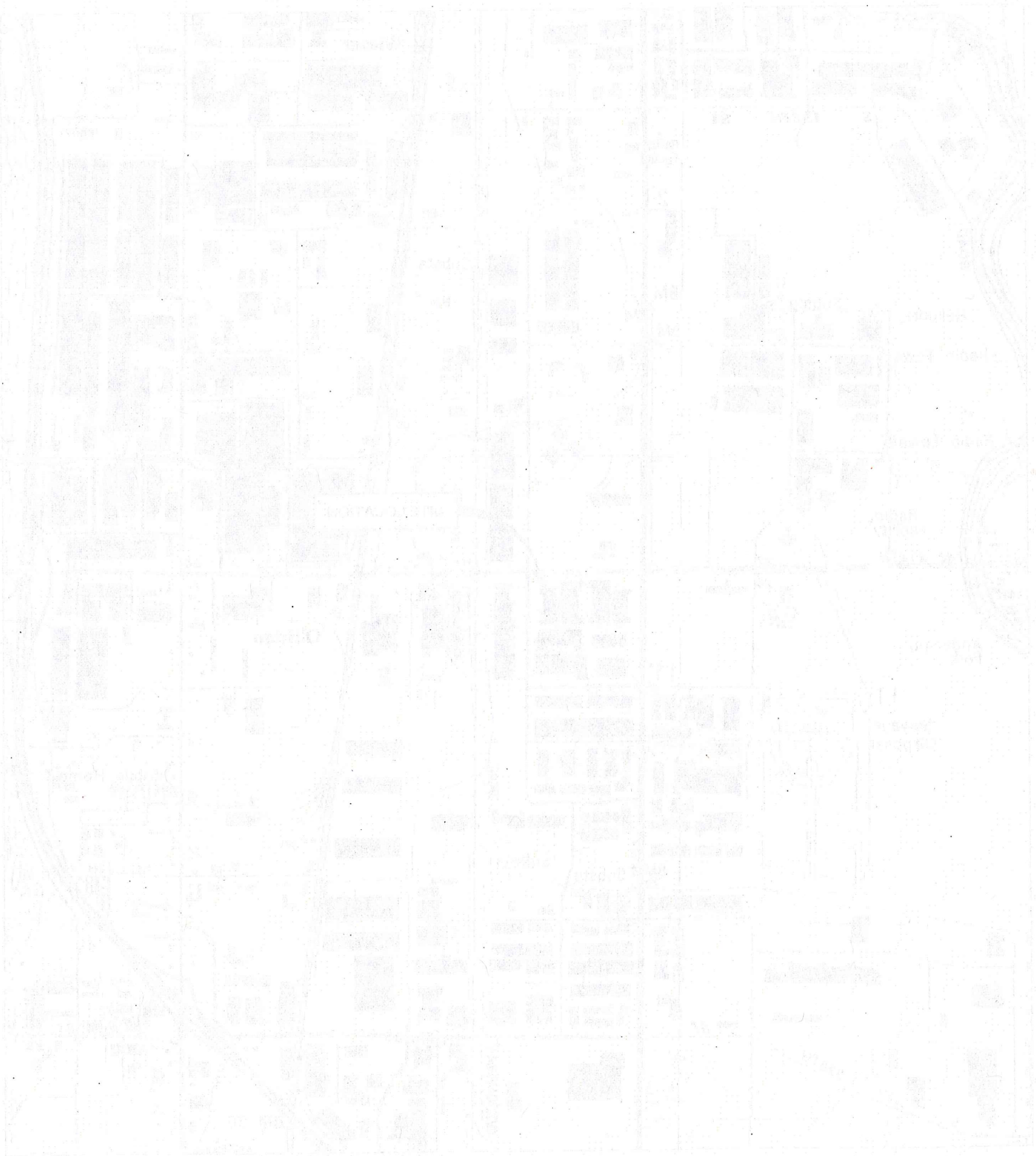
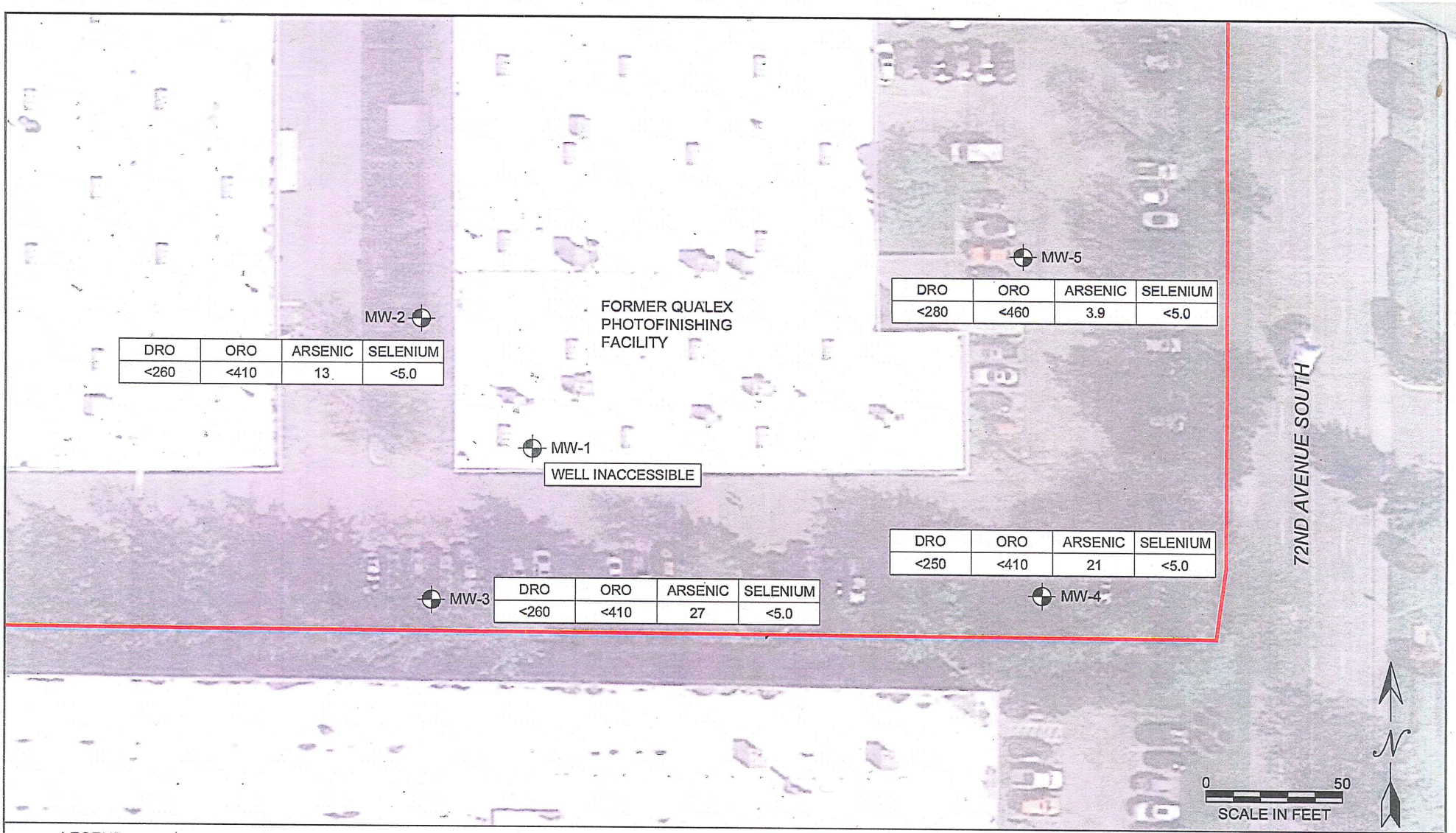
FIGURE 1

SITE VICINITY MAP
21249 72nd AVENUE SOUTH
KENT, WASHINGTON

FARALLON PN: 1071-013-1

Drawn By: GPF Checked By: SA Date: 2/15/2016 Disk Reference: 1071-013-1





LEGEND:

	SITE BOUNDARY
⊕	MONITORING WELL LOCATION
27	GROUNDWATER ANALYTICAL RESULT IN MICROGRAMS PER LITER (µg/L)
<260	INDICATES CONCENTRATIONS NOT DETECTED AT OR ABOVE THE STATED LABORATORY REPORTING LIMIT
DRO	TOTAL PETROLEUM HYDROCARBONS (TPH) AS DIESEL-RANGE ORGANICS
ORO	TPH AS OIL-RANGE ORGANICS

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FIGURE 2

SITE PLAN SHOWING GROUNDWATER ANALYTICAL CONCENTRATIONS, JANUARY 21, 2016
21249 72nd AVENUE SOUTH
KENT, WASHINGTON

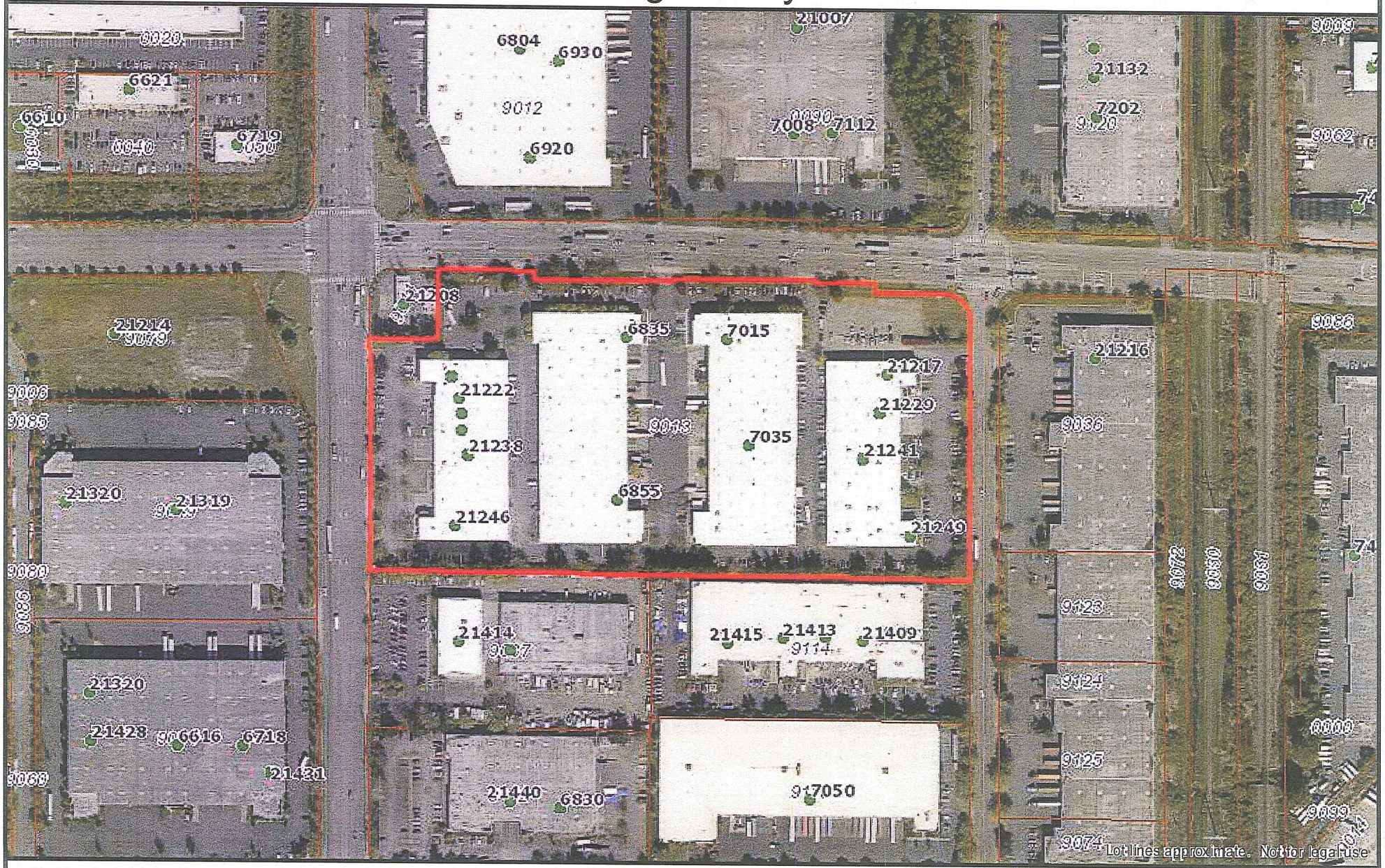
FARALLON PN:1071-013-1

Drawn By: GPF Checked By: SA Date: 2/15/2016 Disk Reference: 1071-013-1

Enclosure B

King County Department of Assessment

King County



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Date: 8/29/2017

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PARCEL DATA

Parcel	122204-9013
Name	C/O PROLOGIS - RE TAX
Site Address	21238 68TH AVE S 98032
Geo Area	70-50
Spec Area	
Property Name	O'DONNELL BUSINESS PARK

Jurisdiction	KENT
Levy Code	1525
Property Type	C
Plat Block / Building Number	
Plat Lot / Unit Number	
Quarter-Section-Township-Range	NW-12-22-4

Legal Description

N HALF SW QTR NW QTR STR 12-22-04 EXC N 30 FT FOR COUNTY ROAD NO 22; & EXC PORTION CONDEMNED BY CITY OF KENT LN KING CO SUPERIOR COURT CAUSE NO 693116 FOR WIDENING OF S 212TH ST (O'BRIEN RD); & EXC E 30 FT CONVEYED TO CITY OF KENT BY DEED UNDER RECORDING NO 8211100509; & EXC W 30 FT FOR STATE HIGHWAY; & EXC FOLLOWING DESCRIBED TRACT: BEGINNING AT INTERSECTION OF E LINE OF STATE HIGHWAY BETWEEN SECTION 11 AND SECTION 12 OF SAID TOWNSHIP AND RANGE, WITH S LINE OF COUNTY ROAD NO 22 LEADING WEST FROM TOWN OF O'BRIEN IN SAID SECTION 12. TH SOUTH ALONG E LINE OF STATE HIGHWAY 165 FT TH EAST 165 FT TH NORTH 165 FT TO S LINE OF SAID COUNTRY ROAD NO 22 TH WLY ALONG SAID S LINE OF COUNTY ROAD TO POB; & EXC PORTION CONDEMNED BY STATE OF WA IN KING CO SUPERIOR COURT CAUSE NO 657493 FOR HIGHWAY 2-M; & EXC PORTION THEREOF CONVEYED TO CITY OF KENT FOR STREET PURPOSES UNDER RECORDING NO 9506050769; & EXC PORTION CONVEYED TO CITY OF KENT BY DEED UNDER RECORDING NO 890220990145 (AS DESCRIBED & DELINEATED PER CITY OF KENT LOT LINE NO LL-2000-10 RECORDING NO 20000615001611)
PLat Block:
Plat Lot:

ADVERT

LAND DATA

Highest & Best Use As If Vacant	MANUFACTURING
Highest & Best Use As Improved	PRESENT USE
Present Use	Warehouse
Land SqFt	734,866
Acres	16.87

Percentage Unusable	
Unbuildable	NO
Restrictive Size Shape	NO
Zoning	M1
Water	WATER DISTRICT
Sewer/Septic	PUBLIC
Road Access	PUBLIC
Parking	ADEQUATE
Street Surface	PAVED

Views

Rainier	
Territorial	
Olympics	
Cascades	
Seattle Skyline	
Puget Sound	
Lake Washington	
Lake Sammamish	
Lake/River/Creek	
Other View	

Waterfront

Waterfront Location	
Waterfront Footage	0
Lot Depth Factor	0
Waterfront Bank	
Tide/Shore	
Waterfront Restricted Access	
Waterfront Access Rights	NO
Poor Quality	NO
Proximity Influence	NO

Designations

Historic Site	
Current Use	(none)
Nbr Bldg Sites	
Adjacent to Golf Fairway	NO
Adjacent to Greenbelt	NO
Other Designation	NO
Deed Restrictions	NO
Development Rights Purchased	NO
Easements	NO
Native Growth Protection Easement	NO
DNR Lease	NO

Nuisances

Topography	
Traffic Noise	
Airport Noise	
Power Lines	NO
Other Nuisances	NO

Problems

Water Problems	NO
Transportation Concurrency	NO
Other Problems	NO

Environmental

Environmental	NO

BUILDING

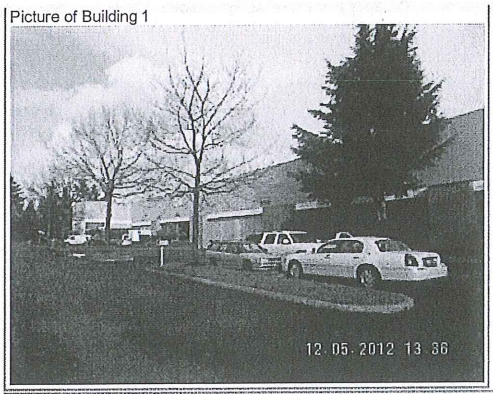
Building Number	1

Click the camera to see more pictures.

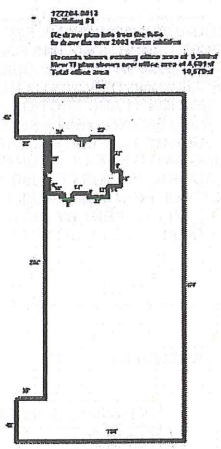
Building Description	DISTRIBUTION WHSE BLDG 1
Number Of Buildings Aggregated	1
Predominant Use	WAREHOUSE, DISTRIBUTION (407)
Shape	Rect or Slight Irreg
Construction Class	MASONRY
Building Quality	AVERAGE
Stories	1
Building Gross Sq Ft	59,884
Building Net Sq Ft	59,884
Year Built	1981
Eff. Year	1989
Percentage Complete	100
Heating System	SPACE HEATERS
Sprinklers	Yes
Elevators	

1 2 3 4

Picture of Building 1



Floor plan of Building 1



Section(s) Of Building Number: 1

Section Number	Section Use	Description	Stories	Height	Floor Number	Gross Sq Ft	Net Sq Ft
2	WAREHOUSE OFFICE (810)		1	12		10,679	10,679
1	WAREHOUSE, DISTRIBUTION (407)		1	27		49,205	49,205

TAX ROLL HISTORY

Account	Valued Year	Tax Year	Omit Year	Levy Code	Appraised Land Value ($)	Appraised Imps Value ($)	Appraised Total Value ($)	New Dollars ($)	Taxable Land Value ($)	Taxable Imps Value ($)	Taxable Total Value ($)	Tax Value Reason
122204901302	2017	2018		1526	6,981,200	24,239,600	31,220,800	0	6,981,200	24,239,600	31,220,800	
122204901302	2016	2017		1525	6,613,700	24,007,500	30,621,200	0	6,613,700	24,007,500	30,621,200	
122204901302	2015	2016		1525	6,246,300	15,478,700	21,725,000	0	6,246,300	15,478,700	21,725,000	
122204901302	2014	2015		1525	6,246,300	16,120,900	22,367,200	0	6,246,300	16,120,900	22,367,200	
122204901302	2013	2014		1525	6,246,300	14,992,700	21,239,000	0	6,246,300	14,992,700	21,239,000	
122204901302	2012	2013		1525	5,511,400	14,924,500	20,435,900	0	5,511,400	14,924,500	20,435,900	
122204901302	2011	2012		1525	5,511,500	15,426,300	20,937,800	0	5,511,500	15,426,300	20,937,800	
122204901302	2010	2011		1525	5,695,200	15,247,900	20,943,100	0	5,695,200	15,247,900	20,943,100	
122204901302	2009	2010		1525	5,254,200	15,856,700	21,110,900	0	5,254,200	15,856,700	21,110,900	
122204901302	2008	2009		1525	4,776,600	16,334,300	21,110,900	0	4,776,600	16,334,300	21,110,900	
122204901302	2007	2008		1525	4,409,100	12,906,800	17,315,900	0	4,409,100	12,906,800	17,315,900	
122204901302	2006	2007		1525	4,409,100	11,232,100	15,641,200	0	4,409,100	11,232,100	15,641,200	
122204901302	2005	2006		1525	4,409,100	10,284,400	14,693,500	0	4,409,100	10,284,400	14,693,500	
122204901302	2004	2005		1525	4,409,100	12,305,000	16,714,100	0	4,409,100	12,305,000	16,714,100	
122204901302	2003	2004		1525	4,409,100	12,305,000	16,714,100	0	4,409,100	12,305,000	16,714,100	
122204901302	2002	2003		1525	4,041,700	11,850,100	15,891,800	0	4,041,700	11,850,100	15,891,800	
122204901302	2001	2002		1525	4,041,700	12,108,600	16,150,300	0	4,041,700	12,108,600	16,150,300	

122204901302	2000	2001		1525	4,041,700	12,108,600	16,150,300	0	4,041,700	12,108,600	16,150,300	
122204901302	1999	2000		1525	4,040,400	8,440,800	12,481,200	0	4,040,400	8,440,800	12,481,200	
122204901302	1998	1999		1525	3,924,600	8,680,300	12,604,900	0	3,924,600	8,680,300	12,604,900	
122204901302	1997	1998		1525	0	0	0	0	3,924,600	8,680,300	12,604,900	
122204901302	1996	1997		1525	0	0	0	0	3,141,600	9,463,300	12,604,900	
122204901302	1994	1995		1525	0	0	0	0	3,141,600	9,463,300	12,604,900	
122204901302	1992	1993		1525	0	0	0	0	2,856,000	7,747,300	10,603,300	
122204901302	1991	1992		1525	0	0	0	0	2,498,900	7,744,400	10,243,300	
122204901302	1990	1991		1525	0	0	0	0	2,498,900	7,744,400	10,243,300	
122204901302	1989	1990		1525	0	0	0	0	1,755,600	7,734,300	9,489,900	
122204901302	1988	1989		1525	0	0	0	0	1,764,000	7,734,300	9,498,300	
122204901302	1986	1987		1525	0	0	0	0	1,622,400	7,602,900	9,225,300	
122204901302	1984	1985		1525	0	0	0	0	1,513,500	6,432,300	7,945,800	
122204901302	1983	1984		1525	0	0	0	0	506,000	6,821,800	7,327,800	
122204901302	1982	1983		1525	0	0	0	0	506,000	6,821,800	7,327,800	

SALES HISTORY

Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	Sale Reason
2787328	20160330001262	3/28/2016	$0.00	PROLOGIS TARGETED US LOGISTICS HOLDINGS LP	PROLOGIS TARGETED US LOGISTICS FUND LP	Quit Claim Deed	Correction (refiling)
2526002	20120111000609	1/9/2012	$26,650,000.00	LEAVITT-WOLFF NORTHWEST PROPERTIES LLC	PROLOGIS TARGETED U S LOGISTICS HOLDINGS L P	Bargain and Sales Deed	None
2109850	20050323002246	3/17/2005	$0.00	LEAVITT INVESTMENT COMPABY ET AL	LEAVITT-WOLFF NORTHWEST PROP LLC	Statutory Warranty Deed	Other
2109835	20050323002160	3/17/2005	$0.00	P B INVESTMENTS LP	LEAVITT INVESTMENT COMPANY ET AL	Statutory Warranty Deed	Other
2109816	20050323002233	3/17/2005	$15,196,539.00	LEAVITT INVESTMENT CO ET AL	LEAVITT-WOLFF NORTHWEST PROP LLC	Statutory Warranty Deed	None
1720712	19991109000613	10/29/1999	$16,410,000.00	TCW REALTY FUND VIA	P.B INVESTMENTS LP	Statutory Warranty Deed	None
1431644	199506050769	5/11/1995	$0.00	TCW REALTY FUND VA HOLDING CO	KENT CITY OF	Quit Claim Deed	Other
1274753	199210262003	10/23/1992	$13,325,000.00	O'DONNELL CARBIDE/KENT	TCW REALTY FUND VIA HOLDING CO	Warranty Deed	None

REVIEW HISTORY

Tax Year	Review Number	Review Type	Appealed Value	Hearing Date	Settlement Value	Decision	Status
2018	1700976	Local Appeal	$31,220,800	1/1/1900	$0		Active
2017	1600610	Local Appeal	$30,621,200	1/1/1900	$0		Active
2016	1503790	Local Appeal	$22,594,700	1/1/1900	$21,725,000	REVISE	Completed
2015	1400912	Local Appeal	$22,367,200	1/1/1900	$22,367,200	SUSTAIN	Completed
2004	0302184	Local Appeal	$16,714,100	1/1/1900	$0		Completed

PERMIT HISTORY

Permit Number	Permit Description	Type	Issue Date	Permit Value	Issuing Jurisdiction	Reviewed Date
CNST-2160571	BUILDING PERMIT ONLYINTERIOR T.I. WITHIN EXISTING OFFICE AREA TO PROVIDE 6 NEW OFFICES.ARCHITECT OF RECORD: RONALD W. WRIGHT JR. WA. ID#5064 PHONE:(206) 728-4248,	Remodel	2/22/2016	$48,801	KENT	6/21/2016
CPLU-2152159	ADD PLUMBING FIXTURES FOR THREE NEW RESTROOMS (UNDER SEPARATE PERMIT).,	Other	6/18/2015	$0	KENT	4/5/2016
CNST-2151309	BUILDING PERMIT ONLY PLUMBING/MECHANICAL/SPRINKLERS AND ELECTRICAL SEPARATE PERMITS1)INSTALL 2 NEW SINGLE OCCUPANT ACCESSIBLE RESTROOMS WITHIN EXISTING WAREHOUSE. AT GRID LINE 5	Remodel	6/8/2015	$60,000	KENT	4/5/2016

	BETWEEN G & H2)ENLARGE EXISTING OH DOOR 12'x12' TO 16'x1					
CNST-2151295	BUILDING PERMIT ONLY MECHANICAL FOR THIS NEW ROOM BY SEPARATE PERMITCONSTRUCT NEW IN HOUSE (ONLY) TRAINING ROOM WITH A MAXIMUM OCCUPANCY OF 39 INSIDE OF THE EXISTING OPEN OFFICE AREA.ARCHITECT OF RECORD:RONALD W. WRIGHT Jr. WA. ID#5064	Remodel	4/30/2015	$12,670	KENT	7/9/2015
CNST-2150571	BUILDING AND PLUMBING PERMIT ONLY MECHANICAL PERMIT SEPARATE1)CREATE NEW CONDITIONED SPACES IN EXISTING WAREHOUSE; 2)DEMOLITION OF 4 RESTROOM AREAS IN CENTER OF WAREHOUSE AREA.3) CONSTRUCTION OF (3) NEW TOILET ROOMS AND NEW BREAK ROOM;	Remodel	4/14/2015	$90,000	KENT	7/9/2015
CNST-2150034	REPLACE ROOFTOP GAS PIPING WITH NEW INDOOR GAS PIPING.GAS PIPING GOING TO THREE HEATERS ONLY.,	Other	1/9/2015	$0	KENT	
CNST-2143529	BUILDING PERMIT ONLYINSTALL RACK STORAGE SYSTEM.NUMBER OF BAYS: 32RACKS INSTALLED AROUND THE TENANT SPACE.16 - 44"x12'16 - 36"x12'COMMODITY CLASS IV.ENGINEER OF RECORD: GARNIK OHANIAN WA. ID#33552 PHONE:(818) 240-3810,	Other	10/13/2014	$12,359	KENT	
CNST-2142011	REMOVE STRUCTURALLY DEFICIENT CONCRETE WALL PANELS ON SOUTH FACE OF BUILDING AND REPLACE WITH NEW METAL STUD AND STUCCO WALL WITH THREE ALUMINUM STORE FRONT WINDOWS. BUILD A TEMPORARY WALL TO HOLD ROOF DURING WALL REPLACEMENT.TYPE OF CONSTRUCTION: I	Remodel	10/6/2014	$304,844	KENT	7/9/2015
CNST-2143151	GAS PIPING PERMIT ONLYTIE INTO EXISTING GAS PIPING TO SERVE NEW GAS PACKAGED ROOFTOP UNITSNEW UNITS UNDER SEPARATE PERMIT,	Other	9/8/2014	$0	KENT	
CNST-2143150	GAS PIPING PERMIT ONLYTIE INTO EXISTING GAS PIPING TO SERVE NEW GAS PACKAGED ROOFTOP UNITSNEW UNITS PER SEPARATE PERMIT,	Other	9/8/2014	$0	KENT	
CNST-2143127	GAS PIPING PERMIT ONLYTIE INTO EXISTING GAS PIPING TO SERVE 4 NEW GAS PACKAGED ROOFTOP UNITS.UNITS UNDER SEPARATE PERMIT,	Other	9/8/2014	$0	KENT	
CNST-2143050	BUILDING AND MECHANCAL PERMIT ONLY GAS PIPING BY SEPARATE PERMITREPLACE (3) 5 - TON AND (2) 7.5 TON ROOFTOP UNITS WITH NEW GAS PACKAGED UNITS.INSTALL NEW CURB ADAPTERS ON TOP OF EXISTING CURBS FOR NEW UNITS ABOVE.	Other	9/2/2014	$30,602	KENT	
CNST-2143049	BUILDING AND MECHANCAL PERMIT ONLY GAS PIPE BY SEPARATE PERMIT1)REPLACE (2) 7.5 TON AND (1) 4 TON GAS PACKAGED ROOFTOP UNITS WITH LIKE UNITS.2)INSTALL NEW CURB ADAPTERS TO UNITS ABOVE3)INSTALL 2 NEW ROOFTOP UNITS. (1) 5 -TON AND (1) TWO	Other	9/2/2014	$52,362	KENT	
CNST-2143048	BUILDING AND MECHANICAL PERMIT ONLYREPLACE (1) 7.5 TON GAS PACKAGED ROOFTOP UNIT WITH NEW GAS PACK. ADD NEW CURB ADAPTER TO EXISTING CURB.NO GAS PIPING. (USING EXISTING PIPING TO BE VERIFIED BY INSPECTOR) ENGINEER OF RECORD: KEITH WM. MOORE WA. I	Other	9/2/2014	$4,893	KENT	
CNST-2143047	BUILDING AND MECHANICAL PERMIT ONLYREPLACE (2) 5 - TON AND (1) 7.5 TON WITH (2) 5 - TON AND (1) 3 - TON GAS PACKAGED UNITS. INSTALL (1) NEW 3 - TON GAS PACKAGED ROOFTOP UNIT. TIE INTO EXISTING GAS PIPING. ********GAS PIPING UN	Other	9/2/2014	$14,648	KENT	
CMAL-2142935	RE-ROOF COMMERCIAL BUILDING. NUMBER OF ROOFING SQUARES: 592OVERLAY. REMOVE AND REPLACE SHEET METAL FLASHINGS. RECOVER EXISTING BUR ROOFING WITH 1.5"	Other	8/19/2014	$223,330	KENT	

	COVER BOARD AND SINGLE PLY ROOFING MEMBRANE. REPLACE SMOKE VENTS WITH NEW.,					
CNST-2142544	RECONFIGURE EXISTING TENANT OFFICE TO ACCOMMODATE NEW TENANTS NEEDS. THERE WILL BE NO ADDITIONAL OFFICE AREA. THE PROJECT WILL ALSO ADD A SINGLE RAMP TO ALLOW DRIVE IN BUILDING AT THE FRONT.BUILDING ONLY.DEFERRED SUBMITTAL : RAMP DESIGN,	Remodel	8/8/2014	$60,000	KENT	
CMAL-2142379	RE-ROOF COMMERCIAL BUILDING. NUMBER OF ROOFING SQUARES: 410INSTALL MECHANICALLY ATTACHED .60 MIL TPO ROOF SYSTEM OVER EXISTING CAP SHEET BUR. MECHANICALLY ATTACH ONE LAYER OF 1.5 INCH POLYISO INSULATION.,	Other	7/7/2014	$162,315	KENT	
CMAL-2142376	RE-ROOF COMMERCIAL BUILDING. NUMBER OF ROOFING SQUARES: 930INSTALL MECHANICALLY ATTACHED .60 MIL TPO ROOF SYSTEM OVER EXISTING CAP SHEET BUR. MECHANICALLY ATTACH ONE LAYER OF 1.5 POLYISO INSULATION.,	Other	7/7/2014	$225,357	KENT	
CNST-2141930	VOLUNTARY SEISMIC RETROFIT - WALL ANCHORAGE AND CONTINUITY TIES.TYPE OF CONSTRUCTION: IIIBOCCUPANCY CLASSIFICATION: B/F-1/S-1(ORIGINALLY B-2 C.O.#3824) SPRINKLED,	Remodel	7/1/2014	$93,000	KENT	
CNST-2141928	VOLUNTARY SEISMIC RETROFIT - WALL ANCHORAGE AND CONTINUITY TIES.TYPE OF CONSTRUCTION: IIIBOCCUPANCY CLASSIFICATION: B/F-1/S-1(ORIGINALLY B-2 C.O.#3825) SPRINKLED,	Remodel	7/1/2014	$143,000	KENT	
CNST-2141926	VOLUNTARY SEISMIC RETROFIT - WALL ANCHORAGE AND CONTINUITY TIES.TYPE OF CONSTRUCTION: IIIBOCCUPANCY CLASSIFICATION: B/F-1/S-1(ORIGIANLLY B-2 C.O.#3826) SPRINKLED,	Remodel	7/1/2014	$138,000	KENT	
CNST-2141925	VOLUNTARY SEISMIC RETROFIT - WALL ANCHORAGE AND CONTINUITY TIES.TYPE OF CONSTRUCTION: IIIBOCCUPANCY CLASSIFICATION: B/F-1/S-1(ORIGINALLY B-2 C.O. #3827) SPRINKLED,	Remodel	7/1/2014	$90,000	KENT	
CMAL-2142295	TEAR OFF AND REROOF COMMERCIAL BUILDING. REMOVE THE EXISTING ROOFING AT THE CURBS AND WALLS ONLY. PREPARE THE EXISTING ROOF SURFACE TO RECEIVE THE NEW ROOF SYSTEM. MECHANICALLY ATTACH 1 LAYER OF 1.5" ISO INSULATION; THEN MECHANICALLY ATTACH 1 LAYE	Other	6/30/2014	$378,569	KENT	7/25/2014
CNST-2140950	BUILDING AND PLUMBING PERMIT ONLY1)INSTALL 1 NEW DEMISING WALL TO ADD APPROX. 6737 MORE SQ FT TO EXISTING TENANT SPACE2) AND CREATE 1 NEW OPENING IN EXISTING DEMISING WALL.3)INSTALL A NEW ACCESSIBLE DRINKING FOUNTAIN,	Remodel	5/15/2014	$25,000	KENT	
CNST-2133781	BUILDING PERMIT ONLY 2012 IBC1) ADD A 3'X7' DOOR IN EXISTING WALL WITH ACCESSIBLE HARDWARE AND SEALS2)REMOVE PORTION OF EXISTING WALL TO WIDEN AN EXISTING OPENING IN WAREHOUSE SPACE,	Remodel	10/30/2013	$6,500	KENT	4/15/2014
CNST-2131359	REPLACE ONE FREESTANDING SIGN AT SAME LOCATION.HEIGHT OF SIGN: 6' 3" x 9',	Other	4/25/2013	$5,428	KENT	4/22/2014
CNST-2131338	REPLACE ONE FREESTANDING SIGNS AT SAME LOCATION.HEIGHT OF SIGN: 6' 3" x 9',	Other	4/25/2013	$5,428	KENT	4/22/2014
CNST-2121846	BUILDING ONLYREMODEL UNOCCUPIED 21,203 sf LEASE SPACE. SPACE INCLUDES 14 NEW OFFICES IN EXISTING OPEN OFFICE AREA AND ONE (1) ADDITIONAL TOILET TO EACH EXISTING BATHROOM.2009 IBC. 2009 WSEC Entire project subject to field inspectors' review	Remodel	7/26/2012	$75,000	KENT	7/23/2013
CNST-2120357	BUILDING AND MECHANICAL ONLYINSTALL 25 FT OF 12" DIAMETER SPIRAL PIPE STRAIGHT UP FROM THE	Other	2/27/2012	$500	KENT	8/6/2012

	PRINTING PRESS THROUGH THE ROOF.TYPE OF CONSTRUCTION: IIIBOCCUPANCY CLASSIFICATION: B/F-2/S-1(ORIGINALLY B-2) SPRINKLEDPRINTING INK FUMES DO NOT MEET HAZARDOU					
CNST-2110397	INSTALL TWO 3,200 CFM FANS ON ROOF TO EXHAUST FUMES FROM AN INK PRINTING PRESS ULTRAVIOLET DRYER.TYPE IIIB CONSTRUCTIONB/F-2/S-1 OCCUPANCY CLASSIFICATIONSPRINKLED	Other	6/9/2011	$500	KENT	4/22/2014
CNST-2070469	Adding small office area in existing warehouse, new ceiling & grid.	Remodel	5/3/2007	$50,000	KENT	4/15/2014
CNST-2030662		Building, New	4/8/2003	$250,000	KENT	6/6/2003
CNST-2010413		Accessory, New	5/16/2002	$600,000	KENT	6/13/2003

HOME IMPROVEMENT EXEMPTION

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