VCP NW0417

Taylor Edwards Facility
LUST # 2900

Taylor Edwards Transfer

March 1994

ENVIRONMENTAL SITE ASSESSMENT REPORT

Taylor-Edwards Warehouse
21255 76th Avenue South
Kent, Washington

prepared for
Taylor-Edwards, Inc.

ENTERED
5/19/00

DEPARTMENT OF ECOLOGY
NWRO/TCP TANKS UNIT

INTERIM CLEANUP REPORT	☐
SITE CHARACTERIZATION	☐
FINAL CLEANUP REPORT	☐
OTHER site assessment	☑
AFFECTED MEDIA: SOIL	☑
OTHER _____ GW	☑
INSPECTOR (INIT.) [illegible] DATE 5/19/00	

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Table of Contents

Executive Summary

A Phase I Environmental Site Assessment was conducted at the subject property, Taylor-Edwards Warehouse, at 21255 76th Avenue South in the City of Kent, Washington. The site inspection was conducted by Hazcon Environmental Division personnel on February 7, 1994.

The property is currently occupied by Taylor-Edwards Warehouse, a site in the Green/Duwamish River Valley. The area was agricultural through the 1960s when warehouse and industrial developments started expanding across the valley. Downtown Kent lies to the south approximately two miles. State Highway 167, East Valley Highway, runs in a north-south direction less than one mile east of the property.

This assessment revealed several issues of environmental concern at the subject property:

On-site building materials are a cause for concern and need special handling for repair and renovation. Specifically, asbestos-containing materials and lead-based paint are suspect building materials of concern. An operations and maintenance plan is recommended to aid in properly managing such materials.

Two former on-site underground storage tanks were removed in 1990, and soil contamination was discovered attributed to leaks from these tanks. Petroleum hydrocarbon contaminated soil was removed and soil sampling indicated the soil was free of contamination based on the Washington State Model Toxics Control Act (MTCA) clean-up levels. However, because no groundwater sampling was done at the time of clean-up, under MTCA, groundwater sampling would still be required to make a final determination of contamination levels at the site. Even though the report on the tank removal process lacks completeness, adequate clean-up may have actually been carried out, but the question of groundwater contamination remains unanswered. The Department of Ecology has signed off on this clean-up, but, they have the option of opening the file if the issue is raised in the future by this or adjoining sites. Groundwater sampling would be required to answer this issue.

Eleven 55-gallon drums stored on pallets in the outside yard require proper disposal. According to the maintenance superintendent, Mr. Skinner, these eleven drums contain waste vehicle coolant. Other drums on the property may require disposal attention. In particular, a 55-gallon drum is stored on the shop mezzanine floor. Mr. Skinner stated that this drum probably contains waste turpentine. This drum and contents also should be properly recycled or disposed of.

The stained soil area observed along the southern edge of the property approximately 200 feet from 76th Avenue South requires clean-up and sampling to determine the contaminant and levels of contamination.

No other sites listed with regulatory agencies appear to pose a risk of environmental contamination. No on-site practices raise a concern for potentially hazardous material contamination except those noted above. Adjacent and nearby property uses do not appear to be a cause for direct concern.

Section 1.0 Introduction

1.1 Purpose

At the request of Taylor-Edwards, Inc., Hazcon, Inc. (Hazcon) has performed a Phase I Environmental Site Assessment at the subject site, address 21255 76th Avenue South in the City of Kent, Washington. Currently the subject site contains the Taylor-Edwards Warehouse, consisting of one warehouse building with an attached shop/office. The site inspection was conducted by Hazcon Environmental Division personnel on February 7, 1994. This evaluation was performed pursuant to Hazcon's written proposal of January 31, 1994, which was approved by Fred Taylor of Taylor-Edwards, Inc., on February 2, 1994.

1.2 Special Terms and Conditions

None.

1.3 Limiting Conditions

(a) Weather-related limitations: None

(b) Access-related limitations: None.

Section 2.0 Site Description

2.1 Location and Legal Description

(a) Site Location References: King County Assessor parcel account number 1222204-9084-0. See Figure 2: Site Area Schematic.

(b) Address: 21255 76th Avenue South, Kent, Washington.

(c) County: King County, State of Washington.

(d) Township, Range, Section: 22 North, 4 East, Section 12.

(e) Reference Map: US Geological Survey. *Renton, Washington*, 7.5 x 15 minute quadrangle, scale: 1:25,000. (US Geological Survey, Reston, Virginia, 1983). See Figure 1: Site Location Map.

Figure 1: Site Location Map taken from the US Geological Survey 7.5 x 15 minute quadrangle, 1:25,000-scale topographic maps *Renton, Washington* (1983). Elevation contour intervals in five meter increments.

Figure 2: Schematic Site Plan. Not to scale.

2.2 Site and Vicinity Characteristics

Physical Description of Site.

(a) Site acreage: approximately 6.4 acres.

(b) Estimated per cent of site covered by buildings and pavement: 85 per cent.

(c) Site and building layout: The site is a rectangular shaped parcel with a warehouse building constructed in 1974. Included within the building are some office areas and a shop and maintenance area with truck repair facilities. Truck docking areas are provided on the east side of the site with a large parking and access paved area. An adjacent rail spur offers rail car access on the west side of the building. Please see Figure 2.

(d) Topography and slope: The subject site is situated on the Duwamish/Green (Green) River plain. The Green River valley is covered by alluvium deposits of silt, clay, and sand. On-site slope is probably less than two per cent. The alluvial plain is quite level in this area.

According to the USGS topographic map the median elevation of the subject property is approximately 23 feet above mean sea level (msl).

(e) Depth to groundwater/flow direction: The Joe Hall Construction company reported groundwater at the subject site was found at four feet below grade during an underground storage tank removal in 1990. See Appendix VI and the report section 2.7 (d). Typically we would expect the direction of groundwater flow to be toward the Green River and downstream in this area (west and north). Seasonal variations in groundwater flow direction are common in areas close to river systems as the river system may recharge adjacent land when river levels are relatively high. According to Luzier (*Geology and Ground-water Resources of Southwestern King County*, USGS, 1969), the generalized direction of groundwater movement in the area of the subject property would be northwest to west being fed by sources coming off East Hill to the east.

The water table in the Green River Valley is approximately parallel to and has about the same gradient as the land surface (Luzier). The actual determination of the direction of groundwater flow at the subject property site will vary with the time of year and would require an in-depth study of local well elevations and hydrologic characteristics of the glacial sediments, which is beyond the scope of this report. Direction of groundwater flow may indicate the flow

direction of contamination carried by groundwater movement. Groundwater studies were reviewed for this report at the Department of Ecology archives.

Studies near 83rd Avenue South and South 212th Street show depth to groundwater at six to eight feet with a direction toward the northwest. Near 84th Avenue South and South 208h Street depth to groundwater was one-half to two feet with a direction toward the northwest, west, and south, depending on the season. In the 22200 block on 76th Avenue South the flow direction was west.

(f) Surface water and wetland areas (including streams, rivers, ponds, etc.): None currently exists at the subject site, although adjacent to the neighboring property on the west is Mill Creek, a Class 2 (with salmonids) stream flowing north. This stream is protected under the Sensitive Areas Ordinance of King County.

The property appears to be within the 500-year flood plain of the Green River. However, our investigation indicates the subject site is not subject to flooding from the Green River. A document titled the *Flood Insurance Study, King County, Washington and Incorporated Areas* by the Federal Emergency Management Agency (FEMA) dated September 29, 1989 states:

> "The land in the lower Green River Valley from Auburn to Renton had historically been inundated by large floods, such as occurred in December 1933, November 1959, and February 1951, until the construction of the Howard A. Hanson Dam. Since operation commenced in 1962, the dam, in combination with levee systems constructed along river segments below Auburn, has prevented that degree of flooding and limited flood damages. During the floods of January 1965, December 1975, and December 1977, discharges downstream were effectively reduced to non-damaging levels. The 1977 flood would have had the highest unregulated peak of any event since diversion of the White River in 1906."

Controlling the Green River also involved building a system of levees along the banks. All data is predicated on the regulation of flood water by the Howard A. Hanson Dam system.

(g) Ditches/Drainage Features: The subject property has an on-site, subsurface drainage system installed during the current construction and modified more recently. The on-site system includes oil/water separator structures. The system is connected to the City of Kent storm water control system.

2.3 Description of Cultural Features

(a) Type of structures and facilities on the subject property:

The site currently contains one concrete building with tilt-up exterior walls and post and beam interior supports for the roof. Interior walls are frame construction. Loading docks are provided for rail cars and trucks on two sides. Additionally a shop and office wing is attached on the south side of the structure. A row of offices stretch along the east wall of the warehouse section.

(b) Type of nearby and adjacent roads:

South 212th Street, an east-west arterial is approximately 200 feet north of the subject property. 76th Avenue South, a secondary street, runs north-south adjacent to the subject property on the east. 76th Avenue South is also known as Fourth Avenue North and formerly as Chapman Road. State Highway 167, East Valley Highway, runs in a north-south direction less than one mile east of the property. Another north-south arterial is State Highway 181, West Valley Highway, less than one-half mile west of the site.

(c) Information regarding the adjacent properties and surrounding area:

The area to the north of the subject property is a steel fabrication warehouse. Adjacent to the east across 76th Avenue South is a Boeing Company Robbins facility which produces engine packages. Adjacent on the south is the Pozzi Brothers trucking terminal. On the west of the subject property is a rail siding offering rail car access to the subject site building. Adjacent to the rail spur on the west side of the site is the O'Brien Commerce Center, a single building complex of retail and service providers including an industrial supplies seller, a welding supplies outlet, a machine mover, a vehicle repair shop, a beverage brewing supply house, and a water-based coating manufacturer. Typical of the surrounding area are warehouses, light manufacturing facilities, some older housing (single family), truck service centers, and a new car auction lot.

Burlington Northern and Union Pacific main rail rights-of-way straddle the subject site area in north-south corridors. These rail lines are less than 500 feet east and west of the subject property.

2.4 Selected Subject Property Information

(a) Septic tanks/leaching fields: None suspected. No previous structures were discovered on the subject site.

(b) Sanitary sewers: The subject property is currently connected to the City of Kent's sanitary sewer system.

(c) Process waste water sewers: None.

(d) Facility water supplies: The subject property is served by the City of Kent Water Department. According to the Northwest Regional Office of the Washington State Department of Health, this water system is in compliance with Washington State drinking water standards.

(e) Wells (active or abandoned monitoring, potable or process water supplies, injection, gas/oil): None found.

(f) Exterior lagoons, pits, other disposal areas: None

2.5 Information regarding environmental liens or specialized knowledge or experience, pursuant to SECTION 5 of ASTM Standard E-1527-93

No environmental liens are currently recorded at the King County auditor's office for the subject property.

2.6 A brief description of current use in terms of products made; processes used; raw materials employed; chemicals and fuels used and wastes generated, including waste disposal facilities/locations used

No manufacturing is conducted at the subject property. This site has been solely utilized as a general merchandise warehouse facility with on-site vehicle maintenance and some office space. There is an exterior storage yard on the south side of the building. There are currently several fork lift trucks stored in this area. Also stored in this yard is steel scaffolding. See additional discussion in the next section.

2.7 Description and former uses of site, including dates where known, and other relevant information concerning waste generation or disposal, hazardous building materials, and above ground and underground storage tanks of any type

(a) The current building was constructed in 1974.

(b) Aerial photographs from 1936 through 1969 show the subject property was farmed. Row crops are not visible. It appears to have been used for pasture, forage crops, or hay or grain. This area of the Green River valley was typically used for vegetable and dairy farming. Milk production served the a neighboring cities (Seattle) and also supplied the major canned milk plant in Kent (Carnation). Cabbage, lettuce, beans, and berries were popular crops in the area. Several vegetable packing, canning, and freezing plants operated in the City of Kent supplied by local farms until the 1960s. Hazcon does not anticipate that the previous agricultural use is an environmental concern at this time.

(c) No buildings appear to have been on the subject property until the present warehouse was constructed. However a residential house was located, off-site, on the adjacent property to the north from 1958 through at least 1968.

(d) According to the owner, Mr. Taylor, the current facility in the past had underground storage tanks on-site for vehicle fuel storage. The inspection report from the tank removal company, Joe Hall Construction, states that petroleum-contaminated soil was discovered during tank removals. The environmental consulting firm, Sweet Edwards/EMCON, obtained the Joe Hall report. According to the subject property owner all tanks were removed. Soil samples were taken by Hall personnel. Sweet Edwards/EMCON was not on-site during the work. Sample results indicated the soil was contaminated above Washington State Model Toxics Control Act (MTCA) clean-up levels. One hundred and fifty cubic yards of soil was removed for aeration. The question of groundwater contamination was not addressed in either the Hall letter or the Sweet Edwards/EMCON letter. The highest concentrations were as follows (copies of Spectra Lab data sheets in Appendix VI):

	parts per million (ppm)	MTCA
Total Hydrocarbons	506.00	100.00 (gasoline)
Benzene	7.87	0.50
Toluene	11.10	40.00
Ethyl Benzene	6.34	20.00
Para Xylene	6.78	20.00
Meta Xylene	16.40	20.00

Note our copies of some data sheets are incomplete. Resampling of excavation sidewalls after over excavation of 150 cubic yards of soil showed concentrations below MTCA clean-up levels and the

hole was backfilled with pea gravel. The highest concentrations were as follows for the second round of sampling:

	parts per million (ppm)	MTCA
Total Hydrocarbons	51.00	100.00 (gasoline)
Benzene	less than 0.01	0.50
Toluene	< 0.01	40.00
Ethyl Benzene	< 0.01	20.00
Para Xylene	< 0.01	20.00
Meta Xylene	< 0.01	20.00

The Hall diagram indicates the site of the tanks was just west of the shop wing of the subject building with a pump island on the south side of the shop (see figure 2). Hazcon obtained these reports from the Department of Ecology (Ecology) files (See Appendix VI). Apparently, the removal and clean-up were successful. Hazcon notes that there is no mention of the pump island excavation, or any report on signs of leaks from the piping system.

Underground storage tanks were not specified in the plans and files of the building construction documents; however, the closure permit indicates a life of 15 years for these tanks at the time of removal (1990). The Hall diagram shows two underground storage tanks of 5,000 gallons each. Fuel type is not indicated in the Hall report. The closure permit indicates the tanks held gasoline and diesel fuels.

Hazcon located a Department of Ecology report on the subject property tank removal. Mr. John Stormon of Ecology inspected the site on January 1, 1991. Mr. Stormon was at the site after the tank removal was complete and contaminated soils had been removed. He interviewed the maintenance manager, Mr. Tom Skinner (see Appendix VI). The Ecology report indicates the status of the project is "Tanks Removed/Cleanup Complete."

Hazcon's preliminary assessment of this tank clean-up was based on Ecology's recommendation of "Cleanup Complete," and this is the current status of the site according to our review of the Ecology file. In all likelihood Ecology's assessment is final and no further action will be required from their perspective. However, there remains an unanswered question from the process reviewed above: No sampling or assessment of potential groundwater contamination was made during the period when the tank hole was open.

Hazcon assumes from the Hall letter that groundwater was found on the site at approximately four feet below the ground surface (bgs). It is possible that this did not represent groundwater level and the water in the hole accumulated from some other source. However, shallow groundwater of this depth is likely in this area of the Green River Valley. Depth to groundwater is significant due to the ability of groundwater to conduct the contaminant away from the source location and contaminate other soils and groundwater. This would compound the clean-up problems.

Although the Hall analytic tests on soil samples were not carried out to determine whether gasoline or diesel was the source of the soil contamination found, it likely was gasoline based on the benzene levels reported. Gasoline can travel relatively rapidly in the groundwater medium as groundwater moves through the soil. In this case, i.e., where contamination was carried away from the tank location, simply sampling soil in the tank removal hole may not adequately characterize the extent of contamination.

In summary, the assessment in the Joe Hall report may in fact accurately reflect that potential contamination on the subject property is below MTCA clean-up levels. However, because no sampling was done on groundwater, Hazcon can not confirm the site is free of concern from the former underground storage tanks leaks. Ecology may never require such confirmation, but Ecology does have the power to do so. Petroleum hydrocarbons contaminated soil was removed and soil sampling indicated the soil was free of contamination based on the MTCA clean-up levels. However, because no groundwater sampling was done at the time of clean-up, under MTCA, groundwater sampling would still be required to make a final determination of contamination levels at the site.

(e) One above ground storage tank was observed on the subject site adjacent to the exterior west wall of the shop wing of the subject building. According to Mr. Skinner, this is "drain oil." This waste oil should be properly recycled or disposed of with a hazardous material handler.

(f) Eleven 55-gallon drums were observed during Hazcon's site visit stored on pallets in the outside yard southwest of the shop. According to the maintenance superintendent, Mr. Skinner, these eleven drums contain waste vehicle antifreeze/coolant. These drums require proper disposal as hazardous material. Testing may be necessary to determine actual content and concentrations. One additional 55-gallon drum was found at the extreme southwest corner of the subject warehouse building. This drum appeared to contain rain water, scrap, and debris. This waste may

also require hazardous waste disposal when the contents are evaluated.

(g) A 55-gallon drum is stored on the shop mezzanine floor of the shop area of the subject building. Mr. Skinner stated that this drum probably contain waste turpentine. This drum and contents should also be properly recycled or disposed of.

(h) During the Hazcon site inspection, a number of materials were observed in the shop area of potential environmental concern. Most of these materials are used or have been used in the past as truck repair and maintenance items and operations maintenance items. The materials and equipment include a welding rig, transmission fluid, a 55-gallon container of motor oil, hydraulic oil, a 55-gallon container of floor wax, miscellaneous solvents, acetic cleaner, enamel reducer, paint cans, paint thinners, antifreeze/coolant, and various lubricants. These materials are generally adequately maintained with labels and lids. Several area of the floor show staining from minor spills and vehicle use. The vehicle oil storage area has absorbent material scattered on the floor to collect spilled material. While no serious problem areas were observed, house keeping could be improved with attention to immediate cleanup of spills and better organization.

(i) Lead-based paint:

There was minor visual evidence of peeling or chipped paint on the exterior and interior walls of the two on-site buildings. Given the age of the building (1974) the exterior or interior paint may be lead-based or has lead-based paint layers. Walls, ceilings, or floors of the subject property building may contain lead-based paint. No paint chip samples were taken.

There are currently no regulations or laws in Washington State or King County requiring specific action regarding lead-based paint in buildings. The US Department of Housing and Urban Development (HUD) does have specific standards for projects under their guidance. Some landfills have specific requirements for disposal of lead-based paint contaminated debris. Also, remodeling or demolition processes may require protection and monitoring for workers and others who may potentially be exposed to contaminated dust (see Appendix IV). Hazcon notes that sampling prior to remodeling or disposal activities may be legally required to meet air-borne contaminates control regulations and disposal requirements.

(j) Asbestos-containing building materials:

Hazcon's site visit included a visual walk-through search for possible asbestos-containing building materials (ACM). To determine and confirm the exact extent and presence of ACM throughout the buildings, sampling would be necessary.

During Hazcon's site inspection the following materials were noted as suspect asbestos-containing building materials:

Floor tile.
Mastics, such as the type used to adhere cove molding to the walls or carpet to floors.
Gypsum board and joint compound.
Roofing material and asphalt type water sealant products.
Leveling compound.
Both vehicle (replacement stock) and sprinkler system gaskets.
Electrical insulation.

In an undamaged state ACM does not present a hazard, however, any demolition, renovation, or replacement of existing suspect materials could cause asbestos fibers to be easily released into the air. No work in the buildings by renovation or clean-up workers should be allowed to disturb materials suspect for contain asbestos. Workers need protection and/or training in handling ACM hazards. No damaged or friable materials suspect for containing asbestos were observed at the subject property. Friable refers to materials easily crushed by hand pressure and represent a greater hazard.

All suspect material should be considered ACM until sampling and analysis is performed. If suspect ACM must be modified in such a manner that disturbs the material, we recommend the material be assessed for asbestos content and removed under controlled conditions if found to contain asbestos. Once again, friable materials require special care. If renovations do not disturb the existing material, it can be left in place, with the assumption that it is asbestos-containing. If this decision is made, an operations and maintenance plan should be implemented to maintain all suspect materials in good condition (see Appendix V).

(k) Stained soil was observed along the southern edge of the property approximately 200 feet from 76th Avenue South. The stained area covers approximately three square feet and the discoloration may have been oil or some petroleum product. Hazcon recommends sampling to determine the contaminant and levels, and clean-up if sampling indicates hazardous material contamination above Washington State Clean-up levels (see photograph 6, Appendix III).

2.8 Description of current and former uses of properties adjacent or abutting to the site, including relevant information concerning potential waste generation, above ground and underground storage tanks

(a) Adjacent to the north of the subject property is a steel fabrication warehouse.

(b) Adjacent to the east across 76th Avenue South is a Boeing Company Robbins facility which produces engine packages.

(c) Adjacent on the south is the Pozzi Brothers trucking terminal. This facility includes underground registered fuel storage tanks, office space, and trucking parking.

(d) On the west of the subject property is a rail siding offering rail car access to the subject site building. Adjacent to the rail spur on the west side of the site is the O'Brien Commerce Center, a single building complex of retail and service providers including an industrial supplies seller, a welding supplies outlet, a machine mover, a vehicle repair shop, a beverage brewing supply house, and a water-based coating manufacturer.

(e) Prior to the construction of the current commercial facilities on the properties east, west, north, and south of the subject property, all areas were agricultural and the area south of 212th Street remained undeveloped until the early 1970s except for farm buildings and residences.

(f) North of 212th Street (not adjacent) development came some what earlier with warehouses, a cement pipe factory, a wood beam construction facility, and later a modular house construction factory.

(g) Current Burlington Northern and Union Pacific main rail rights-of-way in the subject site area date back to the early years of the century. The line on the west side of the subject property (Union Pacific) was the Interurban passenger line route. This rapid transit rail service also offered a way for local farmers to get milk and produce to market. There was an Interurban depot on this line at 212th Street. This depot was the early hub of the area's farming community known as O'Brien. Highways and trucks replaced the Interurban and the line ended in 1928.

Section 3.0 Records Review

3.1 Review of Federal, State and Local Environmental Record Sources

We have reviewed several major governmental databases as follows for listings of potentially hazardous sites within a radius of one-fourth mile to one mile of the subject property (based on the American Society of Testing and Materials standard).

(a) The National Priority List (NPL), which includes sites that have been reviewed (e. g. under CERCLIS) and considered as potential Superfund sites for the Environmental Protection Agency (EPA) Region 10. These sites have necessarily failed some aspect of the EPA's CERCLA criteria regarding hazardous materials. (ASTM radius is one mile.):

No sites listed.

(b) The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List, a management database which lists all current and past sites that qualify or are being considered for further investigation under the EPA Superfund Assessment Program. According to the EPA, the fact that a site is included on the CERCLIS list "does not necessarily mean it is contaminated," and because a site is not on the list "does not necessarily mean it is contaminant free." Rather, the list details sites for more investigation by the EPA. (ASTM radius is one-half mile.):

No sites listed.

(c) The Washington State Department of Ecology (Ecology) Affected Media and Contaminants (AMC) list, which includes sites that have been reviewed under either federal, state or local auspices. These sites are reviewed under the Washington State Hazardous Waste Investigations and Cleanup Program. (ASTM radius is one mile.). Nine sites were recorded on this list. Due to location and site character, eight sites (listed below) were investigated in depth to determine possible impact at the subject property. A review of Department of Ecology files indicates that none of these sites are likely to be of concern as potential sources of contaminants at the subject property.

Olympic Steamship Co. Inc.
8220 South 212th Street
Kent

Slag Disposal/Beckwith Property
South 218th Street and 88th Avenue South
Kent

Sun Chemical Corporation
8810 South 212th Street
Kent

Boeing Co. - Kent Benaroya
20651 84th Avenue South
Kent

Salmon Bay Steel
22011 84th Avenue South
Kent

Sunset Foundry Co. Inc.
8228 South 206th Street
Kent

Fiberchem Inc.
22239 76th Avenue South
Kent

Kent Sewage Lagoons
Southwest of South 212 Street & 68th Avenue South
Kent

(d) The Resource Conservation and Recovery Act (RCRA) List, which includes all current and past sites that are storing, transporting, treating, generating, or disposing of hazardous materials or waste. This list will include anything from chemical industry to small businesses like dry cleaners and gasoline stations. (ASTM radius is one-quarter mile for all RCRA classifications except RCRA Treatment, Storage, and/or Disposal Sites, for which the radius is one mile.). Nine sites were recorded on this list including three Treatment, Storage, and/or Disposal Sites. Of the nine, Hazcon had files pulled on the sites listed below. Due to location and/or the character of the listing, none are considered likely to have an impact at the subject property.

The subject site itself is listed as a generator and transporter. According to the files, the transporter status is not current and a request to terminate registration was received in 1985 by the EPA. RCRA Small Generator status appears to relate to the one time use permit in 1983 at the subject property to use Calcium Hypochlorite. Calcium Hypochlorite is used as an algicide,

bactericide, fungicide, and water purifying agent. The current RCRA status of the subject property does not indicate an environmental concern.

RCRA Large Generators

Boeing Co. Robbins Facility
7615 South 212th Street
Kent
WAD980987846

RCRA Small Generators

Taylor Edwards Warehouse & Transfer
21255 76th Avenue South
Kent
WAD086247079

Farwest Freight
7405 South 212th Street, Ste. 122
Kent
WAD988490876

RCRA-Treatment, Storage, and/or Disposal Sites

Van Waters & Rogers - Kent
8201 South 212th Street
Kent
WAD067548966

RCRA-Transporter

Taylor-Edwards Warehouse & Transfer
21255 76th Avenue South
Kent
WAD086247079

(e) The Washington State Department of Ecology (Ecology) Leaking Underground Storage Tank (LUST) Database. The LUST program at Ecology maintains files on reported leaking underground storage tanks and tank systems and oversees corrective action. (ASTM radius is one-half mile.): Four sites, listed below within one-half mile of the subject property, were investigated through Ecology files. For these sites, investigative reports indicate that no impact is anticipated to the subject property.

The subject site itself is on the LUST list. See the discussion in section 2.7 (c) above on fuel leaks from underground storage tanks. The Ecology report on Taylor Edwards Kent LUST site indicates the status of the project is "Tanks Removed/Cleanup Complete." The current status of the subject property does not indicate an active environmental concern from the LUST listing.

Taylor Edwards Kent
21255 76th Avenue South
Kent
Ecology #2900

Metro Hauling Inc.
20848 77th Avenue South
Kent
Ecology #2383

Olympic Steamship DBA Salmon Terminal
8220 South 212th Street
Kent
Ecology #1188

Exxon 7-3383/Closed
8315 South 212th Street
Kent
Ecology #1843

Olympic Steamship Schultz Card
8220 South 212th Street
Kent
Ecology #2282

(f) The Emergency Response Notification System (ERNS) database is a computerized EPA inventory of reported oil and hazardous substance spills, including spill reports made to the EPA, the US Coast Guard, the National Response Center, and the Department of Transportation. (ASTM standard is on or adjacent to the subject property.):

No sites listed.

(g) State and County Landfill/Solid Waste Inventory Lists (ASTM radius is one-half mile.):

No sites listed.

3.2 Physical Setting Sources;

(a) Flood Plain Maps: *Flood Insurance Study, King County, Washington and Incorporated Areas.* (Federal Emergency Management Agency (FEMA), 1989).

(b) Aerial Photographs:

Aeorlist and Walker and Associates aerial photographs were viewed from the years 1936, 1946,1960, 1966, 1968, 1969, 1970, 1974, 1977, 1979, 1980,1984, 1985, 1987, 1988, 1990, 1991, and 1992 for the subject area.

(c) US Geological Survey Topographic Maps:

US Geological Survey. *Renton, Washington* (map, 7.5 x 15 minute quadrangle, scale: 1:25,000). (US Geological Survey, Reston, Virginia, 1983).

3.3 Historical Setting Sources;

(a) Sanborn Insurance Maps:

Sanborn or other insurance maps are not available for the subject property area.

(b) Aerial Photographs:

Aeorlist and Walker and Associates aerial photographs were viewed from the years 1936, 1946,1960, 1966, 1968, 1969, 1970, 1974, 1977, 1979, 1980,1984, 1985, 1987, 1988, 1990, 1991, and 1992 for the subject area.

(c) Tax Assessor Records:

King County Assessor and Auditor records were researched at the King County Archive office.

(d) Building and Zoning Records:

City of Kent land use files for the subject property have been reviewed. Representatives from other departments at the Kent City Hall were interviewed including personnel from the planning department.

(e) Plat Maps: Kroll Map Co. *Atlas of King County.* (Kroll Map Co., Seattle, undated).

(f) Personal Interviews:

Interviews were carried out with persons knowledgeable about the history of the subject property and the property area. See Appendix II for a list of persons interviewed.

Section 4.0 Site Reconnaissance and Interviews

4.1 Observations Concerning Waste Management Practices at Site

(a) Date of site/facility inspection: February 7, 1994.

(b) Weather-related limitations: None.

(c) Access-related limitations: None

(d) General condition of interior areas:

(i) Process areas: The buildings are not designed or used for commercial or industrial processes. No process areas were observed containing hazardous operations or conditions.

(ii) Floor drains, sumps: None.

(e) General condition of exterior areas:

(i) Process areas: There are no commercial or industrial process areas in use at this site. No process areas were observed containing hazardous operations or conditions.

(ii) Catch basins: Subsurface surface water collection system includes a basin and a pump station according to building department files and plans.

(f) Other observations:

(i) Discolored soils:

Stained soil was observed along the southern edge of the property approximately 200 feet from 76th Avenue South. The stained area covers approximately three square feet and the discoloration may have been oil or some petroleum product. Hazcon recommends sampling to determine the contaminant and levels and clean-up if sampling indicates hazardous material contamination above Washington State Clean-up levels (see photograph 6, Appendix III).

In addition, stained soil was observed on the north side of the building including areas possibly on the neighboring property to the north. This latter staining appears to be a minor problem, possibly from paint over spray. Hazcon does not recommend action for this north side paint staining.

(ii) Discolored surface water: None.

(iii) Unusual odors: None.

(iv) Unusual vegetative conditions: None.

4.2 Hazardous and Unidentified Substances Containers

(a) Drums and/or barrels:

(i) Eleven 55-gallon drums were observed during Hazcon's site visit stored on pallets in the outside yard southwest of the shop. require proper disposal. According to the maintenance superintendent, Mr. Skinner, these eleven drums contain waste vehicle antifreeze/coolant. These drums require proper disposal as hazardous material. Testing may be necessary to determine actual content and concentrations. One additional 55-gallon drum was found at the extreme southwest corner of the subject warehouse building. This drum appeared to contain rain water, scrap, and debris. This waste may also require hazardous waste disposal when the contents are evaluated.

(ii) A 55-gallon drum is stored on the shop mezzanine floor of the shop area of the subject building. Mr. Skinner, maintenance supervisor, stated that this drum probably contains waste turpentine. This drum and contents should also be properly recycled or disposed of.

(iii) See also section 2.7 (f,g,h).

(b) Storage, handling and disposal practices (descriptions): See section 2.7.

4.3 Electrical Transformers/Capacitors

(a) Pole-mounted transformers service the subject property according to the service provider, Puget Power. The transformers are located across 76th Avenue South and are not on the subject property. There is no concern for PCB contamination from this equipment.

(b) Any fluorescent fixtures discovered in the buildings (built in 1974) may required routine disposal of PCB-containing (polychlorinated biphenyls) ballasts. Fluorescent fixtures were observed

throughout the buildings. Ballasts suspect for containing PCBs should be replaced and disposed of as soon as practical.

4.4 Indications of On-site Chemical and Solid Waste Storage/Disposal Practices

(a) Raw material/chemical supply areas: None.

(b) Waste storage areas: Dumpsters for garbage disposal. Also see section 2.7.

(c) Loading/unloading docks: Truck docking areas are provided on the east side of the site. A rail spur offers rail car access on the west side of the building with rail car loading docks.

4.5 Physical Setting Analysis, if migrating hazardous substances an issue

Migrating hazardous substances are not an issue.

4.6 Assessment of the potential for significant levels of radon gas in the subject property buildings

The January 1993 United States Department of Energy, Bonneville Power Administration (BPA) report titled *Radon Monitoring Results from BPA's Residential Conservation Program* was reviewed. Radon levels for homes in Township 22 North, Range 4 East (which includes the subject property) were published in the report. The BPA sampling was carried out in weatherized homes which would tend to indicate higher values over non-weatherized dwellings or housing in general. The results are as follows:

Number of sites monitored:	16
Highest Reading in pCi/l:	1.20 pCi/l (picoCurie per liter)
Arithmetic mean:	0.52 pCi/l
Action level:	4.00 pCi/l

The mean reading was well below the action level of 4.00 pCi/l.

Based on radon gas surveys done in the subject property area by the BPA, the probability of significant radon gas levels at the subject property above the action level is considered low.

However, the only way to estimate actual conditions present on the subject property is to test for radon gas at the site.

Section 5.0 Conclusions and Recommendations

On-site building materials are a cause for concern and need special handling for repair and renovation. Specifically, asbestos-containing materials and lead-based paint are suspect building materials of concern. An operations and maintenance plan is recommended to aid in properly managing such materials.

Two former on-site underground storage tanks were removed in 1990 and soil contamination was discovered attributed to leaks from these tanks. Petroleum hydrocarbons contaminated soil was removed and soil sampling indicated the soil was free of contamination based on the Washington State Model Toxics Control Act (MTCA) clean-up levels. However, because no groundwater sampling was done at the time of clean-up, under MTCA, groundwater sampling would still be required to make a final determination of contamination levels at the site. Even though the report on the tank removal process lacks completeness, adequate clean-up may have actually been carried out, but the question of groundwater contamination remains unanswered. The Department of Ecology has signed off on this clean-up, but, they have the option of opening the file if the issue is raised in the future. Groundwater sampling would be required to put this issue to rest.

Eleven 55-gallon drums stored on pallets in the outside yard require proper disposal. According to the maintenance superintendent, Mr. Skinner, these eleven drums contain waste vehicle coolant. Other drums on the property may require disposal attention. In particular, a 55-gallon drum is stored on the shop mezzanine floor. Mr. Skinner stated that this drum probably contains waste turpentine. This drum and contents also should be properly recycled or disposed of.

The stained soil area observed along the southern edge of the property approximately 200 feet from 76th Avenue South requires clean-up and sampling to determine the contaminant and levels of contamination.

No other sites listed with regulatory agencies appear to pose a risk of environmental contamination. No on-site practices raise a concern for potentially hazardous material contamination except those noted above. Adjacent and nearby property uses do not appear to be a cause for direct concern.

Section 6.0 Phase I Report Limitations

This report, including the enclosed exhibits, describes the results of Hazcon's initial visual inspection to identify the potential presence of significant hazardous waste contamination problems involving or affecting the subject property.

Hazcon performed this Phase I Environmental Assessment in a professional manner using that degree of skill and care exercised for similar projects under similar conditions by environmental consultants. Nonetheless, there are several major qualifications that are inherent in the conduct of this or any other environmental due diligence examination. First it is difficult to predict which, if any, of the identified potential problems will become actual problems in the future, for federal and state regulations continually change as do the enforcement priorities of the applicable governmental agencies involved. Second, there is always the distinct possibility that major sources of future environmental liability have yet to manifest themselves to the point where they are reasonably identifiable through an external investigation such as the one conducted for this proposed transaction.

Third, we note that the results of our investigation represent the applications of a variety of engineering and technical disciplines to material facts and conditions associated with the subject site. Many of these facts and conditions are subject to change over time; accordingly, the conclusions and recommendations must be viewed within this context. Hazcon's investigative activities took place between February 2 to March 18, 1994, with the on-site inspection having been performed on February 7, 1994.

Fourth, Hazcon shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld or not fully disclosed at the time the evaluation was performed.

Finally, we note this Phase I Environmental Assessment was prepared solely for the benefit of Taylor-Edwards, Inc.. Any use of or reliance upon this information by a party other than the client shall be solely at the risk of such third party and without legal recourse against Hazcon, or its subsidiaries and affiliates, or their respective employees, officers or owners, regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent or other negligence and strict liability of Hazcon), statute or otherwise.

Section 7.0 Signatures and Quality Control Review

By:

Rick Rice

Registered Environmental Assessor

Date: March 24, 1994

QUALITY CONTROL REVIEW:

By:

Robert A. Barnes

Title: Environmental Assessment Inspector

Date: March 24, 1994

Section 8.0 Appendices

Appendix I:	Documents Referenced
Appendix II:	Interview Documentation
Appendix III:	Subject Property Photographs
Appendix IV:	Lead-based Paint Hazards
Appendix V:	Asbestos-containing Building Materials
Appendix VI:	Underground Storage Tank Documents

Appendix I Documents Referenced

Best's Loss Control Engineering Manual. (Best Company, 1991).

Bishop, Greg and Wayne Turnberg. *Abandoned Landfill Study in King County.* (Seattle-King County Department of Public Health, Seattle, 1985).

Bonneville Power Administration (BPA). *Radon Monitoring Results from BPA's Residential Conservation Program , Report No. 15.* (BPA and the United States Department of Energy, Seattle, 1993).

Creahan, Kathy and Joanne LaFond. *King County Sensitive Areas Map Folio.* (King County Planning and Community Development Department, Seattle, 1990).

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Permit file for subject property. (City of Kent, Planning Department).

RL Polk & Co. *Polk's South King County City Directory.* (RL Polk & Co., Monterey Park, California, 1968, 1975,1977, 1982,1987, and 1991).

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Sax, N. Irving and Richard Lewis. *Hawley's Condensed Chemical Dictionary, Eleventh Edition.* (Van Nostrand Reinhold, New York, 1987).

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Subject property Plans. (Edward Taylor files, Seattle).

Turnberg, Wayne. *Seattle-King County Abandoned Landfill Toxicity/Hazard Assessment Project.* (Seattle-King County Department of Public Health, Seattle, 1910).

US Geological Survey. *Renton, Washington* (map, 7.5 x 15 minute quadrangle, scale: 1:25,000). (US Geological Survey, Reston Virginia, 1983).

Appendix II: Interview Documentation

Fisher, Judy. Department of Ecology, Bellevue, February 18, 1994.

Fundidado, Diane. City of Seattle; Fire Department Records Clerk.

James, LaVerne. City of Seattle, Water Department.

Neely, Luke. Puget Power, March 11, 1994.

Stairs, P. King County Archives, February 10, 1994.

Stairs, P. King County Archives, February 10, 1994.

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Taylor, David. Taylor Edwards. February 8, 1994

Taylor, Fred. Taylor Edwards, President. February 8, 1994

Appendix III Subject Property Photographs

Appendix IV Lead-based Paint Hazards

1. Lead-based paint hazards.

The use of lead-based paint as a surface covering was common in all buildings in the United States prior to the 1980s. Lead-based paint is today commonly recognized as a health hazard. Even small amounts of lead can prove harmful, and larger amounts, deadly. Lead from paint is most commonly absorbed into the body by inhalation and ingestion, and is a cumulative poison, accumulating in the blood, bones and organs. Health effects include flu-like illnesses in the early stages, to damage to the blood, nervous system, kidneys, bones, heart and reproductive system, and well as high blood pressure.

This report is not intended as a thorough review of the health hazards of lead-based paint. The purpose is to provide the client with accurate data, risk assessment, recommendations, and cost estimates on which to base decisions for appropriate action.

The Department of Housing and Urban Development (HUD) defines lead-based paint as paint which contains more than 0.50% lead by weight. The Consumer Product Safety Commission defines lead-based paint as that which contains more than 0.06% lead by weight. The HUD guidelines are most commonly used at the present time as the criteria for determining lead-based paint content. The scope of Hazcon's survey included limited sampling of lead-based paint.

2. Regulatory Review.

Lead based paint abatement in facilities such as the subject property buildings is controlled under a variety of regulations including, but not limited to the National Ambient Air Quality Standards, The Clean Water Act, the Resource Conservation and Recovery Act, the Comprehensive Environmental Response, Compensation, and Liability Act, and State and Local regulations. The Final Rule for Lead in Construction went into effect December 1993.

Lead-based paint is considered a hazardous material that will require worker protection safeguards. These requirements will have to be addressed in the project specifications for the abatement of the lead based paints in accordance with the new guidelines mentioned above.

While lead-based paint is always considered a hazardous material, it may or may not be a hazardous waste. Debris containing lead-based paint from the subject building will have to be tested using the TCLP to determine if the material leaches out lead greater than the regulatory limit of 5 part per millions. If so, it will have to be disposed of as *hazardous waste* or *Dangerous Waste*. During demolition activities, the building materials may have to be segregated for disposal into *Dangerous* or *Non-dangerous* waste in order to reduce disposal costs. It will also have to be determined where materials which contain lead, but are not *Dangerous Waste*, will be allowed for re-cycling.

Appendix V Asbestos-containing Building Materials

1. Asbestos Hazard.

Asbestos has been a common material used in construction. Its resistance to heat and chemicals, durability, physical shape, and cost make it an ideal material for many applications. Many of these same properties have also been responsible for the severe health consequences resulting from the inhalation of airborne asbestos fibers.

These health effects may include Asbestosis, Lung Cancer, and Mesothelioma (a cancer of the chest lining). All these diseases are the result of inhalation of airborne asbestos fibers. This building survey focused on those materials that have the potential for releasing fibers into the air under normal use, accidental contact, or foreseeable repair and maintenance. This report is not intended as a thorough review of the health hazards of asbestos. The purpose is to provide the client with accurate data, risk assessment, and recommendations on which to base decisions for appropriate action.

2. Regulatory Review.

There are three regulatory agencies which would govern asbestos removal at the subject property in Kent, Washington. They are as follows:

The Puget Sound Air Pollution Control Agency (PSAPCA) regulates asbestos removal as it relates to air pollution. Their guidelines are based upon asbestos regulations of the National Emissions Standards for Hazardous Air Pollutants (NESHAP). One important PSAPCA regulation is the requirement for submittal of a notification form and fee for all regulated ACM removal. The fee amount is dependent on the amount of ACM being removed or encapsulated and ranges between $25 to $1,000.00. PSAPCA conducts compliance inspections on selected asbestos abatement projects and may fine for violations. There is also a ten day waiting period between submittal of notification and the start of abatement.

The Washington State Department of Labor and Industries (L&I) regulates the protection of asbestos workers on job sites through the Washington Asbestos Standard. These regulations identify the standards for personal protection, permissible exposure limits, hazard communication, inspection requirements, approved removal techniques, and other related issues. A submittal of a notification form is required ten days prior to start of abatement. However, there are no fees involved. L&I conduct compliance inspections on selected asbestos abatement projects and may fine for violations.

The EPA is responsible for enforcing federal environmental protection laws covering water and air pollution and hazardous waste. No notification or fees are required prior to an asbestos abatement project.

3. ESTABLISHMENT OF AN OPERATIONS & MAINTENANCE (O&M) PLAN

If confirmed or suspect ACM is to remain on site, an O&M Plan should be established. Suspect material not analyzed should be treated as ACM until such time as it is proven otherwise. The plan should stay in effect as long as suspect and confirmed ACM remains on site. Key components of an O&M Plan include:

(a) conduct a unit by unit inspection of confirmed and suspect material to determine condition of material. Damaged material should be repaired or replaced using appropriate work practices.

(b) Clean up existing contamination.

(c) Minimize future fiber release by controlling access to ACM.

(d) Maintain ACM until it is eventually removed.

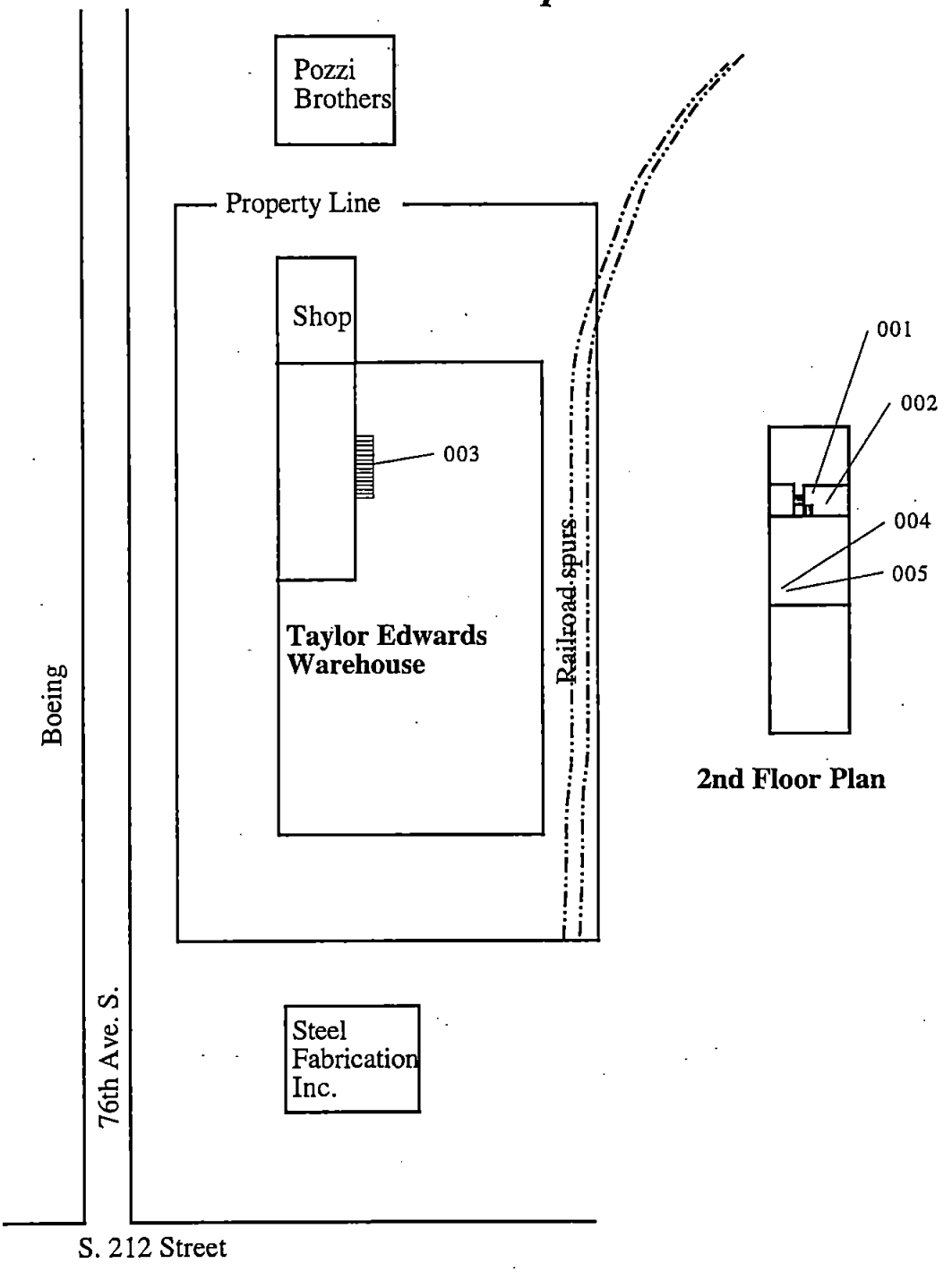
(e) Assign an Asbestos Control Program Manager (APM) to the facility, whose duties would include knowing where the ACM is located, insuring it is not disturbed and that it is handled only by properly trained personal. The Program Manager should receive at minimum an equivalency of the AHERA (Asbestos Hazard Emergency Response Act) two hour asbestos awareness course.

(f) Asbestos Control Program Manager inspect the site every six months, with findings attached to O&M Plan.

The Program includes keeping documentation of existing ACM for any future renovation or demolition. When properly prepared, the Plan documents the owners prudence in dealing with asbestos in the building.

HAZCON has experienced staff, trained in designing, monitoring, and implementing O&M Plans.

TAYLOR EDWARDS WAREHOUSE
Site Map



Scale 1:1400	Project #4742	Figure 1

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