Phase I Environmental Site Assessment
for

WALKER CHEVROLET

633 DIVISION AVENUE
TACOMA, WASHINGTON

Prepared for:

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CONTENTS

EXECUTIVE SUMMARY

Bison Environmental Northwest, Inc. conducted a Phase I Environmental Site Assessment of Walker Chevrolet, an automobile dealership located at 633 Division Avenue in Tacoma, Washington. This assessment was conducted to identify potential environmental concerns on the property prior to leasing of the Walker Chevrolet business. The assessment was conducted in accordance with the American Society of Testing and Materials (ASTM) Designation E 1527-93, "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process." The results of our assessment are summarized in the following paragraphs. Please refer to the body of this report for details, including our methodology, findings, conclusions, and limitations. A map showing the site location, site drawings, and site photographs are included in Appendix A of this report.

The site consists of three areas surrounding the intersection between North First Street and North G Street in downtown Tacoma, Washington. For the purposes of this report, the areas are referred to as the main building, north parking lot, and south parking lot.

The main building is triangular in shape, and located on the southeast side of North 1st Street. This building houses the maintenance shop, body shop, salesroom, parts department, and offices. A Thriftway store, which is excluded from this site assessment, is located in the northeast end of the lower floor of this building.

The north parking lot is located north of the intersection between North First and North G. The lot is used primarily for parking dealership vehicles. A small one-story sales office ("North Office") is located along the northeast side of the lot. A building on the northwest side of this lot is used for detailing and washing cars ("Detail Shop").

The south parking lot is located west of the intersection of North First and North G. This lot is also used for parking dealership vehicles, and also contains a small one-story sales office ("South Office").

The business is listed by the EPA as a small quantity generator of hazardous waste due to waste products generated by the maintenance and body shops. We have been informed by the EPA that they have no records indicating past violations or enforcement actions related to the site's generation of hazardous waste. In general, the business appears to be operating in an environmentally responsible manner, with petroleum products and solvents properly used and stored. Housekeeping practices on the site appeared to be very good, with waste products recycled or disposed of properly.

Our historical research indicates that the main building has been

used as an automobile dealership since it's construction in 1925. A 1912 Sanborn Fire Insurance map indicates that a seminary and girl's school had been present at this location. A gasoline service station operated in the southwest corner of the main building lot from before 1930 until about 1949. Records at the Pierce County Assessor's office indicate that three 2,000-gallon underground storage tanks (USTs) were present in this area.

The north and south parking lots were occupied by residences and a boarding house in 1912. The south parking lot has been used for dealership parking since at least 1945. A gasoline service station was present on the north lot during the 1940s through the 1960s.

This assessment has revealed the following potential environmental concerns on the property:

South Gasoline Station- During the 1930s and 1940s, a gasoline station operated on a portion of the site located southwest of the main building. During our site visit, fills, ventlines, and other evidence of existing USTs were observed in this area. A total of seven USTs were subsequently removed from this area. Petroleum contaminated soil was encountered in the excavations, and was removed and stockpiled pending disposal. The results of laboratory analysis indicate no petroleum contamination remained in the excavations, which have been filled. The UST closure and remedial activities will be discussed in a forthcoming report. No further action is recommended in this area other than proper disposal of the contaminated soil.

North Gasoline Station- A gasoline station operated in the north parking lot area from the 1940s through the 1960s. No evidence of USTs was observed in this area during our site visit, and no historical records indicating the presence of USTs have been found. However, this does not rule out the possibility that USTs were, and possibly still are, present in the north parking lot. It is our opinion that the past presence of a gasoline station in the north parking lot could be a source of environmental concern for the property owner. However, the parking lot is paved, and future lessees of the business would not be expected to contribute to any contamination in this area. Based on this consideration, further work to assess the north park lot may not be required at this time.

Paint Booth- Two floor drains and a cleanout access were observed in the paint booth, which is located on the lower floor of the building. The southern drain contained a dry, grayish sediment, and the northern drain contained a wet, brown sediment with a 6-inch layer of water on top. Sediments in the north drain exhibited strong solvent-like odors. A UST which had stored oil for the building's heating system is also located beneath the floor slab in this area. The UST would be considered unregulated, since it was used for "consumptive

purposes on the premises where stored". The building now uses suspended natural gas heaters.

The contents of the floor drains and UST have been pumped out and cleaned, and the sediments and wash water properly disposed of. The drains and UST were filled with concrete slurry. Four borings were made in the vicinity of the UST and drains, and soil samples were collected for analysis. The cleaning, tank closure, and soil sampling will be discussed in detail in a forthcoming report.

Asbestos- Asbestos-containing materials (ACM) identified during this study include the insulation on the boiler and steam pipes in the boiler room. This heating system is no longer in use, and some of the insulation material is in poor condition. While the boiler room is rarely used, it would be prudent for the owner to have this material abated or encapsulated.

Additional "suspect" ACM on the property include vinyl flooring located in the two sales office buildings, the showroom in the main building, and in restrooms throughout the property. These materials are considered non-friable in their present condition, and it is our opinion that there is little cause for concern provided they are not disturbed by activities such as cutting, tearing, or grinding. If the future renovation or demolition activities require removal of this material, it should be tested for asbestos, and removed by qualified workers if asbestos is present.

Lead-based paint- There is some potential for lead-based paint on the buildings based on their age. The painted surfaces appeared to be in good condition, and it is our opinion that there is little potential for human exposure at the present time provided the site is not used for residential purposes, and provided the painted surface is not sanded, chipped, or otherwise disturbed.

Offsite Concerns- Potential sources of contamination on nearby properties include a gasoline service station which was located adjacent to the north parking lot from at least 1930 until around 1970, an operating service station with confirmed groundwater contamination located roughly 300 feet southwest of the site, and an operating drycleaner adjacent to the northeast of the main building. The drycleaner began operations sometime between 1912 and 1930. Since this Site Assessment primarily addresses the Walker Chevrolet business, as opposed to the property, further work to address potential off-site sources may not be required at this time.

CERTIFICATION OF REPORT INTEGRITY

Bison Environmental Northwest, Inc. certifies that this Phase I Environmental Site Assessment has been conducted in accordance with industry standards, and to the best of our knowledge, represents an accurate accounting of the environmental condition of the subject property at the time of assessment.

Henry Perrin, Environmental Engineer — Date: 8/11/94

Bill Shuck, President — Date: 8/11/94

PHASE I ENVIRONMENTAL SITE ASSESSMENT
WALKER CHEVROLET
AUGUST, 1994

1.0 INTRODUCTION

This report presents the results of our Phase I Environmental Site Assessment (ESA) for Walker Chevrolet, located at 613 Division Avenue in Tacoma, Washington. Bison Environmental Northwest, Inc. was retained by Bonneville, Viert, Morton, & McGoldrick to conduct this assessment.

1.1 Purpose

The purpose of an ESA is to identify the general environmental condition of a property, and to evaluate the potential for contamination by hazardous substances and petroleum products. ESAs are often used to satisfy one of the requirements for the "innocent landowner" defense to liability under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); that is, to make "all appropriate inquiry into the previous ownership and uses of a property consistent with good commercial or customary practice." In these instances, the objective of an ESA is to demonstrate that, at the time of the study, the user had no knowledge or reason to know that any hazardous substance had been released on the property.

In 1993, the American Society for Testing and Materials (ASTM) published designation E 1527-93, "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process." This publication is intended to define good commercial and customary practice for conducting ESAs, and states that the goal of the assessment process is to establish "recognized environmental conditions" associated with the property. The term recognized environmental conditions is defined as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." The term is not intended to include "de minimus" conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

1.2 METHODOLOGY/SCOPE OF WORK

This assessment was conducted in accordance with procedures outlined in ASTM Designation E 1527-93, and the scope of work for this project included:

- Review of past ownership and uses of the property, using county assessor records, historic maps and directories, interviews with individuals familiar with the property, and aerial photography as primary resources.

- Reconnaissance of the property to review current land use practices in the area, and to look for indications of recognized environmental conditions (e.g.: soil discoloration, odors, discarded drums, or distressed vegetation).

- Review of current regulatory agency information to identify potential sources of contamination in the area.

- Preparation of this report.

The scope of work for this project did not include the examination, sampling or laboratory analysis of subsurface soil or groundwater.

1.3 LIMITATIONS

This report has been prepared for the exclusive use of the client and their representatives for specific application to this site. The work for this project was conducted in a manner consistent with generally accepted environmental science practices for phase 1 site assessments in the area, and in accordance with the terms of the client's request. No other warranty is expressed or implied.

Examination, sampling, or analysis of subsurface soils or groundwater is beyond the scope of work for this project. The actual condition of subsurface soils or groundwater cannot be determined solely on the basis of surficial evidence.

If new information on the site is developed during future environmental studies, Bison Environmental, Inc., should be allowed to review this information, to reevaluate the conclusions of this report, and to provide amendments as required.

2.0 SITE LOCATION AND DESCRIPTION

The site is located in downtown Tacoma, Washington, in the southeast quarter of section 32, township 21 north, range 3 east. The legal description for the site, as listed at the Pierce County Assessor's Office, has been included in Appendix B. Please refer to Appendix A for the site location, drawings, and photographs.

The property is being used by Walker Chevrolet for automotive sales and service. The site consists of three areas surrounding the intersection between North First Street and North G Street.

The main building occupies most of a triangular-shaped lot located on the southeast side of North 1st Street. This lot is roughly 25,000 square feet in size. The building is a two-story structure which houses the maintenance shop, body shop, saleroom, parts department, and offices. The upper floor of the main building contains the showroom, offices, maintenance shop, and parts department. The body shop and estimating office are located in the lower floor. A Thriftway supermarket, which is excluded from this site assessment, is located in the northeast end of the lower floor.

The north parking lot is located north of the intersection between North First and North G. The lot is used primarily for parking dealership vehicles, and is roughly 29,000 square feet in size. A small one-story sales office ("North Office") is located along the northeast side of the lot. A building on the northwest side of this lot is used for detailing and washing cars ("Detail Shop").

The south parking lot is located west of the intersection of North First and North G. This lot is also used for parking dealership vehicles, and also contains a small one-story sales office ("South Office"). The parking area is approximately 27,000 square feet in size.

3.0 EXISTING FEATURES

3.1 Topography

In general, topography on the vicinity of the site slopes gently downward to the north and west. Surface water and shallow groundwater flow in the area would be expected to follow local topography, flowing to the northwest, and eventually draining into Commencement Bay.

3.2 Buildings

As previously noted, three structures and a portion of a fourth building are used by Walker Chevrolet. Details on construction are shown below:

Building	Size*	Construction
Main Building	24,000 ft^2	2-story, concrete, flat tar roof
North Office	700 ft^2	1-story, wood frame, flat tar roof
South Office	600 ft^2	1-story, wood frame, flat tar roof
Detail Shop	6,000 ft^2	1-story, concrete, flat tar roof

* Sizes are approximate footprint areas.

The buildings utilize suspended gas heaters, electric hot water heaters, and fluorescent lighting. The main building has a concrete slab floor in most areas, with some vinyl flooring, and the two sales office buildings have vinyl floors. The detail shop has a concrete floor.

3.3 Site Geology

We contacted the Tacoma-Pierce County Health Department for information on the geologic conditions in the vicinity of the site. However, a response has not been obtained within the time frame allowed for this assessment. Based on local topography, we anticipate that groundwater is located at depths greater than 20 feet, with a gradient to the northwest.

3.4 Site Utilities

Water:	Service connection provided by the City of Tacoma.
Sanitary:	Service connection provided by City of Tacoma.
Storm:	Surface water drainage is directed into the City storm water system via catch basins located throughout the site.
Electrical:	Service provided by Tacoma City Light.
Heat:	Washington Natural Gas provides service for the suspended gas heaters in the service areas. The office and bathroom utilize electric baseboard heaters.

4.0 SITE WALKTHROUGH AND INSPECTION

The site inspection was conducted by Henry Perrin of Bison Environmental on July 27, 1994. Mr. Perrin was also present on the site for several days during the following week to observe removal of USTs from the site, and to collect soil samples. During our inspection existing environmental conditions and the potential for contamination from hazardous materials were evaluated. All accessible areas of concern were inspected including the potential for the presence of Underground Storage Tanks (USTs), hazardous chemicals used and stored on-site, the presence of polychlorinated biphenyls (PCBs) and asbestos containing materials (ACM).

4.1 Asbestos

Asbestos is a naturally occurring mineral that separates into very fine fibers. The fibers are heat-resistant and very durable, and due to these qualities, were widely used in construction and industry. Adverse health affects can occur when asbestos fibers are released into the air. Inhalation of airborne asbestos fibers can cause respiratory ailments, including asbestosis, mesothelioma, and lung cancer. On July 12, 1989, the EPA issued its final rule making under the Toxics Control Act which banned, in staged intervals, the use of asbestos in almost all products manufactured or sold in the United States.

Asbestos-containing materials (ACM) can be categorized as friable or non-friable. The EPA defines "friable" ACM as material containing over 1 percent asbestos which can be "crumbled, pulverized, or reduced to powder by hand pressure". Friable ACM is considered capable of releasing asbestos fibers into the air, while non-friable ACM would not be expected to release fibers unless mechanically disturbed by actions such as chopping, sawing or grinding.

During our visit, we collected small samples of friable "suspect" ACM. The results of laboratory analysis, using polarized light microscopy (PLM), of the samples are shown below, and the laboratory report is included in Appendix C.

Sample Number	Material	Location	Results
A1	Boiler Insulation	Boiler Room	15% Chrysotile* 10% Amosite
A2	Pipe Insulation	Boiler Room	15% Chrysotile 5% Amosite
A3	Popcorn Ceiling	N Sales Office	None Detected (<1%)

* Chrysotile and Amosite are common types of asbestos

The boiler room is located in the lower floor of the main building. The boiler is no longer in use, and the room appears to be unused except for routine servicing of a fiber-glass insulated electric hot water heater. Some of the pipe and boiler insulation was in poor condition.

The vinyl flooring located in the two sales office buildings, the showroom in the main building, and in restrooms throughout the property, would be considered suspect ACM. These materials are not friable, and were in fair to good condition.

4.2 Radon

Radon is a naturally occurring gas produced by the radioactive decay of uranium and thorium. Adverse health effects can occur when radon migrates from underlying soils or concrete and accumulates inside structures. The EPA has established a radon concentration of 4.0 pico-Curies per liter (pC/l) of air as an "action level" beyond which abatement measures are recommended.

The Puget Sound region of Washington is typically underlain by glacially-deposited soils which contain very low concentrations of radon-forming minerals. The Washington Department of Health recently published a listing of radon measurements indicating a state-wide average of 1.0 pC/l, and a Pierce County average of 0.9 pC/l (reference 14). Based on this information, it is considered unlikely that radon levels on the site exceed the EPA's 4.0 pC/l action level.

4.3 PCBs

Prior to 1979, polycholorinated byphenyls (PCBs), were widely used in electrical equipment such as transformers, switches, and fluorescent light ballasts. The EPA banned any further manufacturing of PCBs in the United States in 1979.

Fluorescent light fixtures are present throughout the buildings. We disassembled representative fluorescent light fixtures in the maintenance shop, north sales office, and south sales office. All of the ballasts were clearly labelled "No PCBs".

No transformers were noted on the site.

4.4 Lead-Based Paint

During the earlier part of this century, paint containing 30 to 40 percent lead was commonly used on the interior and exterior surfaces of buildings. Exposure to particles of lead-based paint through inhalation or ingestion has been found to cause a variety of adverse human health effects. Children are particularly sensitive to these effects, and lead-based paint in residential areas is considered a major public health problem.

In 1977, the Consumer Products Safety Commission banned the sale of paint products for consumer use which contained lead in excess of 0.06 percent by weight. According to current regulatory standards, paints are considered lead-based if they contain over 1.0 milligrams lead per square centimeter of surface, or more than 0.5 percent lead by weight.

Based on the construction dates of the existing buildings (see section 6.0), there is potential for lead-based paint on the structure. All of the painted surfaces observed during our visit were in good condition.

4.5 Hazardous Materials and Petroleum Products

All maintenance and body work for automobiles takes place within the main building. The maintenance shop has several hoists, all of which are above-ground. An above-ground hoist is also present in the detail shop.

In general, the business appears to be operating in an environmentally responsible manner, with petroleum products and solvents properly used and stored. Housekeeping practices on the site appeared to be very good, with waste products recycled or disposed of properly.

Waste oil generated by the business is stored in a 500 gallon, above ground tank located in a room in the southwest corner of the maintenance shop. Used antifreeze, used oil filters, and floor cleaning solvent are also stored in this room, along with various new oil and lube products. At the time of our visit, the following products were present in the waste oil room:

Quantity	Container	Product
1	55-gal drum	Used floor solvent
1	55-gal drum	New floor solvent
2	55-gal drum	New chassis lube
1	55-gal drum	New hydraulic oil
2	55-gal drum	Used antifreeze
2	55-gal drum	Used oil filters
1	20-gal drum	Grease
2	5-gal bucket	Grease

The antifreeze, filters, and floor solvent are stored in 55-gallon drums. At the time of our visit, Floors in the maintenance shop are cleaned by mopping with the solvent, and the used solvent is then placed in drums for recycling. The tank and containers appeared to be in very good condition, and no signs of leaks or spills were observed.

According to Gary Michael, the service manager, the waste products generated by the business are picked up for disposal or recycling approximately once per week. Waste oil is picked up by Arcon Oil, and the remaining waste products are picked up by Safety Clean.

Mr. Michael stated that the majority of the antifreeze is recycled on-site, but after continued use and recycling the antifreeze breaks down and must be disposed of.

Parts cleaning for the business is accomplished using "closed-loop" solvent sinks maintained by Safety Clean, who delivers new solvent, and picks up used solvent for recycling, on a regular basis. Eight solvent sinks are present in the shop.

Two above ground tanks, used to store new oil and automatic transmission fluid, are present in the northwest corner of the maintenance shop. The tanks are roughly 100 gallons in capacity and appeared to be in good condition.

According to Mr. Michael, on a monthly basis the service department generates approximately 1,200 gallons of used oil, 25 gallons of used antifreeze, 80 gallons of used solvents, and one-half of a 55-gallon drum of used oil filters. Mr. Michael stated that to the best of his knowledge, the maintenance shop has never been issued citations, warnings, or other enforcement actions related to the shop's use of cleaning solvents and automotive products.

Waste products stored in the body shop include a 55-gallon drum containing used antifreeze, a 55-gallon drum for used oil filters, and 2 20-gallon drums containing used paint thinner. According to Barbara Michael, the body shop manager, all of these products are disposed of regularly by Safety Clean. The thinner is used in a cleaning sink to remove build-up from paint guns. Three 20-gallon drums of new paint thinner were present in the body shop at the time of our visit. Approximately 10 1 gallon buckets, 50 pints, and 20 spray cans containing paints and related products were present in the body shop.

According to Ms. Michael, the body shop generates roughly 20 gallons of used paint thinner per month, and fills a 50-gallon drum with used filters approximately 4 times per year. Ms. Michael stated that to the best of her knowledge, the body shop has never been issued citations, warnings, or other enforcement actions related to the shop's use of cleaning solvents and automotive products.

Materials stored in the detail shop included two 55-gallon drums of new oil, a 55-gallon drum of new automatic transmission fluid, a 55-gallon drum of roof coating, and two 40 gallon containers of soap. According to Mr. Michael, the oil and automatic transmission fluid are used for "topping off" new cars, and no oil changes or other maintenance occurs in this area. Nine 20 gallon buckets of grease undercoating were also present in the detail shop. Personnel working in the shop explained that 8 of these had hardened, and could not be used. Labelling on the buckets stated that the product is "considered non-toxic" once it has hardened.

4.6 Underground Storage Tanks

During the 1930s and 1940s, a gasoline station operated on a portion of the site located southeast of the main building. During our site visit, fills, ventlines, and other evidence of existing USTs were observed in this area. A total of seven USTs were subsequently removed from this area. Petroleum contaminated soil was encountered in the excavations, and was removed and stockpiled in the southwest corner of the south parking lot pending disposal. The results of laboratory analysis indicate that no petroleum contamination remained in the excavations, which have been filled. The removed material is stockpiled on visqueen, covered by visqueen, and surrounding by a berm of clean fill soil.

A heating oil UST is present beneath the floor slab of the main building, located in the paint booth area. This UST had serviced the building's boiler, and is not longer in use. The UST was recently cleaned and filled with concrete slurry. Soil samples were collected by our firm from around the tank using a hand auger.

The UST removal, filling, and soil sampling will be discussed in detail in a forthcoming report issued by our firm.

4.7 Floor Drains

Two floor drains and a cleanout access were observed in the paint booth during our initial visit. The lids for the drains were circular, and measured 2 feet in diameter, and the square cleanout access cover was roughly 1 foot on a side. The covers of the drains and cleanout access were removed to inspect the contents.

The southern drain consisted of a 2-foot diameter cylinder with a layer of dry, grayish sediment in the bottom. The drain was probed, and appeared to be 4 feet deep, with approximately 1 foot of sediment.

The northern drain was also a 2-foot diameter cylinder, and was nearly full of a wet, brown sediment. Probing indicated that this drain was roughly 2 1/2 feet deep with approximately 1 1/2 feet of sediment and a 6-inch layer of water on top. The sediment exhibited a solvent-like odor. A 6-inch diameter drain line was observed in the drain at a depth of roughly 1 foot. This line appeared to run toward the cleanout access, which was located roughly 2 feet east of the north drain. The cleanout access was roughly 1 1/2 feet deep, with drain line running east to west, and contained a small quantity of wet, brown sediment.

According to Ms. Michael, the drains have received water from cleaning the paint booth floor, and to the best of her knowledge, no hazardous materials or petroleum products have been directly disposed of in the drains.

The contents of the floor drains have recently been sampled, and the drains and cleanout access have been pumped out and cleaned, with the sediments and wash water properly disposed of. The drains and cleanout access were then filled with concrete slurry. Soil samples were collected by our firm from around the drains using a hand auger. The cleaning and soil sampling will be discussed in detail in a forthcoming report.

A floor drain is also present in the detail shop, and receives water from washing cars. According to Dave Shaw, the property owner, this floor drain is connected to the sanitary sewer system.

5.0 NEIGHBORING PROPERTIES

Land use in the vicinity of the property is a mixture of light commercial and residential development. Usage of neighboring properties at the time of our visit is summarized below:

Northeast: Morrel's Drycleaners is located northeast of the Main Building, followed by retail shops with frontage on Tacoma Avenue. A Key Bank branch office and retail shops are located northeast of the north parking lot.

Southeast: The site is bordered to the southeast by Division Avenue, followed by a church and Wright Park.

Southwest: The site is bordered to the southwest by apartment buildings.

Northwest: A vacant lot is located northwest of the south parking lot. Tacoma Tent and Awning, a light manufacturing business, is located northwest of the north parking lot.

6.0 HISTORICAL USAGE

The following summary of historical site usage is based on information available at the Pierce County Assessor's office, the Tacoma Public Library, interviews with individuals familiar with the property, and historic aerial photography.

According to Dave Shaw, the property was purchased by himself and Darrell Wickham during 1981 from Leslie Fite. Mr. Shaw thought that Leslie Fite had purchased the property from Lumberman's Improvement, a land trust, around 1970. According to Mr. Shaw, the site has been a car dealership since about 1925, and a Chevrolet dealership since 1933.

Records at the Pierce County Assessor's office confirm Mr. Shaw's statement regarding property history, and list David Shaw and Darrell E. Wickham as the current owners, having purchased the property from Leslie R. Fite during June of 1981. The records indicate that the main building was constructed during 1925, and appears to have been used as car dealership and maintenance shop since it's construction. Lumberman's Improvement Company appears as the property owner in an appraisal dated August 4, 1954. The appraisal sheet indicates that the portion of the main building now occupied by the Thriftway was also being used as a grocery store at that time. A service station was located southwest of the main building, operating out of what is now the estimating office and a storage closet. The records indicate three 2,000 gallon gasoline USTs were present, and that the station had discontinued operations by 1963.

Assessor's office records indicate that the south office was constructed in 1964, the north office was constructed in 1986, and the detail shop was built in 1941. The detail shop was originally used as a grocery store and was owned by Safeway at the time of an appraisal dated September 13, 1954.

A 1912 Sanborn Fire Insurance map indicates that a large building and a gymnasium, housing the Annie Wright Seminary boarding school, was present on the triangular block now occupied by the main building. This building was constructed of wood and used a steam heating system. The north and south parking lots were occupied by residences and a boarding house at that time. Wright Park was present at it's current location southeast of the main building, and a garage was located on the adjacent property to the northwest of the south parking lot. This adjacent property is now a vacant lot. The remaining adjacent properties in the area were occupied by residences and apartments.

A 1945 Sanborn map show the main building in it's current configuration, and indicates the building was used for "automotive sales and service" at that time. A canopy is indicated on the property directly southwest of the main building, and this area is labelled "oils". The south parking lot was being used as a

automobile sales lot.

The 1945 map indicates that a service station was present in the north parking lot at that time. Four structures associated with this station are shown on the map: a service garage, a "grease bay", a restroom, and a building or canopy labelled "gas and oil". The map indicates that the detail shop and adjacent Tacoma Tent and Awning building were used for "grocery and storage".

Review of the 1945 Sanborn map indicates that land use to the southwest of the property was residential, and that the garage to the northwest of the south lot was now a vacant lot. A gasoline station was located northeast of the north lot, and a dry cleaners was present northeast of the main building, in the building now occupied by Morrel's Cleaners. Wright Park and a church were located to the southeast.

We reviewed Polk Directories at roughly 10 year intervals from 1930 onward for listed businesses at the site address and immediate vicinity. In the 1930 directory, Allen Motor Company and Packard Tacoma Inc., are listed at 633 and 629 Division Avenue, respectively. These addresses would be located in the Main Building. Walker Chevrolet appears at 633 Division Avenue in directories dated 1940 and later. The grocery store in the Main Building (610-618 North First Street) was vacant in 1930, and appears to have been continuously occupied since 1940. Past groceries in this portion of the building include Stadium Market during the 1940s through 1960s, and Lucky Grocery during the 1970s and 1980s.

The gasoline station which was located southwest of the main building (632-634 North First Street) is listed in directories from 1930 to 1949 under the names "Wright Park Auto Service", "Roy Colyar Service Station", and "Bob Hoffer Gas and Oils".

The service station in the north parking lot (613 North First Street) is listed in directories from 1940 to 1960 under the names "Dexter Petroleum", "Johnnie's Mobil Service", and "Olson's Mobile".

Franklin Food and/or Safeway are listed at various addresses from 111 to 123 North "G" Street, from 1940 through 1960. These addresses probably correspond to the detail shop and Tacoma Tent and Awning locations.

Review of Polk Directories indicates the following historical uses of properties in the immediate vicinity of the subject site:

Northeast: The existing drycleaning business adjacent to the northeast of the main building (608 North First Street) appears in directories from 1930 onward under various names, including Puget Sound Cleaners and Marcus Cleaners. The service station which was adjacent to the northeast of the north parking lot

(601 North First Street) appears in directories from 1930 to 1970. In general, businesses along Tacoma Avenue in the vicinity of the property appear to have been retail shops and offices in from 1930 onward. Two exceptions were noted. "Eugene Hall Gas and Oils" is listed in the 1930 directory at 2 Tacoma Avenue North. This business would have been located approximately 100 feet northeast of the main building. An existing service station at 116 Tacoma Avenue North is listed in directories from 1930 onward. This station is located roughly 200 feet north of the detail shop.

Southeast: No listing appears for Divison Avenue directly southeast of the property in any of the directories reviewed. As previously noted, review of Sanborn maps indicate that Wright Park has been present at this location since at least 1916.

Southwest: The Woodstock Apartments are listed at the adjacent lot to the southwest (711 North First Street) from 1930 onward. The existing gasoline station at 801 Division Avenue, roughly 300 feet southwest of the Main Building, is listed in directories from 1940 onward.

Northwest: Tacoma Tent and Awning is listed at 121 North "G" Street from 1980 onward. Properties across North Second Street appear to have been residential since 1930.

Review of historic aerial photographs of the area, dated 1946, 1969, 1980, 1982, 1985, and 1989, appears to confirm that the main building and detail shop have been present on the site since at least 1946. The north sales building first appears in the 1989 photograph, and the south sales building first appears in the 1969 photograph. The north and south parking lots appear to have been paved and used for parking since 1969. Four buildings, in the general configuration indicated on the 1945 Sanborn map, are visible in the north parking lot in the 1946 photograph. The south parking lot appears to have been covered with grass at this time.

With two exceptions, review of aerial photographs indicates little change in use of the surrounding area. The vacant lot to the northwest of the south parking lot appears to have been covered with trees or brush during 1946, and appears similar to it's current condition in photographs dated 1969 and later. The service station located adjacent to the northeast of the north parking lot is visible in the 1946 photograph. A small structure is visible at this location in the 1969 photograph, the lot appears vacant and undeveloped in the 1980 and 1982 photographs. The existing building on this property first appears in the 1985 photograph.

7.0 REGULATORY AGENCY REVIEW

As previously noted, shallow groundwater and surface water in the immediate area would be expected to flow toward the northwest, eventually draining into Commencement Bay. In general, risk to a property increases when potential sources of contamination are located "up-gradient" with respect to the direction of surface and groundwater flow.

7.1 County Abandoned Landfill Records

Review of Tacoma-Pierce County Health Department documentation suggests that no abandoned landfill sites are located within one mile of the subject property (reference 1).

7.2 WDOE-Underground Storage Tanks

The site appears on the WDOE's listing of registered underground storage tanks (USTs). The list indicates that three tanks are present, and in the closure process. Mike Kelly of Fife Sand and Gravel, who removed the USTs during July and August of 1994, informed the department of the presence of three USTs while obtaining a permit for tank removal. It is expected that the WDOE will update this listing to indicate the seven USTs removed from the site once they have received the UST closure report which is currently being prepared by our firm.

The following sites within one-half mile of the subject property appeared on the WDOE's listing of registered USTs:

Site and Location	Comments
Conifer Developments 755 Tacoma Ave S 1/2 mile south, cross-gradient	1 removed waste oil
Harold A Allen 715 Tacoma Ave S 1/2 mile S, cross-gradient	1 removed leaded gas
Temple Baptist Church 245 St Helens Ave S 1/4 mile southeast, cross-gradient	1 removed leaded gas
Bekins Moving & Storage 615 Tacoma Ave S 1/2 mile S, cross-gradient	1 removed leaded gas
1st Presbyterian Church 102 Tacoma Ave S 100 feet east, cross-gradient	1 exempt unleaded gas

City of Tacoma 425 Tacoma Ave S 1000 feet S, cross-gradient	1 active unleaded gas 1 active diesel fuel
Ken Gilcrest 510 Tacoma Ave S 1000 feet S, cross-gradient	1 removed unleaded gas 1 removed diesel fuel
Ball Auto Sales & Service 116 Tacoma Ave N 200 feet N, down-gradient	2 active unleaded gas 1 active leaded gas 1 active used oil
Pat Wardian 801 Division Ave 300 feet SW, up-gradient	2 active unleaded gas 1 active leaded gas 1 active used oil 2 removed unleaded gas 1 removed leaded gas 1 removed waste oil

7.3 WDOE-Leaking Underground Storage Tanks (LUST)

The following sites within one-half mile of the subject property were noted on the current WDOE LUST listing.

Site and Location	Comments
Conifer Developments 755 Tacoma Ave S 1/2 mile south, cross-gradient	Remediation of contaminated soil conducted
Shell #50 801 Division Ave 300 ft SW, up-gradient	Cleanup of petroleum-contaminated soil and ground water in progress

7.4 WDOE-Contaminant Sites

The following sites within one mile of the subject property were noted on the current WDOE Confirmed and Suspected Contaminant Sites (C&SCS) listing:

Site and Location	Comments
Commencement Bay Tideflats Commencement Bay 1/4 mile NE, down-gradient	Confirmed soil and surface water contamination by PCBs Independant Remedial Action in progress

7.5 EPA-RCRA/FINDS

The subject site appears on the EPA's Resource and Recovery Act (RCRA) notifier's and the Facility Index System (FINDS) databases as a small quantity generator of hazardous materials generated during routine business activities.

The following sites within one-half mile of the subject property also appeared on the RCRA Notifiers and FINDS listings:

Site and Location	Comments
Tacoma Cty El Maint 425 Tac. Ave E	Small quantity, non-regulated generator.
Titanium Reclaim Corp. 310 Tacoma Ave S	Non-regulated transporter
Standard Parts Corp. 305 S Tacoma Way	Small quantity generator
Texaco Service 801 Division Ave	Small quantity, non-regulated generator
Morrel's Dry Cleaners 608 N 1st Street	Small quantity exempt generator
Edward R Ester 224 N G Street	Transporter
Tacoma Tent & Awning 121 N G Street	Small quantity generator
Don Harter's Cleaners 602 Tacoma Avenue South	Large quantity generator

7.6 EPA-CERCLIS

Our review of the EPA's CERCLIS database indicates that one site within one mile of the subject property have been designated as potentially hazardous or eligible for the Superfund cleanup program. This site is the Commencement Bay Tide Flats, and is discussed in the National Priority Listing section of this report.

7.7 EPA-National Priority Listing

One site within one mile of the property appears on the EPA's National Priority Listing (NPL). The Commencement Bay Tide Flats site also appears on the C&SCS and CERCLIS listings. The site covers 12 square miles in Commencement Bay, which begins roughly one-forth mile northeast of the subject property. Dredging and

filling of the bay began during the 1920s to open waterways where a wide variety of industrial and commercial operations are located. Past and present operations include pulp and lumber mills, shipbuilding, chemical production, aluminum, lead, and copper smelting, and oil refining. Groundwater, sediments, and soil in this area are known to be contaminated by volatile organic compounds, polynuclear aromatic hydrocarbons, PCBs, and heavy metals.

7.8 AGENCY INTERVIEWS

We interviewed the following individuals at Federal, State, and Local agencies for information on the property and immediate vicinity:

Dave McRoberts of the Tacoma Fire Department stated that, other than the recently removed USTs, the fire department has no record indicating past or current USTs on the property (8/2/94).

Bob Gower of the City of Tacoma Building Department stated that except for a minor remodel which occurred 8 years ago, the city has no records of building permits or plans for the property (8/2/94).

Kim Ogels of the EPA stated that EPA records do not indicated that Walker Chevrolet, and the adjacent Tacoma Tent and Awnings and Morrel's Drycleaner's, have a history of violations or enforcement actions related to their status as small-quantity generators of hazardous waste (8/10/94).

8.0 CONCLUSIONS

This assessment has revealed the following potential environmental concerns on the property:

South Gasoline Station- During the 1930s and 1940s, a gasoline station operated on a portion of the site located southwest of the main building. During our site visit, fills, ventlines, and other evidence of existing USTs were observed in this area. A total of seven USTs were subsequently removed from this area. Petroleum contaminated soil was encountered in the excavations, and was removed and stockpiled pending disposal. The UST closure and remedial activities will be discussed in a forthcoming report. No further action is recommended in this area other than proper disposal of the contaminated soil.

North Gasoline Station- A gasoline station operated in the north parking lot area from the 1940s through the 1960s. No evidence of USTs was observed in this area during our site visit, and no historical records indicating the presence of USTs have been found. However, this does not rule out the possibility that USTs were, and possibly still are, present in the north parking lot.

Paint Booth- Two floor drains and a cleanout access were observed in the paint booth. A UST which had stored oil for the building's previous heating system is also located beneath the floor slab in this area. The UST would be considered unregulated, since it was used for "consumptive purposes on the premises where stored".

The contents of the floor drains and UST have been pumped out and cleaned, and the sediments and wash water properly disposed of. The drains and UST were filled with concrete slurry. Four borings were made in the vicinity of the UST and drains, and soil samples were collected for analysis. The cleaning and soil sampling will be discussed in detail in a forthcoming report.

Asbestos- Asbestos-containing materials (ACM) identified during this study include the insulation on the boiler and steam pipes in the boiler room. This heating system is not longer in use, and some of the insulation material is in poor condition. Additional "suspect" ACM on the property include vinyl flooring located in the two sales office buildings, the showroom in the main building, and in restrooms throughout the property. These materials are considered non-friable and were in good condition.

Lead-based paint- There is some potential for lead-based paint on the buildings based on their age. The painted surfaces appeared to be in good condition, and it is our opinion that there is little potential for human exposure at

the present time provided the site is not used for residential purposes, and provided the painted surface is not sanded, chipped, or otherwise disturbed.

Offsite Concerns- Potential sources of contamination on nearby properties include a gasoline service station which was located adjacent to the north parking lot from at least 1930 until around 1970, an operating service station with confirmed groundwater contamination located roughly 300 feet southwest of the site, and an operating drycleaner adjacent to the northwest of the main building. The drycleaner began operations sometime between 1912 and 1930.

9.0 RECOMMENDATIONS

The following recommendations are made based on the information developed during this study:

North Gasoline Station- It is our opinion that the past presence of a gasoline station in the north parking lot of the property is a source of potential environmental concern. It would be prudent to have conditions in this area assessed prior to any future sale of the property. However, the parking lot is paved, and future lessees of the business would not be expected to contribute to any contamination in this area. Based on this consideration, further work to assess the north park lot may not be required at this time.

Asbestos- The former boiler room is rarely used, and it is our opinion that there is little cause for immediate concern regarding the asbestos present in the boiler and pipe insulation. However, it would be prudent for the owner to have this material abated or encapsulated. In the interim, we recommend that any personnel entering this area should be informed of the presence of friable asbestos, and should be equipped with a properly fitted half-face respirator.

With respect to the vinyl flooring materials which are "suspect" ACM, it is our opinion that there is little cause for concern provided they are not disturbed by activities such as cutting, tearing, or grinding. If the future renovation or demolition activities require removal of this material, it should be tested for asbestos, and removed by qualified workers if asbestos is present.

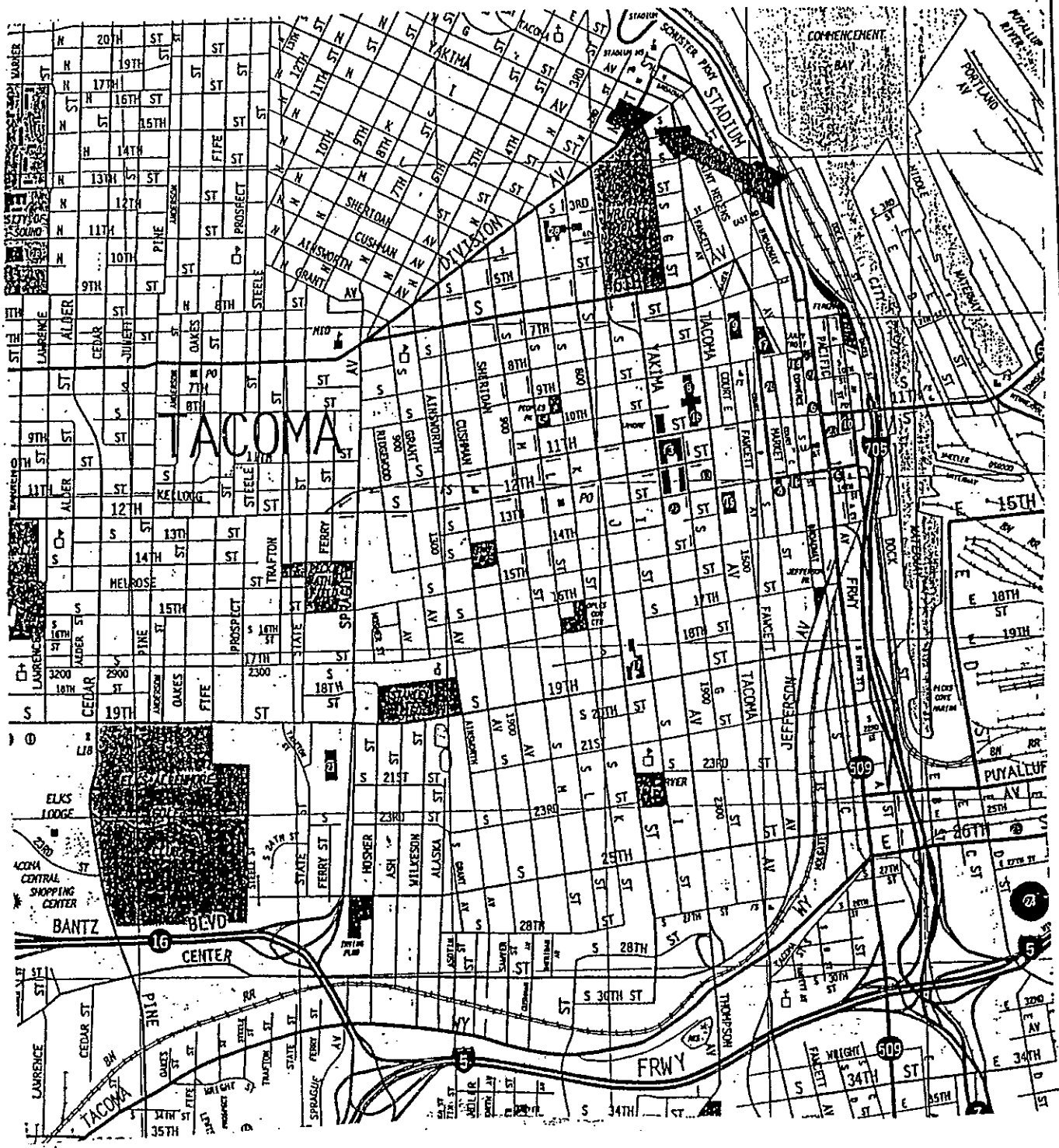
Offsite Concerns- Since this Site Assessment primarily addresses the Walker Chevrolet business, as opposed to the property, further work to address potential off-site sources may not be required at this time. However, prior to any sale of the property, it would be prudent to conduct phase 2 studies to assess potential migration of contamination onto the property from off-site sources.

10.0 REFERENCES

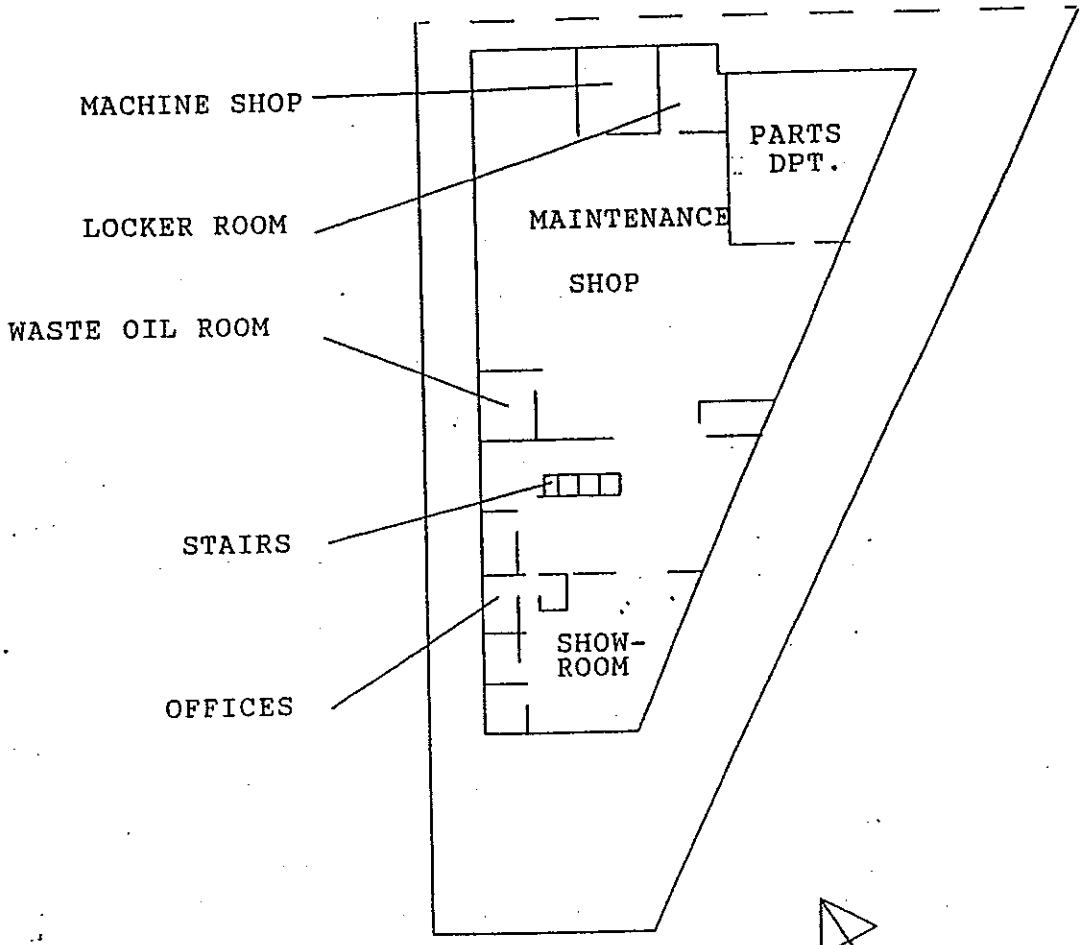
1. Tacoma-Pierce Co. HD Closed Landfill Study - April, 1993
2. WDOE LUST Site List - 01/19/94
3. WDOE Registered UST List - printout 07/27/94
4. WDOE C&SCS List - 05/09/94
5. EPA FINDS database - printout 07/27/94
6. EPA RCRA Notifiers database - printout 07/14/94
7. EPA HWDMS Compliance database - printout 02/19/94
8. EPA CERCLIS database - printout 06/13/94
9. EPA NPL Sites Report
10. Sanborn Map of Tacoma- 1911 and 1945
11. Tacoma Polk Directories 1930-1990
12. Washington Department of Health: "Radon Measurements in Washington State Counties" - October 1993

APPENDIX A

SITE LOCATION (1)
SITE DRAWINGS (3)
SITE PHOTOGRAPHS (6)

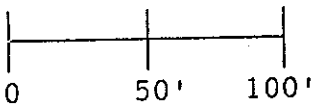


SITE LOCATION
BISON ENVIRONMENTAL NORTHWEST, INC.
PROJECT #94481 AUGUST 1994

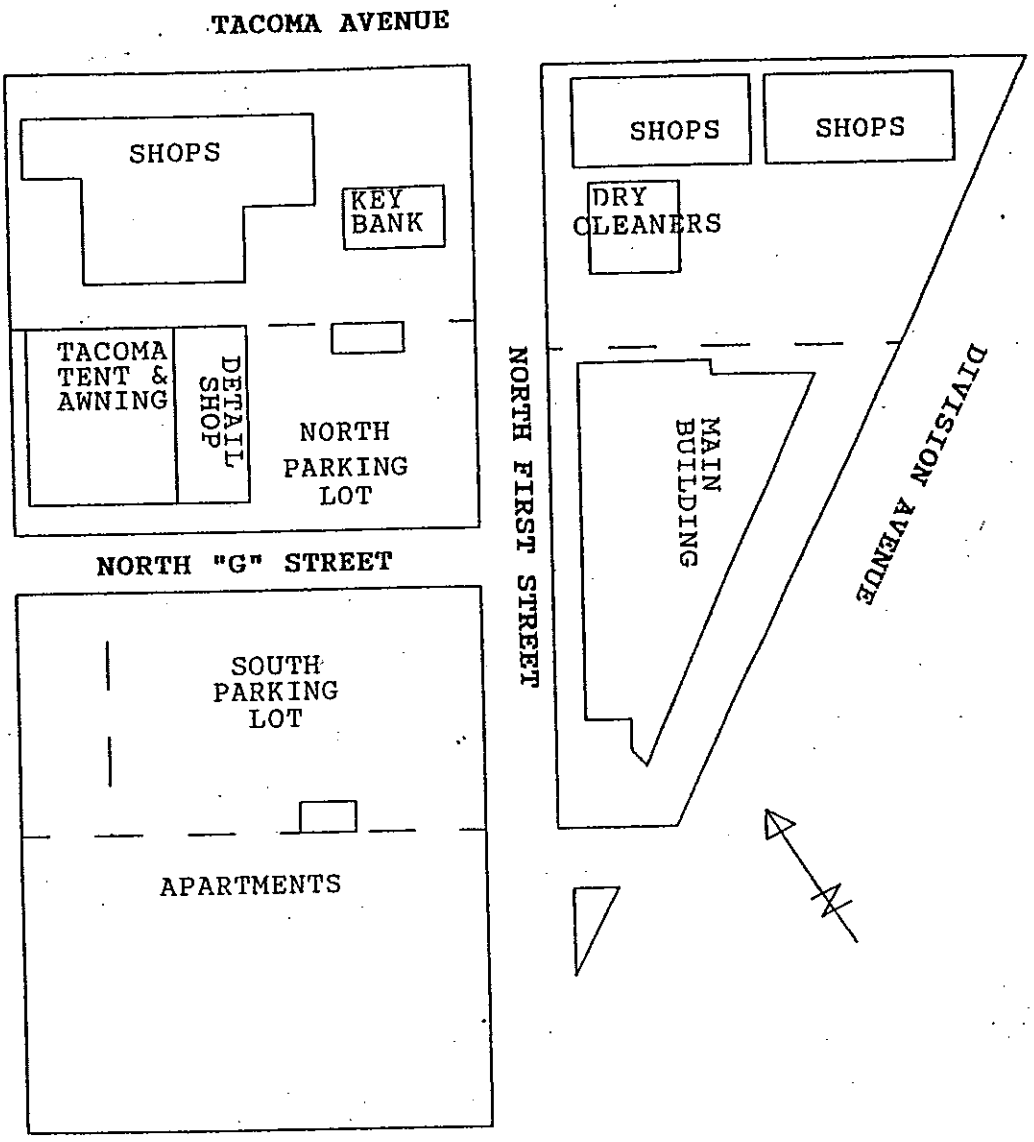


NOTE:
INTERIOR WALL LOCATIONS
ARE APPROXIMATE

SCALE



SITE PLAN - UPPER FLOOR MAIN BUILDING
BISON ENVIRONMENTAL NORTHWEST, INC.
PROJECT# 94481 AUGUST 1994



SITE PLAN
BISON ENVIRONMENTAL NORTHWEST, INC.
PROJECT# 94481 AUGUST 1994

LISTING OF PHOTOGRAPHS

1 - Main Building from Northeast

2 - South Parking Lot and Sales Building from North

3 - North Parking Lot, Sales Building, and Detail Shop from South

4 - Detail Shop, drain in foreground

5 - Waste Oil Storage Room, 500-gallon waste oil AGT

6 - Parts Wash Sink

7 - South Gas Station, UST fills and vent lines

8 - Heating oil UST fill (outside building NW of paint room)

9 - South Drain in paint room

10 - Cleanout Access in paint room

11 - ACM Boiler Insulation

12 - ACM Pipe Insulation

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SITE PHOTOS
BISON ENVIRONMENTAL NORTHWEST, INC.
PROJECT# 94481 AUGUST 1994

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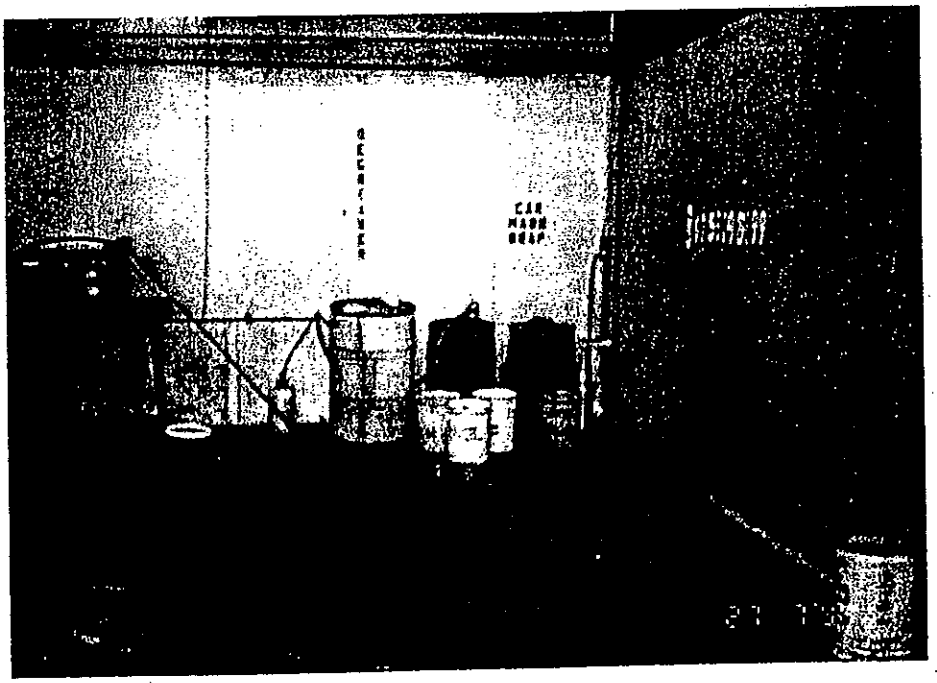

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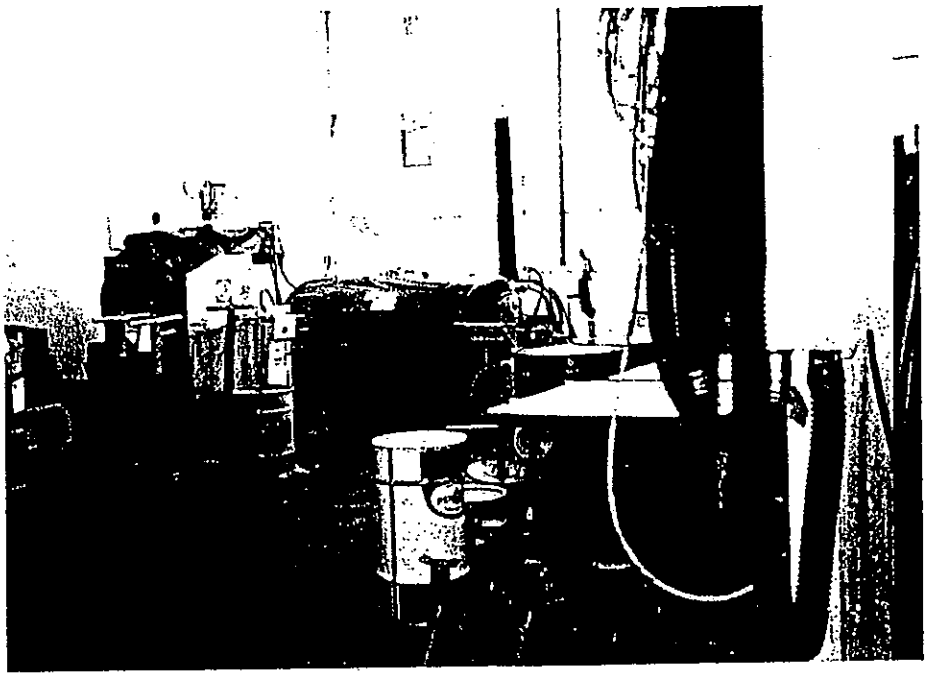

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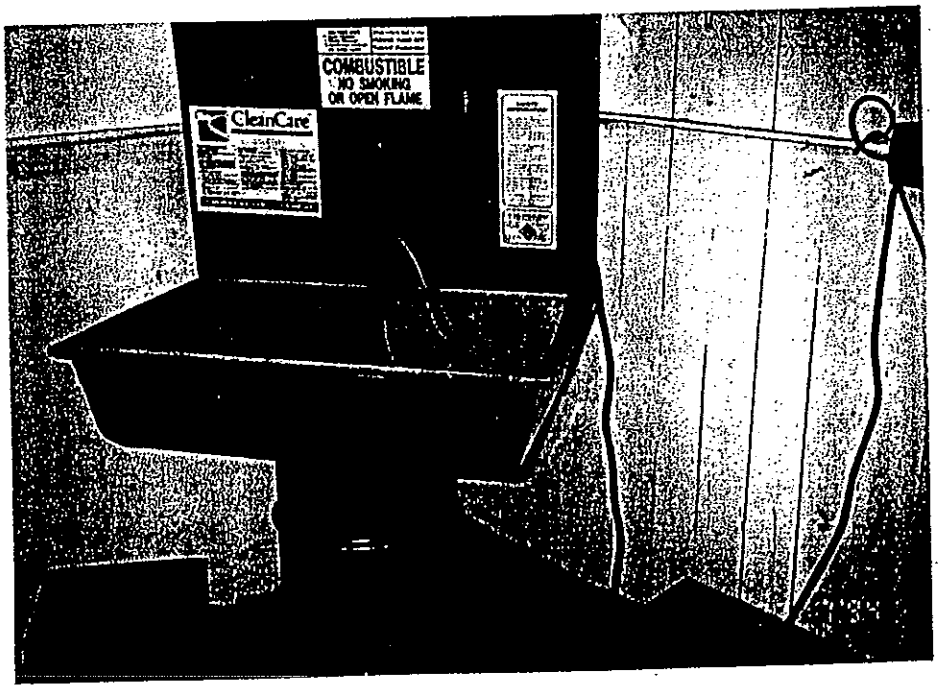

SITE PHOTOS
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PROJECT# 94481 AUGUST 1994

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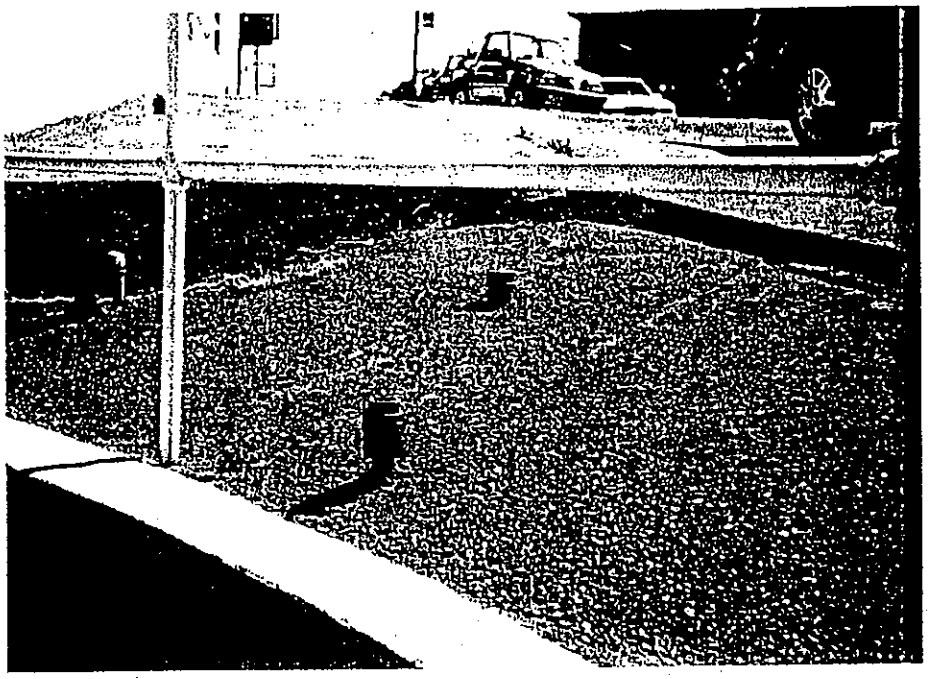

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SITE PHOTOS
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PROJECT# 94481 AUGUST 1994

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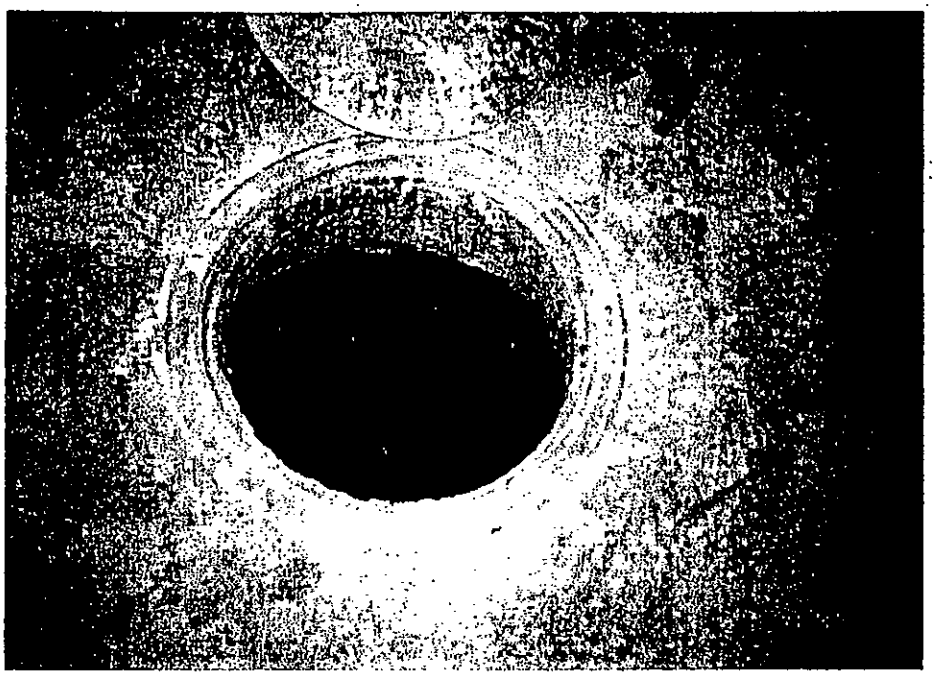

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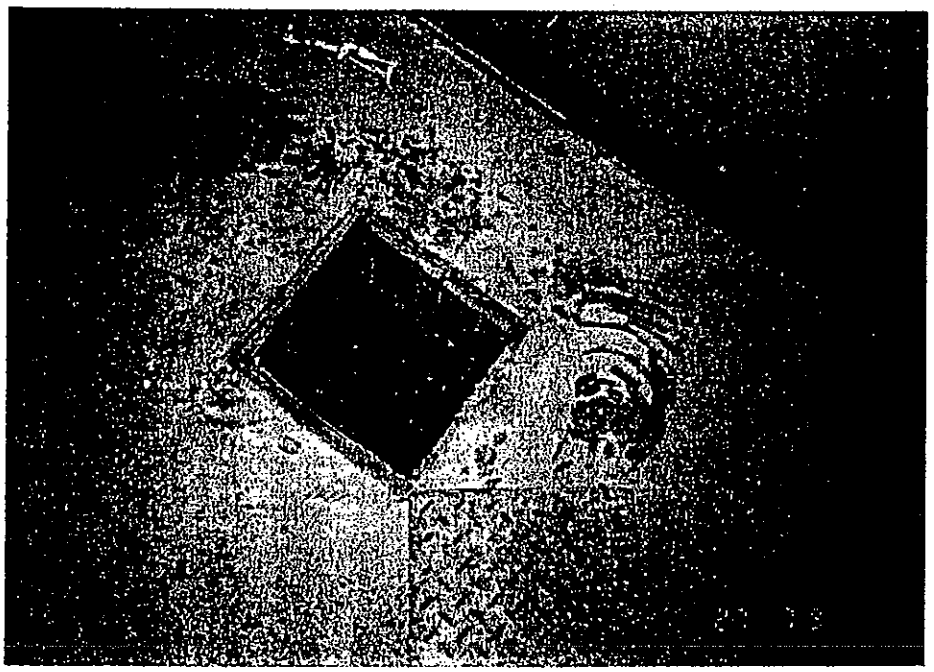

SITE PHOTOS
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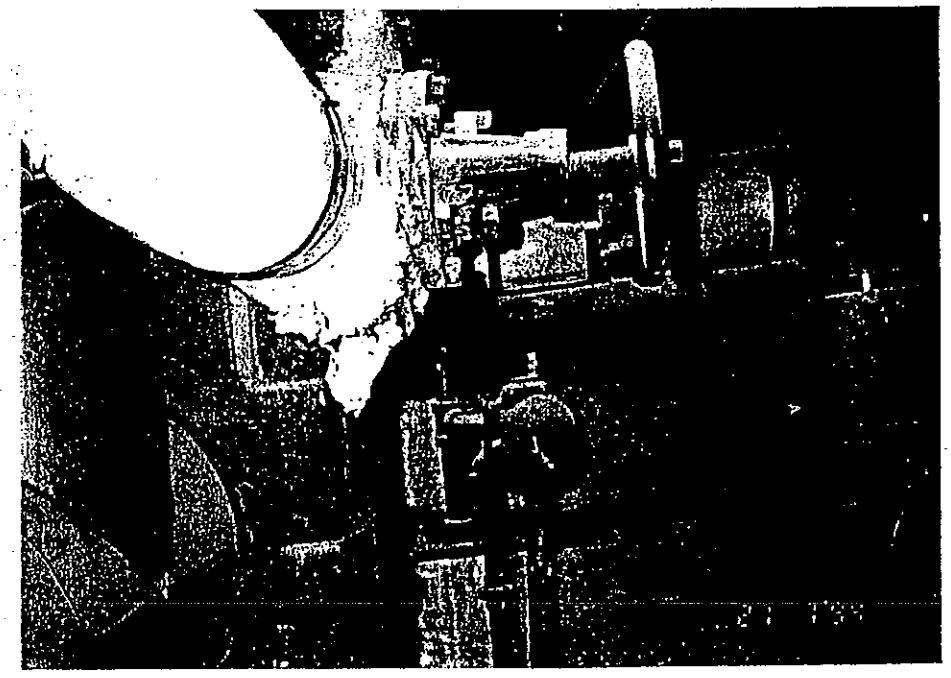

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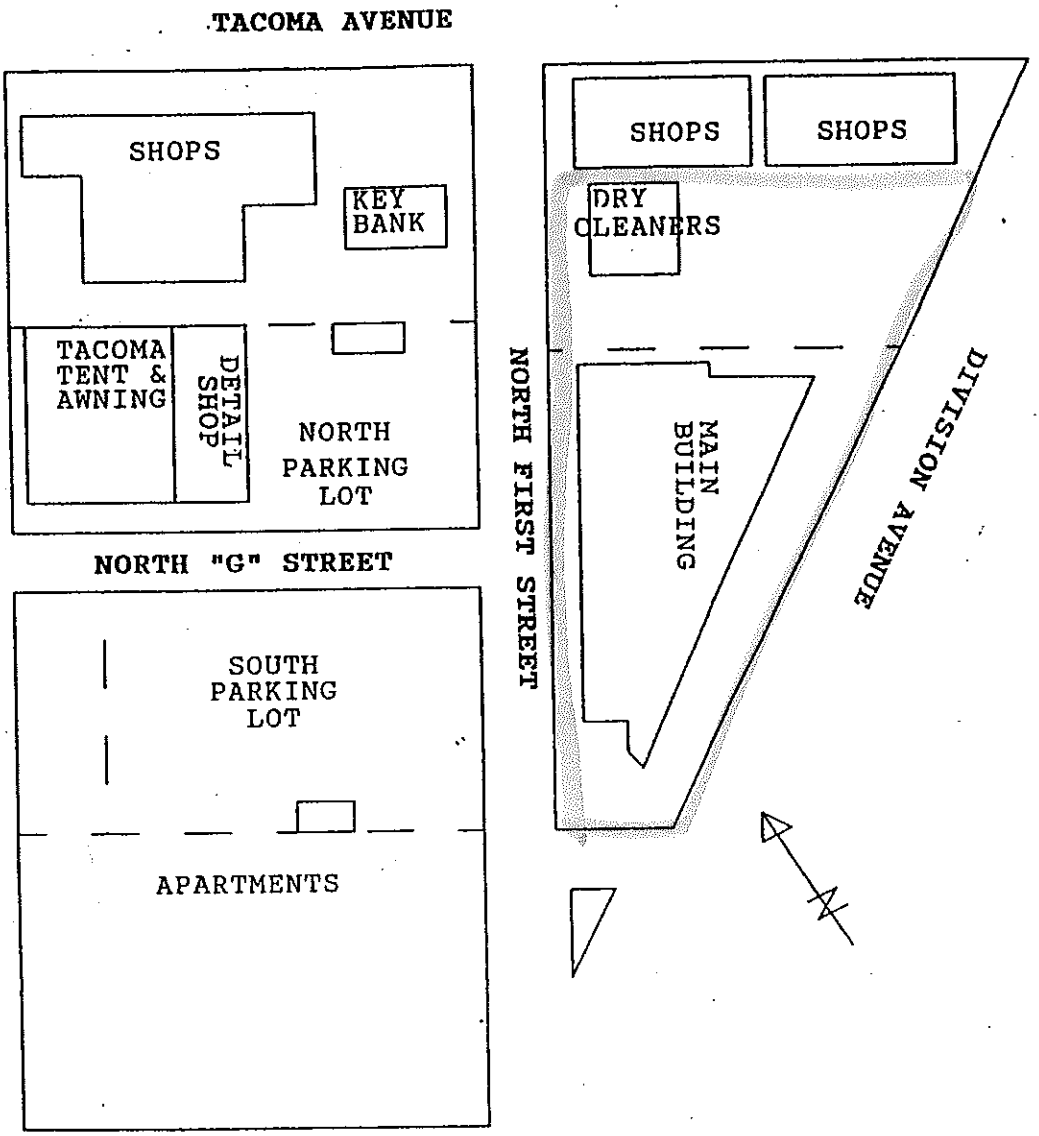

SITE PLAN
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